



April 14, 2023

Andrew Levinson, MPH  
Director, Directorate of Standards and Guidance  
U.S. Department of Labor  
Occupational Safety and Health Administration  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

**Concerning: Docket Number OSHA-2022-0012**

Submitted at Regulations. Gov

Dear Mr. Levinson,

The Institute of Hazardous Materials Management [IHMM] is pleased to submit comments concerning the docket cited above regarding OSHA's Voluntary Protection Program [VPP].

Founded in 1984, the Institute of Hazardous Materials Management® (IHMM®) is a not-for-profit organization headquartered in Rockville, Maryland, operating in all 50 states and 85 countries. IHMM has been protecting the environment and the public's health, safety, and security through the creation of credentials recognizing professionals who have demonstrated a high level of knowledge, expertise, and excellence in the management of hazardous materials, dangerous goods transportation, environmental protection, health, and workplace safety.

It is primarily through four of IHMM's professional credentials that we provide comments in this submission; the Certified Hazardous Materials Manager® [CHMM®], the Certified Hazardous Materials Practitioner® [CHMP®], the Certified Safety and Health Manager® [CSHM®], and the Certified Safety Management Practitioner® [CSMP®]

**IHMM Professional Credentials**

The **Certified Safety and Health Manager® (CSHM®)** demonstrates the knowledge and skills necessary to understand general and business management principles; apply management systems; apply occupational health and safety, security, and environmental knowledge, principles, and standards; apply to utilize risk identification, management, and



*Accredited by the American National Standards Institute and  
the Council of Engineering and Scientific Specialty Boards*



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controls; and set related goals, objectives, and targets. Safety and health managers are responsible for ensuring environmental compliance and promoting workplace safety through proper and ongoing leadership. Critical decision-making skills and expertise are needed to effectively address safety, health, and environmental hazards associated with operations and activities. We illustrate the workplace safety and risk management knowledge, skills, and abilities of the CSHM by including the CSHM blueprint in **Attachment One**.

The CSHM is accredited by the Council on Engineering and Scientific Specialty Boards [CESB], and IHMM is now preparing to submit the new blueprint of the CSHM for accreditation by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants. The management of environmental, health, and safety issues in the workplace is governed by model regulations from the U.S. Department of Labor, the Occupational Safety and Health Administration, as well as from safety industry best practices regulations. Accredited credentials allow professionals to not only gain knowledge to use and implement these regulations but to be recognized for their competency to properly manage and perform the functions of the profession.

The **Certified Safety Management Practitioner® (CSMP®)** demonstrates the knowledge, skills, and competencies necessary to understand general and business management principles, safety management methods and systems, safety management systems of ISO standards, and utilize risk identification management and hierarchy controls. Safety professionals are responsible for ensuring that employers' safety management systems remain compliant in the workplace and follow all applicable legislation for the worker and the workplace. We illustrate the workplace safety and risk management knowledge, skills, and abilities of the CSMP by including the CSMP blueprint in **Attachment Two**.

The CSMP is accredited by the Council on Engineering and Scientific Specialty Boards [CESB], and IHMM is now preparing to submit the new blueprint of the CSMP for accreditation by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants. The management of environmental, health, and safety issues in the workplace is governed by model regulations from the U.S. Department of

Labor, the Occupational Safety and Health Administration, as well as from safety industry best practices regulations. Accredited credentials allow professionals to not only gain knowledge to use and implement these regulations but to be recognized for their competency to properly manage and perform the functions of the profession.

The **Certified Hazardous Materials Manager® (CHMM®)** is a professional who has demonstrated, through education, experience, and examination, the ability to identify and assess the risks of hazardous materials, mitigate, or eliminate those risks, and manage their impact on human health and the environment. A CHMM provides proper controls for material handling, transportation, and security throughout the life cycle of hazardous materials, from design and production through storage, recycling, and ultimate disposal. They apply scientific knowledge, engineering technologies, and best management practices in compliance with U.S. regulatory requirements. We illustrate the workplace safety and risk management knowledge, skills, and abilities of the CHMM by including the CHMM blueprint in **Attachment Three**.

The CHMM is accredited by the Council on Engineering and Scientific Specialty Boards [CESB], and by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants. The handling and management of hazardous materials and the transport of dangerous goods are governed by model regulations published by the US Environmental Protection Agency, US Department of Transportation, the U.S. Department of Labor, the Occupational Safety and Health Administration, as well as by the safety industry best practices regulations. Accredited credentials allow professionals to not only gain knowledge to use and implement these regulations but to be recognized for their competency to properly manage and perform the functions of the profession.

