

April 5, 2022

Mr. Douglas L. Parker  
Assistant Secretary of Labor for  
Occupational Safety and Health  
U.S. Department of Labor  
Occupational Safety and Health Administration  
200 Constitution Avenue, NW  
Washington, DC 20210

Association of  
American Medical Colleges  
655 K Street, N.W., Suite 100, Washington, D.C. 20001-2399  
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[www.aamc.org](http://www.aamc.org)

***Re: Occupational Exposure to COVID-19 in Healthcare Settings, OSHA-2020-0004***

Dear Mr. Parker:

On behalf of our members, the Association of American Medical Colleges (AAMC) is writing to request that the Occupational Safety and Health Administration (OSHA) extend the comment deadline for the reopening of the Emergency Temporary Standard (ETS) “Occupational Exposure to COVID-19” (OSHA-2020-0004). **The AAMC urges OSHA to extend the comment deadline by at least an additional 30 days, through May 23.**

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members comprise all 155 accredited U.S. and 16 accredited Canadian medical schools; approximately 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 the millions of individuals employed across academic medicine, including more than 191,000 full-time faculty members, 95,000 medical students, 149,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. In 2022, the Association of Academic Health Centers and the Association of Academic Health Centers International merged into the AAMC, broadening the AAMC’s U.S. membership and expanding its reach to international academic health centers.

AAMC member teaching hospitals and their associated faculty physicians remain the frontline response to the COVID-19 public health emergency. However, challenges still linger as hospitals try to return to providing pre-pandemic levels of service. Providing additional time for review will allow our members to thoughtfully reflect on the COVID-19 PHE impact on their health care systems since the submission of initial comments to the Emergency Temporary Standard interim final rule and offer updated approaches that ensure the safety of health care employees, the patients they care for, and the visitors to health care settings.

Thank you for your consideration of this request. Hospitals and health systems must have the ability to remain flexible as they continue to learn about the disease and its variants, increase and/or mandate vaccination of health care workers, and monitor the local disease prevalence. If you have questions regarding our comments, please feel free to contact Mary Mullaney at [mmullaney@aamc.org](mailto:mmullaney@aamc.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Janis M. Orlowski, M.D." followed by "M.A.C.P." in smaller letters.

Janis M. Orlowski, M.D., M.A.C.P.  
Chief Health Care Officer, AAMC