**Appendix L**

**Response to 60day FRN public comment**

Dear Laura L. Towne:

We are responding to your Comments on the Centers for Disease Control and Prevention (CDC) Notice: Online Training for Law Enforcement to Reduce Risks Associated with Shift Work and Long Work Hours

Thank you for the input and support for training for law enforcement community to help them with demands of shift work, long work hours, and related sleep issues. The following are your suggestions and responses to those.

Page 2 “…if there will be adequate coverage of training material specific to public officials, managers, and supervisors. “

Page 3 “This training should target administrators as well as officers.”

Response. The training includes a module on management strategies and discusses management strategies in other modules. Information in Part 1 explains our sleep system and the risks associated with inadequate sleep, fatigue, shift work, and long work hours. That information provides the scientific rational for management strategies and personal strategies in the training and should help promote improvements in the law enforcement culture on this topic.

Page 5 “….this measurement scheme does not provide sufficient insight into the effectiveness of the training on management personnel.”

Response. This study is a small pilot study that is testing the newly drafted training in 60 police officers on patrol duties. Future studies can test the training in management personnel and other groups.

Page 5. “The officers involved in the training are aware that the data collected is being used for measurement of their performance associated with training effectiveness.  The officers may fear the results of this testing could affect their performance evaluations.  This could affect newly trained employees just entering the work force, who want to please superiors more.”

Response. The CDC requirements for handling personally identifiable data are being followed. An individual officer’s data will not be released to anyone. When we publish the study results, we will report grouped data. Therefore, no manager will see the officer’s data.

Page 5. “The use of a device and periodically recording sleep and activity may skew the result.   Research suggests that applications which are used to measure key health factors can by themselves result in a positive change in behavior which may be unrelated to the training”

Response. The actigraph data is not visible to the participant so it will not affect the results to a great extent. The diary will help the officer become more aware of the timing of their sleep, duration of their sleep, times of fatigue, and so forth. The training recommends officers use a sleep diary when they are trying strategies in the training to determine the effects. So, a diary is part of the training and a useful tool to help officers learn to cope better with shift work.

Again, thank you for taking the time to comment on this project.

Claire C. Caruso, PhD, RN, FAAN
Research Health Scientist
National Institute for Occupational Safety and Health, CDC
Cincinnati, OH 45226
Email: ccaruso@cdc.gov