

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

From:

Sent: Wednesday, March 26, 2008 3:33 PM

To: NIOSH Docket Office (CDC)

Subject: 132 - NIOSH WorkLife Essential Elements

Dear Sir:

Today I was reading an issue of Occupational Health & Safety and came across the "Essential Elements of Effective Workplace . . ." draft. Although the comment acceptance date expired on March 19th, I felt a need to send my comments anyway. I conduct behavior safety training with industries and feel as though the true behavior emphasis is missing in this document. The focus is on "conditions" -- those element external to the worker over which he/she has limited to no control, as opposed to behaviors -- those characteristics over which the worker has complete control. I reference the following:

Program Design: #5

"Prevention is more efficient and effective than treatment." *{I agree}*.

"Changes in the work environment (such as reduction in toxic exposure or improvements in work station design and flexibility **{Conditions}**) affecting all workers pay greater dividends than relying solely on individually focused change strategies **{Behaviors}** that must be embraced by each affected individual to succeed."

Here's my problem with the second sentence. This is truly "Big Brother's" conceptual approach to "taking care of the workforce." Until focus is placed on individual responsibility and involvement, we will continue to "get what we've got." Continuing to emphasize "conditions" rather than "behaviors" take us down the familiar paths of change and adjustment. I agree that conditions need to be assessed, adjusted, and sometimes dramatically changed. But creating the "ideal and safest work environment" still will be subjected to "Human Elements and Human Error."

Perhaps the time has come to address "human error risk" through "behavior safety programs." Self Coaching is a behavior safety process I teach. It presents "mental skills" that are measurable, easy to implement, and pertain to all aspects of a worker's life. These skills focus on what individuals can do for themselves -- instead of waiting for things to be done for them. With these skills, personal involvement and responsibility increase, while placing the reduction of human errors in the hands of those committing these errors. Teaching "mental skills" allows individuals to take responsibility for their behaviors, because these behaviors related to conditions they must face daily.

I refer you to an article I have written: "Compliance: Building a Self Directed Employee Culture." INCIDENT PREVENTION, Volume 4, Issue 6, November-December, 2007. You also can check this organization's website at: www.incident-prevention.com.

Thank you for your efforts.