



June 30, 2021

The Honorable Marty Walsh
Secretary
U.S. Department of Labor
200 Constitution Avenue NW
Washington, D.C. 20210

Re: MGMA concerns related to the OSHA COVID-19 Healthcare ETS

Dear Secretary Walsh,

On behalf of our member medical group practices, the Medical Group Management Association (MGMA) writes to express our shared commitment to protect healthcare workers from contracting COVID-19. While we appreciate that the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) is attempting to protect healthcare workers through the COVID-19 healthcare emergency temporary standard (ETS), we believe the ETS was issued much too late and as a result, will disrupt the ongoing efforts of medical groups to balance the needs of patients against the imperative to protect employees. **We urge you to rescind the ETS, or at a minimum, delay its effective date until stakeholders, such as MGMA, have adequate opportunity to provide input on the standard.**

With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical groups in which more than 350,000 physicians practice. These groups range from small private practices in rural areas to large regional and national health systems and cover the full spectrum of physician specialties and organizational forms. Our diverse membership uniquely situates MGMA to offer its expertise on what's already working and what might be improved.

Since the beginning of the COVID-19 pandemic, medical groups have worked tirelessly to care for their patients and employees. They have truly been on the front lines for more than 18 months. They have invested heavily in personal protective equipment (PPE), abided by cleaning and disinfecting standards put forth by the Centers for Disease Control and Prevention (CDC), and set up protocols for screening patients and employees for COVID-19 prior to entry. Group practices are additionally required to comply with state requirements to protect healthcare workers. Implementing a new layer of requirements at this late stage of the public health emergency (PHE) is duplicative, confusing, and will divert time and resources away from patient care. Moreover, the ETS will hold physician practices to a standard on which they were denied the opportunity to provide feedback, before being required to comply.

MGMA believes the protocols medical groups have had in place for over a year already fulfil the spirit of what the ETS is trying to achieve. **We urge you to rescind the ETS, or at a minimum, delay the effective date until stakeholders have an adequate amount of time to comment on the standard.** As the voice for the country's medical group practices, MGMA remains committed to promoting policies that enhance the ability of our members to provide high-quality, cost-effective care to the millions of patients they serve routinely, and to the emergency cases they are called upon to serve during this

pandemic. Should you have any questions, please contact Claire Ernst at cernst@mgma.org or 202-293-3450.

Sincerely,

/s/

Anders Gilberg, MGA
Senior Vice President, Government Affairs