

Government Relations Department Guidelines and Procedures

Adopted December 1992, revised July 2017

I. ISSUE IDENTIFICATION AND PRIORITIZATION

Each year the Government Relations (GR) Department shall provide each AIHA member with the opportunity to identify the top public policy issues that may be of interest to the Association and the profession.

The GR Department will use the most efficient means to survey the membership. This may involve the mailing of surveys, e-mailing of surveys, or online surveys.

After soliciting member input on the top public policy issues for the Association, the results of the survey shall be forwarded to the AIHA Board of Directors. The membership and other interested parties shall also be notified via press releases, articles, e-mail, or online notification on the AIHA webpage.

After receiving the results of the public policy issues survey, a subgroup of the Board, or other entity charged by them, shall be convened to develop a report that contains rank ordered recommendations on what the top public policy priorities should be for the coming calendar year. This report shall be presented to the Board for consideration and approval.

II. POSITION STATEMENTS, WHITE PAPERS, FACT SHEETS, AND REFERENCE OR GUIDANCE DOCUMENTS

A. Purpose of Position Statements, White Papers, Fact Sheets, and Reference or Guidance Documents

The purpose of Position Statements, White Papers, Fact Sheets, and Reference or Guidance documents is to educate public policymakers, AIHA members, other OEHS professionals, and the general public on the Association's views regarding issues AIHA considers important.

B. Development of Position Statements, White Papers, Fact Sheets, and Reference or Guidance Documents

The development of Position Statements, White Papers, Fact Sheets, and Reference or Guidance documents shall be conducted in accordance with the Volunteer Group Document Proposal Form.

III. DEVELOPMENT OF RESPONSES TO ISSUES

The GR Department shall monitor activity in Congress, the Executive Branch, OSHA, NIOSH, EPA and the States to determine issues that may have a direct impact on the Association and the profession.

When an issue is identified, GR (or STI if the issue is of only a technical nature) shall gather all available information, compile a synopsis of the issue and forward this information, if time allows, to one or more of the following: AIHA President, Board Coordinator, Executive Committee, committee Chairman, or any other individual. The GR Department shall inform all parties of any potential deadline required for adequate response to the issue.

Within the response period allowed, all parties should provide the GR Department with the pros and cons of the issue, comments, and a recommendation. GR shall compile a final recommendation and forward, along with any relevant material, to the President. When possible, dissenting views and the reasons for the dissenting view shall be made available. The President may request inclusion of other individuals to receive this final review if time constraints allow. However, it is the responsibility of the President to make this determination and recommend the next course of action. **There will be times when the President or CEO must make the decision on the recommendation him/herself, depending on the time available to ensure that AIHA participates in a timely manner on the issue.**

The GR Department shall, if at all possible, notify all Board members of any dissenting views from other directors so that a discussion might be held to determine whether or not the final recommendation should be approved.

If approved, the final document will be formatted and made available to the membership, Board, press and other outside sources.

If not approved, appropriate reasons will be given to the membership, trade press or other sources if asked.

Consensus standards will be tracked and responded to via the Standards Steering Panel processes and webpage.

IV. COMMENTS ON PUBLIC POLICY ISSUES

AIHA recognizes that in order for the Association to have an impact on occupational safety and health issues it is imperative that the Association responds to as many requests for comments on public policy issues as possible.

Because of the increase in the number of requests for public policy comments, the introduction of numerous legislative measures, and the various issues AIHA members and others deem important, it is important to develop a written process whereby the Association can respond in a timely and professional manner.

The Association has at its disposal the expertise of technical committees comprised of active and informed AIHA members. This expertise needs to be tapped in such a way as to provide a broader voice to the public policy process. In addition, AIHA must ensure that the most appropriate committees are included in the discussion and comments provided on these public policy issues.

The process:

A. Issue Identification

- GR shall review the Federal Register and Congressional Record on a daily basis to locate and determine those public policy issues that may be of interest and/or require a response from the Association.
- When an issue is located within the Federal Register or Congressional Record, GR shall provide a copy of the proposal to STI staff for further action. The request to scientific and technical initiatives (STI) staff shall include:
 - 1) A request from GR to forward to the appropriate committee and to notify GR as to which committee(s) STI staff has contacted or will contact to determine interest in the issue. Upon submission to a particular committee(s), STI staff shall notify GR as to which committee(s) the request was sent. STI shall also notify the Board Coordinator(s) of the committees involved.
 - 2) GR shall also provide STI with the deadline required for submission of any comments. Because of the requirement for submission to policymakers this deadline shall not be extended if at all possible. In some cases where the public policy issue is of a legislative nature, GR shall provide STI with an approximate date for the submission of comments.
 - 3) GR shall use the most efficient means available to keep STI and others informed of upcoming deadlines.
 - 4) STI staff shall work with the committee(s) whenever possible to assist in gathering comments on the public policy proposal. The Board Coordinator(s) shall also be kept informed and involved.
 - 5) Upon submission of the comments to STI, the comments shall be forwarded to GR for review, formatting and internal staff editing.
 - 6) GR shall be responsible for seeking Board approval, if required, for any comments to be submitted. The process for seeking Board approval shall be the same process used for other Government Relations issues as found in these guidelines and procedures.

