

Injury & Illness Prevention Program (I2P2)

*Recommendations Presented to Federal OSHA in Response to the Agency's Request for Input and
Guidance in the May 4, 2010, Federal Register*

Developed by the

**American Industrial Hygiene Association[®]
I2P2 Task Force**

December 17, 2010



Table of Contents

1. Introduction
2. Regulatory Approach
3. Scope and Application
4. Covered Hazards
5. Relationship to Existing OSHA Requirements
6. Organization and Regulatory Text
7. Role of Consensus Standards and Existing Third-Party Certification Schemes
8. Essential Elements
9. Appendices, Mandatory or Voluntary
10. Economic Impacts
11. In Light of Consensus OHSMS Standards and OSHA's 1989 Guidelines, What Are the Advantages and Disadvantages of Addressing Through Rulemaking a Systematic Process that Proactively Addresses Workplace Health and Safety Hazards?
12. OSHA Internal Issues: Inspector Training and Compliance Tool(s) Validation
13. Small Business
14. Successful Mechanisms for Employee Participation
15. Naming the Approach/Standard
16. Affirming AIHA Support and Future Actions

Appendices

- A. Non-Governmental Consensus OHSMS Outlines
- B. AIHA *Synergist*, Special Section on Plan-Do-Check-Act and OHSMS, May 2007
- C. AIHA I2P2 Task Force Members

1. INTRODUCTION

The Occupational Safety and Health Administration (OSHA) has indicated that it is interested in receiving input on issues related to the agency's potential development of an Injury and Illness Prevention Program (I2P2) rule [*Federal Register*, May 4, 2010]. This document was developed by the American Industrial Hygiene Association® (AIHA®) in response to the agency's request.

In addition to addressing specific questions posed by the agency, AIHA affirms the need and importance of effective occupational health and safety (OHS) programs. We affirm their successes and the general acceptance in the industrial hygiene and safety community that hazard assessment and control and implementation of a written safety and health program are parts of minimally acceptable professional practice at any work site. These programs provide essential systems for employers to identify and control occupational hazards. They also provide a systematic process for employee involvement in health and safety. These programs are effective in reducing workplace injury and the negative impacts on organizations and workers.

AIHA is an internationally recognized organization that supports the health and safety of workers. Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals in the United States charged to protect worker health and safety. AIHA's 10,000 members represent a cross section of industry, private business, labor, government, and academia and play a crucial role on the front line of worker health and safety every day.

AIHA recognizes that under the Occupational Safety and Health Act of 1970 (Act), employers are responsible to "furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." AIHA members provide occupational health and safety expertise and management program support to help ensure that worker health and safety hazards are identified and the risks to workers are effectively managed, if not eliminated.

AIHA Leadership in Advancing OHS Management Science and Practice

AIHA has been providing leadership in the development of OHS management science and practice since its inception. With management systems and programs, AIHA is the Secretariat for the American National Standard for Occupational Health and Safety Management Systems (ANSI/AIHA Z-10) committee and was instrumental in the development of the International Labour Office's (ILO) occupational health and safety management system (OHSMS). AIHA has also been a robust contributor to the OHSAS 18001 Working Group as well as the United States Technical Advisory Group to ISO 14001. While outside the OHS arena, AIHA representation in the ISO 31000 (Risk Management) and ISO 26000 (Social Responsibility) processes helped interject OHS issues into those standards.

ANSI/AIHA Z10

AIHA was instrumental in initiating the ANSI process to develop a U.S.-based OHSMS standard. The 2005 ANSI/AIHA Z10 standard presents a sound and respected OHS management approach. Ideas from it were subsequently incorporated in the OHSAS 18001 revisions of 2007 and continue to be relevant today, in consideration of an OSHA I2P2 rule. Several unique features that advanced OHS management practices in Z10 are presented in this document. The ANSI/AIHA Z10 standard's table of contents is provided in Appendix A, along with the tables of contents for OHSAS 18001 and the ILO OHSMS.

Value of the Profession

AIHA's Academy of Industrial Hygiene recently developed and published a process for health and safety professionals to promote investing in injury and illness prevention. The process is presented in the *AIHA Value Strategy Manual* and is based on a rigorous study of Fortune 500 companies to determine how they value the contributions of health and safety professionals. A key benefit of this study is that properly planned and executed health and safety projects add value to a business. In addition, employing engineering controls also provides enhanced value. The *AIHA Value Strategy Manual* provides a framework, methods, and tools for health and safety professionals to advance worker protection.

