

Virginia Office
District – 2-13



Workers of America

January 9, 2021



3960 Stillman Parkway, Suite 130
Glen Allen, Virginia 23060

RE: Comments for Proposed Permanent Standard for Infectious Disease Prevention for COVID-19

Dear Board,

On behalf of all of our hard-working members, we are writing to encourage the adoption of a strong Permanent Standard for Infectious Disease Prevention for COVID-19. Our members desperately need the protection these standards provide.

Communications Workers of America (CWA) represent thousands of workers throughout the Commonwealth in the areas of Corrections, Telecom, Manufacturing, Healthcare, Airlines and Journalism. These workers have been in the forefront of “essential” services and thus we know very well how important these standards have been.

The Temporary standard has been essential in protecting workers in Virginia. It can however be improved. We would suggest the following improvements:

- Virginia’s Correctional, Jail, and Detention facilities have been some of the hardest hit. As an example, the Department of Corrections (DOC) has had 1000’s of positive cases for both housed offenders and DOC staff. There have also, unfortunately, been 48 offender and 2 staff deaths. This environment is unique in that it does not easily allow isolation, six-foot separation and other guidelines set up to prevent COVID. It is for these reasons that this type of work should be removed from the “Medium” risk category and placed in the “High” risk.
- Employers should also set up a hierarchy of controls when employees are forced to share vehicles.
- In regard to training on the use to extend the use of PPE, CWA has concerns in reusing PPE at any time. We believe this should not be allowed. If this is to be allowed the training should at least include criteria on how PPE would be extended, how to properly store PPE and criteria on determination if said PPE would be safe to use in an extended period.

We would encourage passage of these standards without any delay. We have heard some members of the business community continue to delay with calls for a longer “commenting” period, delay in training implementation and now a so-called “cost/benefit” analysis to be done. These delays forget the very real reasons that a standard is needed in the first place; the safety of our workers and citizens. We should instead think of how many Virginians will die if delays are put in place. How many workers will get sick? What will be the impact to their livelihood if rules aren’t there? We cannot put a cost on a life and we cannot delay any standard for a virus that has impacted so many Virginian’s lives.

This pandemic has been a learning experience for us all. But what it has shown us is that bold decisive action to isolate those infected and protect those who are not is the best way to return us to normal and allow our economy to get going again. CWA urges the quick adoption of a permanent standard.

Sincerely,

Richard Hatch

Staff Representative

Communications Workers of America