

June 2, 2021

Chair David Thomas and Members
Occupational Safety & Health Standards Board
Department of Industrial Relations, State of California
2520 Venture Oaks Way
Suite 350
Sacramento, CA 95833

Submitted electronically: oshsb@dir.ca.gov

RE: New COVID-19 Emergency Temporary Standards Amendments

Dear Chair Thomas and Members of the Board:

The California Chamber of Commerce and the undersigned organizations submit this letter to provide comment upon, and underline the need for clarification of, the proposed re-adoption of the COVID-19 Emergency Temporary Standard (Section 3205, or “ETS”), and its differences from the existing provisions of the ETS (the “Amended ETS”).¹ Many of us, including the California Chamber of Commerce, have provided repeated comments regarding the ETS, including participating in Cal/OSHA’s advisory committee meetings held in February of 2021 related to the drafting of the Amended ETS (“February Advisory Committee”). We were pleased to see the delay in approving these proposed regulations in order to address recent CDC guidance that basically eliminates the need for vaccinated individuals to continue using masks in most settings. In addition, we were hoping the proposed text would mirror the Governor’s announcement that the state would be following the federal Centers for Disease Control (CDC) guidance starting June 15th.

Unfortunately, the proposed regulations do not conform to the most recent CDC guidance, and will create an inconsistent standard in the workplace as compared to the rest of the State. Starting June 15th, vaccinated individuals will be able to go to most public settings without having to wear masks, even if other unvaccinated individuals are present. But vaccinated employees at that same location will have to wear a mask. This inconsistent standard is not justified by best practices or science and should not be approved. Our concerns are summarized below, and in greater detail in the following letter.

Executive Summary:

The Amended ETS which the Standards Board will vote on at the June 3rd meeting presents the following key concerns, each of which is flushed out in the following letter.

- **The Amended ETS is inconsistent with the CDC’s present guidance regarding vaccination.** As of May 13th, the CDC has advised that vaccinated individuals “can resume activities without wearing a mask or physically distancing . . .”² In contrast, the Amended ETS will continue to require social distancing until July 31st, and effectively requires masking for vaccinated individuals until 2022³ by requiring 100% vaccination in the workplace for employees to cease wearing face masks.
- **The Amended ETS is inconsistent with Governor Newsom’s commitment to open the state on June 15th due to improving COVID-19 numbers and hospital capacity.** In addition, the

¹ The “Amended ETS” includes the changes proposed at the May 20th, 2021 Cal/OSHA Standards Board meeting, as well as the changes proposed for the June 3rd Board meeting, unless otherwise stated, to the extent that we were able to integrate them into this comment letter in the extremely limited period since their release on May 28th, 2021.

² (emphasis added). CDC guidance was first posted on May 13th, 2021, but was most recently updated on May 16th, and is available here: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>

³ Though the Amended ETS’s provision does not explicitly mention 2022, it will (if re-adopted on June 3rd) continue in force until early 2022. Because the provision regarding face masks has no inherent sunset, it will continue in effect for the duration of the emergency regulation.

Amended ETS will (if approved) go into effect around June 13th – mere days before the Governor's June 15th loosening occurs – but will be in sharp substantive conflict (as discussed above), which will lead to confusion for employers and employees..

- **The Amended ETS requires employers to stockpile N95 respirators for unvaccinated employees who work indoors, despite face masks having successfully served the same purpose (reducing airborne spread) for the duration of this pandemic.** After July 31st, employers are required to stockpile N95 respirators for all unvaccinated indoor employees in case an employee requests to use one. Such stockpiling will compete directly with healthcare for these essential pieces of personal protective equipment. Moreover, stockpiling N95s places all of the cost burdens on the employer for the choices of their employees. Finally, even at the height of the State's infection, there was never a requirement by any public health official, Governor, or CDC for employees to wear N95 masks. California is experiencing its lowest infection rate, with more individuals becoming fully vaccinated. It is unreasonable for employers to now have to stockpile N95 masks – a higher level of protection that is more costly – even though other masks have been sufficient and effective for the past year.

I. Introduction

Our comments below are guided by three core concerns: (1) clarity regarding employer obligations; (2) feasibility for employers to implement; and (3) consistency with up-to-date best practices and science.

