

March 28, 2022

Douglas L. Parker  
Assistant Secretary of Labor for  
Occupational Safety and Health  
Occupational Safety and Health Administration  
200 Constitution Ave NW  
Washington, DC 20210

Dear Assistant Secretary Parker:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, and our clinician partners — including more than 270,000 affiliated physicians, 2 million nurses and other caregivers — and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) is writing to request a deadline extension for the comment period reopening of Occupational Safety and Health Administration's (OSHA's) interim final rule establishing an Emergency Temporary Standard (ETS) on "Occupational Exposure to COVID-19" (Docket No. OSHA-2020-0004).

**The AHA urges OSHA to extend the comment deadline by at least an additional 30 days, through May 23.** The AHA and its members are working diligently to assess the need for and impact of the potential provisions and approaches specified in the notice as well as OSHA's request for additional studies, information and data related to the delta and omicron variants since the close of OSHA's initial comment period in August 2021. An extension will enable hospitals and other stakeholders to deliberate, analyze and prepare thoughtful comments for OSHA's review.

As such, we are gathering input from our members regarding their views and concerns and the impact these possible changes to the ETS will have on their operations and employees. The AHA's fact-finding with our members will enable us to provide the agency with substantive and data-informed comments. To provide comprehensive feedback, we respectfully request that OSHA allow for a minimum additional 30 days of public comment.

Thank you for your consideration of our request. Please contact me if you have questions or feel free to have a member of your team contact Roslyne Schulman, AHA's director of policy, at [rschulman@aha.org](mailto:rschulman@aha.org) or 202-626-2273.

Sincerely,

/s/

Stacey Hughes  
Executive Vice President  
Government Relations and Public Policy

