



April 1, 2020

Mr. 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 the members of the International Window Cleaning Association (IWCA) who represent thousands of professional window cleaners as well as all independent cleaning contractors throughout our country. The IWCA Membership is responsible for cleaning and sanitizing numerous surfaces in commercial and residential facilities throughout the country. This includes the interior and exterior of business locations that have been deemed critical and essential infrastructure. We know our members will play a very crucial and important role in reducing the spread of the virus during these times and aiding facilities with getting back to a level of cleanliness so they can officially reopen to the public.

The IWCA would like to request and in fact, urges you to allow exemptions for small business owners, such as our members in particular, to create the least amount of burden as we can. Our members are included in the fewer than 50 employee's regulation that is referenced in the Families First Coronavirus Response Act (FFCRA).

The viability of small businesses in the cleaning industry is extremely important to our country bouncing back from this pandemic together. The recent stay at home and shelter in place orders have taken a toll on our operators and their business because the many customers they serviced were deemed not essential and forced to close. Many of our members and other small business cleaning contractors lack the viable capital to comply with the paid leave requirements in the act. In the meantime, our members are focusing their effort on helping our country clean up and fight through this crisis on the front lines.

The IWCA supports the FFCRA act and we believe in the end with proper oversight and attention to the small business owners cleaning the exterior and interior of essential businesses as part of the critical infrastructure we can keep every one of them in business. We can also move us past this crisis quicker and in the most efficient manner as possible.

We thank you for the attention to this matter as it affects our members; members who will provide our country with vital infrastructure to safeguard American citizens lives.

Sincerely,

Paul Collum - IWCA President