



# **COVID-19 WORKPLACE**

## **SAFETY PLAN**

**July 2021**

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## INTRODUCTION

The January 20, 2021, the Executive Order on [Protecting the Federal Workforce and Requiring Mask-Wearing](#) and the [National Strategy for the COVID-19 Response and Pandemic Preparedness](#) established that:

*“It is the policy of the Administration to halt the spread of coronavirus disease 2019 (COVID-19) by relying on the best available data and science-based public health measures. Such measures include wearing masks when around others, physical distancing, and other related precautions recommended by the Centers for Disease Control and Prevention (CDC). Put simply, masks and other public health measures reduce the spread of the disease, particularly when communities make widespread use of such measures, and thus save lives.”*

On January 24, 2021, the Office of Management and Budget (OMB) issued guidance, [M-21-15 COVID-19 Safe Federal Workplace: Agency Model Safety Principles](#), to assist federal agencies in developing tailored COVID-19 workplace safety plans. The federal government is committed to addressing essential work requirements consistent with best public health practices.

## PURPOSE AND SCOPE

The U.S. Office of Government Ethics (OGE) places the health and safety of its employees<sup>1</sup> at the very forefront while navigating the challenges presented by the COVID-19 pandemic. OGE is committed to protecting the health and safety of its workforce using data and science-based approaches that are appropriate to the risks each person faces in their job.

OGE recognizes that COVID-19 is a highly contagious infectious disease. This document is primarily focused on application of [Centers for Disease Control \(CDC\) guidelines](#) to mitigate the spread of COVID-19 in the workplace. This guidance supersedes any conflicting information in previously published OGE guidance on COVID-19. Additional and supplemental implementation guidance will be provided as necessary. The Deputy Director for Compliance should be notified of any employee or visitor failing to comply with the protocols of this plan.

## COVID-19 COORDINATION TEAM

OGE has established a COVID-19 Coordination Team to oversee our efforts to ensure the health and safety of our workforce and other individuals who visit our workplace. The team:

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<sup>1</sup> Any reference to employees in this plan is intended to include contract employees.

- Conducts assessments to establish, implement, and monitor compliance with (1) safety protocols for physical space and masking; and (2) determinations of on-site and telework/remote work.
- Periodically reviews the OGE's Workplace Safety Plan and considers potential revisions as necessary.
- Coordinates with the Safer Federal Workforce Task Force and Federal COVID-19 Response Coordinator.
- As appropriate, consults with the General Services Administration (GSA), the Office of Personnel Management (OPM), and the Office of Management and Budget (OMB). Since OGE occupies leased space, the team will coordinate with GSA and building security and safety committees as necessary.
- Determines appropriate next steps if COVID-19 cases occur within OGE work space.
- Develop a re-entry schedule outlining which employees will work on-site at any given time to adhere to capacity guidelines.

## COMMUNICATIONS

OGE is committed to proactively communicating with staff as well as continuously seeking information from staff through surveys and feedback to supervisors.

OGE's Coordination Team will hold an all-hands meetings (approximately on a monthly basis) in order to provide updates on the group's work.

A resource repository located at H:\Return to 1201 will be maintained with pertinent information from OMB/OPM and building management. This repository will also contain links to new and modified internal policies as well as records of communications to staff.

OGE has developed a Frequently Asked Questions (FAQ) document to assist employees in navigating key aspects of the plan and related policies. The document will be updated, circulated, and saved in the resource repository as it is revised.

*How will employees be notified of new policies/procedures?*

Generally, any new policy or procedure will be announced at an all-hands meeting and then circulated by email and saved in the resource repository. Revisions to existing policies may be circulated by email between all-hands meetings and saved in the resource repository.

*How will employees be notified when OGE determines it is appropriate to alter access to the workplace?*

The Director of OGE will send an agency-wide email notifying staff that a determination has been made to alter access to the workplace. The email will be followed by an all-hands meeting to discuss the implementation of the change.

