



AMERICAN INDUSTRIAL HYGIENE ASSOCIATION

GOVERNMENT AFFAIRS DEPARTMENT

GUIDELINES and PROCEDURES

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I. ISSUE IDENTIFICATION AND PRIORITIZATION

On or about September first of each even-numbered year, the Government Affairs Department shall provide each AIHA member with the opportunity to identify the top public policy issues that may be of interest to the association and the profession. The Government Affairs Department shall provide the membership with a list of issues from which to choose. Each member will be asked to rank these issues and may add any issue to the list they deem important.

The Government Affairs Department will use the most efficient means to survey the membership. This may involve the mailing of surveys, e-mailing of surveys, or on-line internet surveys.

After soliciting member input on the top public policy issues for the association, the results of the survey shall be forwarded to the Board of Directors. The membership and other interested parties shall also be notified; i.e., press releases, articles, e-mail, on-line notification on the AIHA web page.

II. ISSUE CATEGORIES

Issues identified as important to the profession or association may fall within one or more categories:

- **Proactive.** A proactive issue is one determined to have a future impact on the profession and/or association. A proactive issue could also be defined as an “emerging issue” that a technical committee, board member, association member, staff, or other individual believes may be important. A proactive issue should be acknowledged as a public policy statement of the association.
- **Reactive.** A reactive issue is one determined to be in response to an action or activity that has taken place and requires a response by the association. A reactive issue could be in response to a legislative measure that has been introduced or a proposed regulation that may require input from the association.
- **Guidelines, Fact Sheets or Reference Documents.** There may also be issues that are neither proactive nor reactive but defined as “informational”. An example of such an issue would be a “reference document” that provides the membership and/or outside parties with additional facts or data. These documents would assist the reader with learning more about a specific issue; i.e., AIHA facts about mold brochure, AIHA ergonomics reference document. These issues may or may not require board approval and may or may not be under the facilitation of government affairs (GA), scientific technical initiatives (STI), or other appointed staff.

III. PROACTIVE ISSUES

A. Purpose of Position Statements and White Papers

Position statements and white papers shall be prepared at the direction of the AIHA board to respond proactively to pertinent policy and technical issues facing the industrial hygiene profession or the association. Groups that ensure representation of the appropriate technical disciplines and viewpoints of AIHA will draft these documents. Once approved by the board, these documents shall become official policy statements of AIHA. As such, position statements and white papers should be presented in a way that will be clearly understood, not only by industrial hygiene professionals, but also by those responsible for policy and government affairs activities and other public audiences.

A position statement should succinctly set forth the AIHA assessment of an issue. The white paper should provide a rationale for a position statement, with an emphasis on clearly explaining the reasons for the AIHA position, but not developed to the point that the white paper becomes a major scientific or policy review of the issue under consideration. The white paper should, at a minimum, be scientifically defensible and reviewed by the board.

B. Development of Position Statements and White Papers

A position statement and white paper may be initiated by presidential action, or at the request of a technical committee. With a priority listing of public policy issues chosen by the membership, the president may direct the appropriate technical committee or a task force to draft a position statement and white paper on an issue for board review and approval. The president may delegate the responsibility of assigning a lead committee, task force or other appropriate party to develop this document. This assignment will be made in consultation with AIHA STI and GA to assist in determining the most appropriate lead for the issue. The president may request a white paper be developed to provide background for a position statement previously approved as a stand-alone document.

A request for approval to prepare a position statement and white paper may be submitted by a technical committee to the president. Whether initiated by the president or by technical committee request, the same procedures must be followed.

A position statement will typically have a white paper, but there will be exceptions. In general, a white paper should be written to document a position statement on a scientific or technical issue; i.e., a position statement is ultimately a summary of the white paper.

A white paper may not be necessary for an issue which affects the professional practice of industrial hygiene or when the association determines that a wide-ranging position statement on an issue will suffice. The president may determine whether or not a white paper should be prepared to support a position statement.

In assignment of authorship responsibilities for proactive position statements and white papers, the president has several options available:

- The president or designated appointee may direct the appropriate technical committee with the issue expertise to take charge of the project;
- The president or designated appointee may direct one technical committee to take the lead in the project and request other committees to be included for consultation or peer review before submission to the board for approval; or
- The president or designated appointee can appoint a task force of individuals to lead the project.

In assigning authorship responsibilities, attention should be given to soliciting volunteers with varying degrees of expertise and points of view.

