December 22, 2021

Dr. Rochelle P. Walensky, MD, MPH, Director
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329

Dear Dr. Walensky:

On behalf of National Nurses United, the largest labor union and professional association for registered nurses in the United States, I am writing to urge you to maintain current guidance regarding isolation after a positive SARS-CoV-2 test for health care workers, other frontline workers, and the general public. Weakening Covid-19 guidance now, in the face of what could be the most devastating Covid-19 surge yet,\(^1\) will only result in further transmission, illness, and deaths.

I am aware that U.S. employers are beginning a drumbeat urging the Centers for Disease Control and Prevention (CDC) to weaken Covid-19 guidance. Specifically, employers are calling for the CDC to reduce the timeframe for fully vaccinated workers to isolate if they test positive for SARS-CoV-2 from ten to five days.\(^2\) Proposals vary, but the arguments solely focus on maintaining business operations, revenues, and profits, without regard for science or the health of employees and the public.

The Omicron variant of concern presents a renewed threat to public health in our country and around the world. While many questions remain incompletely answered, preliminary

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data indicates that Omicron is extremely transmissible as virulent as Delta, and has enhanced immune escape. There is no conclusive evidence that shortening the isolation


5 A shorter incubation period was documented with the Omicron variant compared to the Delta and other previously circulating non-Delta variants in an outbreak investigation in Oslo, Norway (median 3 days vs. 4.3 and 5.0 days, respectively). Notably, the researchers reported, “Duration of symptoms cannot be estimated accurately since 62 (78%) of the 80 symptomatic cases were still experiencing symptoms at the time of the interviews.” Interviews occurred eight to ten days following the party where the outbreak occurred (party was on Nov. 26, 2021 and interviews occurred Dec. 4 and 6, 2021). The vast majority (98 percent) of those who became infected in this outbreak were fully vaccinated. Brandal, L.T., E. MacDonald, et al., “Outbreak caused by the SARS-CoV-2 Omicron variant in Norway, November to December 2021,” Eurosurveillance, 26(50): Dec. 16, 2021, https://www.eurosurveillance.org/content/10.2807/1560-7917.ES.2021.26.50.2101147.

6 The Imperial College of London found “no evidence (for both risk of hospitalization attendance and symptom status) of Omicron having different severity from Delta, though data on hospitalisations are still very limited.” Imperial College London, MRC Center for Global Infectious Disease Analysis, “Report 49 - Growth, population distribution and immune escape of Omicron in England,” Dec. 16, 2021, https://www.imperial.ac.uk/mrc-global-infectious-disease-analysis/covid-19/report-49-Omicron/.

7 The Imperial College of London found that the Omicron variant was significantly associated with reinfection (5.41 times higher relative risk of reinfection compared with Delta). Imperial College London, MRC Center for Global Infectious Disease Analysis, “Report 49 - Growth, population distribution and immune escape of Omicron in England,” Dec. 16, 2021, https://www.imperial.ac.uk/mrc-global-infectious-disease-analysis/covid-19/report-49-Omicron/.

8 More than 20 reports have been posted (mostly as pre-prints) that provide preliminary data indicating that the Omicron variant has enhanced immune escape.


time following a positive test will effectively prevent further transmission. Now is not the time to relax protections. We urge the CDC to maintain and enhance guidance to protect public health.


Nurses and other health care workers have worked on the frontlines of this pandemic for nearly two years. We are exhausted. We have experienced incomparable loss — as of December 17, 2021, at least 4,686 health care workers have died from Covid-19, including at least 476 registered nurses. Too many of us have experienced deep moral distress and injury caused by the abandonment of our health and safety by our employers and governments during the pandemic. We continue to have to fight for the workplace protections we need to care for our patients safely.

Weakening guidance on isolation is not the solution to the staffing crisis in health care settings; improving protections is. The hospital industry manufactured the current staffing crisis by imposing unsafe working conditions on nurses. This began before the Covid-19 pandemic and has been exacerbated by the failure of hospitals to protect us and our patients during the pandemic. More nurses would return to direct care if hospitals immediately improved working conditions.

As you consider the request from employers to shorten isolation guidance to enable business practices, I want to remind you what happened in March 2020, when the previous CDC Director appointed by President Trump acquiesced to industry pressure and weakened Covid-19 personal protective equipment (PPE) guidance for health care workers. Health care employers quickly refused to provide workers with respirators and other PPE, placing supplies under lock and key and restricting access. The guidance led to a national health and safety crisis in our hospitals, and by May 2020, the vast majority of nurses (87 percent) reported having to reuse single-use disposable respirator or mask with a Covid-19 patient. Health care employers continued to ration PPE access for nurses, even

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after there was a glut of N95 respirator supply.\textsuperscript{14} This weakened guidance led to more health care worker infections, illness, and deaths from Covid-19. If the CDC weakens isolation requirements instead of following the science on transmission and the precautionary principle in the face of Omicron, it will lead to increased transmission, illness, and deaths among nurses, and will worsen the staffing crisis we are experiencing right now. I urge you not to repeat this history in the face of the Omicron surge.

As always, the priority of registered nurses is to advocate for our patients’ health. Maintaining strong guidance on isolation protocols for workers is critical to protecting our patient’s health. We urge you to follow the science and the precautionary principle by maintaining Covid-19 isolation guidance and directing health care and other employers to improve workplace safety to protect staff and public health during the Omicron surge.

Sincerely,

Zenei Triunfo-Cortez, RN
President, National Nurses United