



August 30, 2017

Melissa McLawhorn Houston
Commissioner of Labor
Oklahoma Department of Labor

AIHA Comments on Draft Blueprint for Occupational Licensing
AIHA Recommends that an Industrial Hygienist Who Has Obtained Certification as a Certified Industrial Hygienist (CIH®) Should Not Be Required to Obtain a State License

Dear Commissioner Houston:

On behalf of the American Industrial Hygiene Association® (AIHA), I write to you in the hopes of beginning a dialogue on the importance of protecting a type of professional designation – the Certified Industrial Hygienist (CIH®) – which may be addressed in Oklahoma’s draft Blueprint for Occupational Licensing.

A healthy environment and productive workplaces are central to the life of a community. 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.

Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals. AIHA’s 8,500 members play a crucial role on the front line of worker health and safety every day. Our members represent a cross-section of industry, private business, labor, government and academia. AIHA has 68 Local Sections – including an active Local Section in Oklahoma. (I am a native of Tulsa, and practiced industrial hygiene in Oklahoma from 1975 to 2004, serving as President of AIHA’s Oklahoma Local Section from 1991 to 1992.)

AIHA recommends that an industrial hygiene professional who has earned certification as a CIH® should not be required to obtain a state license.

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®²), adhere to a high standard of ethical conduct, 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 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>.

demonstrate, through the completion of a required examination, an acceptable level of skills and knowledge in a number of different areas, including³:

- 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

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 Certified Industrial Hygienists®.

We look forward to working with you to help protect the health and safety of all of Oklahoma's residents. Please feel free to contact Mark Ames, AIHA's Director of Government Relations, at mames@aiha.org or (703) 846-0730.

Sincerely,

Deborah Imel Nelson

Deborah Imel Nelson, PhD, CIH®
President, AIHA (2017 – 2018)
Past-President, AIHA Oklahoma Local Section (1991 -1992)

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