



April 17, 2020

Alex Michael Azar II
Secretary
U.S. Department of Health and Human Services

Request to Immediately Rescind April 8, 2020 CDC Guidance for Critical Infrastructure Workers and COVID-19

Dear Secretary Azar:

The American Industrial Hygiene Association (AIHA®) urges you to immediately rescind the April 8, 2020 Centers for Disease Control and Prevention's (CDC) Interim Guidance for "Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19".¹ If this does not happen, the lives of workers and the public will undoubtedly be placed at greater risk of illness and death related to COVID-19.

The CDC clearly states that to slow the spread of COVID-19, if a person is healthy, but has come into contact with someone who has COVID-19, they should self-quarantine at home for 14 days.² Without providing any additional evidence, just four days after making this statement, the CDC's Interim Guidance for Critical Infrastructure Workers appeared to contradict itself by recommending that workers in essential industries who have come into contact with someone with a confirmed case of COVID-19 *may* continue working as long as they remain asymptomatic. This is particularly troublesome, in light of evidence that 25 to 50% of people infected with the virus are asymptomatic, and that the risk of virus transmission from asymptomatic or pre-symptomatic individuals is reported to be similar to those with symptoms.^{3,4} This means that workers who are deemed the most essential and follow the CDC's latest guidance may unknowingly be infecting their coworkers and the public, worsening the pandemic and placing our nation's most critical infrastructure at greater risk.

As an organization charged with protecting workers and the communities in which they live, AIHA must recommend in the strongest terms possible that the CDC immediately rescind the interim

¹ CDC. Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19, April 8, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

² CDC. Social Distancing, Quarantine, and Isolation, April 4, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

³ New York Times. As many as half of those with the coronavirus could be asymptomatic, Fauci says. <https://www.nytimes.com/2020/04/05/world/coronavirus-live-news-updates.html#link-327dd1e4>

⁴ Coronavirus disease 2019 (COVID-19) in the EU/EEA and the UK (8th update), April 8, 2020.

<https://www.ecdc.europa.eu/sites/default/files/documents/covid-19-rapid-risk-assessment-coronavirus-disease-2019-eighth-update-8-april-2020.pdf>

guidance issued on April 8, 2020, and replace it with a reaffirmation of its prior guidance,^{5,6} which places the health and safety of the public and workers above all else. Anything less than such a move threatens to erode trust in the CDC and its exalted role as a world leader.

Background on AIHA

Founded 81 years ago, AIHA is a nonprofit organization serving professionals dedicated to the anticipation, recognition, evaluation, control, and confirmation of environmental stressors in or arising from the workplace that may result in injury, illness, impairment, or affect the well-being of workers and members of the community.

More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists (CIHs) and many hold other professional designations. AIHA serves as a resource for those employed in the industrial, consulting, academic, and government sectors. AIHA has Local Sections located throughout the United States. Collectively, AIHA's members impact millions of American workers.

AIHA provides comprehensive education programs and other products and services that help its members maintain the highest professional standards. We maintain more than 50 volunteer groups and have partnership agreements with governmental and nongovernmental organizations representing the full spectrum of worker health and safety vocations. AIHA also produces several award-winning publications, including the *Journal of Occupational and Environmental Hygiene (JOEH)*. The JOEH, which is jointly published by AIHA and the American Conference of Governmental Industrial Hygienists (ACGIH®), is a peer-reviewed publication that provides a written medium for the communication of ideas, methods, processes and research in the areas of occupational, industrial and environmental hygiene; exposure assessment; engineering controls; occupational and environmental epidemiology, medicine, and toxicology; ergonomics; and other related disciplines. For additional information on AIHA, please visit www.aiha.org. To learn more about the profession of industrial hygiene, please visit <https://www.aiha.org/ih-careers/discover-industrial-hygiene>.

Conclusion and Next Steps

AIHA looks forward to its continued work with the CDC to protect the health and safety of Americans. For additional information, please contact Mark Ames at mames@aiha.org or (703) 846-0730.

Respectfully,



Kathleen S. Murphy, CIH
President
AIHA

⁵ CDC. Public Health Recommendations for Community-Related Exposure, March 30, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>

⁶ CDC. Social Distancing, Quarantine, and Isolation, April 4, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>