

May 28, 2020

Robert R. Redfield, MD, Director
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329

By electronic mail: RRedfield@cdc.gov

Dear Dr. Redfield:

The undersigned associations represent hundreds of thousands of employers who employ millions of employees. Many of these companies have been idled by the coronavirus pandemic and various orders to shutdown, while others have been able to maintain some level of operations. Without exception all of these companies are seeking reliable and authoritative answers to questions about how best to protect their employees and what is expected of them as they reopen or increase their level of business. To assist employers, we believe CDC should expand its current [Frequently Asked Questions](#) page to allow businesses and employers to submit specific questions to which they need detailed answers.

The CDC is the most widely cited authority for specific procedures on protecting employees and the general public. As you know, CDC guidelines are central to how OSHA expects employers to comply with the General Duty Clause for protecting employees. In addition, CDC is looked to by state and local public health and safety agencies, as well as companies in general.

While the CDC guidelines have been the standard reference documents, many issues are surfacing where more specific information and direction is needed. Several of these issues will determine whether and to what extent companies can reopen, and how they will conduct business. An FAQ process that accepts questions from employers would provide direct answers to questions and allow CDC to disseminate information in an efficient and timely way.

Various agencies have set up employer directed FAQs that have been highly effective in helping employers understand what is expected of them, or how they could access government relief. In particular the Department of Labor's [Wage and Hour Division](#) even conducted a widely attended conference call to solicit questions that employers had to make sure they addressed the questions that mattered most to employers.

As an initial set, our members have told us they need guidance on the following questions:

- While the six foot distancing recommendation is widely known, there are many settings where maintaining that level of separation is not possible, and as more companies come back, those types of settings will increase. What should employers do to protect their employees when keeping them six feet apart is not possible?
- Whether customers are comfortable coming back to various businesses such as restaurants and stores may depend on whether they have confidence that publicly

available restrooms have been sufficiently sanitized. What restroom cleaning protocols does CDC recommend?

- Various workplaces are, by nature, very confined. These include restaurant kitchens, small retail boutiques, certain construction sites, and long haul trucking and delivery services where the driver is accompanied. What does CDC recommend for these settings where six foot separation is not possible?
- What protocols does CDC recommend for testing of employees before reentering the workplace? For instance: Which test(s) should employers use? How frequently should employees be tested? How should an employer isolate an employee who tests positive? Should employers rely on employees self-testing at home? Should employers rely on employees answering questionnaires regarding whether they are symptomatic, or their movements?

We are sure there are many more scenarios where further clarity in the practical application of CDC guidelines would be useful, which would likely surface if CDC initiates a process for questions to be submitted.

As America's businesses look to recover and lead the rebound of the economy, they will need as much precise information on how to reopen responsibly as possible. They will be looking to the CDC for guidance and answers. Developing a submission process for employers would be the most efficient way to further CDC's mission of promoting sound public health practices while also helping America's employers bring employees back to work. We look forward to working with CDC on this effort.

Sincerely,

Associated Builders and Contractors
College and University Professional Association for Human Resources
HR Policy Association
National Association of Manufacturers
National Retail Federation
U.S. Chamber of Commerce

CC: John Howard, MD, MPH, JD, LLM, MBA
Director, NIOSH
Anne Schuchat, M.D. Rear Admiral, USPHS (ret.), Principal Deputy Director Centers for
Disease Control and Prevention
Frank J. Hearl
Kyle McGowan