



March 30, 2020

The Honorable Eugene Scalia  
Secretary of Labor  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, DC 20210

Dear Secretary Scalia:

I am writing on behalf of ISSA—The Worldwide Cleaning Industry Association’s more than 9,300 members across the country. Our members play a key role in protecting the public health through the manufacture of cleaning equipment, cleaning products, sanitizers, and disinfectants, as well as by providing cleaning services to hospitals, residential care facilities, schools, other institutional buildings, and residences throughout the nation.

The full spectrum of the cleaning industry is fulfilling its important role in reducing the spread of the novel coronavirus that causes COVID-19. For the industry to continue to do this, there is an acute need for guidance from the U.S. Department of Labor on how new requirements imposed on the industry, particularly on smaller building service contractors and residential cleaners, by the Families First Coronavirus Response Act (FFCRA) will be implemented. We look forward to upcoming regulations from your department’s Wage and Hour Division concerning the implementation of this act.

**As these regulations are considered, we urge you and the division to ensure that the exemption for small businesses--demonstrating that complying with the paid leave requirements of the act will jeopardize the viability of the business--be applied as broadly and as least burdensome as possible.** Employers with fewer than 50 employees like many of our building service contractor and residential cleaning members have been particularly hard-hit by this health crisis and the subsequent, mandated stay-at-home orders now in place across the country. Many of these small businesses lack the necessary liquidity to comply with the act’s paid leave requirements.

ISSA supported the FFCRA and believes that providing paid leave to employees during this crisis is the right thing to do. We applaud the administration’s efforts to put in place policies to reduce the spread of COVID-19 and get on top of this health crisis as soon as possible. The least onerous the regulations for small businesses can be, the faster and more efficiently they can contribute to the overall effort to restore our nation’s health and economy.

Thank you for your attention to this pressing matter and for all that you and the Department of Labor are doing to protect Americans by stemming the spread of the novel coronavirus and by ensuring the long-term economic vitality of our country.

Sincerely,

John H. Barrett  
Executive Director ISSA—The Worldwide Cleaning Industry Association