## TELEWORK AND WORKPLACE FLEXIBILITIES

As a general principle, every effort will be made to maximize the use of telework during widespread community transmission. Maximum telework will be in effect with only a predetermined number of employees occupying the workspace at predetermined times and intervals. The building will be accessible only to the voluntary employees, designated personnel, and employees who have received prior approval from the Deputy Director for Compliance on an ad hoc basis. Self-certification protocols will be required prior to any employee entering OGE workspace.

Telework and other workplace flexibilities such as alternative work schedules, expanded core hours, and limited use of administrative leave for caregiving responsibilities and receiving vaccinations, have been established to meet the health and wellness concerns of OGE employees during the COVID pandemic.

## HEALTH AND SAFETY

**UPDATE: On May 13, 2021, CDC issued revised guidance regarding masking and physical distancing requirements for fully vaccinated individuals.** Consistent with this guidance, fully vaccinated employees, contractors, and visitors are no longer required to wear masks or socially distance. “Fully vaccinated” is defined as being at least two weeks past your final dose.

**The following requirements regarding masks and physical distancing remain in effect for all employees and visitors who are not fully vaccinated or who choose not to share their vaccination status.**

### MASKS AND PHYSICAL DISTANCING

- A. All employees and visitors are required to wear a face covering that covers the nose and the mouth while in the office. The use of masks is not a substitute for physical distancing practices.
  1. According to CDC guidance, adequate face coverings are non-medical disposable masks, masks that fit properly (snugly around the nose and chin with no large gaps around the sides of the face), masks made with breathable fabric (such as cotton), masks made with tightly woven fabric (i.e., fabrics that do not let light pass through when held up to a light source), masks with two or three layers,

and masks with inner filter pockets. OGE does not allow novelty/non-protective masks, masks with ventilation valves, or face shields as a substitute for masks.

2. Employees and visitors should bring their own face covering to the office. OGE has a limited supply of masks that may be provided to employees in an emergency.
  3. Employees may temporarily remove face coverings while alone in their own private offices, with the door closed.
  4. Employees must wash their hands with soap and water for at least 20 seconds or use hand sanitizer with at least 60% alcohol after touching or removing their mask.
  5. If an employee or visitor does not have a face covering and OGE is unable to provide one, they should leave the office immediately.
  6. If an employee is unable to wear a face covering for a medical or other reason, they should notify their supervisor to request a reasonable accommodation in accordance with OGE's Reasonable Accommodation Policy.
- B. All employees and visitors are required to practice physical distancing (stay at least six (6) feet from other people) while in the office. Physical distancing is not a substitute for wearing masks, which is also required in the presence of other people. In addition, the following precautions must be observed:
1. Employees and visitors must follow directional signage and posted room capacity limits while in the office.
  2. Work-related meetings will continue to be held virtually or via telephone. (No face-to-face meetings.) When the Director of OGE has determined that it is safe for in-person meetings, employees who are working in the office may participate in meetings of no more than three (3) people, provided that the meeting is held in a private office space or a conference room, all participants are wearing face coverings, and all participants practice social distancing (six (6) feet apart) during the meeting.
  3. The use of common areas (such as the kitchens) or particular common items or equipment (such as kitchen utensils, mugs, the refrigerator, coffee pot, water fountain, water cooler, and microwave) are likely to be subject to limitation and/or restrictions on use by employees working in the office. Employees in the office agree to abide by any posted or communicated limitations and/or restrictions.

4. No more than one person is permitted in an office restroom at one time. Each restroom has been fitted with a locking mechanism which indicates that the restroom is occupied when the lock is engaged. Individuals are required to engage the locking mechanism when using the restroom.
5. Employees are prohibited from bringing other individuals into the Office for any reason, without prior approval from the Deputy Director for Compliance. Such individuals will be required to complete the same self-certification process prior to entering the office that OGE employees must complete.