Regarding consistency: the Amended ETS will be behind recent state and federal changes to best practices and guidance as soon as it is passed, and will only grow more inconsistent with time. Below are two recent examples:

- **Physical distancing:** The Centers for Disease Control and Prevention (CDC) recently released guidance that "*Fully vaccinated people can resume activities without wearing a mask or physically distancing . . .*"⁴ In contrast, the Amended ETS doesn't allow relaxation of physical distancing until July 31st, unless "all employees are fully vaccinated" at a location, or N95 respirators are available for all unvaccinated employees.
- **Face masks:** Governor Newsom has repeatedly expressed his intent to re-open the state on June 15th of 2021, and re-iterated that masking would be reduced at that point. In contrast, the Amended ETS continues to apply its face covering obligations without regard to the June 15th deadline – meaning face masks will be required in the workplace for vaccinated workers for the duration of this re-adoption (which would expire in early 2022) and potentially longer if the ETS is re-adopted.⁵
- As the nation and California move towards opening, the Amended ETS is adding completely new and considerable obligations, such as providing N95 respirators to every unvaccinated, indoor employee in the state (discussed more fully below).

While we appreciate that it is difficult to keep pace with evolving knowledge regarding COVID-19, we are very concerned that the Amended ETS, if passed as written, will freeze employers into a compliance model that is already out-of-date, and will only grow more outdated in the coming months.

⁴ This guidance is available here: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>. While we respect that the text of the ETS was in progress prior to this May 13th update, the CDC's direction is clearly in conflict with the Amended ETS – despite California having better COVID-19 numbers than much of the country.

⁵ Obviously the exception contained in 3205(c)(7)(A)(1) allows for no face masks when "all persons in a room are fully vaccinated" – but given that it is unlikely that every person in a workplace will be vaccinated by July 31st (or even August 31st), we believe it is likely many employers will simply continue to require uniform masking to avoid room-by-room distinctions.

II. Substantive Discussion of Amendments

a. Appreciated Amends

We appreciate the overdue improvements contained in the Amended ETS text. Below is a sampling of the most significant improvements – but it is certainly not all encompassing. Most significantly, we are glad to see vaccination (and post-infection immunity) integrated into the Amended ETS, though we have some substantive and clarity concerns regarding those provisions, as discussed below. We are also glad to see considerable improvements that make the Housing and Transportation sections of the Amended ETS (Sections 3205.3 & 3205.4) more feasible. Similarly, improvements to cleaning and disinfection requirements have been made that bring them more in line with recent science regarding the surface-based transmissibility of COVID-19. In the interests of efficiency and constructively moving forward, we will focus the remainder of this letter on how the Amended ETS must be improved.

b. Critical Substantive Concerns

The following provisions of the Amended ETS are of urgent concern, and we believe must be addressed as soon as possible – either by amends by the Standards Board prior to passage, or, should the Amended ETS pass, by subsequent amendments or clarifications.

The Amended ETS Should Be Consistent With California's Opening on June 15th – (Various)

Despite repeated statements by the Governor and other executive branch officials that Californians will return to relatively normal life on June 15, the Amended ETS fails to lighten its provisions related to physical distancing or masks. Instead, the Amended ETS relies on a July 31st date for a change in employers' obligations in the Physical Distancing and Engineer Controls sections. In addition, the Amended ETS will functionally obligate ongoing wearing of face masks at most indoor workplaces, even after July 31st, because it only permits employers to dispense with mask wearing if "an employee is alone in a room, or when all persons in a room are fully vaccinated and do not have COVID-19 symptoms."⁶ Given present data on vaccine hesitancy, we believe very few workplaces will reach 100% vaccination, meaning that most employers, state-wide, will continue to have to enforce masking for their vaccinated employees for the duration of the ETS – which could, if re-adopted, extend into 2022. This is an absurd departure from the rules applicable to the very same employees in their personal lives, and particularly bizarre given that the very customers/members of the public that employees may be serving (e.g., in the restaurant or retail industries) will be free from any social distancing or masking obligations as of June 15th.

