



HEALTHIER WORKPLACES | A HEALTHIER WORLD

Government Relations Actions Approval Procedures

Last updated June 2023

Summary of changes from last version:

- Under “Issue Identification and Prioritization”, updated the reference to conducting a public policy survey from even years to every year.
- Under “Development of Responses to Government Relations Matters”, added the following as a footnote: “A “letter” includes all formal communications (including petitions, comments on government agency actions, letters to legislators, etc.) between AIHA and one or more government entities.”

Issue Identification and Prioritization

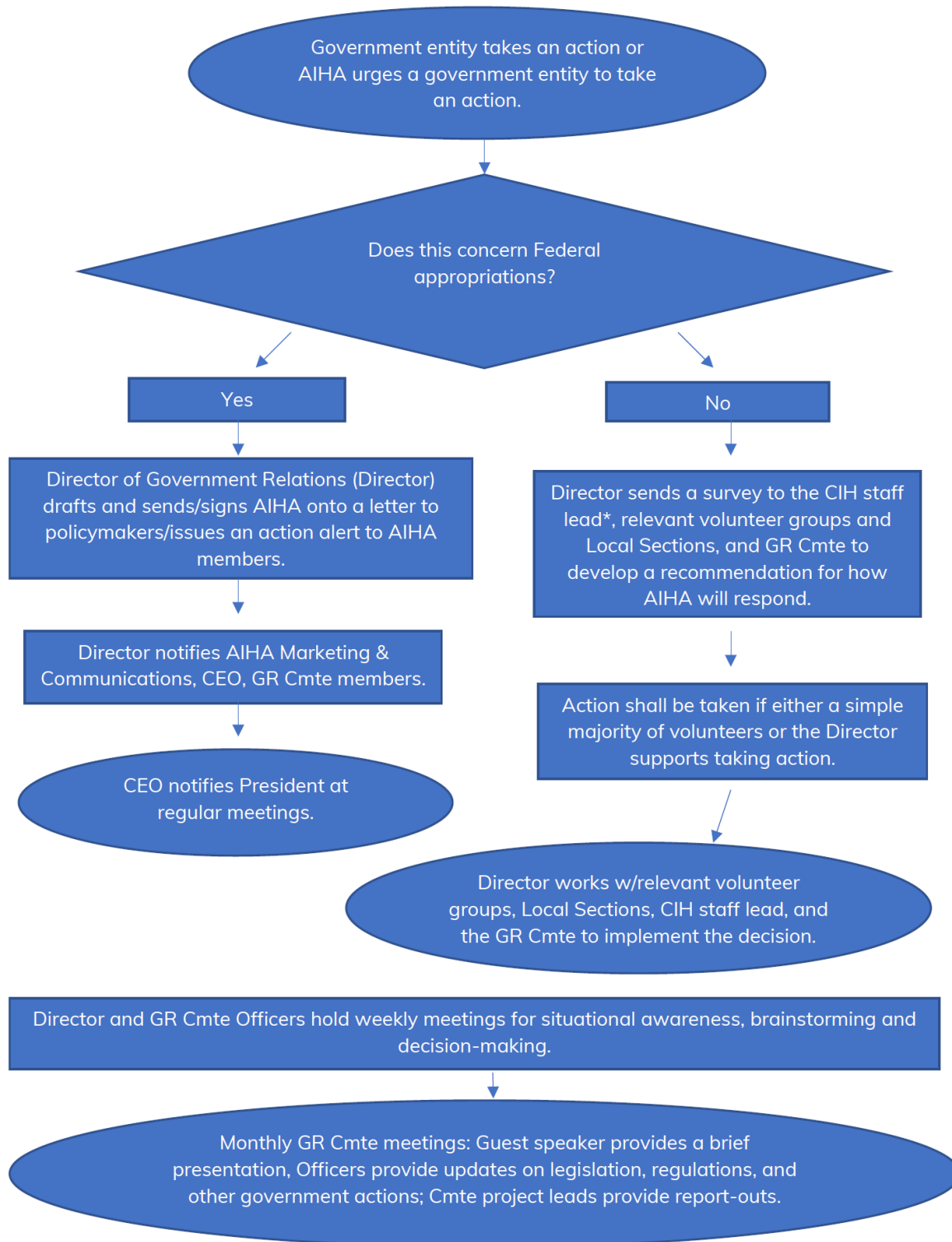
Every year, the Government Relations (GR) Department shall survey AIHA members to identify the top public policy issues that may be of interest to the Association and the profession. Additionally, throughout the year feedback will be continuously sought from AIHA members, with a specific focus on soliciting feedback from Local Section officers, volunteer group officers, and Government Relations Committee members.

After soliciting member input on the top public policy issues for the Association, the results of the survey shall be forwarded to the Government Relations Committee. After receiving the results of the public policy issues survey, a subgroup of the Government Relations Committee shall be convened to determine if any changes are recommended to AIHA's Public Policy Agenda. A report summarizing the survey and the subgroup's recommendations shall be presented to the Board for consideration. The Board will be asked to approve the Public Policy Agenda with or without amendment. Following approval, the membership and other interested parties shall be notified of any changes to the Association's Public Policy Agenda via press releases, articles, email, and AIHA's website.

Development of Responses to Government Relations Matters

The GR Department shall monitor activity in Congress, the Executive Branch, Federal Agencies, and the States, watching for issues that may have a direct impact on the Association and the profession. The following flowchart provides an overview of how AIHA proactivity and reactively engages with government entities.