## OCCUPANCY

Occupancy in OGE's workplace will not exceed 25% of normal capacity during periods of significant or high community transmission. This capacity limit will be used in combination with other controls including required physical distancing and the use of masks. The COVID-19 Coordination Team will ensure that all of these controls are used correctly to mitigate the potential for COVID-19 spread. Levels of community transmission can be established by consulting CDC's COVID Data Tracker County View.

## SYMPTOM MONITORING

We all share in the responsibility for limiting the spread of COVID-19. One of the best ways to limit the transmission of the virus is to stay home if you are sick.

If an employee or visitor is experiencing or has experienced within the last 48 hours any of the following symptoms, they MAY NOT enter the office:

1. Fever (temperature over 100.4 degrees) or chills
2. Cough
3. Shortness of breath or difficulty breathing
4. Fatigue
5. Muscle or body aches
6. Headache
7. New loss of taste or smell
8. Sore throat
9. Congestion or runny nose
10. Nausea or vomiting
11. Diarrhea

## SELF-CERTIFICATION PROCESS TO BE PRESENT IN OFFICE

Prior to reporting to the office, an employee must receive a one-time approval from their supervisor, and must thereafter submit a self-certification to their supervisor as described in subsection A below, for each day they are physically in the office.

- A. If an employee or visitor has not experienced any of the above symptoms within the last 48 hours, and plans to be physically present in the office, they must certify the following each day as a condition of entering the office:
  - 1. Within the past 14 days, to their knowledge, they have not been in close physical contact (6 feet or closer for a cumulative total of 15 minutes) with:
    - a. Anyone who is known to have laboratory-confirmed COVID-19 OR
    - b. Anyone who has any symptoms consistent with COVID-19
  - 2. They are not isolating or quarantining because they may have been exposed to a person with COVID-19 or are worried that they may be sick with COVID-19
  - 3. They are not currently waiting on the results of a COVID-19 test.
- B. If an employee or visitor cannot attest to all of the above statements on the day that they plan to be physically present in the office, they MAY NOT report to the office. There are no exceptions to this prohibition.
- C. Any intentionally false or misleading statement, certification, or response provided on the self-certification form is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001. It may also serve as the basis for disciplinary action.

## ENTRANCE PROTOCOLS

The primary entrance to the OGE suite will be the main entrance double doors opposite the atrium. The single doors nearer the atrium will be EXIT ONLY. Both ENTRANCE and EXIT ONLY signs are posted at eye level on the doors. Personnel flow within OGE will be counter clock-wise from the main entrance (take a left when entering). Directional signs placed at eye level on the walls indicate direction of movement. Personnel must wear masks and maintain physical distance of at least 6 feet when transiting the hallways. The hallway in front of the Director's office will be bi-directional.

### A. RE-ENTRY SCHEDULE (Sample)

Only a predetermined number of employees and/or visitors will be allowed to occupy the workspace at predetermined times and intervals. OGE will plan for and



monitor occupation of the office using a spreadsheet that will track, at least, the number and names of occupants, the number of days per week employees will be in the office, and the specific days on which the employees are expected to be present. A simplified sample of this tracking spreadsheet follows directly below:

**Sample Simplified Tracking Spreadsheet**

	Monday	Tuesday	Wednesday	Thursday	Friday
Group 1 (Max 9)		X			X
Group 2 (Max 9)	X			X	

**B. SIGNAGE**

Appropriate signage with notices on face coverings, social distancing hygiene practices, space limits, etc. are to be prominently posted in common areas throughout the office. Directional signage is posted at eye level to indicate the proper flow of personnel through OGE hallways. Entrance and Exit are properly marked to indicate their use. Locations of hand sanitizer, disinfectant, cleaning supplies, etc., have been identified and posted.

