

May 23, 2024

Denis R. McDonough
Secretary of Veterans Affairs
U.S. Department of Veterans Affairs

Rob Shriver
Acting Director
U.S. Office of Personnel Management

Tanya Bradsher
Deputy Secretary of Veterans Affairs
U.S. Department of Veterans Affairs

Latonia Page
Acting Executive Director, Chief Human
Capital Officers Council
U.S. Office of Personnel Management

Tracey Therit
Chief Human Capital Officer
U.S. Department of Veterans Affairs

Opposing the Proposed Pay Downgrade for Industrial Hygienists at the U.S. Department of Veterans Affairs

Rather than downgrading pay, we urge you to maintain or increase the paygrade of industrial hygienists and other key worker health and safety workers at the VA.

Dear Secretary McDonough, Deputy Secretary Bradsher, Ms. Therit, Acting Director Shriver, and Acting Executive Director Page:

Recently, we learned that the U.S. Department of Veterans Affairs (VA) is proposing to downgrade the pay of six positions, including Industrial Hygienists (GS-0690-12 and above), covering more than 4,000 workers, many of whom are veterans.

On behalf of the undersigned organizations, representing a diverse array of occupational and environmental health and safety professionals, we strongly recommend that you reconsider this course of action. We understand that this proposal follows consistency reviews designed to reduce geographical pay disparities and hiring times. We also appreciate the pressures VA and other agencies face to keep costs down and use taxpayer dollars effectively. However, the proposed pay downgrade would not accomplish those goals and would instead weaken VA's ability to carry out its missions.

Furthermore, if VA's proposed pay downgrade moves forward, it could inspire other agencies to reduce the pay of industrial hygienists and other occupational and environmental health and safety workers they employ. The likely result of such a scenario would be a weakening of the entire Federal government's ability to protect workers and their communities from health and safety hazards, as it will likely take

longer and become harder to find and hire employees for these critical positions; this action runs counter to the intended outcomes of the consistency review process.

Rather than continue along this perilous road, we recommend that you maintain (and consider increasing) the paygrade of industrial hygienists and other key worker health and safety workers at the VA. These highly skilled professionals are a critical element to ensuring safe workplaces and workers, thus reducing the likelihood of workers comp claims and ensuring business efficiencies.

Thank you for your consideration of this request.

Sincerely,

AIHA

American Association of Occupational Health Nurses

American Board for Occupational Health Nurses, Inc.

American Society of Safety Professionals (ASSP)

Board of Certified Safety Professionals

Campus Safety Health and Environmental Management Association (CSHEMA)

Institute of Hazardous Materials Management (IHMM)

ISEA – International Safety Equipment Association

About AIHA

AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists, and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.

About the American Association of Occupational Health Nurses

The American Association of Occupational Health Nurses (AAOHN) is the professional association of licensed nurses engaged in the practice of occupation and environmental health nursing. The major roles and responsibilities of AAOHN are to:

- Define the scope of practice and set standards for occupation and environmental health nurses.
- Develop standards of professional conduct for the occupational and environmental nurse as described in the AAOHN Code of Ethics.
- Promote the health and safety of work and workplace communities.

- Promote and provide continuous learning opportunities for occupational and environmental health nurses and professionals offered through the AAOHN Academy.
- Advance the profession by encouraging and facilitating research.
- Advocate for occupational and environmental health nursing in business, hospitals, government and other professional areas.
- Respond to issues critical to the practice of occupational and environmental nursing.

AAOHN serves over 3,200 members located across the United States, U.S. Territories, and the World, with our international membership. AAOHN is comprised of over 30 chapter organizations that are incorporated agencies under their state regulations. Each chapter has its own by-laws and officers, but follows guidance from AAOHN, nationally.

For more information, please visit www.aaohn.org.

About the American Board for Occupational Health Nurses, Inc.