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**Recertification of Credentials.** After recognizing the strength of the content of the credential, and then its accreditation comes the requirements imposed by the certification body [IHMM] for the periodic recertification of the credential. IHMM requires that the CSHM, CSMP, CHMM, and CHMP holders recertify their competency to continue to hold the credential every 5 years based on the contents of the certification blueprint. This ensures OSHA and every public and private sector entity that relies on the professionals who hold these credentials that are constantly upgrading their skills, knowledge, and abilities in their communities of practice. We strongly recommend that the OSHA rely on professional credentials that require recertification based on the certification blueprint at least every 5 years.

**Training.** IHMM's commitment to the excellence of its professional credentials, and throughout OSHA's work with employers, is the emphasis on the necessity of receiving training, and IHMM applauds the dedication to training and education as we stand behind and support our credential holders. IHMM has a Foundation, the Hazardous Materials Society [HMS] <https://hazmatsociety.org/> whose reason to exist is principally a focus on the education and training of IHMM's certificants.

Here <https://hazmatsociety.org/education-training/> our certificants can easily find and take an extraordinary range of courses to upgrade and expand their knowledge, skills, and abilities.

If there are specific areas where OSHA-required training can be made available to IHMM certificants then we are pleased to make these resources available to all.

## **The OSHA Voluntary Protection Program**

In VPP, management, labor, and OSHA work cooperatively and proactively to prevent fatalities, injuries, and illnesses through a system focused on: **hazard prevention and control**; worksite analysis; training; and management commitment and worker involvement.

### **To qualify for VPP a facility must have the four VPP elements:**

- Management Leadership and Employee Involvement.
- Worksite Analysis.
- Hazard Prevention and Control.
- Safety and Health Training.

While IHMM applauds the collaborative elements of the VPP between OSHA and employers and employees, its ultimate success is achieved through the commitment of employers to have trained professionals capable of encouraging employee involvement, capable of conducting worksite analyses, conduct hazard prevention and control systems, and conduct safety and health training.

It is for these reasons that we bring to the attention of OSHA the four IHMM professional credentials outlined at the beginning of this submission as all four embody the critical elements of conducting a successful Voluntary Protection Program.

- **Applying for VPP is typically a lengthy process.**

It is important to note the four VPP elements must be in place for one year before OSHA performs its onsite review. This helps ensure a facility has had an opportunity to critique the elements and made necessary changes to enhance element effectiveness. Another important component is employees understanding and supporting VPP. This typically consists of educational sessions on VPP as well as promotional campaigns. Also, to attain VPP status you must go above and beyond basic OSHA compliance. **A VPP site is considered the gold standard concerning safety & health programs.**

- **The Value of VPP**

Statistical evidence for VPP's success is impressive. The average VPP worksite has a Days Away Restricted or Transferred (DART) case rate of 52% below the average for its industry. These sites typically do not start with such low rates. Reductions in injuries and illnesses begin when the site commits to the VPP approach to safety and health management and the challenging VPP application process.

Fewer injuries and illnesses mean greater profits as workers' compensation premiums and other costs plummet. Entire industries benefit as VPP sites evolve into models of excellence and influence practices industry-wide.

The [ANSI Z10 standard](#) helps to establish OSH management systems to improve employee safety, reduce workplace risks and create better working conditions, and the [ISO 45001](#) were all based in large part on the success of VPP, and they incorporate most if not all of the elements of VPP.

These ANSI and ISO standards are also a part of the credential blueprint development process undertaken by IHMM, and IHMM is pleased to work with the **American Society of Safety Professionals [ASSP]** in incorporating their outstanding standards development efforts into IHMM credentials.

- **Role of Accredited Certification Bodies in VPP Reviews**
- **Is there a role for certification bodies who are accredited to audit organizations for conformance to SHMS consensus standards to perform or assist in performing VPP application reviews?**

As a certification body, IHMM obviously believes that the answer to this question is a resounding, "yes."

