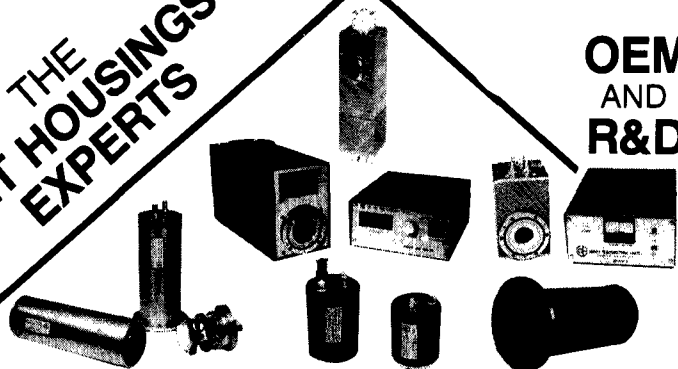


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DOD deserves much credit for supporting important basic research in this country, to a very large extent unclassified, and for doing it in an enlightened and flexible manner that ought to be an example for other federal funding agencies. It deserves better than such blanket diatribes. The "the military will destroy democracy" specter is no better than the "communist under every bed" syndrome and does not do anything to promote a useful debate of fundamental issues. Whether universities accept DOD funds is one issue and largely a practical one, although not entirely so. Whether the country needs a larger defense budget is quite another problem. To address that there are good and tried channels; waiving implied boycotts and innuendos regarding military research will not help.

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OSHA Standards

I am writing to correct the record about several Occupational Safety and Health Administration (OSHA) standards mentioned in R. Jeffrey Smith's article "OSHA shifts direction on health standards" (News and Comment, 26 June, p. 1482). Our agency has not withdrawn a *requirement* for labeling of chemical hazards in the workplace, but rather a proposal. As Smith's article correctly states, we expect to issue a revised proposal for labeling chemical substances in the workplace by 1 September.

The hearing conservation amendment to OSHA's current noise standard, scheduled to go into effect on 1 August, would not impose a "tighter limit on workplace noise" as noted by Smith. Rather, it would define in specific terms the components of an acceptable hearing conservation program. Hearing conservation programs are currently required under OSHA's standard covering occupational exposure to noise.

Also, the agency has not exempted the construction industry from the OSHA standard covering worker access to employer-maintained medical and exposure records. Instead, OSHA has stayed for the construction industry those portions of the standard giving workers access to exposure records; construction employers must continue to maintain these records and must provide medical records to workers and individuals given specific written consent by workers to see their individual medical records. The agency has solicited the views of the Advisory

Committee on Construction Safety and Health, which was not consulted during the rule-making on these issues, and is evaluating their recommendations along with public comments requested on the records issue.

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Circular A-21: An Alternative Reporting Method

Much has been written about the effort-reporting requirements imposed upon educational institutions by the Office of Management and Budget (OMB) Circular A-21. Much of the furor appears to be due, as John J. Lordan apparently suggested to the Council of Scientific Society Presidents (News and Comment, 15 May, p. 760), to either overreaction or perhaps reaction to inappropriate interpretations of the provisions of paragraph J.6 of the circular, which authorizes and describes two alternative methods for distributing salaries and wages—either personnel activity reports or a monitored work load.

Individual faculty members and other university representatives (especially at institutions that have adopted the personnel activity alternative) have stated that the opposition results from what is perceived to be a requirement that faculty members keep track and report precisely how much time they spend on research, teaching, administration, counseling, and other activities both on campus and off.

The circular, however, provides [in paragraph J.6(b)] that "because of the nature of work involved in academic institutions, the various and often inter-related activities of professorial and professional employees frequently cannot be measured with a high degree of precision, that reliance must be placed on reasonably accurate approximations, and that acceptance of a degree of tolerance in measurement is appropriate." Certifications confirming "that the distribution of activity represents a reasonable estimate of the work performed by the employees during the period . . . will be signed by the employees or by a responsible official having firsthand knowledge of the work performed" [paragraphs J.6c(5) and J.6d(4)]. Therefore, at most institutions many individual faculty members need not be involved in the certification of their activity distribution because department heads or deans

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