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From: WHudson@dstoutput.com
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To: NIOSH Docket Office (CDC)
Subject: 132 - NIOSH WorkLife Essential Elements

Following are my comments on the 20 Essential Elements:

1. Build organizational culture supporting improving personal health, safety and attention to environmental stewardship and sustain that culture
2. Coordination of many employer elements (as in the IOM NASA book on Integrating Employee Health) as part of an overall worklife improvement strategy works far better than isolated uncoordinated efforts
3. Aligning incentives with improvement objectives in tis area works.
4. Knowing and assessing regularly the health of the employee population by using tools like confidential Health Risk Assessments (HRAs including presenteeism measures) is essential to be able to understand not only what health areas to target for improvement but whether improvement is occurring, how much and as well as where it is not occurring. Incentives for HRA participation are effective and may need to be in the several hundred dollar range and should be tied to individualized participation in health education and health coaching around areas identified for personal health improvement.
5. Detailed look at overall health and health costs in all buckets is essential to avoid apparent dollar savings in one bucket but which drive health decrements in other areas, and to understand where dollar expenditures improve health and cause savings
6. The worklife message needs to be communicated outside the health and safety world to include business schools both faculty and attendees, CEOs and CFOs, unions, and include such organizations as NBGH, PBGH, MBGH, Watson Wyatt, Towers Perrin, Hewitt, Deloitte Touche, Mercer, the Business Roundtable, the Conference Board, the Young Presidents Organization., SHRM, etc.
7. Legislation must be supportive and facilitative of the worklife wellness efforts and include area of IRS/FASB valuing human capital, HIPAA, ADA, as well as incentives for employer wellness/worklife activities and staying at work and returning to work with some degree of either impairment or discomfort as beneficial to individuals and organizations, while balancing the issue of presenteeism from not addressing health issues that affect worklife
8. Clear research on what works in improving worklife as in the CDC Community Prevention Guide and USPSF guides need to be available
9. Further research is needed on which incentives work and how much is needed, better info on how to effect behavior change in low wage, hourly , ESL high turnover populations in this area
10. examination of the ethical issues of the right balance between work and non work life activities, what is and benefits of healthful work, understanding benefits and downsides of non work over lifetime.

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