Aspects of OHSMSs and ANSI/AIHA Z10 are recommended for inclusion in an I2P2 standard. AIHA recognizes that the wholesale adoption of ANSI/AIHA Z10 may go beyond the statutory limits of the Act. For instance, the practice of continual improvement is a central component of OHSMS approaches but may be beyond the limits of the Act.

2. REGULATORY APPROACH

Over the years, OSHA has developed numerous OSH management approaches and tools that have been well received. A few of these include:

- 1989 Health and Safety Program Guidelines
- The Voluntary Protection Program (VPP)
- Safety Health Achievement Recognition Program (SHARP)
- SHARP associated Form 33
- The Performance Evaluation Profile (PEP)

The agency took actions to establish an I2P2-like standard in the 1990s and subsequently suspended them. Numerous state OSHA programs have adopted I2P2-like standards; California's is often cited as an example program.

Develop an I2P2 Standard

AIHA supports the development and promulgation of an I2P2 standard based on the agency's mandate in §6 of the Act. AIHA believes that an I2P2 standard is consistent with the agency's statutory mandate and mission.

Level of Specification in an I2P2 Standard

In the spirit of consensus management system standards, AIHA believes that an OSHA I2P2 standard should be a performance standard. A performance approach is flexible, allowing employers multiple ways to comply with the standard.

However, AIHA fully recognizes the complexities of a performance-based approach. In particular, the adequacy of hazard assessment and control is difficult to enforce through performance standards. OSHA will have to clarify the relationships between enforcing requirements under the I2P2 standard, existing standards, and the General Duty Clause. OSHA should make sure that in addition to conducting the risk evaluation, employers are required to develop a control strategy for each identified hazard that can be feasibly addressed. The standard should also ensure that employers conduct a hazard assessment at each location under the employer's control.

AIHA believes it would be in the best interest of all affected parties, but especially workers, for the OSHA rulemaking process to first determine and specify the management processes that

employers will be required to use in an I2P2 standard. The core OHS management processes that establish the fundamental practices to guide worker health and safety should be established on publication of the standard. The standard should be very clear on each of the required core management process elements so that the regulated community knows which actions it must take to achieve compliance.

AIHA urges the agency to explicitly define what is required in each health and safety program element. The hazard assessment and control program must be industry- and site-specific, but there should be clear, enforceable/auditable components common to all programs. When any of these common elements is missing, the employer would be issued a citation. OSHA should avoid using reported injury or workers' compensation claims rates to evaluate compliance because of the inherent problems of underreporting or intimidation that can undermine such measures.

Non-Regulatory Approach: Update the 1989 Health and Safety Program Guidelines

AIHA recommends that the agency update the 1989 Health and Safety Program Guidelines in conjunction with the development of an I2P2 standard.

AIHA recognizes the value of these Guidelines. Health and safety professionals have used these to improve the health and safety of workers in America and around the world since their inception. The Guidelines can serve as a repository of best practices and recommendations for employers who want to craft their I2P2s beyond the requirements of an I2P2 standard and during the extensive rulemaking process.

The updated Guidelines should utilize what was learned in OSHA's attempt at I2P2-like rulemaking in the 1990s.

3. SCOPE AND APPLICATION

In AIHA's view, an I2P2 standard needs to have the widest industry and employer coverage that the rulemaking process can tolerate and employ a risk-based approach to OHS management. We believe that the standard should apply to all employers and industries, including construction and maritime activities.

Do not exempt workplaces based on size or employers with low injury rates.

AIHA believes that the OSHA rule should not exempt small employers or workplaces based on the number of employees and should not exempt individual employers/workplaces based on injury/illness incident rates alone. The risk inherent to the operation is more indicative of prospective health and safety issues than the size of an organization. We believe that the potential burden to small employers/workplaces can be minimized through:

- reduced documentation requirements, as done in the California I2P2;
- mandatory and non-mandatory appendices that provide guidance and tools;
- an I2P2 process flowchart that clearly indicates I2P2 elements that would not apply in low-hazard/risk workplaces; and
- extending the implementation timeline for small employers/workplaces.

For example, dynamite blasting companies are often very small business organizations, employing only a shooter or two and several helpers. It is clear that this activity is inherently very dangerous. The number of FTEs in an organization should have no bearing on whether it is required to meet certain fundamentals of safety and health programs.