Vaccination and Immunity Should be Treated Consistently – (Various) – The Amended ETS treats vaccination and immunity (acquired after a COVID-19 infection) as interchangeable in some sections, but not in others. For example, Sections 3205(c)(10)(B)(2) [regarding exclusion and earnings] and 3205.1(b)(1)(C) [regarding testing during an outbreak] both provide exemptions for vaccinated employees or employees who have naturally acquired immunity by surviving a COVID-19 infection. However, multiple other sections of the regulation ignore post-infection immunity, including Sections 3205(c)(6)(C)(1) [pre-July 31st physical distancing], 3205(c)(7)(A)(1) [face coverings], and 3205.3(a)(5) [housing requirements]. We see no reason for this distinction – an employee has immunity in both cases and should be treated as such.

Employers Should Not be Providing N95s to Unvaccinated Employee – (Various) – The Amended ETS includes an entirely new mechanism: providing unvaccinated employees with N95 respirators (in the correct size) to be used in compliance with voluntary use standards and related training.⁷ The scale of this obligation is not small. Prior to July 31st, employers must provide N95 respirators to unvaccinated employees during outbreaks, as well as to unvaccinated employees in vehicles.⁸ And that demand pales

⁶ Though there are obviously other exceptions under subsection 3205(c)(7)(A), only exception 1 is broadly applicable to most workplaces, or allows long-term non-usage.

⁷ See Section 3205(c)(8)(E)(1).

⁸ See Sections 3205.1(g) & 3205.4(c)(3).

in comparison to the post July 31st obligation to provide respirators to *all unvaccinated employees working indoors*⁹ in perpetuity.¹⁰

On a policy level, this is the wrong direction and makes no sense. Under the ETS, up until now, face masks have been provided if an employee is outdoors and within 6 feet of another employee, or when indoors. Now, with vaccination increasing and case rates diminishing, employers are being compelled to provide *much more expensive equipment* – N95 respirators – where face masks have had great success in reducing transmission in the workplace. Moreover, this requirement creates incorrect incentives, because it burdens the employer based on a choice made by the employee (i.e., to not be vaccinated). Finally, this will drive employers across all sectors of the California economy into competition with healthcare, critical industries, and first responders for the existing supply of N95s. It may even, depending on the scale of the consumption, deny this critical equipment to healthcare workers in other parts of the world where COVID-19 is surging, such as India.

Mathematically, we estimate these provisions as requiring employers across California to stockpile and consume significant amounts of N95 respirators. Putting aside the uncertainty as to how many employees will choose to utilize N95s, we can assume that approximately 20% of Californians will remain vaccine hesitant (or be unable to be vaccinated) past the July 31st deadline.¹¹ Out of a workforce of 20 million, that means 4 million workers. Assuming about half of those work indoors,¹² that means we have potentially 2 million workers who will need to regularly be provided N95s for voluntary use pursuant to the Amended ETS for the duration of the Amended ETS.¹³ To be clear, this obligation is far beyond the stockpiling required by the recent Protection from Wildfire Smoke Regulation, in that it applies across the entire economy (all sectors), and is not seasonal. In order to avoid these unnecessary costs and preserve supplies for healthcare, we believe employers should not be required to stockpile N95s for each indoor, unvaccinated employee.

Logistically, it should be noted that the requirement to provide such masks in the correct size for each employee is yet another problem. Theoretically, the Amended ETS does not require fit testing . . . but without fit testing, how can employers determine the appropriate size for each employee?

We would ask for urgent amendments to correct this issue prior to July 31st. However, alternatively, Cal/OSHA should immediately provide clarification via an FAQ that: (1) N95s, to the extent they are made available, can be re-used by the same employee for multiple days; (2) that N95s need not be handed out, but must be available if requested, pursuant to Section 5144's voluntary requirements; (3) Employers do not need to fit test employees to comply with the ETS.

Verbal Notice is Not Feasible as Written and Must be Clarified – 3205(c)(3)(B)(3)(a) – The Amended ETS adds a requirement of follow-up verbal notice in a language understandable by the employee “as soon as practicable” if the employer should reasonably know that an employee has not received the notice or has “limited literacy in the language used in the notice.” This requirement was never discussed at the February Advisory Committee meeting and poses both clarity and feasibility concerns. To be workable, the trigger for verbal notice must be clear for large and small employers because they are required to take action “as soon as practicable.” With that in mind, we believe “limited literacy” is too vague to yield quick

⁹ See Section 3205(c)(8)(E)(2) - “Starting July 31, 2021, employers shall provide respirators for voluntary use in compliance with subsection 5144(c)(2) to all employees working indoors who are not fully vaccinated.” Notably, this obligation is subject to certain limitations, such as being alone in a room, but those limitations are not likely to significantly diminish the demand in our estimation.

