

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

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**From:** helitzer@salud.unm.edu  
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**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)  
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**Comments**

This is an excellent document and the authors should be commended for their compilation of salient points in a pithy and easy to read format. I believe that the document does incorporate the state-of-the-art in program design and overall concepts of what we know about worker health.

A few things could be added: the concept of using behavior and systems change theory to develop programs; the use of logic models to link program, theory, objectives, and evaluation; and the consideration that barriers (such as wearing a beard prevents use of respirators) are often best overcome when involving the participants in coming up with solutions.

I was struck by the fact that the document did not really address "community participation" in the development, implementation or evaluation of programs; yet we know from experience that this is usually the most effective strategy to change culture, behavior, and systems.

Thank you for the opportunity to comment.