Cover Contract/Leased Labor and Multi-Employer Work Sites

Given the increased use of contract and leased labor, AIHA recommends that an I2P2 standard include requirements that an employer's I2P2 cover leased or contract labor that is under the direction, control, or supervision of the employer for more than 30 days.

AIHA believes that an I2P2 standard needs to address coordination on multi-employer work sites. That is, the senior employer entity in these settings needs to have accountability in ensuring coordination of I2P2 standard requirements among entities on site. Guidance on this issue can be found in ANSI/AIHA Z10 §5.1.4 and §E5.1.4.

Be Cognizant of Potential Documentation Burdens on Small Employers

AIHA recommends that the agency be cognizant of potential documentation burdens that an I2P2 standard could place on small employers. The documentation issue has been an historical bellwether issue in the development of non-governmental consensus OHSMSs. We believe that the ANSI/AIHA Z10 committee made a significant contribution to the OHSMS arena with the way they addressed this issue by requiring documentation of only a handful of key activities within its system. See ANSI/AIHA Z10 §E5.4.

In like fashion, AIHA recommends that OSHA define the handful of essential activities that would need to be documented in an I2P2. Examples of these include hazard/risk assessment/identification and control activities; recordkeeping and reporting; training; an OHS policy; and incident investigations.

To reduce the potential I2P2 burden on small employers, AIHA recommends that the agency consider following the California I2P2 approach with reduced documentation requirements in small workplaces.

Exemptions Based on Self-Reported Data

AIHA does not believe there should be any exemptions based on employer-generated data, such as OSHA-required data reporting on injury/illness, lost workdays, etc. The problems with these data are widely known.

VPP, OHSAS 18001, and ANSI/AIHA Z10 Certified Workplaces

Depending on how the actual I2P2 standard proposal is written, AIHA recommends that some level of I2P2 exemption be considered for workplaces that have received VPP-Star status, OHSAS 18001, or ANSI/AIHA Z10 certification from an Accredited Registrar. While the actual requirements of an I2P2 standard are not known at this time, it is anticipated that VPP, 18001, and Z10 requirements will exceed them. If there is such an exemption, it should expire within 6 months of a site losing certified status.

In the event that there is an exemption for consensus OHSMS-certified sites, requirements are needed to ensure that the certification addresses actual locations and not just the overall organization. It is possible that an organization may have an organization-wide certification. For there to be an exemption in an I2P2 structure, the agency needs to require evidence that each specific workplace in the organization is also conformant.

4. COVERED HAZARDS

AIHA believes that an I2P2 standard should address all hazards covered by OSHA standards and the General Duty Clause, where the General Duty Clause is not exempted by a State Plan.

Proactive Identification and Control of Hazards and Risks

AIHA believes the rule should focus on proactive identification and control of workplace hazards and risks. We strongly support the need for systematic hazard identification, risk assessment, and associated controls. A regular physical inspection of the workplace should be a basic element of the hazard evaluation along with a review of relevant policies, procedures, and organizational practices.

We believe it is possible to write a standard such that small employers can meet these requirements.

An All Hazards Approach

To develop an I2P2 standard that is properly focused on systems processes and applicable to diverse work environments, OSHA should create a rule that focuses on basic systems that must be in place across all industries. The goal should be for employers to have operational systems to identify hazards and control measures to safeguard employees. Employers with pre-existing hazard control programs should be allowed to integrate them by reference in their written safety and health program.

Emphasize the Important Key Elements of Hazard Evaluation and Control

AIHA believes that an effective I2P2 standard needs to emphasize the important key elements involved in hazard evaluation and control. The hazard assessment should evaluate all safety, physical, biological, and chemical hazards. Some minimum steps should be outlined, such as reviewing records, incident reports, and workers' compensation data. Workplace sampling should be conducted in conformance with existing OSHA, NIOSH, or more stringent standards (if adopted by that employer). A physical inspection of the workplace should be a basic element of the hazard evaluation as well as a review of relevant policies, procedures, and organizational practices. I2P2 programs should implement feasible control measures based on the risks identified in the hazard evaluation, using the hierarchy of controls.

Employee Participation in Hazard Identification and Control

The standard should define a minimally acceptable level of employee and authorized employee representative involvement in the hazard identification and control activities. It has been the experience of AIHA members that people who work close to the exposures are likely to have valuable input in identifying hazards and feasible controls.