¹⁰ Pursuant to the revisions to the Amended ETS after May 20th, employers have the option of adopting the N95 compliance path prior to July 31st as well, but are not required to do so.

¹¹ As of the date of this letter, approximately 50% of Californians are vaccinated, but we expect this number to rise. See <https://covid19.ca.gov/vaccination-progress-data/#progress-by-group>.

¹² This 50% percentage is a cautious assumption because we could not locate good data dividing California’s workplace based on indoor/outdoor work. It is quite possible that this number is too low, but it serves for purposes of the estimations in this letter.

¹³ We acknowledge that these estimates are basic, but believe they accurately reflect the approximate scale of potential demand for N95s under the Amended ETS in the next 6-12 months.

and clear determinations for employers. For example - how should an employer define “limited literacy”? What if a worker can read, but below a high school reading level? Conversely, is “limited literacy” only intended to reflect whether the worker understood the basic point of the notice (i.e., that COVID-19 was at the worksite at one point recently)? Without clarifying “limited literacy” or replacing it, this standard will be unworkable for employers and trigger waves of unnecessary and difficult verbal notice.

Employers Should Have the Option of Maintaining Present Practices After July 31st – 3205(c)(7)/(8)

– Perhaps the most notable change to the Amended ETS in preparation for the June 3rd Board meeting was in Section 3205(c)(6), which now provides two compliance options for employers prior to July 31st. Prior to July 31st, employers may now either (1) maintain social distancing and masking as presently required (Section 3205 (c)(6)(A)) or (2) switch to voluntary use of N95s for all unvaccinated indoor workers and cease social distancing.¹⁴ While our concerns remain about the relative benefits of N95 respirators and their costs, we appreciate this flexibility in compliance, and believe such flexibility should extend beyond July 31st.

Specifically, employers should be allowed to utilize the compliance methods that we have used under the present ETS (social distancing and masking) after July 31st. These practices are effective in curbing workplace spread and maintaining them would have considerable benefits for many employers, particularly small employers. First, for employers who do not want to delve into the logistical difficulties of documenting vaccine status of their employees, an option to continue under present protocols avoids those recordkeeping and privacy concerns. Second, we have all heard the widespread difficulty that employers (and citizens) have had in keeping up with the evolution of COVID-19 safety protocols throughout the pandemic. Allowing employers the option of maintaining present protocols would avoid yet another significant change on July 31st, when employers may just be getting used to this present regime. This continuity is particularly appealing because the Amended ETS may not be necessary in a few months. Hopefully, if COVID-19 rates continue to fall and vaccinations continue to rise, then California will look significantly different in October and we can consider an end to this emergency regulation. With that potential end for the regulation in mind, forcing employers to significantly shift their compliance method for what may be the last few months seems particularly wasteful. Third, allowing present precautions to be used in the Amended ETS after July 31st would avoid the mass purchasing of N95 respirators that may drive up prices for healthcare professionals, and lead to a waste of N95s if employees choose not to utilize them.

Exposed Group Should Only Include Employees – 3205(b)(7) – Under the present ETS, an outbreak can be triggered by non-employees who visit a store to shop. This is unacceptable because employers could be placed under costly outbreak obligations by three non-employees standing in their workplace for 15 minutes, without any workplace spread of COVID-19. We are glad to see this issue addressed in the June 3rd text for adoption and believe it will lead to greater certainty for employers and also align employers’ responsibilities with their scope of control (i.e., their employees).

Outbreak Precautions Must Remain Feasible – 3205.1 – The Amended ETS makes a number of changes to outbreak requirements applicable to employers, to which we have concerns regarding feasibility and consistency.

