

July 17, 2020

Mayor London Breed and the San Francisco Board of Supervisors
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Hotel cleaning standards

Dear Mayor Breed & Supervisors:

Along with my colleagues below, I write regarding the recently-passed Healthy Buildings Ordinance, which you are now considering adopting as a permanent standard for San Francisco hotels. During the passage of the initial ordinance, we heard numerous hotel representatives challenge the safety of daily room cleaning during the COVID-19 pandemic. We want to share our considered opinions on the subject.

Hotel companies have stated that daily cleaning of guest rooms is unsafe

In an opinion published in the San Francisco Examiner, Thomas J. Baltimore, chairman and CEO of Park Hotels & Resorts Inc., stated *“by prioritizing daily cleaning of all guest rooms, there is a blatant disregard for the personal safety of housekeepers and guests”*.ⁱ Similar statements were made during public testimony to the Board, including by the California Hotel & Lodging Association, the San Francisco Hotel Council, and numerous hotel companies.ⁱⁱ

We are concerned that these statements misrepresent the scientific understanding of the transmission of SARS-CoV-2, the virus that causes COVID-19. We are also concerned that these statements may induce hotel guests, workers, and operators alike to take measures that are ill-advised during this pandemic. Almost all public health guidance has recommended more frequent and more thorough cleaning of surfaces. Daily cleaning of hotel rooms, with an opt-out for customers who want to, was the norm prior to COVID-19 and we do not believe that should change. As the World Health Organization recommends, programs offering incentives to refuse daily housekeeping should be suspended indefinitely.

Cleaning guest rooms daily is consistent with public health guidance

Much is unknown about SARS-CoV-2 transmission. However, scientists have identified three primary forms of transmission, and health officials around the world are designing policy to disrupt all three:

- *Contact Transmission*: infection via transfer from contaminated hands to mucus membranes, such as nose, mouth and eyes
- *Droplet Transmission*: infection by large droplets created during coughing or sneezing that are propelled into the face and onto mucus membranes, such as nose, mouth and eyes
- *Airborne Transmission*: infection via the inhalation of smaller particles both near and far from an infectious source

There is uncertainty about each route of transmission and whether any one of these is more important than the other. The risk level and precise mechanisms are not fully understood, although the receptors for SARS-CoV-2 are generally found throughout the respiratory system. Nor do scientists fully understand what constitutes an “infectious dose”, nor how many particles, of what size, containing how many viruses pose a serious infection risk.

Public health guidance has consistently underscored the importance of *enhanced* and *frequent* cleaning of high-touch surfaces, a measure designed to reduce the risk of contact transmission caused by touching contaminated objects and subsequent transmission through the eyes, mouth, or nose. Hand washing also has a role to play in preventing contact transmission. SARS-CoV-2 remains viable for up to a week on certain surfaces. While the degree of transmission risk posed by contact with such surfaces remains uncertain, this fact underpins the consensus that high-touch surfaces should be cleaned often.

Hotel guest rooms are filled with objects made of materials on which SARS-CoV-2 is known to remain viable for 48-144 hours – glass, plastic, treated wood, stainless steel. Many of these objects, such as TV remote controls, light switches, desk tops and bathroom fixtures are likely to be touched by more than one person, including visitors from the community or guests staying in other rooms.

Cleaning guest rooms can bring important public health benefits

It is important to recognize that, while access to individual hotel rooms may be limited by a lock and key, guest rooms pose a public health hazard similar to common areas in hotels. Guests often invite other guests or individuals from the community into their rooms, and bring in food and alcohol from outside the hotel. In addition to professional meetings and business travel, hotel stays are central to hosting sporting events, weddings, reunions, and other social events, during which guests commonly move back and forth between multiple rooms to socialize, eat and drink.

