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Ms. Marley Hart, Executive Officer  
Occupational Safety and Health Standards Board  
2520 Venture Oaks Way, #350  
Sacramento, CA 95833

RE: Certified Safety Professional (CSP) definition missing in Title 8

**OCCUPATIONAL SAFETY AND HEALTH  
STANDARDS BOARD**

Dear Ms. Hart:

Title 8, Subchapter 20, Tunnel Safety Orders, Article 3, Injury and Illness Prevention Program, §8406 (g) (B) requires:

*"Formal safety related education degree in safety or certification as a Certified Safety Professional (CSP), Certified Industrial Hygienist (CIH), Professional Safety Engineer (PSE), or similar."*

Further, Title 8, Subchapter 7, General Industry Safety Orders, Group 16, Control of Hazardous Substances, Article 108, Confined Spaces, §5157 Permit-Required Confined Spaces, Appendix B - Procedures for Atmospheric Testing requires in paragraph (1):

*(1) Evaluation testing. The atmosphere of a confined space should be analyzed using equipment of sufficient sensitivity and specificity to identify and evaluate any hazardous atmospheres that may exist or arise, so that appropriate permit entry procedures can be developed and acceptable entry conditions stipulated for that space. Evaluation and interpretation of these data, and development of the entry procedure, should be done by, or reviewed by, a technically qualified professional (e.g., Cal/OSHA consultation service, or certified industrial hygienist, registered safety engineer, certified safety professional, certified marine chemist, etc.) based on evaluation of all serious hazards.*

While Certified Industrial Hygienist, Professional Engineer, registered safety engineer, and certified marine chemist definitions are easily found in Title 8 and elsewhere in California statutes, CSP, Certified Safety Professional and certified safety professional are not.

This issue recently came to up when a speaker during a safety symposium was introduced as a CSP, a **Certified Speaking Professional**. This designation is apparently awarded by NSA, the National Speakers Association, based upon speaking experience and perhaps other qualifications.

**I request that the Standards Board adopt a definition such as the following:**

A Certified Safety Professional (CSP) is an individual who holds a current certification as an active Certified Safety Professional (CSP) as issued by the Board of Certified Safety Professionals of Burwash, IL.

These qualifications are necessary as the BCSP issues other designations, such as Occupational Health and Safety Technician (OHST), and Construction Health and Safety Technician (CHST). Furthermore, Certified Safety Professionals who are no longer active only qualify as Emeritus CSPs.

I also suggest that the Board be more consistent in its regulations: Certified Safety Professional and certified safety professional are not the same.

Thank you for your consideration.

Sincerely,

John R. McCullough, C.S.P.  
Assistant Vice President

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