



March 7, 2016

The Honorable David Michaels  
Assistant Secretary  
Occupational Safety and Health Administration  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

RE: Docket Number OSHA-2015-0018  
OSHA Safety and Health Program Management Guidelines

Dear Secretary Michaels:

The American Industrial Hygiene Association (AIHA) expresses its appreciation to the Occupational Safety and Health Administration (OSHA) for the opportunity to comment on OSHA's revisions to its Safety and Health Program Management Guidelines.

AIHA is the premier association serving the needs of professionals practicing industrial hygiene in industry, government, labor, academic institutions, and independent organizations. The AIHA mission is to promote healthy and safe working environments by advancing the science, principles, practice, and value of industrial hygiene. A healthy workforce is essential to the success of American industry, our economic recovery, and our future position in the global economy.

As stated in OSHA's announcement of this revision, the guidelines represent experiences from employers that have successfully adopted safety and health management systems focused on identifying, assessing, preventing, and controlling workplace hazards. The guidelines are targeted to small- and medium-sized employers to help find and fix hazards before workers are injured, become ill, or are killed. Engaging more employers in injury and illness prevention, which is at the heart of these guidelines, has the potential for shifting the curve on safety culture in America.

In 2010, OSHA requested input and guidance on a proposal to develop an injury and illness prevention program (I2P2). In response to the OSHA request, AIHA developed and submitted to OSHA numerous recommendations for a successful I2P2 standard. One of these recommendations was to update the 1989 Health and Safety Program Guidelines. AIHA stated:

*"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."*

AIHA is pleased OSHA has undertaken this update and is supportive of OSHA efforts.

#### Comments

The AIHA Occupational and Environmental Medicine Committee and the AIHA Ergonomics Committee provided the following recommendations:

- The actions listed in the proposed revisions are the correct actions to take. However, there are a few major challenges with the format and structure. The draft program reads as the traditional OSHA approach; program outline, U.S. centric, and not aligned or reflective of international processes. This U.S. centric approach could reduce application and use by employers with operations outside of the U.S.
- Although displayed as a process, the document describes program elements which are not presented as a sequential process. Today's employers are well versed in continuous improvement processes (e.g. Six sigma, TQM, safety management system, etc.) and the elements in the draft do not align well with any familiar process. To improve uptake and comprehension, the draft should follow a familiar, common process.

Comparison with Current CI Processes:

Shewhart Cycle (Continuous Improvement)	Proposed ISO 45001	ANSI Z10 Occupational Health and Safety Management Systems	Draft OSHA Safety and Health Program Management Guidelines
	1. Scope	1. Scope, Purpose & Application	
	2. Normative references		
	3. Terms and definitions	2. Definitions	
	4. Context of the organization		
Plan	5.0 Leadership, worker participation and consultation	3.1 Management Leadership 3.1.1 OHS Management System	1. Management Leadership
	5.1 Leadership and commitment	3.1.2 Policy	2. Worker Participation
	5.2 Policy	3.1.3 Responsibility and Authority	
	5.3 Organizational roles, responsibilities, accountabilities and authorities	3.2 Employee Participation	
5.4 Participation, consultation and representation			
Do	6. Planning	4.0 Planning	3. Hazard Identification and Assessment
	6.0 Actions to address risk opportunities	4.1 Initial and Ongoing Reviews	7. Coordination and Communication on Multiemployer Worksites
	6.2 OH&S objectives and planning to achieve them	4.2 Assessment and Prioritization	
		4.3 Objectives	
	4.4 Implementation Plans and Allocation of Resources	1. Management Leadership	
	6.1 Support		5. Education and Training
	6.2 Resources		7. Coordination and Communication on Multiemployer Worksites
	6.3 Competence		
	6.4 Awareness		
	6.5 Information & communication		
	7.5 Documented information		
Do	8. Operation	5.0 Implementation and Operations	4. Hazard Prevention and Control
	8.1 Operational planning and control	5.1 OHSMS Operational Elements	7. Coordination and Communication on Multiemployer Worksites
	8.2 Management of change	5.2 Education, Training, Awareness and Competence	
	8.3 Outsourcing	5.3 Communication	
	8.4 Procurement	5.4 Documentation and Record Control Process	
	8.5 Contractors		
8.6 Emergency preparedness and response			
Check	9. Performance evaluation	6.0 Evaluation and Corrective Action	6. Program Evaluation and Improvement
	9.1 Monitoring, measurement, analysis and evaluation	6.1 Monitoring, Measurement, and Assessment	
	9.2 Internal audit	6.2 Incident Investigation	
	9.3 Management review	6.3 Audits	
		6.4 Corrective and Preventive Action	
		6.5 Feedback to the Planning Process	
Act	10. Improvement	7.0 Management Review	
	10.1 Incident, nonconformity and corrective action	7.1 Management Review Process	
	10.2 Continual improvement	7.2 Management Review Outcomes and Follow Up	