The American Board for Occupational Health Nurses (ABOHN) is an independent nursing specialty certification board and was founded in 1972 as an independent not-for-profit organization to set professional standards and conduct occupational health nursing specialty certification. ABOHN is the sole certifying body for occupational health nurses in the United States and awards three credentials:

- Certified Occupational Health Nurse (COHN)
- Certified Occupational Health Nurse – Specialist (COHN-S)
- Case Management (CM)

ABOHN has certified over 16,000 and currently has 3,500 estimated active certificants. We use predetermined standards of nursing practice to validate an individual registered nurse's qualifications, knowledge and practice in specific areas of occupational health nursing.

Vision: ABOHN Certification is recognized and valued as the standard to maximize the health and safety of workers worldwide.

Mission: ABOHN's mission is to promote a standard of excellence in occupational health nursing through credentialing.

Principles and Values:

To accomplish its mission and vision, ABOHN commits its resources to achieving the following principles and values:

- Establish and promote credentialing standards for professional occupational health nurses.

- Publicly recognize individuals who demonstrate that they meet these standards.
- Elevate the quality of occupational health nursing practice.
- Stimulate the development of improved educational standards and programs in the field of occupational health nursing.
- Encourage occupational health nurses to continue their professional education.
- Perform the above unrestricted by consideration of national origin, race, creed, disability, color, age and gender.
- Create value for employers, their employees and the occupational health professional.
- Seek inclusion by partnering with organizations that share the ABOHN mission and values.

For more information, please visit www.abohn.org.

About the American Society of Safety Professionals (ASSP)

The American Society of Safety Professionals is a global association for occupational safety and health professionals.

For more than 100 years, we have supported occupational safety and health (OSH) professionals in their efforts to prevent workplace injuries, illnesses and fatalities. We provide education, advocacy, standards development and a professional community to our members in order to advance their careers and the OSH profession as a whole.

Who We Are

Informative: Sharing knowledge is at the heart of what we do – through symposiums, networking events, continuing education offerings, our professional journal and more.

Established: Since 1911, we have been the most respected advocate for workplace safety and health professionals, working hard to advance the profession and the individuals who choose it.

Connected: With 35,000 members in 80 countries around the world, we connect safety and health professionals to a vast community of peers, resources and opportunities.

Passionate: Our members are dedicated to making the world a safer and healthier place. We share their dedication and are passionate about helping them achieve their goals.

For more information, please visit www.assp.org.

About the Board of Certified Safety Professionals

The Board of Certified Safety Professionals (BCSP), a not-for-profit corporation headquartered in Indianapolis, Indiana, has been setting and certifying the technical competency criteria for safety, health, and environmental (SH&E) practitioners since 1969.

In that time, over 100,000 BCSP credentials have been achieved by our safety practitioner pioneers, improving safety practice by meeting the challenge of achieving and maintaining quality, accredited safety certification – The Gold Standard.

For more information, please visit www.bcsp.org.

About the Campus Safety Health and Environmental Management Association (CSHEMA)

The Campus Safety, Health, and Environmental Management Association (CSHEMA) is the only organization focused entirely on serving EHS professionals in higher education.

It was founded in 1954 as the Campus Safety Association and since 1995 has been a nonprofit 501(c)3 organization. For more information, please visit www.cshema.org.

About the Institute of Hazardous Materials Management (IHMM)

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 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®), the **Certified Dangerous Goods Trainer®** (CDGT®), the **Associate Hazardous Materials Manager®** (AHMM®), the **Student Certified Hazardous Materials Manager®** (ST/CHMM®), and the **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.

For more information, please visit ihmm.org.

About ISEA – International Safety Equipment Association

ISEA is the association for safety equipment and technologies – equipment and systems that enable people to work in hazardous environments. For more than 85 years, ISEA has set the standard for personal protective technologies, supporting the interests of its member companies who are united in the goal of protecting the health and safety of people worldwide.

ISEA is a recognized leader in the development of ANSI-accredited safety equipment standards, in the U.S. and around the world. It works with Congress and government agencies to consult with policymakers whose decisions affect the industry. It is a forum for information sharing and industry action, providing market insight and advocating for the use of safety equipment to keep workers safe.

For more information, please visit [safetysafetyequipment.org](https://www.safetysafetyequipment.org).