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# Domestic COVID-19 Testing Requirements for Aviation: Analysis and Implications

**Overview: Federal COVID-19 measures should:**

- Be based on a scientific and data-driven risk assessment.
- Be effective, feasible, and scalable.
- Produce net-positive benefits for public health and avoid unintended consequences.

## Scientific data is clear: The risk of COVID-19 transmission while flying is low.

- **There are already strong, layered protections in place throughout the air travel corridor:** The air travel community has embraced a science-driven, layered approach to protect aviation workers and travelers that aligns with the Centers of Disease Control and Prevention (CDC) guidance and includes recommendations for the curb-to-curb travel journey including:
    - Mandatory and universal facial covering (mask) wearing;
    - Physical distancing;
    - Enhanced sanitization;
    - Pre-flight health forms; and
    - Air exchanges with HEPA filters that remove viruses.

- **The federal mask mandate has made flying even safer:** The CDC has just implemented an order requiring masks throughout the air travel process, which is strongly supported by the aviation and travel communities. We believe the mask mandate will further improve the safety of flying and the impact of this new policy should be measured as part of any risk assessment.

- **Rigorous scientific studies show that existing protections effectively mitigate risk:** Studies by both the Harvard T.H. Chan School of Public Health's Aviation Initiative (APHI) and US TRANSCOM found that the risk of onboard transmission is low, especially when compared to other routine activities. Similarly, a recent study in Canada found that travel was the smallest contributor to new COVID-19 infections and has remained extremely low throughout the crisis.

**CONCLUSION:** A data-driven risk assessment shows that the risk of COVID-19 transmission while flying is already low. Therefore, an aviation-only testing mandate would be discriminatory and unwarranted.

## A domestic testing requirement is not scalable, feasible or effective.

- **Not scalable.** Testing on international inbound flights is manageable because there are currently only 691 international departures per day. However, a domestic air travel requirement would be 17-times greater in scale, as there are more than 12,200 domestic departures per day. This policy would also necessitate a 42% increase in daily testing capacity nationwide. Of note, the institution of international testing requirements resulted in demand drops from 31% to 48% depending on the market. The expected domestic demand decrease will be even more dramatic since the price of the COVID tests will be a greater percentage of the travel cost.

- **Not feasible.** If testing is required for air travel, it sets an unachievable precedent that mandatory testing should be implemented for all closely confined public activities – including other modes of public transportation, going to the grocery store, or indoor dining. Universal testing on such a broad scale is simply not feasible. If testing mandates are pursued, policies should start with the highest-risk activities.

- **Not effective.** Because air travel is low risk and likely accounts for a small number of transmissions, a universal testing mandate would do little to slow the spread of COVID-19. The added cost and difficulty with compliance would also shift travel demand to higher risk modes of transportation, such as trains or buses, which could have a net-negative impact on public health.

**CONCLUSION:** A testing mandate for domestic air travel would require extraordinary resources, set unachievable standards for protecting public health, and do little to further curb COVID-19 transmission.

## A domestic testing requirement will have negative and unintended consequences.

- **Not Effective.** Creating an aviation industry specific testing standard well above any other economic sector is impractical and discriminatory for no material societal benefit given wide community spread domestically and the option to easily utilize other modes of transportation.

- **Siphons resources from more important public health priorities**. A pre-departure testing mandate for domestic air travel would divert testing and financial resources away from more pressing public health priorities. For example, based on January 2021 data, a testing requirement for domestic air travel would necessitate a 42% increase in daily testing capacity nationwide.[i]

Although testing production is expected to increase, there is still no question that a mandate of this magnitude would syphon public health resources away from more vulnerable populations such as nursing homes, medical facilities and schools.

- **Shifts travel demand to higher-risk modes of transportation.** The prospect of procuring up to two separate COVID tests will significantly raise the cost of air travel, curb what little demand exists today and will simply push travelers to drive, take a bus or ride a train. The other transportation options do not have the mitigation measures in place that air travel does. The option of driving is especially unadvisable given the expected climate impact and uptick in driving fatalities as seen after 9/11.

- **Lead to further job losses, without producing meaningful public health benefits.** A nationwide testing mandate for domestic air travel would further suppress demand for flying and reduce travel spending, while at the same time require significant financial resources to operationalize and enforce. The sweeping economic consequences to aviation and travel industries, at a time when these important economic drivers are already facing unprecedented harm, will result in further shrinking of our economy coupled with additional jobs losses. The broader travel industry lost an estimated $510 billion in travel spending and 4.5 million jobs in 2020, which accounts for 42% of all jobs lost nationwide since the pandemic began. In fact, airlines have recently warned that they may need to lay off another 27,000 employees. Many airports have begun or are considering layoffs around the country. A domestic testing requirement will further increase the need for layoffs.

- **Disproportionately impact low-income households and rural communities.** Public health and economic data indicate that domestic testing would disproportionately prevent low-income travelers and rural Americans in small communities from travel. They may have less access to testing facilities, which could cause further job loss and economic harm to the most devastated sectors of the economy, who will need air service to take part in recovery.

**CONCLUSION:** The negative and unintended consequences of an air travel testing mandate would far outweigh any potential benefits that could come from trying to make a provenly safe activity even safer.

## Consultation Request

We look forward to continuing our partnership with the COVID-19 response team and relevant Federal agencies to develop and implement risk-based, data-driven public health measures that enhance the safety of commercial aviation. However, the costs and consequences of a domestic testing requirement for air travel clearly outweigh any potential benefits. Moving forward:

- We request and urge you to seek input from the aviation sector and broader travel industry before implementing any additional testing measures to ensure those plans are feasible and effective in successfully dealing with the health and economic consequences of the COVID pandemic.

- Singling out aviation for a domestic testing requirement is unwarranted given the effective risk mitigations implemented and the lack of data-driven evidence that air travel is a high-risk activity. The travel community would like to understand any data-driven risk assessment that the USG is utilizing as a basis for asserting that there is a large amount of virus transmission in the air travel corridor.

- The CDC has recently implemented a facial covering mandate for airports and airlines. We urge the Administration to gather data on how this measure has further mitigated transmission risk in the air travel corridor before imposing a new domestic mandate.

Finally, within four months, the vaccine is expected to become available to the general population and the priority for time and resources should be given to increasing vaccination rates, as opposed to testing a very safe mode of travel. Moreover, the seven day average infection rate has been trending down for almost three weeks, indicating that new and existing public health protections are starting to have an impact. If these trends continue, it is likely that a broad domestic testing requirement could be even more unnecessary by the time it can actually be achieved.

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[i] Data compares TSA throughout for January 2021 and daily reported COVID-19 tests for January 2021: https://www.tsa.gov/coronavirus/passenger-throughput and https://covidtracking.com/data/charts/us-daily-tests