5. RELATIONSHIP TO EXISTING OSHA REQUIREMENTS

Complement and Support Existing Standards and Requirements

AIHA believes that an I2P2 standard should clearly complement and support existing OSHA standards, requirements, and guidelines. Language should be included that emphasizes this goal of I2P2s. OSHA should define the relationship between requirements of I2P2 with existing standards and the General Duty Clause.

As stated above, employers should be allowed to incorporate by reference existing hazard control programs. A goal of the I2P2 standard should be to require industries to identify recognized hazards, take actions to control them, and increase the implementation of existing and emerging safety and health technology that is feasible and cost-effective.

VPP, SHARP, Form 33, and the 1989 Guidelines

AIHA believes that the agency should use the anticipated I2P2 rulemaking as an opportunity to craft an I2P2 model/approach that represents the cumulative lessons learned from state I2P2s

and consensus OHSMSs (e.g. 18001, Z10). During the I2P2 model/approach development, VPP, SHARP, Form 33, and the 1989 Guidelines should be considered but should not drive the process. The agency may find that the evolution of OHS program management and OHSMS knowledge presents new ideas and methods not included in the existing OSHA programs (e.g., VPP, SHARP).

When the I2P2 development process is complete, the agency will want to review possible impacts and the need for updating VPP, SHARP, Form 33, and the 1989 Guidelines.

Penalty Double Jeopardy

AIHA believes that an I2P2 standard needs to address the potential for citation or penalty double jeopardy—that is, the agency needs to be cognizant of situations where a violation for a pre-existing standard or the General Duty Clause could be an I2P2 violation as well. A strategy needs to be included to address this. A recommendation is to revisit the PEP (Performance Evaluation Profile) initiative from the 1990s. A PEP-like component to an I2P2 standard would provide a mechanism to reduce double jeopardy situations.

6. ORGANIZATION AND REGULATORY TEXT

Use Clear and Concise Language

AIHA believes that an I2P2 standard should be written in clear and concise language that delineates basic requirements in a way that employers can understand because many, if not all, employers do not employ full-time health and safety professionals. Appendices, both mandatory and non-mandatory, should be used as a strategy to keep the core requirements of the standard short and to the point.

Scalability, Flexibility, and Mandatory Core Elements

For decades, AIHA members have effectively deployed OHS management programs, such as those contained within the 1989 Guidelines, to increase health and safety performance in their organizations. However, we recognize that there is not one best way to deliver health and safety programs and overall performance in the workplace. Therefore, it is essential for OSHA to construct a short list of requirements and well-established core elements that are mandated in the regulatory text.

Organize Around the Plan-Do-Check-Act Model and Emphasize a Systematic Approach

AIHA believes that an I2P2 standard should be organized around and reflect the Deming/Shewhart Plan-Do-Check-Act (PDCA) model, and it should emphasize a systematic approach to OHS management. This model is well established and accepted. Many, if not all, consensus OHSMS approaches such as OHSAS 18001 and ANSI/AIHA Z10 are based on this model. We believe that OSHA will make a large contribution in this effort if an I2P2 standard reflects and promotes a systematic approach to OHS management.

As stated earlier, AIHA believes the agency needs to focus on establishing minimum process requirements. Therefore, the agency should proceed with great caution on the issue of continual improvement. While continual improvement is commonly associated with the PDCA model and is included in many OHSMSs, inclusion of it in an I2P2 may be beyond the statutory limits of the Act.

An overview of the PDCA model and its application to OHS management is found in Appendix B.

Learn from Advances

AIHA believes that OSHA should create an I2P2 standard that emulates exemplary management

system consensus standards and elements from effective state I2P2 rules and the agency's Program Standard activities in the 1990s.

AIHA believes that OSHA should neither adopt nor elevate a single consensus standard or state program.

Risk/Hazard Assessment Needs to be Based on Exposure Assessments and Empirical Data

AIHA believes that an I2P2 standard needs to emphasize evidence-based hazard/risk assessment. This includes requirements that these assessments are based on exposure assessment data along with other empirical data collected from incident/accident investigations, self-inspections, audits, etc. These systems should be adaptable to the broad array of industries that will be covered by the rule and have clear language on employer and employee representative involvement.

We believe that all significant accidents, exposures, and incidents should be investigated by employers.

7. ROLE OF CONSENSUS STANDARDS and EXISTING OHSMS CERTIFICATION SCHEMES

Use Caution in Incorporating Existing Consensus OHSMSs

AIHA believes strongly in the value that existing consensus OHSMSs (e.g., Z10, 18001) provide to employers. As stated several times in this document, we believe that these approaches may go beyond OSHA's statutory base.

