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December 22, 2014

Dr. John Howard
Director

National Institute for Occupational Safety and Health
NIOSH Docket Office
1090 Tusculum Avenue MS C-34
Cincinnati, OH 45226

RE: ASSE Comment on Proposed National Total
Worker Health Agenda (NIOSH Docket-275)

Dear Dr. Howard:

Since 2003, the American Society of Safety Engineers (ASSE) has supported your visionary leadership in bringing about the considerable achievements of the National Institute for Occupational Safety and Health (NIOSH) in advancing the integration of occupational safety and health management and worker health promotion. In the years since, NIOSH's Total Worker Health (TWH) program has established a much broader understanding among employers that a worker's safety, health and wellbeing do not begin or end at the workplace door, that significant costs are linked to ignoring the issue, and that much can be gained in adopting proven workplace wellness strategies that increase productivity, lower health care and other costs, and encourage employees to lead healthier and better adjusted lives.

ASSE is committed to working with our 35,000 members to develop strategies that can help them lead their organizations in integrating the management of workplace safety and health risks with employee wellness. Our members have long understood that the risks workers face on the job impact their lives outside the workplace and the risks they accept in their personal lives impact their ability to be safe and healthy at work. However, the typical safety and health professional is stretched far too thin in meeting responsibilities required to manage safety risks to be able to easily integrate wellness on a day-to-day basis, no matter how important it is. ASSE's job and that of the members of our Health and Wellness Branch who are already leaders in organizations' efforts to advance integration is to develop strategies that can help every ASSE member

integrate wellness in the risk management training and support they are already expert in providing employers and their workers.

ASSE commends NIOSH for taking the next step in advancing the integration of workplace safety and health with wellness by proposing a National Occupational Research Agenda (NORA) National Total Worker Health Agenda (http://www.cdc.gov/niosh/docket/review/docket275/pdfs/NationalTWHAgendaFinalDraft9_5_14.pdf). The agenda is comprehensive and provides a roadmap for future research that, if driven by the occupational safety and health community along with NIOSH, will prove valuable to our members and employers seeking to expand Total Worker Health.

The following comments, however, give voice to an underlying general concern that the agenda may not adequately communicate just how important the need is among our members for practical, easily communicated strategies, resources and tools that they can use to convince the employers and workers with whom they work of the importance of Total Worker Health. We assume NIOSH has every intention to fulfill its Research to Practice imperative in these goals, but, as with many issues in occupational safety and health, if research cannot be successfully translated to the most basic training and tools available to a worker in a workplace setting, the research is ultimately ineffective.

Research

ASSE supports each of the strategies outlined in the Research goal. If achieved, these strategies will provide a much better understanding of how to achieve Total Worker Health. Two more needs should be addressed, though. Our members report considerable confusion in organizations about who best can achieve wellness integration. In very large organizations, the responsibility may be in a health department or a safety, health and/or environmental department. In some organizations, human resources has direct responsibility for wellness efforts. Increasingly common is the outsourcing of wellness to health delivery organizations. Often organizations give the responsibility to people who have no health or wellness training. And, in far too many organizations, typically small ones, no one takes responsibility for wellness.

To help address this concern, ASSE urges NIOSH to add another strategy to encourage research that can help employers determine how best to implement Total Worker Health organizationally. Our members need this kind of information if they are to convince the employers with whom they work to commit resources to wellness integration. Organizations that want to implement new programs look for fairly clear deliverables from research that can tell them not only what programs work or do not work but also how to implement the programs. The current strategies do not clearly address this need.

Further, and related to the strategy outlined above, research needs to address how wellness can be integrated into safety and health management systems. If, as our members understand it, the hazard recognition and risk management approaches these systems encourage and support in an organization are the best means for managing safety and health outcomes in a workplace, then the Total Worker Health program cannot ultimately succeed without addressing wellness integration's appropriate place in such systems.

Practice

For ASSE's members, the strategies outlined in this goal may be the most immediately helpful to them in their efforts to assist organizations succeed in achieving Total Worker Health. Best practices based on research, the development of partnerships, communicating benefits of the program, surveys and other information gathering, and the translation of research to the job floor are all ways they succeed in managing risks in the workplace. We are pleased that this section reflects those capabilities and sets out a promising path for future research.

Policy

ASSE's only comment on the Policy strategies outlined here is to reiterate our concerns expressed in the Research and Capacity-Building goals that research must address how wellness is dealt with organizationally and who can and should be responsible for integrating wellness in an organization's occupational safety and health capabilities. The policies an organization should adopt and how those policies are implemented will be greatly dependent on who is responsible for developing and implanting the policies in any given organization. Wellness integration cannot be served with a one-size-fits-all approach.

Capacity-Building

ASSE is fully supportive of the strategies outlined in the Capacity-Building goal. Who can and should appropriately do safety and health – and now wellness – may be the most unexamined question in occupational safety and health. Other professional fields, most notably health care itself, have invested considerable resources in determining who is best able to provide professional services. The assumption those professions accept is that appropriate training and professional accreditation helps drive outcomes. That NIOSH has recognized the importance of this issue in the context of integrating wellness into occupational safety and health is a significant step forward for the field and those who practice in it, not to mention workers who can benefit from this strategy. This may be especially crucial when this effort is asking safety and health professionals to add one more responsibility to their day-to-day work. We should know how best they can accomplish that, what additional training they need, and what the appropriate level of responsibilities is that their training and credentialing can safely allow.

Conclusion

ASSE and its Health and Wellness Branch urges NIOSH to incorporate these comments into a final National Total Worker Health Agenda and looks forward to supporting NIOSH's efforts to encourage the safety and health community to embrace this outline for implementing the significant cost savings and productivity gains that can and will be achieved through this research.

Sincerely,

A handwritten signature in cursive script that reads "Patricia M. Ennis".

Patricia M. Ennis, CSP, ARM
President