- **Re-instituting Engineering Controls Upon Outbreaks is Not Feasible – 3205.1(d)(3)** – The Amended ETS requires employers to install partitions (similar to what is presently required under 3205(c)(8)(A)) if an outbreak occurs. This is infeasible and unrealistic as written. Installation and removal of barriers is not a trivial matter in the workplace, nor is their long-term storage for the periods when they are not being used. Businesses will not be able to quickly swap partitions in and out of place. Recognizing the importance of barriers, we would suggest that this provision is better placed in the major outbreak section of the regulation, which will ensure it is triggered if an outbreak is not quickly quelled via the other precautions in the Amended ETS.

¹⁴ After July 31st, physical distancing requirements end, but employers are compelled to provide N95 respirators to unvaccinated employees for voluntary use, and social distancing ends. See Section 3205(c)(8)(E)(2).

- **Portable HEPA Filtration at Every Outbreak is Not Feasible – 3205.1(f)** – The Amended ETS moves a requirement previously only applied to major outbreaks (3205.2) to all outbreaks (3205.1). - the obligation to install improved air filtration and acquire portable High Efficiency Particulate Air filters (HEPA filters). The text requires employers to evaluate whether HEPA filters would “reduce the risk of transmission and, if so, [use them] to the degree feasible.” Because increased air filtration is virtually certain to hypothetically reduce the risk of transmission, we are concerned this effectively compels the rental (or purchase) of portable HEPA filters by employers in the event of three COVID-19 cases. We see this as more appropriately located among the major outbreak precautions in Section 3205.2, given the potential cost of such measures.

Exclusion Pay Calculation Must be Clarified – 3205(c)(10) – The Amended ETS requires employers to pay the “regular rate of pay” for exclusion pay and then specifies this pay can be enforced in the same way as wages. The calculation for “regular rate of pay” is confusing and challenging for employers to determine what forms of payment are included versus excluded. This confusion is exacerbated by the threat of litigation under the Private Attorney General Act (PAGA), which exposes employers to excessive and burdensome costs and penalties for unintentional errors. The Legislature and Governor have acknowledged both of these challenges by recently excluding enforcement of COVID-19 supplemental paid sick leave from PAGA and providing an easier method for employers to calculate leave, as set forth in Labor Code Section 246(l). We would urge Cal/OSHA to follow this same structure for exclusion pay.

c. Other Concerns Requiring Clarification

Documentation Required to Demonstrate That Employees Are Vaccinated or Immune – 3205(b)(9) – The Amended ETS requires employers to maintain documentation of which employees meet the definition of “fully vaccinated”.¹⁵ There is considerable concern among employers, particularly small employers, about how such documentation may be maintained while respecting the employee’s privacy and medical information. Moreover, putting aside legal concerns, there are also practical concerns – many employees who have been vaccinated may have already lost their vaccine ID’s, and may have no desire to go get a new one, because the only burden for not having such is on the employer (I.e., to provide N95s and other precautions). An FAQ to clarify what documentation employers should maintain and address these difficulties is needed as soon as possible such that employers can prepare to utilize the vaccine-related provisions of the Amended ETS as soon as it goes into effect.

Duration of Records Storage Must Be Clarified – 3205(b)(9) – As employers are pushed to gather data regarding vaccination under the Amended ETS, the storage of those records must be considered. Absent clarity, it would appear that any questionnaire or information gathered related to vaccination could fall under Section 3204 (Access to Employee Exposure and Medical Records), which compels storage for the duration of employment plus 30 years.

First – such a requirement would be absurd to apply in this context. Substantively, the lengthy duration of records retention under Section 3204 was intended to address long-term exposures to dangerous chemicals that may cause much-delayed onset of illnesses. For example, if the employer allows ongoing exposure of the employee to a toxic chemical (such as elevated lead), then that may cause delayed-onset illnesses much later, and therefore justify the lengthy duration. However, here, the Amended ETS would require employers to retain records of vaccinations which authorities have deemed safe and encouraged all Americans to get. There is no argument that such delayed consequences are likely or, if they occur, the employer is in some way at fault.

Second – such a requirement would be overly burdensome to businesses across California, particularly small employers who do not already have in place systems of recordkeeping for compliance with Section 3204’s requirements. This applies even more so in industries with common turnover that do not likely have any experience with similar recordkeeping, such as restaurants or retail.

¹⁵ This same issue – documentation requirements – applies to noting which employees have recovered and therefore have natural immunity under various provisions of the Amended ETS.

For these reasons, we would urge a clarification that vaccinations are not “medical records” pursuant to Section 3204.

