

Comment from Consultative Group Member Edmund C. Baird on *Disclosure of Agency Legal Materials*
August 15, 2022

In the meeting on August 8, one of the consultants asked agencies for provisions in their organic acts relating to publication. The OSH Act contains the following provision:

Whenever the Secretary promulgates any standard, makes any rule, order, or decision, grants any exemption or extension of time, or compromises, mitigates, or settles any penalty assessed under this Act, he shall include a statement of the reasons for such action, which shall be published in the Federal Register.

29 USC § 655(e).

Also, on the agenda for 8/16 is a question about MOUs. OSHA publishes all of its MOUs on its website:

[Memorandums of Understanding - Publication Date | Occupational Safety and Health Administration \(osha.gov\)](https://www.osha.gov/publications/mou)