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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
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Comments

NA Recommendation 1) Research-to-Practice (r2p) efforts should involve individuals with training or with the experience and skills to create strategic diffusion and social marketing plans for National Institute for Occupational Safety and Health research and to evaluate such plans' effectiveness.

NIOSH's response is to develop cross-sector generic R2P resources without additional construction-specific resources.

The "matrix" management structure within NIOSH, outside of the mining program and NPPTL, encourages investigators to work within disciplinary silos and across industry sectors. As the research agenda expands to include applied research and r2p it requires a greater understanding of industry sector specific target audiences and relationships. Social marketing, development of contacts with stakeholders, and strategic diffusion all require an awareness of the industry sector as well as social science dissemination evaluation expertise.

Construction-specific efforts appear to be limited to language in the solicitation for proposals for the National Construction Center. Limiting the review of the r2p function and NIOSH Office of Research and Technology Transfer to a survey of internal NIOSH leadership and project officers seems counter to the objectives of any r2p or tech transfer office in that the viewpoints of external stakeholders are not even solicited. Technical expertise and evaluation skills are important, but working with construction equipment manufacturers or developing small contractor targeted efforts is a multi-year task. It is not realistic to assume that one individual researcher can effectively address all industry sectors in more than a cursory manner. Filling a generic r2p or technology transfer office that works largely on its own investigator-initiated social marketing or dissemination research or materials is interesting, but seems unlikely to have a significant impact on the construction program.

The action plan is not responsive, in that it makes no mention of: how r2p expertise will result in such plans; what those plans will consist of, and who will be responsible for developing and implementing the plans.

The National Construction Center is well poised to conduct r2p as addressed in the 2009 National Center for Construction Safety and Health (U60) Request for Applications (RFA-OH-09-001) which required including a qualified communications specialist/scientist to foster construction-specific r2p activities. NIOSH should expand sector-targeted positions internally, or support more direct r2p collaboration between its internal researchers and sector-specific resources such as the National Construction Center.

NA Recommendation 2) Consideration should be given to having the majority of research-to-practice efforts of the Construction Research Program conducted through the National Construction Center.

It appears that NIOSH has largely rejected this recommendation, and decided to expand internal generic or cross-sector r2p resources in the form of hiring a new Associate Director for Research and Technology Transfer and an Office of Research and Technology Transfer, though the plan does not describe the qualifications for the position or how it will direct/coordinate r2p activities specific to construction.

NA Recommendation 3) High-level attention should be given to determine how to provide program resources that are commensurate with a more robust pursuit of the Construction Research Program's goals.

While NIOSH states that all its programs are worthy of additional funding, and defends current allocation of resources targeting construction issues, it fails to define strategic initiatives that would address specific construction hazards and what those would cost. The NA has encouraged a leadership role for NIOSH to work with CDC and DHHS to establish and fund expanded resources to address the ongoing catastrophe that leads to almost 4 construction deaths each day. The NIOSH response defends current allocations but is not responsive to the recommendation.

NA Recommendation 4) The Construction Program Coordinator and the Construction Program Manager should both be devoted full-time to the Construction Research Program.

NIOSH defends its matrix management structure and appears to reject the NA recommendation to define and expand dedicated human resources focused on unique issues of the construction sector. The mining sector approach demonstrates that such a sector-dedicated structure can be created and function well within NIOSH, but the response indicates that NIOSH chooses not to follow this advice. As NIOSH moves to address dissemination and increasingly applied research, investigator and management awareness of the unique circumstances, challenges and opportunities in construction will be increasingly critical.

The NIOSH response focuses inward on the need for communication across disciplines, retreats with the NIOSH lead team, and construction steering committee meetings, while placing considerably less emphasis on the need for dedicated staff to improve communication, dissemination and involvement of external stakeholders. As research interventions and r2p evaluation are expanded, external communication and relationships must expand. This should be emphasized in the management structure and resource allocations which have largely failed to change in response to the sector-specific NORA-2. The change in the management/staffing and organizational structure of NIOSH, which was recommended by the NA in order to better able to respond to sector specific applied research goals, is rejected by NIOSH in this response in favor of defending the status quo. It appears that no changes are intended.

NA Recommendation 5) The National Construction Center should continue to be used as an important component in the Construction Research Program.

This structure should be considered and promoted by NIOSH as a model for interaction and applied research with other industry sectors which face unique OSH research challenges. Although there is clearly a valuable place for investigator-initiated research, as research priorities become more applied, structures that facilitate effective connections with stakeholders must be developed.

NA Recommendation 6) The Program should establish a closer connection with the Occupational Safety and Health Administration and other regulatory or consensus standards organizations to help ensure that the program's research is applied effectively in rule-making efforts.

This is a valuable role for NIOSH and we agree with the NA committee that these efforts should be

expanded and rewarded in NIOSH internal performance evaluations. As the OSHA Construction Directorate seeks to engage more effectively with NIOSH and the construction industry, the NIOSH structure in which few resources are dedicated specifically to construction research may well become an obstacle to closer collaboration.

While the coordinator and individual investigators bring considerable expertise to OSHA rulemaking and enforcement, staff-level interactions (as opposed to Director:Administrator interaction) on a day to day basis remain poorly defined. This would be best facilitated by increasing the NIOSH staff/management positions dedicated to construction, to create an organization counterpart that parallels the OSHA construction directorate.