**IN-OFFICE ILLNESS PROTOCOL**

- A. If an employee or visitor who has entered office starts to feel ill or starts to experience any of the symptoms listed above, the individual must leave the office immediately and, in the case of an employee, notify their supervisor.
- B. An employee who falls ill while in the office must inform their supervisor what spaces they occupied while in the office and, to their knowledge, with whom they came into contact while in the office.
- C. If an employee presenting symptoms while in the office tests positive for COVID-19, the Deputy Director for Compliance shall contact the Washington DC Reporting and Surveillance Center (DCRC) using the Non-Healthcare Facility COVID-19 Consult Form at: <https://redcap.doh.dc.gov/surveys/index.php/surveys/?s=PCPP97J4EL>

**CONFIDENTIALITY**

All medical information collected from personnel, including test results and any other information obtained as a result of testing and symptom monitoring, will be treated confidentially in accordance with applicable law and accessible only by those with a need to know, in order to protect the health and safety of personnel. Any questions about personal medical information should be addressed to the Deputy Director for Compliance.

## TRAVEL

In accordance with CDC and OMB guidance, travel requirements and restrictions vary depending on the vaccination status of the traveling employee.

### A. TRAVEL BY FULLY VACCINATED EMPLOYEES

There are no government-wide limits on official travel for federal employees who are fully vaccinated. Employees who are fully vaccinated do not need to get tested before or after domestic travel or self-quarantine after domestic travel, unless required by their destination. However, fully vaccinated individuals should self-monitor for symptoms, wear a mask over nose and mouth on planes, buses, trains, and other forms of public transportation traveling into, within, or out of the United States, and while indoors in U.S. transportation hubs such as airports and stations, and take other precautions during travel. Travelers are not required to wear a mask in outdoor areas of a conveyance (like an open-air ferry or top deck of a bus).

With regard to international travel, employees who are fully vaccinated do not need to get tested before leaving the United States (unless required by their destination) or self-quarantine after arriving back in the United States. However, all air passengers coming to the United States from abroad, including Federal employees who are fully vaccinated, are required to have a negative SARS-CoV-2 viral test result no more than three days before the flight to the United States departs or must show documentation of recovery from COVID-19 within the previous 90 days before they board a flight to the United States. Fully vaccinated travelers should also get tested with a viral test 3-5 days after travel, self-monitor for COVID-19 symptoms, if symptoms develop isolate and get tested, and follow all recommendations or requirements of their U.S. destination after travel.

### B. TRAVEL BY EMPLOYEES WHO ARE **NOT** FULLY VACCINATED

At this time, official domestic travel for federal employees who are not fully vaccinated is limited to mission critical trips. The OGE Director will determine what travel meets the mission-critical threshold for OGE employees. Employees who are not fully vaccinated should take recommended precautions during mission-critical travel. These precautions can be found [here](#). For employees who are not fully vaccinated, international travel should be avoided if at all possible.

## WELLNESS RESOURCES

OGE recognizes employees may be experiencing increased anxiety, stress, depression, or other mental health conditions during this time. Accordingly, OGE consistently promotes work/life programs and resources through internal communications to help employees balance and manage daily home and work responsibilities or deal with life challenges. Employees can reach out to the Employee Assistance Program (EAP) for help on coping with stress and anxiety that may result from this public health crisis. This free, confidential, and professionally-staffed service is available to all OGE employees. EAP is a professional resource available to help employees resolve life challenges, through confidential counseling and coaching with experienced, licensed counselors — including legal and financial consultation. EAP is available 24 hours a day/7 days per week/365 days per year. Feel free to contact EAP at 800-222-0364.

## WORKPLACE OPERATIONS

### FACILITY WORKPLACE SAFETY GUIDELINES

Building management continues to work on accommodating building re-entry for all tenants and have provided the following information regarding building protocol and procedures related to social distancing and changes OGE employees will see as populations increase in the building. The situation remains fluid, and these protocols will continue to evolve in response to any new guidance from the federal government, local authorities and CDC.

