



## USTDA COVID-19 Workplace Safety Plan October 2022

USTDA helps companies create U.S. jobs through the export of U.S. goods and services for priority infrastructure projects in emerging economies. USTDA links U.S. businesses to export opportunities by funding project preparation and partnership building activities that develop sustainable infrastructure and foster economic growth in partner countries.

USTDA achieves its mission by funding feasibility studies, technical assistance and pilot projects that integrate U.S. private sector innovation into infrastructure projects at the critical early stages when design choices and technology options are determined. The Agency also connects overseas project sponsors with U.S. partners through its reverse trade missions, industry conferences and expert workshops.

USTDA's dual mission of facilitating overseas economic development and U.S. exports is unique among federal agencies. In carrying out our mission, the Agency places particular emphasis on vital economic sectors including clean energy, information and communications technology, transportation, agribusiness, and healthcare infrastructure.

This workplace safety plan was created in response to a [memorandum](#) issued by the Office of Management and Budget (OMB) on January 24, 2021 in response to the Executive Order, [Protecting the Federal Workforce and Requiring Mask-Wearing](#), which is part of the [National Strategy for the COVID-19 Response and Pandemic Preparedness](#). This workplace safety plan was further updated by incorporating guidance in OMB Memorandum [M-21-25](#) issued on June 10, 2021, Executive Order 14042 [Ensuring Adequate COVID Safety Protocols for Federal Contractors](#), Executive Order 14043 [Requiring Coronavirus Disease 2019 Vaccination for Federal Employees](#), and subsequent guidance issued by the [Safer Federal Workforce Task Force \(Task Force\)](#).

USTDA created this workplace safety plan to guide how the Agency can implement public health best practices as determined by the Centers for Disease Control and Prevention (CDC). As we have done since the start of the pandemic, USTDA will work to balance delivery of our critical missions with adapting to the everyday challenges that COVID-19 presents to the workforce. The health and safety of the USTDA employees and on-site contractors (together, "Staff") is paramount. In response to the memoranda and guidance, we have:

- Established USTDA-wide guidance requiring correct and consistent use of masks, encouraging consideration of physical distancing, and other relevant safety protocols consistent with current CDC guidance in USTDA facilities and offices, when appropriate for the situation
- Reviewed the safety principles provided by OMB and adapted them to meet the

needs of USTDA

- Designated a COVID-19 coordination team within USTDA
- Established a Vaccination Status Screening Process
- Established a Screening Testing Program for federal employees of USTDA
- Established a Reentry Exception Request Process for federal employees of USTDA

While this plan is in response to the COVID-19 pandemic and will guide us thru the pandemic recovery transition, it will also serve as a starting point for any similar future workplace disruptions.

The USTDA COVID-19 workplace safety plan is as follows:

## **Health and Safety**

### **Telework and Remote Work**

USTDA may use telework and remote work as a safety protocol to minimize workplace occupancy. Any limitations to USTDA's workplace capacity will be in alignment with government-wide guidance from OMB and OPM. Any occupancy limitations must be approved by the Director, as advised by the COVID Coordination Team, and in consultation with the Task Force, as appropriate. All Staff are advised to follow best health practices identified by the CDC, and the guidance laid out in this workplace safety plan.

In addition to Federal agency guidance, USTDA will consider the guidance of state and local government where the USTDA office is physically located, with respect to occupancy and or other restrictions. COVID-19 Community Levels information will be obtained by consulting [CDC's COVID-19 Community Levels](#).

Should there be a future, COVID-19 related government-wide maximum telework situation, USTDA will notify all staff as quickly as possible. Once the government-wide maximum telework posture has ended, staff who are teleworking on a frequent or regular basis (e.g., if on an expanded telework schedule, such as "maximum telework") will be given as much advance notice as possible, consistent with government-wide guidance, before being directed to return to the physical workplace. In some cases, mission critical work may require a shorter notification period. USTDA established the Reentry Exception Request process to consider unique employee situations where a delayed reentry for the individual employee may be appropriate. The workplace safety plan will remain in effect as staff return to the physical workplace until the Director, in alignment with government-wide guidance, determines that it is no longer necessary.

### **COVID-19 Coordination Team**

USTDA has established a COVID-19 Coordination Team which includes the Deputy Director & COO, Director of Management Operations, Director for Program Management, Chief of Staff, General Counsel and Administrative Officer. The team is responsible for conducting assessments to establish, implement, and monitor

compliance with: (a) safety protocols; and (b) determinations of protocols for on-site and telework/remote working. The USTDA COVID-19 Coordination Team meets as needed to review compliance with USTDA COVID-19 workplace safety plans and protocols, consider potential revisions to USTDA's COVID-19 workplace safety plan and protocols, and any other operational needs. As part of the role of the USTDA COVID-19 Coordination Team, it will review COVID-19 workplace safety plans and protocols, provide recommended changes to the Director for approval, implement approved changes, and coordinate with the Task Force as may be required. As appropriate, the USTDA COVID-19 Coordination Team may consult with the General Services Administration (GSA), the Office of Personnel Management (OPM), and the Office of Management and Budget (OMB).

## **Face Masks and other PPE**

Pursuant to Executive Order 13991, Federal agencies follow CDC guidelines for mask-wearing and other public health measures. USTDA staff and visitors are required to comply with CDC mask-wearing guidelines based upon the [COVID-19 Community Level](#) for USTDA's office in Arlington County, VA.

