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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 164 - AgFFProgramPlan Comments

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Comments

To: NIOSH Docket 146 - AgFF Program Plan Following NAS Review

From: Barbara Lee, RN, PhD
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The following are my comments regarding the "Plan to Implement the National Academies Program Evaluation Recommendations" dated March 2009.

Overall, the leadership team did a fine job of responding to the eight recommendations of the National Academies (NAS). Some of the NAS recommendations lend themselves to a straightforward action plan, while others are far more obtuse and challenging to handle.

The AgFF plan reads like a general narrative description with many broad statements and only a few specific action steps. In order to operationalize this plan, it may be helpful to set this into a business model with measurable outcomes, responsible person names, target completion dates, etc.

An obvious concern is the human resource requirements for implementing this plan. Certain activities, such as convening meetings and setting up initial surveillance activities, may be feasible with current resources.

However, beyond the most basic tasks, NIOSH will need to allocate substantial personnel to plan, implement and evaluate the many proposed activities.

Based on my organization and management experiences, many people will agree to support activities, but dedicated time to accomplish work-associated tasks rarely comes from volunteers.

Recommendations such as "targeting all key stakeholders as full participants in its research program design and execution" are far easier said than done. This alone could be a full time job for several people over many years.

Given the broad scope of recommendations in this plan, it appears that NIOSH leadership will need to determine priorities among these recommendations and suggest realistic deadlines. Then, funding must be provided for an infrastructure (staff, training, facilities) that maximize the likelihood that objectives associated with priorities can be achieved.

Without that, the plan will remain dormant and staff morale may suffer.