

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

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**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 182 - Draft Construction Program Plan Comments

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**Comments**  
Comments on the NIOSH Construction Program Implementation Plan

**Recommendation 1- Get skilled, trained individuals to do R2P for NIOSH.**

R2P is a critical part of NIOSH's mission and has been not been given the attention of resources it deserves. Many scientists at NIOSH don't have the skills or ability to do R2P work and thus you need individuals with those skills and expertise to assist them. The NIOSH response was a bit weak in that it focuses on the promise a new R2P Director and the cooperation of the Construction Center, which will have an R2P function.

NIOSH could also focus on partnering with representatives and organizations on the NORA Construction Sector Council and other groups like the AIHA Construction Committee and unions and trades and construction contractors. At the same time, there is a need for NIOSH to increase its internal capacity for R2P with skilled trained professionals, perhaps under the leadership of this new Director.

**Recommendation 2- R2P at the Construction Center** This recommendation makes sense in that the Construction Center will have more people who are closer to the industry and understand their needs and concerns and thus will likely be more successful in R2P efforts. However I agree with the response in that NIOSH should not abdicate its role or responsibility to do R2P. It should also continue to partner with others in the industry and practicing safety and health professionals to help translate research to practice.

**Recommendation 3- Increase resources to the Construction Program** The NAS report documents clearly the inadequacy of the Construction program's funding. It's funding has been flat for the past 15 years, even as NIOSH's budget has grown. Construction is still one of the highest risk sectors and a significant part of the economy. The resources this program gets are nowhere near the level of funding devoted to the mining sector, which although higher risk is a much smaller segment of the economy. Funding for the Construction program clearly needs to be increased. Cross-sector collaboration with the mining sector, where there are similar hazards and solutions, would be very helpful (and was also a recommendation of the NAS NIOSH Mining Program review). The response talks about leveraging resources through the Sector Council. This is certainly helpful, particularly in the R2P area. But it can't replace or substitute for the increased Federal resources which are needed.

**Recommendation 4- Full-time Coordinator and Manager positions** Again Construction is being given short shrift in terms of resources.

Mining has an Assistant Director and full-time facilities in Pittsburgh and Spokane. Construction research is spread out throughout the Institute. Having the head of the Division of Safety Research as program manager makes it difficult for her to devote the time needed to the program, given all her other responsibilities. The Program Coordinator is primarily full time with this program but this should

be acknowledged through creation of a full time position, as recommended by the NAS report.

**Recommendation 5- National Construction Center** The NAS recommended that the Construction Center play an important role in the Construction Research Program. NIOSH basically concurred. It does and it will continue to do so. As stated in response to #1, NIOSH should look at other sources besides the National Construction Center, like professional committees, like AIHA Construction Committee, unions or trade groups, and general construction contractors.

**Recommendation 6- Closer ties with OSHA rulemaking** The NAS recommended that NIOSH develop closer ties with OSHA to help its recommendations result in new OSHA rules. This is an important recommendation harkening back to the early days of NIOSH when they developed "criteria documents" with recommended standards for OSHA to adopt. Unfortunately, the OSHA standards setting process has become much more complicated and bogged down since. With the new Administration, there may be more standards setting activity at OSHA than there has been during the past 8 years and this recommendation may make sense. It appears that NIOSH is beginning to develop such ties. But such a relationship has to be a two way street. Until OSHA is willing and able to be a full partner this recommendation is difficult to implement. The work NIOSH outlined in the response is a significant and important step in this direction and in the spirit of this NAS recommendation.

**Future Research-** NIOSH also responded to the NAS report recommending directions for future research. It focused on two areas- intervention effectiveness and cost effectiveness studies. Both of these areas are important ones and promising ones for future research.

Submitted by the AIHA Construction Committee, Franklin Anderson, Chair Andrea Pouliot and Scott Schneider, AIHA Construction Committee Review Leaders