



WILLIAM & MARY

CHARTERED 1693

UNIVERSITY OPERATIONS

July 31, 2021

Jay Withrow, Director
Division of Legal Support, ORA, OPPPI, and OWP
Virginia Department of Labor and Industry
600 East Main Street, Suite 207
Richmond, VA 23219

Re: Comments on Final Permanent Standard (FPS)

Dear Director Withrow:

I am writing as Chief Operating Officer and COVID Director for William & Mary (W&M) to respectfully comment on the Final Permanent Standard (FPS) for Infectious Disease Prevention of the SARS-CoV2 that causes COVID-19, § 16 VAC 25-220, as adopted on June 29, 2021. W&M is grateful for the many hours of work the Safety and Health Codes Board has devoted to this issue over the last year and takes seriously the responsibility of ensuring the safety and wellbeing of our faculty, staff, students, and community.

Since March 2020, W&M has implemented policies and procedures to protect our employees and students which adhere to the guidance from the CDC, VDH, Governor Northam, and others. We are committed to the health and safety of both our university community and our broader community.

Given the evolving landscape, we urge the adoption of Governor Northam's proposed substitute language for 16VAC25-220-10.E which would allow us to use CDC guidelines in concert with the FPS standards to be in compliance with the Department's regulations as the CDC guidance continues to evolve.

Thank you for your consideration.

Sincerely,

Amy S. Sebring
Chief Operating Officer and COVID Director
William & Mary