



## Recommendations from the Association of Occupational and Environmental Clinics

The OSHA budget needs a massive infusion of funds to enable it to conduct the following:

- Review the original OSH Act, in collaboration with all stakeholders, to identify needed modifications and especially to update the Permissible Exposure Limits and develop a system to keep them current.
- Measures to prevent industrial illness and injury should be integrated with efforts to reform the health care system.
- Establish regular communication and collaboration with EPA, MSHA, NIOSH, BLS and DOJ.
- Establish series of meetings co-sponsored with NIOSH to bring together industry, academia, and workers to set priorities and develop strategies to implement them using the NORA program as the template.
- Improve surveillance systems, since accurate surveillance information is essential to: allocate resources appropriately; implement targeted interventions; and evaluate the effectiveness of those interventions. OSHA needs to create a culture of evaluation that utilizes comprehensive information from multiple health based data systems, including data from non-governmental organizations.
- Address the problem of undercounting/underreporting of occupational illness and injury by strengthening OSHA's enforcement of recordkeeping and expanding educational outreach to health care professionals to ensure they understand recordkeeping as distinct from workers' compensation.
- OSHA needs to reinvigorate its support of education that fosters the best practice implementation of OSH regulations and standards. This initiative should include increasing both the amount and scope of the Harwood grants, for example.
- Reinstate/reinforce the requirement to track musculoskeletal disorders on the OSHA 300 log and follow-up with reporting review and enforcement for prevention.
- Establish global connections and work with international companies and unions to determine which international initiatives can be adopted by the US or adapted for use in the US.
- Increase worker participation through educational opportunities and whistle blower protections.
- OSHA should have jurisdiction over **ALL** occupational health and safety matters pertaining to agricultural workers. Some pesticide-related worker health issues currently are under EPA jurisdiction. The responsible divisions at EPA and OSHA should work collaboratively to develop a comprehensive agricultural health and safety program under OSHA's jurisdiction.
- OSHA should have jurisdiction over **ALL** occupational health and safety matters pertaining to agricultural workers, notably including all pesticide-related worker health issues currently under EPA jurisdiction.
- Establish rigorous performance criteria for the state plans, audit their compliance routinely, and contract for an independent study of current oversight. A generic safety and health OSHA program standard needs to be developed for workplaces of all sizes.
- Establish a research to practice (R2P) program within OSHA along the lines of what exists at MSHA.