C. Notification of Committees and Other Interested Persons

After a lead committee, task force or other appropriate party has been assigned, the board, relevant committee chairs and other interested persons will be notified of the appointment. The purpose of this notification is to allow for comments or to allow technical committees or other qualified individuals to request involvement in drafting a position statement and white paper. Final determination of all requests will be made by the president with appropriate input from the board coordinator or other members of the board.

D. Draft Preparation and Review Process

Once a draft position statement and white paper have been prepared, the internal review of the document should optimally be done by:

- Assigned Committee or task force
- AIHA GA and/or STI staff
- Other technical committees with expertise in the issue under review. (Selection of these related committees will be made by the chairperson of the lead committee or task force through consultation with AIHA STI staff, the assigned board coordinator, or other board members.)
- AIHA communications staff for general editing
- The board

Board members or lead committee/task force members may find it desirable to obtain external review to strengthen and improve the review process. "External review" may include individuals

within or outside of AIHA deemed to be experts in the given subject area who have been outside of the drafting process. Before submitting the document to external reviewers, the president or assigned board coordinator should be consulted to safeguard against draft position statements being prematurely released or misused by either proponents or opponents of the stated positions.

When reviewing a white paper, individuals should consider that the purpose of this document is to justify a specific set of positions being taken by AIHA. Although the white paper is not going to be a critical review paper on a subject, it should present a clear rationale to the reader why AIHA is taking a specific position.

Review by assigned committee/task force, AIHA Government Affairs and Scientific Affairs staff and related technical committees should consider the following:

- Is the paper well written and are the issues, position and rationale clear to the reader?
- Are important technical points properly documented using the most current references available? Are important references missing (if so, please provide them to the authors)?
- Has a balanced consideration been given to all viewpoints? If there are dissenting opinions, the reasons for such dissenting opinions should be recorded and made available if requested by other members of the committee/task force, AIHA staff, or members of the AIHA board.
- Are the positions discussed in the paper consistent with what is believed to be good industrial hygiene practices?

Review by the Board (specific procedures for board review and approval are found in section V of these guidelines and procedures) should include a determination that:

- Positions and their rationale are reasoned and clearly stated.
- Balanced consideration has been given to all viewpoints.
- Technical language is appropriate for the intended audiences(s).
- Positions and their justification have technical merit.
- Judgments are based on a review of the diverse views and interests of the industrial hygiene community.
- Positions promote the professional standards of the industrial hygiene community.

Following board review, board comments and/or recommendations will be forwarded to the drafting group. The comments should be reviewed by the lead committee/task force in consultation with the board coordinator, AIHA GA and STI. Approval of the revised draft by the lead committee/task force should be documented. Controversial or sensitive areas with differing viewpoints should be noted and brought to the attention of the board at the time the revised draft is submitted for board approval.

E. Submission for Board Approval

Once a revised draft has been prepared, a technical spokesperson should be appointed to act as a liaison with AIHA GA, STI, the board, and other pertinent parties. The revised draft should then be submitted by the board coordinator for board approval (following board ballot requirements).

If approved, the final document will be formatted and distributed to the membership, board, press and other outside sources.

If not approved, appropriate reasons will be given to the committee/task force with recommendations from the board. The committee/task force chair has the responsibility of ensuring that changes are incorporated while maintaining consensus in the group.

F. Periodic Updates

AIHA GA and STI have the responsibility of performing periodic reviews to safeguard against subtle errors such as:

- References to "proposed" standards that have been approved since release of the position statement and white paper.
- References to "pending" regulations that have passed since release of the position statement and white paper.
- Inclusion of AIHA comments on evolving standards as attachments that have been updated since the release of the position statement and white paper.

AIHA GA and STI will also ensure that a thorough update of the white paper/position statement is done by a pertinent committee when deemed necessary.

IV. REACTIVE ISSUES

Reactive issues are different than proactive issues and therefore require a different process for a response. The AIHA Director Government Affairs (GA) shall monitor activity in congress, the executive branch, OSHA, NIOSH, EPA and the states to determine issues that may have a direct impact on the association and the profession.

When an issue is identified, GA (or STI if the issue is of only a technical nature) shall gather all available information, compile a synopsis of the issue and forward this information, if time allows, to one or all of the following: AIHA president, AIHA president-elect, board coordinator, executive committee, the board, committee chairman, or any other individual. GA shall inform all parties of any potential deadline required for adequate response to the issue.

Within the response period allowed, all parties should provide GA with the pros and cons of the issue, comments and a recommendation. When possible, dissenting views and the reasons therefore, shall also be forwarded to AIHA staff.