That said, and as IHMM has outlined earlier in this submission with regard to IHMM's credentials, OSHA should seek collaboration with those certification bodies whose third-party accreditation standards speak to the strength and security of the development and management of the credentials. IHMM, for example, has credentials accredited by both the Council on Engineering and Scientific Specialty Boards [CESB], and by the American National Standards Institute [ANSI]. The measure of the quality and strength of a certification program is to evaluate its accreditation status. Accreditation is a form of certification for the certifying organization, requiring conformance with strict standards of validity, reliability, and impartiality. A key feature of IHMM credentialing programs, accreditation is essential because of the nature of work performed by IHMM certificants.

IHMM is opposed to the public sector creating and issuing certifications and credentials as it should not be the role of the public sector to compete against the private sector initiatives in the same space.

- **Should OSHA engage with certification bodies and those who accredit them to create a hybrid SHMS certification option for industry (e.g., ISO 45001-VPP)?**

IHMM strongly encourages OSHA to engage with the private, professional credentialing community in the very same way OSHA engages the business community in VPP. IHMM

has, as part of its development of credential blueprints for the CSHM, CSMP, CHMM, and CHMP the ISO 45001 standard. Meeting and working with OSHA can give us guidance on the emphasis OSHA wishes to place on SHMS and how we can either create a microcredential for that specifically designed purpose, or expand emphasis in our existing credential blueprints.

- **Is there a role for certified safety and health professionals (e.g., CSP or CIH) or senior worker safety and health representatives (e.g., a long-term safety committee member) to perform (or assist in performing) VPP application reviews?**

IHMM believes that the **CSHM, CSMP, CHMM, and CHMP** credentials can perform and assist in performing VPP application reviews, **and should be recognized by OSHA as a result**. Important to note, however, that OSHA should engage with the certification body, such as IHMM, in providing guidance on what the agency's desired emphasis and direction for the reviews are at any given time. This will ensure that the agency's results will have reached the broadest spectrum of the regulated community.

- **Should OSHA engage with organizations that credential safety and health professionals to create a designation or special training that helps such professionals demonstrate their competence to perform VPP reviews?**

Yes. IHMM believes that, as we have already outlined in this submission, in the credential blueprint and recertification process there is an opportunity for not only highlighting the existing strengths of professional credentials but in IHMM's development of education and training programs for recertification through our Hazardous Materials Society, opportunities for the agency to engage with us in the development and delivery of education and training.

- **Are there any aspects of the review that would *not* be suitable for certified safety and health professionals or senior worker safety and health representatives to perform?**

No.

We appreciate the opportunity to offer IHMM's comments in this proceeding and again commit to working with OSHA in every way possible in the evolution of workplace safety credentials that help create safer worker environments throughout the nation.

Sincerely,



Eugene A. Guilford, Jr., CAE  
Executive Director

**About the Institute of Hazardous Materials Management - <https://ihmm.org/>**

*Founded in 1984, the Institute of Hazardous Materials Management (IHMM), is a not-for-profit organization. IHMM has been protecting the environment and the public's health, safety, and security through the creation of credentials recognizing professionals who have demonstrated a high level of knowledge, expertise, and excellence in the management of hazardous materials, dangerous goods transportation, environmental protection, health, and workplace safety.*

Over 18,000 homeland security, environmental protection, engineering, health sciences, transportation, and public safety professionals have earned IHMM's accredited **Certified Hazardous Materials Manager (CHMM®)** credential. IHMM also administers the **Certified Hazardous Materials Practitioner (CHMP®)**, the **Certified Dangerous Goods Professional (CDGP®)**, and the **Certified Dangerous Goods Trainer (CDGT®)** credentials. IHMM also works with colleges and universities throughout the United States and, to that end, offers the **Student Certified Hazardous Materials Manager (ST/CHMM)** and **Student Associate Safety and Health Manager [ST/ASHM]** credentials. In 2019, IHMM acquired ISHM and now manages the **Certified Safety and Health Manager [CSHM]**, **Certified Safety Management Practitioner [CSMP]**, **Associate Safety and Health Manager [ASHM]**, **Certified School Safety Specialist [CSSS]**, and **Certified School Safety Manager [CSSM]** credentials.



**Attachment One**  
**Certified Safety and Health Manager® [CSHM®]**  
**Certification Blueprint**

**Attachment Two**  
**Certified Safety Management Practitioner® [CSMP®]**  
**Certification Blueprint**

**Attachment Three**

**Certified Hazardous Materials Manager® [CHMM®]**

**Certification Blueprint**

**Attachment Four**  
**Certified Hazardous Materials Practitioner® [CHMP®]**  
**Certification Blueprint**