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www.springfield-chamber.org

Date: April 2, 2021

RE: Appeal for reasonable revisions to OR-OSHA COVID-19 Permanent Standard Draft Rules

To: Department of Consumer and Business Services/Oregon OSHA: Administrator Michael Wood

OR-OSHA should be providing workers and local businesses with certainty, not layering new regulations on local employers nearly 14 months into the pandemic that pose barriers to already challenging economic recovery efforts.

For small businesses who have been vigilant in adapting to multiple mandates and the OR-OSHA COVID-19 Temporary Standard introduced last November, the Permanent Rules are a point of great dismay. We've absorbed new and increasing costs of doing businesses – much of them unreimbursed expenses of supplies, equipment, labor, and management to operate as a COVID-compliant business and to keep our customers, workers, and our public safe and healthy. Now in spite of expanded state vaccination availability, manageable infectious rates, and the Governor's economic recovery plan that proposes a return to stability and reopening of our economy, the permanent standards are received as either confusing and contradictory or unrealistic and excessive burdens on business.

We welcome collaborative solutions that provide a reasonable path for small business compliance and a healthy, safe, workplace. In that spirit, we urge revisions to any OR-OSHA COVID-19 Permanent Standard as follows:

- **COVID-19 Permanent Rules should expire when the Governor's declaration of a public health emergency is rescinded;**
 - Stating that Permanent Rules will be "repealed when it is no longer necessary for that purpose" is not sufficient to ensure accountability and public trust.
- **Remove all requirement(s) on employers to assume worker vaccination responsibility or medical records as**
 - Employer must monitor, track, and keep records of workers who accept or decline to be vaccinated;
 - Employer must provide a note clarifying that reports of exposure under the COVID-19 rule are exposure records covered by the existing rule governing the retention of medical and exposure records for 30 years.
- **Remove rules that extend beyond OR-OSHA standard powers of authority such as those directing or requiring**
 - employers cooperate with public health authorities who ask to arrange for vaccination in the workplace for vaccination events, or
 - employers provide their written notification documentation of regarding covid-related time off, worker return to work rights, or other.

We continue to be grateful to our public health and healthcare community partners under whose leadership we have better understood, appreciated, and implemented extensive pandemic-related workplace and community safety measures. The pressures have been immense, and yet we all continue to pursue the best outcomes for our community.

The Springfield Area Chamber of Commerce represents 750 employers across the Springfield, Eugene, and surrounding communities of Lane County. Thank you for considering our appeal.

Respectfully yours,

A handwritten signature in black ink, appearing to read "V. Mikkelsen".

Vonnie Mikkelsen
President and CEO