AIHA Government Relations Actions Approval Process



*Consultation with CIH staff lead will be focused their areas of expertise, which include: hazardous materials, hazardous waste remediation, hazards associated with the built environment (asbestos, lead, mercury, PCBs, etc.), healthcare, indoor environmental quality, and cancer and non-cancer risk assessment.

When AIHA's Director of Government Relations (Director) becomes aware of a proposed rule, opportunity to join a coalition, comment on legislation, sign a petition/letter¹, or other similar issue, the following process shall be initiated.

Local Sections who wish to submit comments on a proposed rule, legislation, or other government action, must first receive the Director's approval before doing so. The Director will follow the same process below for Local Section actions. For Federal appropriations bills:

1. Director takes an action, which can include, but is not limited to drafting and sending a letter to legislators or agency staff, signing AIHA onto a letter to policymakers, or issuing an action alert to AIHA members.
2. Director notifies AIHA Marketing and Communications staff, CEO, and GR Committee members.
3. CEO notifies AIHA President at their regular meetings.

For all other government relations actions:

1. Director sends a survey to AIHA's CIH staff lead, GR Committee and relevant volunteer groups and Local Sections to determine how AIHA will respond, if at all.
 - a. Consultation with CIH staff lead will be focused their areas of expertise, which includes hazardous materials, hazardous waste remediation, hazards associated with the built environment (asbestos, lead, mercury, PCBs, etc.), healthcare, indoor environmental quality, and cancer and non-cancer risk assessment.
2. Action shall be taken if either a simple majority of volunteers or the Director supports taking action.
3. Director works with volunteer groups, Local Sections, CIH staff lead, and the GR Committee to implement the decision.
4. The Director approves and sends letters to policymakers.

Bills within Bills

If AIHA has established a position to support or oppose a bill by following the above process, and that bill becomes attached to another bill, AIHA may voice its support or opposition to the combined bill, clearly stating that the Association's position on the bill is solely based upon AIHA's position on the nested bill. AIHA will clearly state that it is not providing a blanket endorsement of the combined bill. AIHA may voice its position on the combined bill without having to go through the position determination process again, so long as the nested bill is substantively identical to the original bill upon which AIHA has already established a position on.

¹ A "letter" includes all formal communications (including petitions, comments on government agency actions, letters to legislators, etc.) between AIHA and one or more government entities.

Testifying

There will be requests for AIHA to provide elected or other government officials with either a written statement for the public record, in-person, or online testimony.

Statements for the Record

When a request is received or made to provide a statement for the record, the statement shall be developed by the Director, GR Committee Officers, staff CIH, and any relevant volunteer groups and Local Sections. Wherever possible and appropriate, the testimony will draw from and refer to relevant AIHA Position Statements, White Papers and other related Board-approved documents for the subject.

The draft statement shall be sent to the Board for approval. If time constraints prevent contacting the full Board, the Executive Committee shall review the draft testimony and give final approval. If time constraints require immediate approval, the President has approval authority.

Synchronous Testimony

When a request is received or made to provide in-person or online testimony on an issue, the President shall decide who will deliver the testimony on behalf of the Association and may determine that they are the best person to represent AIHA in this circumstance. Whenever possible the individual chosen to represent the Association will have expert knowledge of the issue at hand.

The testimony will be developed by the Director, GR Committee Officers, staff CIH, any relevant volunteer groups and Local Sections, and the person selected to deliver the testimony. Wherever possible and appropriate, the testimony will draw from and refer to relevant AIHA Position Statements, White Papers and other related Board-approved documents for the subject.

The draft testimony will be forwarded to the Board for approval. If time constraints prevent contacting the Board, the Executive Committee has the authority to approve the testimony. If time constraints require immediate approval, the President has approval authority.

In all circumstances, the Board will receive a copy of all statements for the record and delivered live testimony.

Membership Notification

AIHA's membership will be kept up to date on government relations actions taken by the association via monthly Government Relations Committee meetings, Open Forum GR Announcement posts on Catalyst, presentations at Local Section and volunteer group meetings, updates at AIHA Board meetings, and other means.

Tone and Characterization

As a nonpartisan organization driven by scientific knowledge, in all correspondence with policymakers and public statements, AIHA and its representatives will not criticize any

policymaker or other individual by name. However, praise and thanks may be individually given to policymakers by name.

AIHA recognizes that its membership is composed of a diverse group of practitioners, with varying backgrounds, employers and perspectives. AIHA statements, White Papers, testimony and other communications will be science-based and reflect the best interests of the Association, profession and membership as a whole, free of apparent bias or other undue influence.

Regarding groups and entities, in all correspondence with policymakers and public statements, AIHA and its representatives are to refrain from making gross generalizations or otherwise characterizing governmental administrations, other governmental entities, or political parties. For instance, AIHA and its representatives are to refrain from making statements such as “X Presidential Administration is expected to support worker health and safety” or “X Party is not supportive of worker health and safety”.

Political Action Committees

AIHA has never established a Political Action Committee (PAC) for Federal or State elections. AIHA prohibits Local Sections from establishing Federal PACs. AIHA Local Sections wishing to create a PAC to influence State elections are advised to consult legal counsel to determine their legality under appropriate State law. The formation of such a State PAC must be independent of the Local Section to avoid any conflict of interest, either financially or professionally, and ensure that PAC funds are accounted for in a strictly separate manner.