Recommendations:

1. Structure:
  - Align with current, existing continuous improvement and safety management system models. The order of the draft OSHA program does not align with the continuous improvement model (e.g. Shewhart Cycle) or common safety management system models. See matrix for an illustration. The primary outages are the sections on **Education and Training** and **Coordination and Communication on Multiemployer Worksites**.
  - Illustrate it as a process.

The introduction page refers to the concept of continuous improvement is key to the guidelines. Continuous improvement is based on a cyclic improvement process, and is the model illustrated in the draft. However throughout the draft the term *program* is used. To be consistent with existing, common approaches to continuous improvement, health and safety management should be referred to as a *process*. This is a major change that will better align the draft with existing EHS and quality systems (e.g. Shewhart cycle, TQM, ISO14001, Proposed ISO45001, OHSAS18001, ANSI Z10).

- Focus on risk and risk reduction.  
The draft uses the term hazard, and has a few references to risk. In reality, and to be consistent with OHSAS18001, ANSI Z10, and proposed SIO45001, the OSHA guideline should guide employers to focus on reducing the *level of risk for each hazard identified*. Risk is mentioned in a note on page 15 but not defined. To truly be proactive, employers need to be focused on the exposure to risks (where risk is based on the level of hazard and the exposure to that hazard).

2. Additional Resources:

- Page 28 . Under Hazard Identification Tools add:
  - OSHA Technical Manual on Hazard Identification [https://www.osha.gov/dts/osta/otm/otm\\_toc.html](https://www.osha.gov/dts/osta/otm/otm_toc.html)
  - American Industrial Hygiene Association (AIHA) Ergonomic Assessment Toolkit
- Pages 30 & 31 - embed hot links to the various OSHA standards to the pages where their resource materials are located (would make it easier for users to find pages)

3. Content:

- Page 12 . Add bullet ~~%Physical Demands+~~below ~~%Physical Agents+~~bullet
  - Page 12 . In column 2 after ~~%potential hazards+~~add ~~%and their related risk+~~
  - Page 14 . After bullet ~~%Assemble and analyze all evidence+~~add ~~%Apply risk evaluation tools where appropriate+~~
- There were some members of AIHA Technical Committees who recommended that the document should be expanded to include large employers and not only small- and medium-sized employers. The comments were that there are many large employers that don't follow these basic concepts or are selective. This is likely more often found in OSHA State Plan States.
  - An additional comment pertained to the management section of the document. The document does not clearly note that a successful program has one individual who is both identified as ~~%in charge+~~and is empowered and has sufficient resources to implement and oversee evaluation of the plans. There should be clear command and control defined.

AIHA thanks OSHA for this opportunity to provide comments. If AIHA can be of any further assistance, please contact me. Thank you.

Sincerely,



Daniel H. Anna, PhD, CIH, CSP  
AIHA President

cc: AIHA Board of Directors