



Public Testimony of the  
American Industrial Hygiene Association® (AIHA)  
to the  
US House of Representatives Judiciary Committee  
Subcommittee on Regulatory Reform, Commercial and Antitrust  
Law  
*Hearing on Occupational Licensing: Regulation and  
Competition*

September 12, 2017

Dear Chairman Marino, Ranking Member Cicilline, and Members of the Subcommittee:

On behalf of the American Industrial Hygiene Association® (AIHA), allow me to thank you for convening this hearing on occupational licensing. This is a matter of great importance to AIHA's 8,500 members for reasons I will discuss below. AIHA agrees that protecting public health and safety while preserving economic competitiveness requires a delicate, thoughtful balance. Just as excessive regulation can pose unnecessary barriers to market entry, so too can a lack of adequate protections place the public, consumers and businesses at risk. AIHA confronts these very challenges throughout the States. Over our 78-year history, we have helped States establish and maintain this balance as they wrestle with the very issues the Subcommittee is addressing at this hearing. **AIHA stands ready to assist the Subcommittee as it continues its deliberations on these challenging issues, and to lend our experiences and insights for the good of the American people.**

Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals. AIHA and our members have a reach that extends to millions of people, and we have solid credibility that is built from 78 years of service to the occupational and environmental health and safety community. Specifically, AIHA has 8,500 members who represent a cross-section of industry, private business, labor, government, and academia. We have 68 Local Sections that meet regularly throughout the United States, and more than 50 volunteer groups. We also have formal and informal partnership agreements with governmental and nongovernmental organizations that represent the full spectrum of worker health and safety vocations. In addition, we have several award-winning publications, a strong social media presence and capabilities, and we host conferences where thought leaders from a variety of industries or who specialize in select health and safety topics, such as personal protective equipment, ventilation, and other exposure control methods, gather to share new information and answer practical questions. For additional information, please visit [www.aiha.org](http://www.aiha.org).

Productive workplaces and a health environment are central to the life of a community and are the foundation for a strong economy. Industrial hygienists (also known as occupational and environmental health and safety professionals) apply scientific principles to anticipate, recognize, and control chemical and other health and safety problems which may arise in or from the workplace. They unite management, workers, and the community in the common goal of protecting health and safety<sup>1</sup>.

One of the greatest insights we can offer is the value of the Certified Industrial Hygienist (CIH®) professional designation. More than half of AIHA's members have earned the CIH designation, and AIHA has chosen to support this professional credential because our members, and the businesses and organizations they work for, see its value to consumers and the market alike. This value flows directly from the paths certain professionals take to achieving this distinction. The CIH is known around the world as the "gold standard" for certification in the industrial hygiene profession, and is referenced in State regulations throughout the Nation. The path to becoming a CIH is challenging; individuals must meet the requirements for education and experience as set forth by the American Board of Industrial Hygiene (ABIH®<sup>2</sup>), adhere to a high standard of ethical conduct, and demonstrate, through the completion of a required examination, an acceptable level of skills and knowledge in a number of different areas, including<sup>3</sup>:

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<sup>1</sup> For additional information on the field of industrial hygiene and the work of AIHA, please visit <https://www.aiha.org/about-aiha/Pages/default.aspx>.

<sup>2</sup> ABIH is the world's largest organization for certified professionals in the field of industrial hygiene. For additional information, please visit <http://www.abih.org/about-abih/index>.

<sup>3</sup> For additional information on the process for becoming a Certified Industrial Hygienist®, please visit <http://www.abih.org/about-abih/cih-caih>.

- Air Sampling & Instrumentation
- Analytical Chemistry
- Basic Science
- Biohazards, including Mold
- Biostatistics & Epidemiology
- Community Exposure
- Engineering Controls/Ventilation
- Ergonomics
- Health Risk Analysis & Hazard Communication
- Industrial Hygiene Program Management
- Noise
- Non-Engineering Controls
- Radiation – Ionizing and Nonionizing
- Thermal Stressors
- Toxicology
- Work Environments & Industrial Processes

To be clear, AIHA does not believe that every professional should be required to obtain a CIH. Rather, those professionals who seek to stand out and clearly communicate their enhanced value to businesses, governments, and consumers should have the opportunity to do so through this distinction, which is itself a product of the supply and demand marketplace.

As we have seen – through AIHA’s own experiences and the Subcommittee’s recognized need for this hearing – markets and the people they are intended to serve are under near constant assault, yet they are vital to the American way of life, which is revered throughout the world. **Consequently, because of their central role in a well-functioning market and their benefits to businesses, consumers, and governments, professional designations such as the CIH should be protected.**

We look forward to working with you on these matters and stand ready to help. Please feel free to contact Mark Ames, AIHA’s Director of Government Relations, at [mames@aiha.org](mailto:mames@aiha.org) or (703) 846-0730.

Sincerely,



Deborah Imel Nelson, PhD, CIH®  
President  
AIHA