

## Memorandum

for

Members of Board of Trustees  
for meeting in New York, July 7, 1936.

To supplement Agenda:

1. The recommendation that Henry Middleton be elected Assistant Secretary is made because the Secretary, Mr. Lloyd Williams, has not been able regularly to attend meetings of the Board, and has designated Mr. Middleton in such cases to be his substitute. Action as recommended would give Mr. Middleton official status.
2. The applicants for membership will, when elected, add one more to the number of trade associations that are members, one to the number of large companies and one to the number of small companies.
3. (a) Clarification of statement of purposes as printed in Code of Regulations.

On Page 3 of Information Circular No. 1 are three key statements:

1. "Air Hygiene Foundation of America, Inc., has been formed by a large group representing various industries."
2. "The purposes of this organization are to conduct investigations of and to stimulate research on problems in the field of air hygiene and to gather and disseminate factual information relating thereto. It will also cooperate with and assist other agencies active in this field and will collaborate in the coordination of such research efforts."
3. "In the important work planned by the Foundation, the cooperation of scientists, governmental authorities and all industrialists concerned is cordially invited. The activities of the Foundation are open to all interested persons and organizations."

At the recent meeting, in New York, of the Planning Committee of the Board of Trustees with representatives of various insurance groups, the suggestion was advanced that the stated purposes might be considered as over-inclusive, in that conceivably the Foundation might intend to set itself up as the "over-all" body which would attempt to assume responsibility for all phases of air hygiene work, regardless of other agencies that might be in the field. The feeling of the questioners was that the statement of purposes should be clarified to indicate that the Foundation is an organization formed by and for industry, is national in scope — that as a specialist in its field, but representing exclusively the viewpoint of industry, it should work with and through existing organizations like American Standards Association, National Safety Council and others, including governmental agencies.

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The Foundation was formed by industry. It is for the benefit of industry in the true sense, that whatever can be done toward the elimination or control of industrial hazards in the field of air hygiene will be good for the employer — at the same time, it will be equally good for the employees and for the public.

A phrase which was used at the meeting in question, "representing exclusively the viewpoint of industry" is open to misinterpretation. It might be taken to mean that the Foundation would interpret the results of its own research and that of others in the light of its (industry's) selfish wishes. This certainly is not in the minds of the Foundation's members. The purpose clearly is to attempt to make a finished pattern, using those pieces already cut that will fit, and cutting or allowing someone else to cut those necessary to complete the whole. To do otherwise, to give a "viewpoint" to facts (other than to consider practicability in the carrying out of a program of prevention based on those facts), would make of the Foundation a partisan body and would very largely destroy its usefulness and its legitimate power in its field.

There is evident (not now referring to the meeting in New York) a feeling, based on the phrase "will .... assist other agencies" that, when a committee in an organization decides that some particular research is needed, and the organization does not have the necessary funds, the Foundation should supply what may be needed.

To go to the extreme of what might be considered by some as the field of activities, the Foundation would be a collection agency, at high expense, for other organizations, with the privilege of receiving and using their reports. Even among such organizations there sometimes is a question as to who should do what.

In that connection, after the April 14 meeting in Washington, some thought that the Foundation's activities would be permitted to lapse until after the presentation and consideration of the reports of the Department of Labor committees. A number of members and prospects have commended the Trustees and staff for proceeding with the preliminary program and for making the Foundation's own survey of the field. It seemed to be the feeling on the part of those who have commented on it in this way that "industry's viewpoint" is to see that its money entrusted to the Foundation is used in making such of its own studies as it should be sure of unbiased facts, and to "farm out" where organizations are specifically set up to do work in special lines — as Mellon Institute of Industrial Research, Harvard School of Public Health, Bureau Laboratories, etc., for research, and American Standards Association for the setting of standards when proper data are available.

In the statement on page 3, Information Circular No. 1, it seems clear enough that the Foundation was organized by industry for the conduct of such investigations as it might wish to do or have done for itself in air hygiene; for the stimulation of research in dust and fumes problems, the word "stimulation" not implying necessarily that the Foundation would either do the work or supply the funds, although the context would indicate that it might do some of its own research, supply funds for cooperative studies with other agencies or individuals, and in other cases act merely in an advisory capacity. The offer not only to cooperate with but to assist other agencies in the field of air hygiene, is definite, as is also the statement that the Foundation will collaborate in the coordination of research efforts — not that it will act up to be the national coordinating body. Here would seem to be a recognition of all other

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agencies looking toward the same goal, an understanding that some of them may be enabled to do more work in their particular lines if assisted in a material way, and finally an acknowledgement that all concerned should work in harmony to have the necessary work done by those best equipped and qualified, and to avoid unnecessary duplication of effort. The further statement that cooperation of all interests is invited serves to emphasize that the Foundation believes that it has a definite field of usefulness to industry, to labor and to the public; that others established in the field should be given and should give due recognition and respect; that the Foundation has no wish or intention to usurp; but it does believe that, because of its makeup, it perhaps is in position materially to speed up the investigational phases in this very important field, to secure more complete cooperation of industry with science, and more rapidly to acquaint the public with facts which will hasten fair regulation. The Foundation is a fact-finding as well as a fact-gathering organization.

