

Thanks Sam,

I am copying Princy Doss so she will add your comment to the record.

Jay

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From: Sam Revenson <ssrevenson@gmail.com>

Sent: Wednesday, December 30, 2020 2:24 PM

To: withrow.jay@dol.gov

Subject: Public Feedback comments on putting into place a permanent COVID Standard in Virginia at this time.

Jay,

I want to put in writing my public feedback.

I would hope that Virginia DOLI goes no further than they already have regarding COVID concerns for the following reasons:

1. The incoming Presidential administration has now indicted its intention of addressing a permanent standard. In this likelihood, DOLI will have to revisit and revise anything additional now. This creates a waste of Virginia DOLI time and resources.
2. By definition, Covid 19 is a specific sickness and is likely temporary in the long term. It is a waste of time and resources to create a non permanent sickness specific standard in permanent form.
3. An alternative could be to extend the existing temporary standard.
4. There are more than enough standards in place already that can be effectively used by Compliance Officers to address any and all concerns. Not the least of which is the General Duty clause. Existing standards have been used for years creating, in essence, case law from which Compliance can use more effectively. Until standards have been in place for some working period they can be more ambiguous in their usage which ultimately triggers additional legal review and considerations. Again, a waste of precious budgetary resources.

I trust every Board member will get a copy of these concerns well before any future Code Board meetings. Please confirm this will and has occurred.

Many thanks,
Sam Revenson

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