Miller, Diane M. (CDC/NIOSH/EID)

From:	Lang, Jason (CDC/CCHP/NCCDPHP)
Sent:	Tuesday, March 18, 2008 2:37 PM
To:	NIOSH Docket Office (CDC)
Subject:	132 - NIOSH WorkLife Essential Elements
Attachments:	Docket #NIOSH-132-NCCDPHP Comments on Essential Elements.doc

Good afternoon.

Attached please find comments from the CDC National Center for Chronic Disease Prevention and Health Promotion concerning Docket # NIOSH-132 - Essential Elements of Effective Workplace Programs and Policies for Improving Worker Health and Wellbeing.

We thank you for the opportunity to comment on this important project and look forward to seeing the outcomes of this work. If you have additional questions, please feel free to contact me.

Thanks,

Jason

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Comment on the Essential Elements of Effective Workplace Programs and Policies for Improving Worker Health and Wellbeing Docket # NIOSH-132

Comments of the NCCDPHP Workplace Workgroup

General Comments
- Who is the audience for this document? The document as it currently exists does not provide any context for who is to use the document, who developed it, and how to put the elements into practice. A brief introduction that addresses these points will make the document more user friendly. For example, if the document is intended for practitioners then links to additional resources, definitions of terms, or other information would be a practical addition.
- It would be beneficial to understand the current evidence based for each of the elements presented.
- There is no specific mention of conducting a needs assessment both to determine employee health and safety needs and interests, but as a planning tool prior to tailoring programs to the specific workplace (Element #7).
- There is also no specific mention of the process of selecting appropriate interventions. It is suggested in a couple of elements (Element #7, #9). The choice and composition the interventions are likely to form the core of a program.

Comments pertaining to specific elements
- Element #8 – it would be helpful to include a definition of the various types of incentives (financial, time off, recognition) and how incentive may differ for individual employees versus vendor incentives which are also discussed. As was mentioned earlier, a discussion of the evidence-base for the effectiveness and utility of incentives would be a useful addition.
- Element #10 – is the fact that workplace health and safety program are complex an element of a program? Perhaps the underlying complexity of these programs is a contextual factor that program administrators need to be aware of and understand not a goal or objective to be achieved when establishing a program. The text that accompanied this element did seem to indicate an important point for program administrators to consider in program design and that is evaluation and monitoring needs to be routine to adjust and adapt program elements to address unanticipated or unforeseen effects.
- Element #13-17 – a specific mention of financial support for program implementation as a resource is not made. It is implied that staffing and space carry a financial cost, but additional financial resources are needed to implement programs including materials or equipment. Incentives also would factor into the overall resources needed.