

Subject: Essential Business Classification



The HVAC Inspection, Cleaning
and Restoration Association

To whom it may concern,

I am the President and Chairman of the Board of the National Air Duct Cleaners Association (NADCA). NADCA represents more than 1,300 small and large businesses and more than 3,000 certified technicians from across the United States and internationally, who perform a highly skilled and particularly essential service to healthcare facilities, commercial buildings, military facilities and homes.

Our members routinely provide service to maintain continuity of operations of the federal critical infrastructure sectors, as outlined at <https://www.cisa.gov/identifying-critical-infrastructure-during-covid-19>.

Our members perform source removal of contaminants from ductwork and clean and apply antimicrobial to HVAC systems and components where appropriate. Our members' services are needed now more than ever as we work together with our facility partners to ensure a safe indoor environment for those businesses who are responsible for keeping our country and our citizens operational during these challenging times.

On March 18th, Chamber of Commerce CEO Tom Donohue offered guidance to President Trump, recommending the government designate "essential businesses and services" during the coronavirus outbreak.

While states are calling for quarantine orders and business closures, businesses and services that support the infrastructure needed to combat the coronavirus must not be harmed, Donohue wrote in a letter to Trump.

In spite of this request, the administration has held off on clearly defining the classifications, leaving states to individually determine and declare essential versus non-essential business.

Because this is uncharted territory, and understandably, the local, state, and federal authorities are making decisions swiftly with as much information as is available to them, our members, in some states, have been on the receiving end of what are surely unintended consequences because of some state classifications of essential versus non-essential. These consequences may have a detrimental effect on the health and well-being of occupants within a particular building environment.

While plumbers and contractors are clearly cited in some state classifications, HVAC technicians and air duct cleaning companies have been overlooked. The argument should be made that language such as "...and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation..." as was included in the California state designation, directly grants essential status to NADCA member companies. I implore you to ensure that you are recognizing and citing HVAC and air duct cleaning companies as essential businesses.

Below are classifications recently released from California and New Jersey, two states with some of the highest infection rates. Note the bolded text:

California classification:

*Plumbers, electricians, exterminators, **and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation** of residences, "essential activities," and "essential businesses."*

NJ classification:

Persons who are employed, contracted, or responsible for performing duties necessary to:

- **ensure maintenance of acceptable conditions at facilities providing health and medical care, veterinary and/or daily residential care facilities,**
- *prevent an immediate danger to the public safety arising from unattended chemical, industrial or other processes involving hazardous materials,*
- *restore, maintain, or safely operate a public utility, transportation or communication system,*
- *permit operations of a business for the purpose of providing fuel, heating, electrical, plumbing **and other services necessary to prevent an immediate threat to the health, safety, and welfare of the public,***
- *conduct news reporting activities.*

Also, below are excerpts from the ASHRAE¹ Position Document on Airborne Infectious Diseases, with key sections noted in bold for your consideration:

There are various methods of infectious disease transmission, including contact (both direct and indirect), transmission by large droplets, and **inhalation of airborne particles containing infectious microorganisms. The practice of the HVAC professional in reducing disease transmission is focused primarily on those diseases transmitted by airborne particles.** (as is the case with COVID-19)

...when outbreaks occur in the workplace, **transmission through HVAC systems must be considered.**

...transmission occurs not only through direct contact or large droplets, as is the long-standing public health tradition, but also through the airborne route, as newer data suggest, **HVAC systems may contribute far more both to transmission of disease and, potentially, to reduction of transmission risk**

... **Ventilation represents a primary infectious disease control strategy through dilution of room air around a source and removal of infectious agents (CDC 2005).**

As you know, Italy has been the hardest hit country in terms of mitigating the death toll and recovering from this pandemic. NADCA member and board member, Andrea Casa, located in Northern Italy, has provided a very telling update to our Board and I'd like to share it with you, attached. You'll see that the Italian authorities have asked HVAC cleaning companies to continue to work to disinfect HVAC components to assist in stopping the spread of COVID-19. These companies are deemed essential. Considering the severity of infection in Italy and the desire in the United States to avoid repeating their mistakes, I ask you to think and move proactively.

On behalf of the thousands of individuals working to help keep our indoor environment clean and safe, I respectfully ask you to add "HVAC technicians" and "air duct cleaning technicians" to the state list of *essential* businesses so that our members may continue to serve the communities where their services are so desperately needed.

Respectfully,



Mark Zarzeczny , ASCS, CVI
President and Chairman of the Board

¹ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its members focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability within the industry. Through research, standards writing, publishing and continuing education, ASHRAE shapes tomorrow's built environment today. ASHRAE was formed as the American Society of Heating, Refrigerating and Air-Conditioning Engineers by the merger in 1959 of American Society of Heating and Air-Conditioning Engineers (ASHAE) founded in 1894 and The American Society of Refrigerating Engineers (ASRE) founded in 1904.