GA shall compile a final recommendation and forward, along with any relevant material, to the president. When possible, dissenting views and the reasons for the dissenting view shall be made available. The president may request inclusion of other individuals to receive this final review if time constraints allow. However, it is the responsibility of the president to make this determination and recommend the next course of action. There will be times when the president must make the decision on the recommendation him/herself, depending on the time available to ensure that AIHA participates in a timely manner on the issue.

GA shall, if at all possible, notify all board members of any dissenting views from other board members so that a discussion might be held to determine whether or not the final recommendation should be approved. This discussion shall only be held when time allows. A

decision on whether or not such a discussion is to take place shall be made solely by the president or his/her designee.

If approved, the final document will be formatted and distributed to the membership, board, press and other outside sources.

If not approved, appropriate reasons will be given to the membership, trade press or other sources if asked.

V. PROCEDURES FOR BOARD REVIEW AND APPROVAL (BALLOTING)

Board review and approval is the most important requirement for any position statement, white paper, or informational document to become a public policy position or statement of the association. In most cases, the review and approval process is the same for any identified issue; however it is best to provide the specific process for each of the issues.

Proactive Review and Approval Process

- Identification of a proactive issue
- With board coordinator involvement, appropriate technical committee, task force, individual appointed to lead project and drafting of position or statement
- Draft document sent to AIHA staff for review and editing
- Draft document sent to full board for review, comments, recommendations
- Comments and recommendations returned to technical committee, task force, individual for review and approval/rejection
- Comments/recommendations accepted, draft document forwarded to AIHA staff to facilitate final board approval/rejection
 - If comments/recommendations are rejected the process begins anew
- Draft document sent to board for approval/rejection
 - See board ballot requirements in this section
- Upon board approval document is formatted and distributed as official association policy

- If board does not approve the president determines the next course of action

Reactive Review and Approval Process

- Identification of a reactive issue

- With board coordinator involvement, appropriate technical committee, task force, individual appointed to lead project and drafting of position or statement
 - Response deadline determined

- Draft document sent to AIHA staff for review and editing

If adequate time for review the following process will take place:

- Draft document sent to full board for comments/recommendations
- Comments/recommendations returned to technical committee, task force, individual for review and approval/rejection
 - If comments/recommendations are rejected the process begins anew
- Comments/recommendations accepted, draft document forwarded to AIHA staff to facilitate final board approval/rejection
 - See board ballot requirements in this section
- Upon board approval document is formatted and distributed as official association policy
- If not approved, the president determines the next course of action

If not adequate time for board review of draft document because of deadline, the following process will take place:

- Draft document sent to executive committee for comments/recommendations. If not adequate time for executive committee review, the president has authority to conduct review of document.
- Comments/recommendations from executive committee and/or president incorporated into document
- Final approval provided by president
- Upon presidential or executive committee approval document is formatted and distributed as official association policy

Guidelines, Fact Sheets and Reference Documents

- Identify type of document
- Determine if government affairs or technical issue
- With board coordinator involvement, appropriate technical committee, task force, individual appointed to lead project and drafting of statement
- Draft document sent to AIHA staff for review and editing
- Draft document sent to full board for review, comments, recommendations
- Comments and recommendations returned to technical committee, task force, individual for review and approval/rejection
- Comments/recommendations accepted, draft document forwarded to AIHA staff to facilitate final board approval/rejection
 - If comments/recommendations are rejected the process begins anew
- Draft document sent to board for approval/rejection
 - See board ballot requirements in this section
- Upon board approval document is formatted and distributed as official association policy
- If not approved, the president determines the next course of action

BOARD BALLOT PROCEDURES

AIHA must comply with all legal requirements when approving or rejecting a specific question through a board ballot or by other means.

There are essentially three ways to approve or reject a specific question:

- A vote of the board at an official board meeting
- A ballot vote by electronic means
- A decision by the president or executive committee because of a deadline

Board Meeting Vote

The most efficient way to approve or reject a specific question is to hold a board vote at a full board meeting. In this case, the board can easily ascertain whether or not a question is approved or rejected. A board vote at an official board meeting does not require a unanimous vote.