- **Facemasks.** Tenants and visitors are required to wear facemasks when entering the building and in public areas. Building management will wear facemasks when in public areas.
- **Hand Sanitizer.** Hand sanitizer stations are available near entryways.
- **Security.** Security personnel will be available to help guide tenants and visitors through new operating procedures while ensuring the building remains safe and secure.
- **Lobby/Elevator Access.** In order to facilitate social distancing in the lobby and elevators, markers have been placed on the lobby and elevator car floors and elevator car capacity has been limited 4 people per ride. Signs have been placed to help facilitate this process.
- **Stair Access.** Stairwells have been dedicated as either up or down access only. Signs have been placed on the stairwell door to facilitate this process. *(Currently, the only*

*stairwell that enters into OGE's suite using Kastle key access is dedicated as a "down" stairwell. OGE is considering ways to allow employees to enter the suite from a designated "up" stairwell, such as moving the Kastle key reader to one of the "up" stairwells.)*

- **Touchpoints.** Building management is working to minimize touchpoints throughout the building. This includes doors, visitor registration, and other common points of contact, to the extent feasible.
- **Enhanced Cleaning Protocols.** Enhanced cleaning protocols of high frequency touchpoints throughout common areas, elevators, and restrooms, including door handles, flat surfaces, and elevator call buttons are performed daily.
- **Amenities.** Parking garage and bike parking is open and available. The roof conference center is open with social distancing guidelines. The fitness center will remain closed for now.
- **HVAC Air Quality.** Fresh air intake has been increased to the maximum allowed by the system. Additionally, filters are being utilized to the maximum MERV filtration levels specified by the system. Building management is looking into replacing air handlers on each floor, but does not have a specified time frame for when this will be completed. For the near term, they are looking into providing portable air filtration scrubbers for each tenant space.
- **Signage.** Signage has been posted throughout common areas of the building to assure building occupants and visitors are aware of new directional paths, policies, and procedures.

## OGE SUITE SAFETY GUIDELINES

### A. SUPPLIES/PROTECTIVE EQUIPMENT

EPA-approved cleaning supplies are provided for employee and visitor use and placed in central locations throughout the suite. Gloves and hand sanitizer will be available for use while in the office. Employees should notify the Administrative Operations Branch (AOB) if supplies need to be restocked.

### B. CLEANING AND DISINFECTING POLICY

#### a. OGE SUITE CLEANING

OGE will contract to have the suite “deep cleaned” prior to the return of non-essential employees to 1201 New York Avenue and then each time in response to a suspected or confirmed case of COVID-19 in the workplace. Any such cases should be reported to OGE’s Administrative Officer in order for her to facilitate the deep-cleaning process. The deep cleaning will be conducted by an authorized cleaning service using CDC-approved cleaning/disinfecting agents and guidance. In addition, building management will conduct daily routine enhanced cleaning of high touch points.

**b. USE OF OGE COMMON AREAS**

Employees should take extra precautions when using common areas such as meeting rooms, kitchens, and restrooms by utilizing the cleaning supplies provided to disinfect high touch points.

**c. USE OF NETWORK COPIERS/PRINTERS**

Since this equipment is frequently used, proper sanitizing of the equipment must be taken before and after immediate use by all personnel. Disinfecting and sanitizing supplies are located in the immediate vicinity of the equipment to facilitate cleaning.

**d. HYGIENE**

To prevent the transmission of all respiratory infections, respiratory hygiene OGE encourages employees and visitors to:

- Cover your cough or sneeze with a tissue or mask, or use the inside of your elbow, and then throw the tissue away in the trash and immediately wash your hands.
- When in public spaces, wear an appropriate mask covering your nose and mouth.
- Do not touch your eyes, nose, or mouth with unwashed hands.
- Wash your hands often with soap and water for at least 20 seconds especially if you have been in a public space, or after blowing your nose, coughing, or sneezing. If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.

- Clean and disinfect frequently touched surfaces daily.