



A Passionate Voice for Compassionate Care

June 30, 2021

James Frederick
Acting Assistant Secretary
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Dear Acting Assistant Secretary Frederick:

On behalf of the Catholic Health Association of the United States (CHA), the national leadership organization of more than 2,200 Catholic health care systems, hospitals, long-term care facilities, service providers and organizations, I am writing to ask that the Occupational Safety and Health Administration OSHA delay the compliance and comment deadlines for the recently published COVID-19 Health Care Emergency Temporary Standard (ETS).

Our members are committed to the health and safety of all their employees and associates. The women and men of Catholic health care have been at the front lines of the pandemic, treating COVID-19 patients, providing testing and working to make sure everyone in their communities have access to vaccinations. We are proud of and grateful for their courage and dedication.

The ETS was made effective immediately upon publication in the Federal Register, giving hospital and health systems very limited timelines for compliance. While as a nation we have made great progress in containing the pandemic, our hospital and health systems are coping with continuing immediate challenges due to COVID-19 as well as addressing the ongoing effects of the pandemic's disruptions on their operations and in their communities. The ETS will require additional changes in policies, procedures and structures. More time is needed to accomplish the analysis and planning, acquisition of needed materials and tools, and personal retraining these changes will require. **We ask OSHA to delay compliance dates for at least six months and to ensure that the agency's initial enforcement efforts take into account hospitals' good faith efforts to comply and address enforcement in an educational, non-punitive manner.**

The ETS is lengthy and its provisions are complicated. **We request that OSHA allow an additional 30 days for the comment period.** This will give CHA and its members more time to thoroughly analyze the ETS and its implications for both our employees and our operations in order to provide constructive and meaningful feedback to the agency. Protecting health care workers is a priority and we must make sure it is done in a manner that is both effective and reasonable given the realities of hospital operations and the health care workplace.

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Thank you for your commitment to protecting America's workers. If you have any questions about these comments or need more information, please do not hesitate to contact me or Kathy Curran, Senior Director Public Policy, at 202-721-6300.

Sincerely,

A handwritten signature in cursive script, reading "Sr. Mary Haddad". The signature is written in black ink and is positioned above the typed name.

Sr. Mary Haddad, RSM
President and CEO