



July 1, 2021

**Association of
American Medical Colleges**
655 K Street, N.W., Suite 100, Washington, D.C. 20001-2399
T 202 828 0400
www.aamc.org

James Frederick
Acting Assistant Secretary of Labor for
Occupational Safety and Health
Occupational Safety and Health Administration
200 Constitution Avenue, NW
Washington DC 20210

Dear Acting Assistant Secretary Frederick:

On behalf of the Association of American Medical Colleges (AAMC or the Association), we share the Occupational Safety and Health Administration's (OSHA) commitment to protecting health care workers from COVID-19, and appreciate the considerable effort put forth by OSHA to develop COVID-19 workforce protections. However, we are writing to request that OSHA delay implementation of the COVID-19 Health Care Emergency Temporary Standard (ETS) for at least six months and extend the comment deadline for the interim final rule by another 30 days. As our members continue to respond on the front lines of the COVID-19 pandemic, we are concerned that it will take significant effort and divert resources for teaching hospitals to review this complex ETS, provide meaningful feedback to OSHA on provisions in the ETS, and make any necessary changes to comply, particularly given the resources they already are devoting to treating patients and protecting both patients and employees from the impact of COVID-19.

The AAMC is a not-for-profit association dedicated to transforming health through medical education, health care, medical research, and community collaborations. Its members are all 155 accredited U.S. and 17 accredited Canadian medical schools; more than 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and their more than 179,000 full-time faculty members, 92,000 medical students, 140,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences.

AAMC member teaching hospitals and their expert faculty physicians, health care teams, and cutting-edge medical technology, provide care for complex patients and often care for patients for who are unable to receive care elsewhere. While the COVID-19 pandemic has posed enormous challenges and has placed tremendous stress on our entire health care system for the past 15 months, teaching hospitals, medical schools, teaching physicians, and researchers have mobilized on all fronts to treat and mitigate COVID-19. For academic medical centers, ensuring the health and safety of their health care workers and patients has been of primary importance. They have made substantial investments to achieve this goal as well as comply with the Centers for Disease Control and Prevention (CDC) guidelines related to COVID-19. They have supplied personal protective equipment to employees, complied with cleaning and disinfecting standards,


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followed infection control standards, established protocols for screening employees and staff, provided employee training, made structural changes to facilities, and much more.

The COVID-19 Health Care ETS standard, which is detailed and complex, became effective on June 21, 2021, immediately upon publication in the Federal Register. Health care facilities need time to thoughtfully review this rule and understand the requirements and to request and receive clarification where needed. Compliance with this rule will require academic medical centers, and all health care facilities, to make modifications to their hospital policies and procedures, and undertake structural changes to their facilities, such as creating physical barriers. Such changes are difficult to immediately implement in such a short time frame, especially at a time when health care facilities are still addressing challenges resulting from the COVID-19 pandemic.

Based on these significant concerns, we request that at a minimum OSHA delay the date for compliance with this rule and allow more time for public comments. Thank you for your consideration. If you have any additional questions, please contact Gayle Lee at galee@aamc.org or Mary Mullaney at mmullaney@aamc.org.

Sincerely,

A handwritten signature in black ink that reads "Karen Fisher". The signature is written in a cursive, flowing style.

Karen Fisher, J.D.
Chief Public Policy Officer
Association of American Medical Colleges