- 7) Following Board approval, GR shall submit the comments to the proper agency and/or legislative body. Copies of the final comments shall be distributed to STI, committee(s) involved, all other technical committee chairs, the Board of Directors, and if needed, to other AIHA departments for public and/or member distribution.

B. No Committee Interest

- Should a specific committee(s) determine there is no interest in providing input on a specific public policy issue; the committee chair should notify STI staff and the Board Coordinator by the required deadline. STI shall notify GR of the non-interest. Notwithstanding the expression of no interest by a committee(s), AIHA National may determine it is in the best interest of the Association and occupational safety and health to comment on the issue. If such a determination is made, AIHA National may provide comments and shall not be required to have the comments reviewed or approved by a committee(s).

C. Regular Updates

- Whenever possible, GR shall provide AIHA committee chairs, the Board and appropriate AIHA staff with an update of all issues that have been forwarded to STI and others for possible involvement, as well as other issues that might be of interest. The purpose of this update is to ensure committees are aware of pending issues and provided with an opportunity to develop comments on a particular issue if the committee membership determines the committee wishes to provide input.

However, a desire to provide comments by any committee shall not guarantee that such comments shall be included in the final submission. AIHA STI and GR staff shall make recommendations to the Board on whether or not to accept such contributions on the issue. The Board shall have final approval.

V. COMMITTEE RESPONSIBILITY

The Board recognizes that individuals serving on technical committees do so on a voluntary basis. However, acceptance of a position on a technical committee also carries with it a certain responsibility.

It shall be the responsibility of the President to determine which actions, if any, are to be taken if committee deadlines are not adhered to when formulating Position Statements, White Papers, or any other action required for the Director of GR to carry out his/her responsibilities. The committee chair, task force chair, Board Coordinator or other appropriate individual has the responsibility to ensure AIHA guidelines and procedures for the development of Position

Statements, White Papers, and other documents are followed. The responsible individuals shall do their best to note any dissenting views and the reasons for such dissenting views.

AIHA committees do not operate independently of the Board. No committee, or individual representing a committee, shall provide a response on behalf of AIHA or an AIHA committee to any elected or appointed official without having contacted GR (or STI if such matters are purely technical) and received approval to proceed.

VI. TESTIFYING

There will be requests to AIHA to provide elected officials (or appointed officials when of a regulatory nature) with either a written statement for the record or in-person testimony.

When a request is received to provide a statement for the record, this statement shall be developed by the appropriate AIHA committee, task force, or other appropriate individual in close consultation with GR and any others deemed appropriate by the President. The statement shall be forwarded to the Board for approval. If time constraints prevent contacting the full Board, the Executive Committee shall review the statement(s) and give final approval. If time constraints require immediate approval, the President has the authority to approve.

When a request is received to provide in-person testimony on any issue, the President shall decide who the spokesperson shall be for the Association. Whenever possible the individual chosen to represent the Association will have knowledge of the issue at hand. This individual is likely to have been involved in the issue for several years. Circumstances may warrant the President delivering the testimony with the technical person present to address detailed technical questions.

Written testimony should be based on the approved Position Statement, White Paper and other related Board-approved documents for the subject. It should be developed and compiled solely between the GR and the individual presenting it. This affords the opportunity to structure the testimony to the presenter's style. STI will be consulted on any matter of a technical nature.

Testimony shall be forwarded to the Board for prior approval. If time constraints prevent contacting the Board, the Executive Committee shall have the authority to approve such testimony. If time constraints require immediate approval, the President has the authority to approve.

In all circumstances, the Board will receive a copy of all statements for the record, comments on regulatory activity, and testimony.

VII. MEMBERSHIP NOTIFICATION

GR will use the *Synergist* and other available means to alert the membership on issues of importance. In the next available issue of the *Synergist*, a summary of a Position Statement and/or White Paper will be printed. This shall be done working in close consultation with communications and member services and others. Together, they will utilize the most efficient system for notifying the membership.

GR shall create an “update” periodically to inform the Board and Local Sections, committee Chairs and other interested individuals of activity taking place.

VIII. TASK FORCES

The number of issues requiring input from AIHA continues to grow. To assist the technical committees and meet deadlines for response to many issues, AIHA may appoint a task force to recommend and/or develop positions for the Association. Guidelines and procedures are in place specifying how task forces are appointed. See AIHA procedures for Tasks forces.

IX. APPLICABILITY

Nothing in the guidelines and procedures herein adopted by the Board is intended to alleviate the responsibility of the GR to take all steps to include other departments of AIHA in consultation on specific issues if the need arises. This guidelines and procedures mechanism is intended only to pertain to those issues involving GR. The Board recognizes that several technical committees will provide Position Statements, White Papers and other such documents which are not related to GR. In such cases STI or other pertinent departments within AIHA shall have jurisdiction.