



April 24, 2018

Recommended Improvements for House Bill No. 748 – Establishing the Occupational Licensing Review Act

Leading Health and Safety Organizations Urge the Legislature to Not Limit the Ability of Individuals Possessing a Professional Designation to Use the Term “Certified” in Their Title

Dear Chairman Martiny and Members of the Senate Commerce, Consumer Protection, and International Affairs Committee, and Representative Emerson:

On behalf of the American Industrial Hygiene Association® (AIHA) and the organizations listed on this letter, allow me to express deep concern with potential unintended consequences of House Bill 748. Specifically, this bill appears to prohibit individuals possessing a certification from a voluntary program from using the term “certified” as a title. **Such provisions would harm the ability of individuals who have earned a voluntary professional designation from nonprofit organizations to stand out and clearly communicate their enhanced value to businesses, governments, and consumers.**

To protect such designations, which are themselves products of the supply and demand marketplace, we recommend deleting the provisions of this bill that would prohibit individuals possessing a certification from a voluntary program from using the term “certified” as a title.

Our organizations agree 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. We confront these very challenges throughout the States.

Productive workplaces and a healthy 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 safety¹.

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 most commonly recognized 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®), 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, including²:

- 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.

Because of their central role in a well-functioning market and their benefits to businesses, consumers, and governments, professional designations such as the CIH, Certified Safety and Health Manager (CSHM)³, Certified Safety Management Practitioner (CSMP)⁴, and

¹ 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>.

² For additional information on the process for becoming a Certified Industrial Hygienist®, please visit <http://www.abih.org/about-abih/cih-caih>.

³ For additional information about the Certified Safety and Health Manager professional recognition, please visit <https://ishm.org/about-cshm/>.

⁴ For additional information about the Certified Safety Management Practitioner professional recognition, please visit <https://ishm.org/about-csmp/>

Certified Internal Auditor® (CIA)⁵ should be protected, as they are earned by stringent processes which include education, experience and examination.

We look forward to working with you on these matters and stand ready to help. Please feel free to contact Mark Ames at mames@aiha.org or (703) 846-0730 as an initial point of contact for the organizations on this letter.

American Industrial Hygiene Association (AIHA)

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 host conferences where thought leaders from a variety of industries gather to share new information and answer practical questions. For additional information, please visit www.aiha.org.

American Board of Industrial Hygiene (ABIH)

Since 1960, the American Board of Industrial Hygiene® (ABIH®) has been the world's largest, organization for certifying professionals in the practice of industrial hygiene. ABIH is not a member organization, so it does not provide services typically offered by member organizations; neither does it call for involvement in any member organization as a requirement for certification. The purpose of ABIH is to administer the Certified Industrial Hygienist® (CIH®) credential, which is a means to objectively assess and measure the professional knowledge and understanding of practitioners engaged in industrial hygiene. For additional information, please visit <http://www.abih.org/about-abih/index>.

American Board for Occupational Health Nurses (ABOHN)

The American Board for Occupational Health Nurses (ABOHN) is an independent nursing specialty certification board and was founded in 1972 as an independent not-for-profit organization to set professional standards and conduct occupational health nursing specialty certification. ABOHN is the sole certifying body for occupational health nurses in the United States and ABOHN has certified approximately 14,000 and currently has 3,200 estimated active certificants. We use predetermined standards of nursing practice to validate an individual registered nurse's qualifications, knowledge and practice in specific areas of occupational health nursing. For additional information, please visit <https://www.abohn.org/>.

⁵ For additional information about the Certified Internal Auditor, please visit <https://na.theiia.org/certification/CIA-Certification/Pages/CIA-Certification.aspx>

Institute for Safety and Health Management (ISHM)

The Institute for Safety and Health Management (ISHM) provides accredited certifications for Safety and Health Managers and Practitioners. It is the only HSE certification provider that focuses on the entire safety management process. It recognizes safety professionals for the education and experience they have gained and is widely accepted by Occupational Health and Safety Departments in General Industry, Construction, Oil and Gas, Utilities, Healthcare and Emergency Management markets.

