



AMERICAN SOCIETY OF
SAFETY PROFESSIONALS

October 1, 2021

The U.S. Department of Labor (DOL)
Office of Management Budget
Chief Evaluation Office (CEO)
200 Constitution Ave NW
Washington, DC 20210

Agency Information Collection Activities; Submission for OMB Review; Comment Request; Employer Adoption of Voluntary Health and Safety Standards

The American Society of Safety Professionals (ASSP) is pleased to submit these comments. They are in response to the U.S. Department of Labor notification, of September 21st, asking for comments on the commissioned evaluation of the use of voluntary consensus standards for occupational health and safety management systems (OHSMS). We understand the evaluation is being done in conjunction with the U.S. Occupational Safety and Health Administration.

Introduction

As the DOL, including OSHA is aware, [ASSP](#) is the oldest society of safety professionals in the world. Founded in 1911, we represent more than 38,000 professionals advancing workplace safety and health in every industry, in every state and around the globe. ASSP members have set the occupational safety and health (OSH) community's standards for excellence, ethics and practice for more than 100 years.

ASSP Position

ASSP is supportive of this information gathering initiative. We understand this OMB Paperwork approval process is for the DOL study/survey addressing the value in investing in occupational health and safety management. The Society has fielded hundreds of inquiries in the past several years alone asking for information about the value of implement occupational health and safety management programs.

The attached position statement addressing the positive value of such management systems and programs has been viewed over 3,000 times in the past year by interested stakeholders. Occupational health and safety management continues to grow in importance. The data and information resulting from this study will be of significant value to both the private and public sectors. The results of this study will have a wide range of applications in a wide variety of organizations and companies in both the public and private sectors.

ASSP has had an overall position about such systems, for many years, as noted below:

Effective occupational health and safety management systems (OHSMS) are essential to creating and maintaining safe, healthy and productive workplaces.

Along with our statement of support for this data gathering initiative, the following materials and files are attached for the record. We hope they are of value and indicative of why it is important to conduct this study:

ASSP has a detailed statement on the use of management systems and the return-on-investment for the implementation of such programs [Attached].



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ASSP has a position statement on the use of voluntary national consensus standards in the private and public sector, [Attached].

ASSP offers a series of American National Standards and ANSI registered technical reports addressing occupational health and safety management systems, which will be part of this data gathering initiative. If there is any need to review the following standards, please call on ASSP and they will be provided:

- ANSI/ASSP/ISO 45001-2018, Occupational Health and Safety Management Systems - Requirements With Guidance for Use
- ASSP/ISO TR - 45001-2021, Occupational Health and Safety Management Systems: A Practical Guide for Small Organizations
- ANSI/ASSP/ISO 45003-2021, Occupational Health and Safety Management, Psychological Health and Safety at Work –Guidelines for Managing Psychosocial Risks
- ANSI/ASSP Z10.0 – 2019, Occupational Health and Safety Management Systems
- ASSP GM-Z10.100-2019, Guidance and Implementation Manual for ANSI/ASSP Z10.0-2019 Occupational Health and Safety Management Systems
- ASSP GM-Z10.101-2019, Guidance Manual: Keep Your People Safe in Smaller Organizations

ASSP also had the opportunity to review the supporting document titled: [Supporting Statement for Employer Adoption of Voluntary Health and Safety Standards](#). ASSP supports the contentions made in this document and is supportive of the work being conducted by the *Technical Working Group* put together to provide assistance. The individuals on this group are occupational safety and health professionals of the highest quality and integrity. We are confident they will continue to positively contribute to the success of this project.

If requested, ASSP will be more than ready to apprise our membership of this data gathering initiative and encourage participation in any survey or study. Our membership would have interest in this initiative, and we believe the Society can proactively and positively contribute.

Thank you for your time and attention to our comments. If we can be of any assistance in this matter, please feel free to contact ASSP via the information provided below.

Respectfully,

Brad D. Giles, P.E., CSP, STS, FASSP
President, ASSP

ASSP Contact Information:

Timothy R. Fisher, CSP, CHMM, CPEA, CAE, ARM, STS
Director, Standards Development and Technical Services
American Society of Safety Professionals (ASSP)
520 N. Northwest Highway
Park Ridge, IL 60068
TFisher@ASSP.Org
847/768-3411

