



September 24, 2021

James Frederick
Acting Assistant Secretary
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue
Washington, D.C. 20210

Dear Acting Assistant Secretary Frederick:

The Coalition for Workplace Safety (www.workingforsafety.com) urges OSHA to reconsider its decision not to accept input from interested stakeholders on its upcoming Emergency Temporary Standard related to COVID-19 testing and vaccinations. This ETS is expected to be the most far-reaching standard ever issued by OSHA, and public input will be critical.

Numerous trade associations, which are member organizations of the coalition, have reached out to us with questions their members have posed regarding the ETS and related implementation. Many of these questions are detailed and nuanced. OSHA should consider these questions and seek written input on a draft standard from stakeholders before issuing any ETS. To do otherwise invites avoidable implementation challenges and costs that would undermine the effectiveness of this ETS achieving its goals.

Thank you for your attention and consideration on this important issue.

Sincerely,

Coalition for Workplace Safety

The CWS is comprised of associations and employers who believe in improving workplace safety through cooperation, assistance, transparency, clarity, and accountability.