



February 9, 2018

## **AIHA Comments and Recommendations on SCR 1037, SB 1404**

Dear Chairman Smith, Vice-Chairman Petersen, and Members of the Commerce and Public Safety Committee:

On behalf of the American Industrial Hygiene Association® (AIHA), I write to you in the hopes of beginning a dialogue on the importance of worker health and safety by protecting the field of industrial hygienists and professional designations such as the Certified Industrial Hygienist (CIH®) – which may be impacted by SCR 1037 and/or SB 1404. As you will see below, these designations are solely focused on protecting worker health and safety. Given the provisions of SCR 1037 and SB 1404, we do not believe that they intend to reduce worker health and safety, rather we are concerned that one or both of the bills may unintentionally have this effect without added clarifications.

**In order to guard against potential misinterpretations and maintain protections for workers, AIHA recommends that each of these bills be amended to either maintain existing worker health and safety licensing requirements, or state that an industrial hygiene professional who has earned certification as a CIH is not be required to obtain a license.**

Industrial hygienists anticipate health and safety concerns and design solutions to prevent them. They are the guardians of workplace safety, applying science to identify and solve health and safety problems. Industrial hygienists also unite management, workers and all segments of a company behind the common goal of health and safety<sup>1</sup>.

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. This is because 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>), 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>:

- 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 Non-ionizing
- Thermal Stressors

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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>.

- Toxicology
- Work Environments & Industrial Processes

We strongly urge you to take these factors into consideration when determining whether government licensing is necessary in various areas, including those listed above, which are particular areas of focus for both industrial hygienists and Certified Industrial Hygienists.

We look forward to working with you to help protect the health and safety of all of Arizona's residents. Please feel free to contact me at [mames@aiha.org](mailto:mames@aiha.org) or (703) 846-0730.

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 79 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).

Sincerely,



Mark Ames  
Director of Government Relations  
AIHA

Cc:

Sen. Sonny Borrelli  
Sen. Sean Bowie  
Sen. David C. Farnsworth  
Sen. Robert Meza  
Sen. Catherine Miranda  
Sen. Bob Worsley