While the statement of purposes might be amplified by additional phrases, it is not easy to see the validity of an objection that the purposes as stated may be construed to mean that the Foundation wants to be more than is indicated that it should be or that it may desire to do unwarranted work in this field.

- (b) Clarification of statements of functions and duties of various committees (suggested copies as prepared by the committee chairman will be presented at Trustees' meeting).

Preventive Engineering Committee. - There was objection on the part of the American Standards Association to the clause indicating that the Foundation might set its own standards for engineering practices. This was settled to the entire satisfaction of the staff of A.S.A. by the statement that the Foundation might recommend standards, but that such would be cleared through A.S.A., with the understanding that the standards as set by A.S.A. on data supplied would not be promulgated until after the Foundation had opportunity to discuss with A.S.A. any differences of opinion that might arise.

Legal Committee. - There was objection on the part of the insurance groups (and possibly others) to the latter part of this section, as indicating the possibility of misunderstanding as to what this committee actually is doing and intends to do. There seemed to be the thought that the Foundation might be considered to be going too far in this phase.

The Planning Committee, at its meeting on June 24, recommended (a), (d) and (e) for consideration by the Board of Trustees and, if approved, to be referred to the next membership meeting for action.

- (a) That the number of Trustees authorized be increased to 25;  
(d) That the Trustees be authorized to elect an Executive Committee of 5; that such officers of the Board as were not elected to the Executive Committee be members ex officio of that body; that 3 constitute a quorum to conduct business at meetings of the Executive Committee.

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(e) That definitely stated meetings of the Board of Trustees be set. It was suggested that these be held quarterly, as January, April, July and October. Also that the Executive Committee meet monthly on some specified day.

(f) Other changes that may seem desirable in the Code of Regulations,

4. In a number of cases arguments in favor of membership have elicited the response that the fee is too high. In most instances the companies approached were of such size and apparent standing that the amount of \$500 should have appeared negligible.

As the middle of the year is past, should the fee for the remainder of 1936 be reduced? There still is a large amount to make up what will be spent before 1937.

5. Formula for assessment of dues for 1937. Discussion at the meeting of the Planning Committee centered around number of employees as the least complex factor. It was recognized that degree of hazard is important, but there seemed to the Committee no way of fairly determining this short of a complete survey, which obviously is at this time out of the question. Since returning from the meeting, the matter has been discussed with several persons — a personnel director, a business executive, and a statistician — none of whom could offer anything of benefit beyond an agreement that the simple way seemed to be division into groups according to number of employees and assessment per capita, with definite maxima. Several other persons, suggested by Mr. Winans, will be seen before the Board meeting on July 7. In the meantime, the following may be considered as an indication of possible grouping on the basis of number of employees only. For simplicity, a budget of \$100,000 has been assumed, and the further assumption made that there will be about 1000 contributing companies. At present there are in the Foundation, 14 company members, 14 trade association members and 1 chamber of commerce, totaling 755.

|         |   |               |
|---------|---|---------------|
| Group 1 | = | 25% of budget |
| 2,3,4   | = | 50            |
| 5,6,7,8 | = | 25            |

|         |   |                       |
|---------|---|-----------------------|
| Group 1 | = | Over 10,000 employees |
| 2,3,4   | = | 10,000 to 1,000       |
| 5,6,7,8 | = | Less than 1,000       |

|   |                  |            | Ass. per emp.     |
|---|------------------|------------|-------------------|
| 1 | = Over 10,000    | = \$500.00 | = 5¢ or less      |
| 2 | = 10,000 - 5,000 | = 350.00   | = 3½ to 5         |
| 3 | = 5,000 - 2,500  | = 200.00   | = 4 to 8          |
| 4 | = 2,500 - 1,000  | = 100.00   | = 4 to 10         |
| 5 | = 1,000 - 500    | = 75.00    | = 7½ to 12½       |
| 6 | = 500 - 300      | = 50.00    | = 8 1/3 to 16 2/3 |
| 7 | = 300 - 100      | = 25.00    | = 8 1/3 to 25     |
| 8 | = Less than 100  | = 12.50    | = 12½ up          |

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Whatever further advice can be secured will be presented at the Board meeting.

H. B. Moller  
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Managing Director

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