Electronic Voting

There are numerous times between board meetings when AIHA must approve or reject a specific request. The most efficient way to do this is through an electronic board ballot. However, there are specific requirements that must be met if the electronic ballot vote is accepted or rejected

- An electronic ballot is sent to the board by
 - Mail
 - Fax
 - E-Mail
- All electronic ballots require a response by a specific deadline
- If the board response on the ballot is –
 - Unanimous. Either in favor of or opposed to the question, the result is official

- The result shall be ratified at the next full meeting of the board of directors
- Not Unanimous. If at least one board member votes in conflict with the other board members or at least one board member abstains, the ballot result is not official and is not approved or rejected.
 - If not approved there are two options:
 - The issue is placed on hold and relegated to the next scheduled face-to-face board meeting for possible discussion
 - The president may call a full board meeting via telephone and conduct another vote. Because this meeting is considered a “real time” meeting of the full board, a unanimous vote on the issue is not required.

Presidential Decision

The most difficult decision to be made is one when a deadline requires an immediate response. The issue can involve public policy issues forwarded through GA or other association issues that require an immediate response in order for the association to continue to operate efficiently.

When these issues arise, there is no easy way to secure full board approval. In cases such as these, the AIHA executive committee or the AIHA president must make the decision to approve or reject a question.

If the president or the executive committee is required to make an immediate decision, the result of this decision should be made available to the full board as soon as possible. Ratification of this decision should be done at the next full board meeting.

VI. COMMENTS ON PUBLIC POLICY ISSUES

AIHA recognizes that in order for the association to have an impact on occupational safety and health issues, it is imperative the association respond to as many requests for comments on public policy issues as possible.

Because of the increase in the number of requests for public policy comments, the introduction of numerous legislative measures, and the various issues AIHA members and others deem important, it is important to develop a written process whereby the association can respond in a timely and professional manner.

The association has at its disposal the expertise of technical committees comprised of active and informed AIHA members. This expertise needs to be tapped in such a way as to provide a broader voice to the public policy process. In addition, AIHA must ensure that the most appropriate committees are included in the discussion and comments provided on these public policy issues.

The process:

A. Issue Identification

- GA shall review the Federal Register and Congressional Record on a daily basis to locate and determine those public policy issues that may be of interest and/or require a response from the association.
- When an issue is located within the Federal Register or Congressional Record, GA shall provide a copy of the proposal to scientific and technical initiatives staff for further action. The request to scientific and technical initiatives (STI) staff shall include:
 - 1) A request from GA to forward to the appropriate committee and to notify GA as to which committee/s STI staff has contacted or will contact to determine interest in the issue. Upon submission to a

particular committee/s, STI staff shall notify GA as to which committee/s the request was sent. STI shall also notify the board coordinator/s of the committees involved.

- 2) GA shall also provide STI with the deadline required for submission of any comments. Because of the requirement for submission to policymakers this deadline shall not be extended if at all possible. In some cases where the public policy issue is of a legislative nature, GA shall provide STI with an approximate date for the submission of comments.
- 3) GA shall use the most efficient means available to keep STI and others informed of upcoming deadlines.
- 4) STI staff shall work with the committee/s whenever possible to assist in gathering comments on the public policy proposal. The board coordinator/s shall also be kept informed and involved.
- 5) Upon submission of the comments to STI, the comments shall be forwarded to GA for review, formatting and internal staff editing.
- 6) GA shall be responsible for seeking board approval, if required, for any comments to be submitted. The process for seeking board approval shall be the same process used for other government affairs issues as found in these guidelines and procedures.
- 7) Following board approval, GA shall submit the comments to the proper agency and/or legislative body. Copies of the final comments shall be distributed to STI, committee/s involved, all other technical committee chairs, the board of directors, and if needed, to other AIHA departments for public and/or member distribution.

B. No Committee Interest

- Should a specific committee/s determine there is no interest in providing input on a specific public policy issue; the committee chair should notify STI staff and the board coordinator by the required deadline. STI shall notify GA of

the non-interest. Notwithstanding the expression of no interest by a committee/s, AIHA national may determine it is in the best interest of the association and occupational safety and health to comment on the issue. If such a determination is made, AIHA national may provide comments and shall not be required to have the comments reviewed or approved by a committee/s.

C. Regular Updates

- Whenever possible, GA shall provide AIHA committee chairs, the board of directors and appropriate AIHA staff with an update of all issues that have been forwarded to STI and others for possible involvement, as well as other issues that might be of interest. The purpose of this update is to ensure committees are aware of pending issues and provided with an opportunity to develop comments on a particular issue if the committee membership determines the committee wishes to provide input.

However, a desire to provide comments by any committee shall not guarantee that such comments shall be included in the final submission. AIHA STI and GA staff shall make recommendations to the board on whether or not to accept such contributions on the issue. The AIHA board shall have final approval.

