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March 30, 2005

Representative Charlie Norwood  
Chairman  
Subcommittee on Workforce Protections  
House Committee on Education and the Workforce  
2452 Rayburn House Office Building  
Washington, DC 20515-1009

Dear Chairman Norwood:

On behalf of the American Industrial Hygiene Association (AIHA) I would like to take this opportunity to offer our support for increased funding for the National Institute for Occupational Safety and Health (NIOSH) and elicit your support for Congress to request a Government Accountability Office (GAO) study on the organizational structure of NIOSH.

As you know, NIOSH is the only federal agency responsible for conducting research and making recommendations for the prevention of work-related injury and illness. Created in 1970, along with the Occupational Safety and Health Administration (OSHA), NIOSH is part of CDC in the Department of Health and Human Services. NIOSH is an agency established to help assure “safe and healthful working conditions for working men and women by providing research, information, education, and training in the field of occupational safety and health”.

The NIOSH mission is multi-faceted. In addition to working with over 500 partners on the National Occupational Research Agenda, NIOSH supports training of occupational safety and health professionals and researchers through 16 regional Education and Research Centers and through training grants throughout the United States.

As the premier association of occupational and environmental health and safety professionals, AIHA members represent a cross-section of industry, private business, labor, academia, and government. AIHA’s 12,000 members rely on NIOSH research and training in our efforts to protect workers and their families. The future of NIOSH is of the utmost importance to AIHA.

**AIHA**

*Your Essential Connection:  
Advancing Occupational and Environmental Health  
and Safety Globally*

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In 2004, CDC announced it was planning to reorganize CDC's programs into four "coordinating centers" as part of the Agency's Futures Initiative. Under the plan, NIOSH would have been placed under one of these "centers". As a result of a tremendous amount of opposition to this recommendation, you and other members of Congress included language in the FY 2005 omnibus budget bill recommending that CDC "maintain the status quo with respect to the direct reporting relationship of the NIOSH director to the CDC director" and that "CDC make no changes to NIOSH's current operating procedures and organizational structure".

While this effort was somewhat successful (the NIOSH budget remained as a separate line item and NIOSH is no longer participating in coordinator center meetings), many questions remain. Because of our continued concerns about the future of NIOSH, AIHA has two requests:

- As work begins on the FY 2006 budget for HHS, CDC and NIOSH, please ensure that NIOSH is adequately funded and that this funding does not simply take into consideration the total dollars appropriated to NIOSH, but the level of funding that is actually appropriated for occupational safety and health research and training.

We have heard that the FY 2006 budget proposal will extract nearly 17 percent of the NIOSH budget and allot this to CDC for administrative expenses (in 2001 this figure was 4.3 percent and has risen continuously since then). This, to us, seems like an extraordinary amount for administrative services and reduces the amount of money appropriated to occupational safety and health research and training.

- AIHA suggests Congress request the Government Accountability Office (GAO) to conduct a study on the organizational structure of NIOSH. AIHA believes the time has come to take a closer look at NIOSH and how it can best serve the professionals in occupational health and safety and provide research that best protects workers.

AIHA believes CDC does not have the capability to effectively oversee both the increased national focus on public health requirements and the numerous occupational health challenges this country is facing. Therefore, potential alternatives to NIOSH being a part of CDC should be considered.

Over the course of the past year, there have been several recommendations regarding the structure of NIOSH. One suggestion is to move NIOSH to the Department of Labor where it can more easily interact with OSHA and the Mine Safety and Health Administration, agencies that most directly receive the advice and research from NIOSH. AIHA is aware of at least one effort to draft language for legislation that would complete this move.

A second suggestion has been to retain NIOSH within the Department of Health and Human Services, but move it to the National Institutes of Health (NIH). NIH is the primary federal agency for conducting and supporting research that leads the way in improving people's health and saving lives. Disease prevention research within NIH is of the utmost importance to the

millions of workers at risk in this country. NIH already has 27 Institutes and Centers under its umbrella and adding NIOSH would allow NIOSH research to take advantage of the many researchers used by NIH.

Both of these suggestions have merit. However, I am not sure anyone has thoroughly looked at what impact these possible moves could, or would, have on occupational health and safety. A GAO study could collect the information necessary to determine whether or not NIOSH would be best suited in the Department of Labor, NIH, or maintain its current organizational structure within CDC. A study of this issue should look at the “pros and cons” of these alternatives and would provide NIOSH, CDC, stakeholders and others with the information and data on how best to address the issue of occupational health and safety in today’s workplace.

AIHA has discussed this with numerous stakeholders and individuals both within and outside of HHS and NIOSH and there seems to be interest in this suggestion. Such a study would provide a framework in which all the various views about NIOSH’s organizational status could be considered. Now, there is no framework.

AIHA offers you our assistance in any way and urges you to seriously consider this suggestion.

Thank you for your continued efforts on behalf of professionals in occupational health and safety and the workers we strive to protect.

Sincerely,

*(signature)*  
*Donna M Doganeiro*

Donna M. Doganiero, CIH  
President

cc: AIHA Board of Directors  
Steven Davis, AIHA Executive Director