



AMERICAN COLLEGE OF
OCCUPATIONAL AND
ENVIRONMENTAL MEDICINE

Submitted via: oshsb@dir.ca.gov

July 24, 2023

The Honorable David Thompson, Chair
Occupational Safety & Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

RE: Comments on Proposed Modifications to Proposed Regulations to Amend the Cal/OSHA Lead Standards

Dear Mr. Thompson and members of the Board:

On behalf of the American College of Occupational and Environmental Medicine (ACOEM), I am writing to reiterate our strong support for the proposed amendments to the Cal/OSHA lead standards, as outlined in your rule-making announcement of March 3, 2023, affecting 8 CCR, Sections 1532.1, 5155 and 5198. We appreciate that the Board is pursuing modifications to the text dated July 7, 2023, including provisions that seek to clarify the delivery of health care services required by the proposed standard.

We urge the Board to consider further clarification in the context of the new proposed regulatory language on “Physician or other licensed health care professional (PLHCP).” **ACOEM believes that mandated medical surveillance and blood lead monitoring provisions present complex issues related to lead exposure and the pharmacokinetics of blood lead. Accordingly, they should be supervised by a physician (M.D. or D.O.) with experience and training in occupational lead medical surveillance with board certification in occupational medicine, medical toxicology, or another American Board of Medical Specialties (ABMS) discipline with experience in leading a lead surveillance program.**

Regrettably, we are aware that in the past, some employers have engaged other healthcare professionals, including paramedics or chiropractors, to oversee their mandated medical surveillance programs. Providers with these credentials lack the requisite training, knowledge, and experience to evaluate the complex health effects of lead exposure on multiple organ systems.

We would also direct the Board to consider any comments provided by the Western Occupational and Environmental Medical Association (WOEMA), which has actively participated in the Cal/OSHA Advisory Committee on the lead standards.

If you should have any questions or need additional information, please contact Dane Farrell (Dane@cascadeassociates.net), ACOEM's Government Affairs Representative.

Founded in 1916, ACOEM is the nation's largest medical society dedicated to promoting employee health through preventive medicine, clinical care, research, and education. The College represents physicians and other healthcare professionals specializing in occupational and environmental medicine (OEM) who are devoted to preventing and managing occupational injuries.

Thank you for your consideration, and we look forward to collaborating with the Division and the Standards Board in finalizing these critical revisions.

Sincerely,



Kenji Saito, MD, JD, FACOEM
President

American College of Occupational and Environmental Medicine (ACOEM)