Directors and Committee Members assure the highest professional standards and candidate qualifications. ISHM is industry-recognized, nationally accredited, and accepted for professional membership by the American Society of Safety Engineers (ASSE). ISHM is CESB Accredited and a member of the National Safety Council. For additional information, please visit <https://ishm.org/about-us/>.

National Safety Council (NSC)

The nation's leading safety advocate for more than 100 years, the National Safety Council (NSC) is a nonprofit organization with the mission of eliminating preventable deaths at work, in homes and communities, and on the road through leadership, research, education and advocacy. NSC advances this mission by engaging businesses, government agencies, elected officials and the public to help prevent the fourth leading cause of death in the U.S. – preventable injuries. Driven by data, NSC publishes Injury Facts – an annual compilation of statistics on unintentional deaths and injuries. To make the greatest impact, the Council focuses on where the most preventable injuries and deaths occur – at work, in homes and communities and on the road. For additional information, please visit <https://www.nsc.org/company>.

The Institute of Internal Auditors (IIA)

Established in 1941, The Institute of Internal Auditors (IIA) is an international professional association with global headquarters in Lake Mary, Florida, USA. The IIA is the internal audit profession's global voice, recognized authority, acknowledged leader, chief advocate, and principal educator. Generally, members work in internal auditing, risk management, governance, internal control, information technology audit, education, and security.

Globally, The IIA has more than 185,000 members. The IIA in North America comprises 160 chapters serving more than 70,000 members in the United States, Canada, the Caribbean (Aruba, Bahamas, Barbados, Cayman Islands, Curacao, Jamaica, Puerto Rico, and Turks & Caicos), Bermuda, Guyana, and Trinidad & Tobago. Members enjoy benefits offered by the North American Service Center including local, national, and global professional networking; world-class training; certification; standards and guidance; research; executive development; career opportunities; and more. Internal auditors throughout North America enjoy free members-only webinars and national conferences such as the General Audit Management Conference, the Governance, Risk, and Control (GRC) Conference, and the All Star Conference. The IIA's Audit Executive Center provides chief audit executives relevant and timely thought leadership and connections to peers for benchmarking and sharing best practices. And resources such as IIA Quality Services make The Institute an indispensable partner to you and your organization. For

additional information, please visit <https://na.theiia.org/about-us/Pages/About-The-Institute-of-Internal-Auditors.aspx>.

National Environmental Health Association (NEHA)

NEHA currently serves 5,000 members to advance the environmental health and protection professional for the purpose of providing a healthful environment for all. Professionals who earn a Registered Environmental Health Specialist/Registered Sanitarian credential from NEHA are recognized as having achieved an established standard of excellence. These environmental health professionals master a body of knowledge (which is verified by examination), and acquire sufficient experience to satisfactorily perform work responsibilities in the environmental health field.

In addition to maintaining high standards of practice and testing for its credentialing programs, NEHA provides training and resources for continuing education through online courses and an online bookstore; holds an annual conference; fosters networking and career growth; and publishes the widely-respected peer-reviewed Journal of Environmental Health. For additional information, please visit <https://www.neha.org/about-neha>.

American College of Occupational and Environmental Medicine (ACOEM)

The American College of Occupational and Environmental Medicine (ACOEM) represents more than 4,000 physicians and other health care professionals specializing in the field of occupational and environmental medicine (OEM). Founded in 1916, ACOEM is the nation's largest medical society dedicated to promoting the health of workers through preventive medicine, clinical care, research, and education. A dynamic group of physicians encompassing specialists in a variety of medical practices is united via the College to develop positions and policies on vital issues relevant to the practice of preventive medicine both within and outside of the workplace. For additional information, please visit <http://www.acoem.org/>.