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Frank J. Hearl
Chief of Staff
National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention
U.S. Department of Health and Human Services

AIHA Comments on NIOSH's Request for Information on State-Based Occupational Health Surveillance

Docket Number: CDC-2019-0068

Dear Mr. Hearl:

The American Industrial Hygiene Association® (AIHA) greatly appreciates the opportunity to comment upon this request for information (RFI) on State-based occupational health surveillance. Below are our recommendations and observations, which we hope you find useful.

Recommendation

- AIHA supports NIOSH's proposal to change from a research cooperative agreement approach to a non-research cooperative agreement approach, as this would increase NIOSH's focus on identifying and controlling occupational health problems and improving occupational health services.

Considerable improvements haven been made in occupational safety and health (OSH) throughout the years; however significant opportunities for improvement remain. Every day approximately 150 people die from occupational injuries and illnesses¹, and each year more than one million Americans suffer non-fatal workplace injuries and illnesses resulting in at least one day away from work². One of the most important tools for making continued progress towards reducing these numbers is occupational health and safety surveillance, which helps to identify important trends and develop more targeted interventions.

AIHA has a keen interest in occupational health and safety data collection and use. This is illustrated both in our mission of "empowering those who apply scientific knowledge to protect all

¹ AFL-CIO. 2017. "Death on the job: The toll of neglect." <https://aflcio.org/sites/default/files/2017-04/2017Death-on-the-Job.pdf>

² Bureau of Labor Statistics. U.S. Department of Labor. *The Economics Daily*. "1.1 million nonfatal workplace injuries and illnesses resulted in days away from work in 2017." <https://www.bls.gov/opub/ted/2018/1-point-1-million-nonfatal-workplace-injuries-and-illnesses-resulted-in-days-away-from-work-in-2017.htm>

workers from occupational hazards”, and from our decision to set “Big Data”³ and “Big Data Management”⁴ as strategic priorities for the association. It is from this vantage point that we strongly support the recommendations of the 2018 National Academies report on improving national occupational health and surveillance systems⁵, including the report’s recommendation for NIOSH to “Explore and implement, as appropriate, alternative approaches to funding ongoing surveillance in the states as applied public health programs rather than research programs.” **AIHA encourages NIOSH to adopt this recommendation and is pleased to see it proposed in this RFI.**

Adopting a non-competitive research approach to State-based occupational health and safety surveillance, as proposed in the RFI, would emphasize NIOSH’s mission of developing new OSH knowledge and transferring it into practice more readily. This more proactive approach might also contribute to reducing the numbers of occupational injuries, illnesses, and deaths over time.

While it may be tempting to believe that the shift to a non-competitive research approach would disadvantage public health research, AIHA holds that the reverse is true.

NIOSH’s present focus areas for State-based OSH surveillance emphasizes the novelty of proposed activities; the investigators who would be performing the research; the methodological approach; and the scientific environment⁶. These areas, while beneficial, do not optimally align with NIOSH’s strategic goals and objectives of applying research to improve worker health and safety⁷. Alternatively, greater alignment would be attained through NIOSH’s proposal to change to an approach that would likely focus on the degree to which a proposal identifies important OSH burdens in a State; the approach for tracking these burdens; the relevance and potential impact of the proposed actions; and the applicants’ ability to achieve the goals stated in their proposal⁸. Rather than hinder OSH research, such an approach would instead work synergistically with it, as the results of more action-oriented State OSH surveillance projects could be incorporated into the latest research, perpetuating a virtuous cycle of continuous learning and progress.

³ American Industrial Hygiene Association. “Content Portfolio Advisory Group.” <https://www.aiha.org/get-involved/volunteer-groups/content-portfolio-advisory-group>

⁴ American Industrial Hygiene Association. “Research Priorities.” <https://www.aiha.org/public-resources/research-priorities>

⁵ National Academies of Sciences, Engineering, and Medicine 2018. “A Smarter National Surveillance System for Occupational Safety and Health in the 21st Century.” Washington, DC: The National Academies Press. <https://doi.org/10.17226/24835>

⁶ U.S. Department of Health and Human Services. “State Occupational Health and Safety Surveillance Program (U60).” <https://grants.nih.gov/grants/guide/pa-files/PAR-14-275.html>

⁷ Centers for Disease Control and Prevention. National Institute for Occupational Safety and Health. “Mission and Objectives.” <https://www.cdc.gov/niosh/about/default.html#Mission%20Goals%20and%20Objectives>

⁸ Centers for Disease Control and Prevention. National Institute for Occupational Safety and Health. “State-Based Occupational Health Surveillance; Request for Information and Meeting Notice.” <https://www.federalregister.gov/documents/2019/08/19/2019-17782/state-based-occupational-health-surveillance-request-for-information-and-meeting-notice>

Conclusion and Next Steps

AIHA thanks you for the opportunity to comment upon this request for information on State-Based Occupational Health Surveillance. We look forward to working with you to help achieve our common goals of protecting worker health and safety. For additional information, please feel free to contact Mark Ames at mames@aiha.org or (703) 846-0730.

Respectfully,

A handwritten signature in black ink that reads "Kathleen Murphy". The signature is written in a cursive, flowing style.

Kathleen S. Murphy, CIH
President
AIHA