



AMERICAN COLLEGE OF
OCCUPATIONAL AND
ENVIRONMENTAL MEDICINE

March 18, 2020

Loren Sweatt
Deputy Assistant Secretary
Occupational Safety and Health Administration
200 Constitutional Ave, NW
Washington, DC 20210

Dear Deputy Assistant Secretary Sweatt:

The American College of Occupational and Environmental Medicine (ACOEM) recognizes that the Coronavirus epidemic is causing important disruptions to health care and most other sectors of the economy. Substantial efforts are being made by our members and many others around the country to minimize unnecessary inter-personal contact and to adhere to recommended social distancing practices. Such efforts and concerns have particular impact on interactions between health care providers and their patients, who generally share close proximity and physical contact.

On March 16, ACOEM recommended to all its members to suspend routine occupational spirometry testing during the COVID-19 pandemic.¹ The purpose of this recommendation is not only to protect the health care staff and workers being tested but also to conserve the supply of PPE for health care workers.

Currently, large numbers of physicians and their staff regularly perform medical surveillance exams, including spirometry, required by the Occupational Safety and Health Administration's (OSHA) expanded health standards for worker exposures to silica, asbestos, and lead, among others. These required exams are rarely of an urgent nature. At the current time, performing these exams pose avoidable COVID infection risks to the workers, physicians and healthcare staff. In addition, availability of physicians and health care staff may be affected as they may more urgently be needed to address more significant health care needs, and those over 60 are being instructed to shelter in place by some local governments.

We appreciate OSHA's new temporary guidance on respirator fit testing. In light of the current Federal Emergency Declaration and the Center for Disease Control and Prevention's public health recommendation to "delay all elective ambulatory provider visits,"² ACOEM urges OSHA to issue additional temporary guidance regarding required medical surveillance exams under OSHA standards. We recommend that the guidance allow employers to delay medical surveillance exams as necessary during this pandemic.

The goals of our recommendation are to enhance efforts to reduce spread of the virus, to alleviate currently excess demands on the health care system, and to protect health care workers and their patients from avoidable infections. We believe that such short-term relief would not adversely impact OSHA's efforts to ensure the safety of our workforce.

Thank you for your leadership at this important time.

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Sincerely,

A handwritten signature in black ink that reads "Steve Frangos". The signature is written in a cursive style with a large, stylized "S" and "F".

Stephen A. Frangos, MD, MPH, FACOEM
President

¹ <https://myemail.constantcontact.com/ACOEM-Advises-Suspension-of-Routine-Occupational-Spirometry-Testing-During-COVID-19-Pandemic.html?soid=1102647720683&aid=idWxyX21cJ4>

² <https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/index.html>