VII. COMMITTEE RESPONSIBILITY

The board recognizes that individuals serving on technical committees do so on a volunteer basis. However, acceptance of a position on a technical committee also carries with it a certain responsibility.

It shall be the responsibility of the president to determine which actions, if any, are to be taken if committee deadlines are not adhered to when formulating position statements, white papers, or any other action required for the director of government affairs to carry out his/her responsibilities. This action may include removal of a committee chair, board coordinator, or technical spokesperson, or other approaches deemed applicable.

The committee chair, task force chair, board coordinator or other appropriate individual has the responsibility to ensure AIHA guidelines and procedures for the development of position statements and white papers (either proactive or reactive) are followed as closely as possible. The responsible individuals shall do their best to note any dissenting views and the reasons for such dissenting views.

AIHA committees do not operate independently of the board. No committee, or individual representing a committee, shall provide a response on behalf of AIHA to any elected or appointed official without having contacted GA (or STI if such matters are purely technical) and received approval to proceed.

VIII. TESTIFYING

There will be requests to AIHA to provide elected officials (or appointed officials when of a regulatory nature) with either a written statement for the record or in-person testimony.

When a request is received to provide a statement for the record, this statement shall be developed by the appropriate AIHA committee, task force, or other appropriate individual in close consultation with GA and any others deemed appropriate by the president. The statement shall be forwarded to the board for approval. If time constraints prevent contacting the full board, the executive committee shall review the statement(s) and give final approval. If time constraints require immediate approval, the president has the authority to approve.

When a request is received to provide in-person testimony on any issue, the president shall decide who the spokesperson shall be for the organization. Whenever possible the individual chosen to represent the organization will have knowledge of the issue at hand. This individual is likely to have been involved in the issue for several years. Circumstances may warrant the president delivering the testimony with the technical person present to address detailed technical questions.

Written testimony should be based on the approved position statement or white paper for the subject. It should be developed and compiled solely between the GA and the individual presenting it. This affords the opportunity to structure the testimony to the presenter's style. STI will be consulted on any matter of a technical nature.

Testimony shall be forwarded to the board for prior approval. If time constraints prevent contacting the board, the executive committee shall have the authority to approve such testimony. If time constraints require immediate approval, the president has the authority to approve.

In all circumstances, the board will receive a copy of all statements for the record, comments on regulatory activity, and testimony.

IX. MEMBERSHIP NOTIFICATION

GA will use the *Synergist* and other available means to alert the membership on issues of importance. In the next available issue of the *Synergist*, a summary of a position statement and/or white paper will be printed. This shall be done working in close consultation with communications and member services and others. Together, they will utilize the most efficient system for notifying the membership.

GA shall create an "update" periodically to inform the Byrd, local sections, committee chairs and other interested individuals of activity taking place.

X. TASK FORCES

The number of issues requiring input from AIHA continues to grow. To assist the technical committees and meet deadlines for response to many issues, AIHA may appoint a task force to recommend and/or develop positions for the association. Guidelines and procedures are in place specifying how task forces are appointed. Following are recommended rules of operation for task forces.

- Task forces are constituted by the president, consistent with AIHA guidelines on their formation.
- The task force chair submits to the board coordinator a budget deemed necessary for the completion of the project. The budget should include travel costs for task force members who have no other source of funds available (i.e., committee budgets). The budget will be reviewed and approved by the president.
- The task force is empowered to fulfill its specific aims as assigned by the president.
- Every effort should be made to solicit, on a time-limited basis, opinions of the leadership of relevant technical committees.
- The work product of the task force should be forwarded to the board coordinator for distribution to, and possible discussion by, the board.
- After a time-limited comment period, and further work by the task force, the work product shall be submitted to the board for a vote. This procedure will follow already adopted guidelines for submission of a ballot to the board.
- The task force is reappointed or abolished by the president as necessary to complete its task for continue to work. The task force will work with appropriate staff and the board to implement the recommendations of the task force.

XI. APPLICABILITY

Nothing in the guidelines and procedures herein adopted by the board is intended to alleviate the responsibility of the GA to take all steps to include other departments of AIHA in consultation on specific issues if the need arises. This guidelines and procedures mechanism is intended only to pertain to those issues involving government affairs. The board recognizes that several technical committees will provide position statements and white papers which are not related to government affairs activity. In such cases STI or other pertinent departments within AIHA shall have jurisdiction.

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