



February 22, 2021

Mr. Jeffrey D. Zients
Chairman, COVID-19 Pandemic Testing Board
Coordinator, COVID-19 Response
Counselor to the President
Executive Office of the President
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. Zients:

The Workplace Employers Alliance for COVID-19 Testing (WE ACT Alliance) is a coalition of leading employers and job creators sponsoring employer-based testing for COVID-19.¹ We are committed to working with the Biden-Harris Administration to keep our employees and communities safe.

Employer-based testing is a critical public health tool. However, to date, employers trying to implement effective testing programs have faced difficulties due to complex and conflicting federal, state, and local requirements. This creates a significant barrier to workplace testing programs, while also exacerbating health disparities that allow the SARS-CoV-2 virus to spread further. We are thankful that the Administration has been clear in its support for enhanced and coordinated COVID-19 testing as part of its strategy to combat the pandemic.² We were pleased to see this support included in President Biden's recent executive order that called for a "Government-wide, unified approach" to controlling COVID-19.³ As the Administration develops and implements its national testing strategy, we urge you to consider the following to better enable employer-based testing programs:

Expand the Type and Volume of Tests Available To Employers

Widespread and frequent workplace testing helps identify the spread of the SARS-CoV-2 virus and protects the health and safety of employees, along with the greater community. Unfortunately, many employers lack access to consistently available, affordable testing options. The federal government can assist by increasing the type and volume of quality tests available. Specifically, it should expand the availability of pooled tests, rapid point-of-care tests, at-home,

¹ Leading U.S. Companies Launch Workplace Virus Testing Alliance WE ACT: Workplace Employers Alliance For Covid-19 Testing, December 22, 2020. <https://weactalliance.org/press-release/leading-u-s-companies-launch-workplace-virus-testing-alliance-we-act/>

² National Strategy for the COVID-19 Response and Pandemic Preparedness, January 21, 2021. <https://www.whitehouse.gov/wp-content/uploads/2021/01/National-Strategy-for-the-COVID-19-Response-and-Pandemic-Preparedness.pdf>

³ Executive Order on Establishing the COVID-19 Pandemic Testing Board and Ensuring a Sustainable Public Health Workforce for COVID-19 and Other Biological Threats, January 21, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/21/executive-order-establishing-the-covid-19-pandemic-testing-board-and-ensuring-a-sustainable-public-health-workforce-for-covid-19-and-other-biological-threats/>

and over-the-counter tests recently authorized or in receipt of an Emergency Use Authorization (EUA) by the FDA.⁴ This would allow employers to test more efficiently on site without burdening commercial or public laboratories.

Issue Clear, Actionable, Enforceable Testing Guidance

One of the biggest problems employers have faced throughout the pandemic is the lack of consistent guidance about which COVID-19 tests to use and how to interpret the data these tests present. Consistent with President Biden's call to "to give employers and employees more comprehensive and specific guidance" about stopping the virus' spread,⁵ the federal government should issue guidance and implementation protocols that provide clarity on how often tests should be taken, whether they should be mandatory, what information needs to be reported to local, state, and/or federal health authorities, when employees should return to work after a positive test result, and whether and when they should take a second test to return to work.

Provide Straightforward Reporting Expectations and Transparent Data to Assist Contact Tracing

Effective contact tracing relies on transparent data. Today, testing data is reported through multiple pathways and intermediaries.⁶ The federal government should provide clear and uniform reporting requirements and streamline the reporting processes to minimize barriers while maximizing compliance. Data should be aggregated and analyzed quickly to provide state and local governments with vital information related to infection rates in local communities and to afford employers' insight in to how to reduce spread at a given worksite.

Invest in University and Research Lab Capacity

Investments in university and research labs are key to increasing capacity, improving turnaround times, and stimulating additional biomedical research. These short-term investments will also provide long-term benefits, such as stronger lab networks around the country that will allow us to better respond to the current pandemic, as well as increase our preparedness for future emerging threats.

Today, workers face significant barriers to testing and vaccinations, as access to these resources is driven in large part by locale, rather than a national program. The Alliance will work with stakeholders and experts to inform policy makers to help create a national strategy that addresses the challenges that this patchwork approach has created in order to get America's workforce more rapidly, consistently, and effectively tested and screened and safely back to work.

Finally, we would appreciate the opportunity to meet with you and your staff working on the Biden-Harris Administration's COVID-19 Response in order to collaborate on an effective testing strategy in the workplace.

⁴ Coronavirus (COVID-19) Update: FDA Authorizes Antigen Test as First Over-the-Counter Fully At-Home Diagnostic Test for COVID-19, December 15, 2020. <https://www.fda.gov/news-events/press-announcements/coronavirus-covid-19-update-fda-authorizes-antigen-test-first-over-counter-fully-home-diagnostic>

⁵ Statement by Vice President Joe Biden and the Biden for President Public Health Advisory Committee on Testing, April 27, 2020. <https://medium.com/@JoeBiden/statement-by-vice-president-joe-biden-and-the-biden-for-president-public-health-advisory-committee-6407f37c93da>.

⁶ How to Report COVID-19 Laboratory Data, November 25, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/lab/reporting-lab-data.html>.

Today, employees—including frontline essential workers—still face significant barriers to COVID-19 testing. We request an opportunity to meet with you and your staff to discuss these and other critical issues to America’s recovery. The WE ACT Alliance appreciates your consideration of our views and request and stands ready to work with the Administration to inform the creation of a national testing strategy that will help get America safely and efficiently back to work.

Sincerely,

Amazon
CVS Health
Thermo Fisher Scientific
Becton, Dickinson and Company
Whirlpool Corporation

cc:

Natalie H. Quillian, Deputy Coordinator, COVID-19 Response
Carole A. Johnson, Testing Coordinator, COVID-19 Response
Tim W. Manning, Supply Coordinator, COVID-19 Response