With that said, we believe that an I2P2 standard should incorporate some of the basic requirements of AIHA/ANSI Z10, OHSAS 18001, and the ILO OHSMS by reference.

An evolving trend in organizations is the development of an integrated environmental health and safety management system (EHSMS) as opposed to a stand-alone OHSMS. Few stakeholders outside the EHS professional community recognize that environmental management contains a number of subspecialties and that safety and industrial hygiene are diverse and distinct professions as well. Incorporation by OSHA of ANSI/AIHA Z10, OHSAS 18001, and the ILO OHSMS as recognized standards in a voluntary appendix would go a long way toward educating stakeholders on the fundamental issues involved in the successful prevention of occupational disease.

Existing OHSMS Certification Schemes

AIHA is aware of historical controversy and concern around third-party evaluation issues in OSHA rulemaking. However, AIHA believes that the agency needs to address in an I2P2 standard how workplaces with existing OHSMS certifications will be handled.

As stated above, we believe that it is necessary to provide some level of "grandfathering" or acceptance of existing health and safety programs that meet the minimum elements of the I2P2 rule for workplaces that have been given VPP-Star status by OSHA or that have an 18001- or Z10-certified OHSMS by an Accredited Registrar, or other programs.

8. ESSENTIAL ELEMENTS

AIHA believes that the six core I2P2 elements presented in the May 4, 2010, *Federal Register* announcement are sound and that the agency's identification of them is correct. Several recommendations are provided that build on the issues covered in the May 4 announcement.

1. *Management Commitment and OHS Leadership*

We recommend inclusion of the distinctions "commitment" and "OHS Leadership." This reflects proactive actions beyond simply defining management duties. This element should include a requirement for a written Health and Safety Policy Statement and a written Health & Safety Program. The Policy Statement simply states the organization's commitment to health and safety, describes its basic process for hazard identification and control, explains its mechanism for employee involvement, and identifies where employees can report incidents or concerns. The written program details all of the elements of the employer's I2P2 program.

2. *Employee Participation*

We recommend including here the unique requirement in ANSI/AIHA Z10 that requires "identifying and removing obstacles or barriers to participation" (Z10 §3.2.C). Where there is a collective bargaining agreement, it should be specified that employee representatives can participate in the development and implementation of the I2P2 program and hazard assessment activities.

3. *Hazard Identification and Assessment*

We recommend that the agency include a requirement, as found in ANSI/AIHA Z10 and the ILO OHSMS, for an initial/baseline review of program elements. An I2P2 standard would be strengthened with the requirement to conduct ongoing reviews at least annually as suggested in ANSI/AIHA Z10 §4.1.2. The inclusion of this requirement will reinforce a systematic approach to OHS management.

Our recommendations on hazards covered and hazard assessment, which are addressed in other parts of this document, also apply here.

AIHA believes the agency should include some level of Design Review and Management of Change requirement as found in ANSI/AIHA Z10 §5.1.2. This is a very important part to a systematic approach to OHS management.

4. *Hazard Prevention and Control*

We recommend that the agency reinforce the long-standing OHS control model called the "hierarchy of controls." Details of this model could be provided in a mandatory appendix. In addition, we believe there needs to be proactive language that requires the assessment of the effectiveness of controls. Once a control is identified and implemented, its effectiveness needs to be assessed.

A valuable distinction found in consensus OHSMSs is corrective and preventive actions. These activities reinforce the "anticipation" component of the bedrock health and safety anticipation-recognition-evaluation-control model. Guidance on this issue can be found in ANSI/AIHA Z10 §6.4 and §E6.4.

5. *Education, Training, Competence and Awareness*

We recommend that an I2P2 standard include requirements for worker competence and

awareness in addition to traditional education and training. Guidance here can be found in ANSI/AIHA Z10 §5.2 and OHSAS 18001:2007 §4.4.2. This reinforces the need for workers to be aware of OHS hazards/risks in the workplace and competent to work safely within implemented controls.

A unique feature of ANSI/AIHA Z10 that can help here is the removal “of barriers to participation in education and training” (§5.2.C).

We recommend the inclusion of some level of requirement that people providing training are qualified and competent. In addition, we recommend a requirement that training effectiveness be assessed beyond simply giving tests at the end of a training.