When understood in that light, we believe there is good reason to ensure that high-touch surfaces in guest rooms receive regular and thorough disinfection, as with other hotel spaces. Waiting until check out to clean a room occupied by an infectious guest or frequent visitor may increase the risk of contact transmission to employees, guests and visitors. A room occupied by an infectious guest or visited frequently by an infectious person will experience an increasing viral load on those surfaces. Thus, if a guest or frequent visitor to a guest’s room is infected with the virus, the risk of infecting others increases during the course of the stay.

Guest rooms can be cleaned safely, given certain precautions

In our view, it is feasible and practical to assess and implement air changes, filtration, and other methods to ensure that rooms can be cleaned safely.

The risks associated with cleaning guest room surfaces are similar to those associated with cleaning high-touch surfaces anywhere else in a hotel (or any other public facility). The most compelling argument we have seen to distinguish guest rooms is the fact that they are small by comparison to other hotel spaces, resulting in potential close proximity of guests and employees. Indeed, the Hilton Union Square, a large convention hotel, lists regular guest rooms at 270 square feet and suites up to 750

square feet,ⁱⁱⁱ and the Hotel Marker lists regular rooms at 220-250 square feet and suites up to 625 square feet.^{iv} However, we point out that many parts of tourist hotels are similarly sized – including public restrooms, business centers, employee break rooms, and even (in smaller hotels) reception areas.

We wholeheartedly agree that, while other individuals of unknown COVID-19 status are physically present, hotels should minimize the entry of employees into any small rooms, including guest rooms. Daily cleaning of guest rooms should take place only when guests and visitors are not present. Allowing for time after individuals have vacated a small space provides for adequate protection against droplet transmission.

The other principal risk associated with cleaning small rooms, including guest rooms, is aerosolized transmission (the subject of a recent letter to the World Health Organization signed by more than 200 scientists^v). Hotels should ensure that small rooms (and indeed, all spaces) are properly ventilated, with a high proportion of outside air, a minimum of recirculation, and well-maintained, high-quality filters (MERV 13+). Wherever possible, demand-controlled HVAC systems should be overridden to allow for maximum ventilation rates. Where this is not possible, hotels should encourage guests to turn up ventilation systems and open windows (particularly before leaving their rooms), and should assign staff to do so manually prior to cleaning. We encourage hotels to consult with occupational health and safety experts to evaluate their ventilation systems, and assess the time necessary to minimize risks in the context of their specific room volumes, air exchange rates, and ventilation system characteristics.

These measures are straight-forward to implement. Given such common-sense steps, the risks to workers associated with cleaning guest rooms are similar to those posed by cleaning and disinfecting high touch areas in other parts of the hotel. Moreover, the public health benefits are also similar. Where pandemic conditions are such that health authorities believe guest rooms cannot be cleaned safely, we question whether it is appropriate to permit hotels to accept tourists at all.

Cleaning guest rooms daily has broader health benefits

We believe there are compelling reasons to encourage daily cleaning of hotel guest rooms, especially in the context of COVID-19. We understand from hotel employees that cleaning rooms after several days without housekeeping services makes it difficult to do a thorough and deep cleaning between guests – something that is all the more important during a pandemic. We also recognize that such delayed cleaning can necessitate the use of more intensive cleaning chemicals and physical effort, which can lead to adverse health consequences.

We hope you will consider these points in your deliberations.



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Endnotes:

ⁱ “Proposed ordinance could keep hotels closed, hurt environment and worse”, by Thomas J. Baltimore, San Francisco Examiner Opinion, 6/26/2020.

ⁱⁱ Testimony to the San Francisco Board of Supervisors Land Use and Transportation Committee, 6/29/2020.

ⁱⁱⁱ <https://www3.hilton.com/en/hotels/california/hilton-san-francisco-union-square-SFOFHHH/accommodations/index.html>

^{iv} <https://www.themarkersf.com/rooms>

^v Morawska L, Milton DK. It is Time to Address Airborne Transmission of COVID-19 [published online ahead of print, 2020 Jul 6]. Clin Infect Dis. 2020;ciaa939. doi:10.1093/cid/ciaa939