Physical Distancing Exception (B) Must Be Clarified – 3205(c)(6)(B) – The Amended ETS includes an exemption for physical distancing when “All employees who are not fully vaccinated [are] provided [N95] respirators for voluntary use in compliance with subsection 5144(c)(2).” This exception, as drafted, is vague as to the obligations of vaccinated workers and workplace with complete vaccination. We assume that the intent is the following: (1) Under (B), vaccinated employees have no physical distancing requirements; and (2) if all employees (or persons) at a location are vaccinated, then the employer is inherently compliant with subsection 3205(c)(6)(B). To clarify this intent, we believe an FAQ would be helpful in the near term.

Training Necessary When N95s Are Provided – 3205(c)(5)(E) – The Amended ETS provides that employers will provide training whenever N95 respirators are provided to employees for voluntary use addressing “how to properly wear the respirator provided” and “how to perform a seal check . . .” We have two issues with this language that need to be clarified. First – the use of “whenever” suggests training on an almost daily basis for millions of employees in California. We would request clarification as to whether this training must, in fact, be provided every time an N95 is provided, or whether this obligation requires employees to be trained such that when they receive an N95, training has already occurred. Second – the substance of this training is ambiguous presently. In order to ensure it is something which employers of all sizes and industries can quickly provide sufficient training, we would ask that Cal/OSHA prepare a handout or other similar easily admissible training model and makes it available to employers. We would suggest a form similar to the handout that presently exists under the Protection from Wildfire Smoke Regulation.

Conclusion

California’s business community supports amending the ETS to bring the current ETS up to date with best practices and recent science. However, we remain concerned that the Amended ETS, as written, adds more burdensome obligations to employers just as the federal government is loosening restrictions and California’s Governor appears to believe California is on track to open in June.

We hope that the Standards Board will consider pushing for specific textual fixes to the above-identified substantive concerns prior to passage of the Amended ETS. If the Amended ETS is passed as written, then we would urge the Standards Board and Division to move with all haste to hold an additional advisory committee hearing as soon as the Amended ETS goes into effect. The substantive concerns outlined above, as well as the unclear provisions of the Amended ETS, must be examined, discussed, and rectified as soon as possible via either FAQs or a second round of amendments.

Sincerely,



Robert Moutrie
Policy Advocate
California Chamber of Commerce
on behalf of

Acclamation Insurance Management Services
Agricultural Council of California
Allied Managed Care
American Composites Manufacturers
Association
Associated General Contractors
Association of California School Administrators
Bowling Centers of Southern California

Building Owners and Managers Association of
California
California Apartment Association
California Association of Joint Powers Authorities
California Association of Winegrape Growers
California Beer and Beverage Distributors
California Builders Alliance
California Building Industry Association
California Business Properties Association

California Business Roundtable
California Chamber of Commerce
California Craft Brewers Association
California Farm Bureau
California Framing Contractors Association
California Gaming Association
California Grocers Association
California League of Food Producers
California Manufacturers & Technology Association
California Restaurant Association
California Retailers Association
California Sheet Metal and Air Conditioning Contractors' National Association
California State Association of Counties
California Trucking Association
Coalition of Small and Disabled Veteran Businesses
El Dorado County Chamber of Commerce
El Dorado Hills Chamber of Commerce
Elk Grove Chamber of Commerce
Family Business Association of California
Family Winemakers
Flasher Barricade Association
Folsom Chamber of Commerce
Hollywood Chamber of Commerce
Housing Contractors of California

International Council of Shopping Centers
International Franchise Association
League of California Cities
NAIOP of California
National Federation of Independent Business
Pacific Association of Building Service Contractors
Public Risk Innovation, Solutions and Management - PRISM
Rancho Cordova Chamber of Commerce
Residential Contractors Association
Roseville Area Chamber of Commerce
Sacramento Regional Builders Exchange
San Diego Regional Chamber of Commerce
Santa Maria Valley Chamber of Commerce
SMACNA of San Diego
The Associated General Contractors, San Diego Chapter
United Chamber Advocacy Network
Western Electrical Contractors Association
Western Growers Association
Western Manufactured Housing Communities Association
Western Steel Council
Wine Institute
Yuba-Sutter Chamber of Commerce

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