



James L. Madara, MD
CEO, EXECUTIVE VICE PRESIDENT

james.madara@ama-assn.org

July 8, 2021

The Honorable Marty Walsh
Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: AMA concerns related to the OSHA COVID-19 Health Care ETS

Dear Secretary Walsh:

On behalf of our physician and medical student members, the American Medical Association (AMA) shares the U.S. Department of Labor Occupational Safety and Health Administration's (OSHA) commitment to protecting health care workers from COVID-19. However, we have serious concerns with how OSHA issued the COVID-19 health care emergency temporary standard (ETS). The lack of notice and the inadequate time to analyze and comment are causing growing alarm among physicians around the country. With little to no warning, OSHA is requiring physician practices to undertake new infection control efforts. Without adequate time to review the ETS, it is unclear if these steps are necessary or duplicative. **In order to ensure that there is ample opportunity for review, analysis, and input, the AMA strongly urges you to delay the effective date and extend the comment period of the ETS.**

Since the beginning of the pandemic, physicians have consistently met the ongoing and evolving challenges related to COVID-19. Physicians have been on the frontlines of this pandemic caring for patients and identifying ways to protect themselves and colleagues. The AMA has partnered with the Centers for Disease Control and Prevention (CDC) and others to share the best available evidence for physicians on how to prevent and treat COVID-19. Throughout the pandemic, the AMA has continued to update and circulate the newest information. Physician practices took numerous steps to stem the transmission of COVID-19. Early in the pandemic, physician practices invested in technology and rapidly adopted telehealth, and they totally revamped their scheduling. They also purchased significant amounts of personal protective equipment and additional cleaning supplies and disinfectants while redesigning their offices and protocols to meet infection control standards.

Physicians are deeply committed to protecting the health of their patients, colleagues, and themselves against COVID-19, and the AMA recognizes OSHA's important role in protecting health care workers. Yet, physicians have more than a year-and-a-half of on the ground experience in fighting the transmission of COVID-19. Given all the experience and the steps physician practices have already undertaken to address infection control issues COVID-19, it is imperative that OSHA provide physicians and the health care community with a real opportunity for a meaningful dialogue about the COVID-19 health care ETS.

With all that physicians and the health care community have done during the pandemic, the Biden Administration at the very least has a duty to provide stakeholders with ample opportunity for analysis and comment. For these reasons, the AMA urges OSHA to extend the comment deadline

The Honorable Marty Walsh

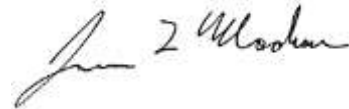
July 8, 2021

Page 2

for the ETS and to delay the effective date to allow an opportunity for all stakeholders to provide their input and dialogue with the agency.

If you have any questions, please contact the AMA's Vice President of Federal Affairs, Margaret Garikes at margaret.garikes@ama-assn.org or call 202-789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim L. Madara". The signature is written in a cursive style with a large initial "J" and "M".

James L. Madara, MD