6. *Program Evaluation and Improvement*

We recommend two additions to the items presented in the May 4 announcement. The first is a requirement that information from performance evaluation activities inform planning activities; that is, that there are proactive steps to use this information in examining hazards/risks and associated controls. Guidance can be found in ANSI/AIHA Z10 §6.5, Feedback to the Planning Process. This concept can be appropriately presented in a non-mandatory appendix or an updated section of the 1989 Guidelines.

We also recommend that some level of Management Review requirement be included in an I2P2 standard. This is a higher-level examination than traditional monitoring of whether employer actions are effective in reducing workplace hazards and risks. Guidance on this can be found in OHSAS 18001:2007 §4.6 and ANSI/AIHA Z10 §7.

Contractors, Visitors, and Procurement

AIHA believes strongly that an I2P2 standard needs to address the work of contractors and visitors. This includes both their coverage by a workplace’s I2P2 controls, as well as ways that they may introduce new hazards/risks and impact existing controls. As stated above, there has been a change in the work force with increased use of long-term labor. We believe that an I2P2 standard needs to address this issue with some time period (e.g., 30 days) after which contract labor working under an employer’s control needs to be covered by the employer’s I2P2.

We recommend that the an I2P2 standard include requirements to assess at some level how procurement activities impact workplace hazards and risks. Guidance on this can be found in ANSI/AIHA Z10 §5.1.3. While requirements in the Hazard Communication Standard make advances in this area, we believe an additional level of specificity is needed within an I2P2 framework.

From a structural perspective, the agency may want to weave contractor, visitor, and procurement requirements throughout the standard’s core elements or address them in a stand-alone section.

Workplace Safety Representative/Officer

AIHA believes there would be value in requiring the designation of a workplace safety representative or officer who has accountability for ensuring the functioning of the I2P2 in the workplace. We realize that very small employers may push back on this point, and thus, consideration should be made to ensure this is not an onerous burden. The best way to address this might be in a non-mandatory appendix.

9. APPENDICES, MANDATORY OR VOLUNTARY

AIHA believes that an I2P2 standard should include mandatory and non-mandatory appendices. AIHA strongly encourages OSHA to develop a mandatory appendix that discusses hazard assessment techniques and tools. Many employers are not familiar with basic hazard assessment techniques, which are central to injury and illness prevention. A second mandatory appendix should delineate the hazard control hierarchy if this topic is not addressed directly in the main text. Again, many employers, especially small businesses, do not know the preferred hazard control order—elimination, substitution, engineering controls, administrative or procedural controls, and personal protective equipment.

AIHA recommends that OSHA develop a non-mandatory appendix that references resources, such as credentialed health and safety professionals, and exemplary consensus standards, including ANSI/ANSI Z10, OHSAS 18001, OSHA VPP, and the ILO OHSMS.

AIHA believes that there would be value in including a non-mandatory appendix that presents an overview of management system concepts embodied in Z10, 18001, VPP, etc. An example of how this could be done is found in Appendix B.

In such a section, a common misconception about management systems should be addressed. This is the belief or understanding that pursuing or implementing a management system necessarily means that registration or certification must also be pursued. This is not the case. While many organizations do pursue certification, many do not; nor would AIHA recommend that certification be other than a voluntary initiative by the business or non-governmental or governmental organization. Making the distinction between a management system and conformity assessment activities in a non-mandatory appendix can reduce confusion.

10. ECONOMIC IMPACTS

Making the Case that a Systematic Approach to OHS is Cost-Effective

Ample anecdotal and case study data demonstrates that a systematic approach to OHS management is cost-effective. Many AIHA members and other OHS professionals have demonstrated this in their companies and practice. A large benefit is commonly observed in lower workers' compensation costs, which, in some cases, can be significant. Improved productivity and quality are also associated with implementation of these programs.

The agency is probably aware of the work of the Conference Board, ORC, The Rand Institute, NIOSH and others who have looked at the cost-effectiveness issue; the agency, of course, examined this issue in its 1990s Program Standard activities. A number of AIHA's Management Committee members have participated in some of this work and would be willing to help the agency, if needed, in summarizing this body of knowledge.

There may be value in holding a working symposium in early 2011 with professionals and organizations who have knowledge in this area. As appropriate, AIHA would be willing to host such an event.

Important data points and sets the AIHA Task Force is aware of include:

- The Conference Board (2003): *Driving toward '0': Best Practices in Corporate Safety and Health*