The Costs of the Biden Administration’s COVID-19 Mandate Rules

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The Occupational Safety and Health Administration (OSHA) finally rolled out its Emergency Temporary Standard (ETS) mandating employers with 100 or more employees to establish and enforce a policy requiring employees to be vaccinated for COVID-19 or submit to mask-wearing and weekly testing. In a new insight, Director of Regulatory Policy Dan Bosch and Senior Regulatory Policy Analyst Dan Goldbeck explain employers’ requirements under the rule and breaks down OSHA’s cost estimates. They also describe the costs associated with a corollary rule from the Centers for Medicare and Medicaid Services (CMS) mandating health care facilities that work with CMS to require vaccination.

Key points:

- OSHA’s ETS will cost an estimated $3 billion over the six-month period the ETS can remain in effect.
- OSHA makes no estimate of the costs to employees, who will have to pay any costs associated with testing and mask requirements should they opt out of vaccination.
- CMS’s vaccination-requirement rule will cost an estimated $1.4 billion in the rule’s first year.
- Combined, the two rules impose about $4.4 billion in costs.

Read the analysis