

November 5, 2021

Occupational Health and Safety Administration 200 Constitution Ave NW Washington, DC 20210

RE: Public Comment on COVID-19 Vaccination and Testing; Emergency Temporary Standard

The Missouri Chamber of Commerce and Industry believes the enactment and implementation of OSHA's Emergency Temporary Standard - COVID-19 Vaccination and Testing is the wrong approach for business.

Each workplace is unique and employers have long held the right to establish vaccine policies that work for their businesses. The Missouri Chamber believes all employers should continue to have this right when it comes to the COVID-19 vaccine and testing. 80% of businesses across Missouri believe they should have the freedom to make their decisions on this matter.

Employers are experiencing crippling workforce shortages across all industries and regions of our state. The pandemic has had a devastating impact on businesses of all sizes, with small businesses shouldering huge financial loss. The Emergency Temporary Standard, whether it is the current version or any future expansion of this, will exacerbate the growing challenge to recruit and retain workers. Workforce availability is key to making a full economic recovery.

Prior to the announcement of the federal mandate, the Missouri Chamber established a "COVID Stops Here" initiative, a completely voluntary program that encourages employers to offer employees accurate information about COVID-19 vaccines and recognizes workplaces vaccinated at certain percentage milestones. Participation in this program was extremely high. We believe the federal government should cooperate with the employers on voluntary efforts, like our "COVID Stops Here" program, instead of limiting their right to make their own decisions on vaccines and testing.

For these reasons, The Missouri Chamber of Commerce and Industry strongly opposes OSHA's Emergency Temporary Standard as it is currently written and any future expansion of the rule.

Sincerely,

Daniel P. Mehan President/CEO