During periods of LOW or MEDIUM COVID-19 Community Level, mask-wearing is optional for all staff and visitors. Individuals may choose to wear a mask, during LOW or MEDIUM COVID-19 Community Levels, for a variety of reasons.

When the COVID-19 Community Level is HIGH, all staff and visitors are required to wear masks, regardless of their vaccination status. The mask must cover the nose and mouth in accordance with current [CDC mask-wearing guidance](#). Please see communication section below detailing how USTDA will inform USTDA staff and visitors about the mask rule and other procedural requirements.

If any staff member is unable to wear a mask properly, [adaptations and alternatives](#) will be considered. Accommodations may be made for individuals with required documentation and should be requested in accordance with the existing USTDA Reasonable Accommodation policy.

For individuals who are required to wear a mask:

- A high-quality mask must be worn consistently and correctly (over mouth and nose).
- A high-quality mask must be worn in any common areas or shared workspaces (including open floorplan office space, cubicle embankments, and conference rooms).
- High-quality masks include masks or respirators that meet U.S. or international standards (e.g., N95, KN95, KF94), masks that meet a standard (e.g., ASTM), or "procedure" or "surgical"-style masks.

USTDA has approved 2 exceptions to the above requirements:

- 1) Mask wearing is not required when an individual is alone in an office with floor to ceiling walls and a closed door.
- 2) The mask may be removed for a limited time when eating or drinking while maintaining distancing in accordance with CDC guidance.

USTDA staff should considerately make visitors aware of the masking requirement. To the extent funds are available, USTDA may purchase masks to provide to visitors but is not required to provide masks. Notice of the mask requirement via written signage must be posted conspicuously at each public entrance to USTDA's office, along with contact information to reach USTDA by phone, mail, email, or the Internet. If the visitor refuses, they must be directed politely to depart the premises and to conduct their business off-site (over the phone or online). USTDA staff should remain respectful yet safe and call for assistance from their supervisor, the Administrative Officer, the Director of Management Operations, or from local authorities if the situation cannot be resolved.

### **Vaccination Status Screening**

Executive Order 14043 requires that all Federal Executive Branch employees be fully vaccinated, except in limited circumstances where an employee is legally entitled to a reasonable accommodation. To ensure compliance with an applicable nationwide preliminary injunction, which may be supplemented, modified, or vacated, depending on the course of ongoing litigation, USTDA will take no action to implement or enforce the COVID-19 vaccination requirement pursuant to Executive Order 14043 on Requiring Coronavirus Disease 2019 Vaccination for Federal Employees. Any aspects of this COVID-19 Workplace Safety Plan related to the vaccination requirement pursuant to E.O. 14043 are not in effect and will not be implemented or enforced by agencies while the injunction is in place.

Executive Order 14042 requires that all Federal contractors covered by Executive Order 14042 be fully vaccinated, except in limited circumstances where the contractor is legally entitled to a reasonable accommodation. To ensure compliance with an applicable nationwide injunction, USTDA will take no action to implement or enforce E.O. 14042 on Ensuring Adequate COVID Safety Protocols for Federal Contractors. For existing contracts or contract-like instruments that contain a clause implementing requirements of E.O. 14042, USTDA will take no action to enforce the clause implementing requirements of E.O. 14042, absent further written notice from USTDA.

It is the responsibility of the USTDA employee who is hosting the visitors to ensure the visitors are aware of and complying with the safety protocols before allowing the visitor to enter the USTDA office.

### **Screening Testing Program**

USTDA developed a COVID-19 Screening Testing Program in response to OMB M-21-25. Consistent with Task Force guidance, USTDA has not implemented screening testing.

### **Contact Tracing**

USTDA's COVID-19 Coordination Team will collaborate with and support the contact tracing efforts of local health departments to identify, track, and manage contacts of COVID-19 cases. Staff who receive a positive COVID-19 result within seven (7) days of being in the office, must report the positive COVID-19 result to the Director of Management Operations immediately. The Director of Management Operations will ensure transparency in communicating relevant information to the workforce, consistent

with local and Federal privacy and confidentiality regulations and laws.

If three (3) COVID-19 cases occur within the office, it will be the responsibility of USTDA's COVID-19 Coordination Team to determine—in consultation with local public health officials—appropriate next steps, provide recommendations to the Director for approval, and implement the approved action. This may include potential redesign of safety practices in the building/work setting and/or reevaluation of work scheduling. USTDA will be transparent in communicating related information to the workforce, as relevant and appropriate, consistent with local and Federal privacy and confidentiality regulations and laws.

## **Travel**

Pursuant to Executive Order 13991, USTDA employees are required to comply with CDC guidance while on duty. The CDC has extensive guidelines for both [domestic travel](#) and [international travel](#), and federal workers should carefully consult these resources, as well as [the Safer Federal Workforce](#) website, before deciding to travel. USTDA will follow guidance from the Department of State regarding USTDA staff at overseas duty stations.

USTDA staff should be aware that they may be required to stay at home for isolation or quarantine purposes as required by CDC guidance after official or personal travel, as well as follow any testing guidance as appropriate before they are allowed to return to the workplace. Staff should research any potential restrictions related to official travel and advise their supervisor before the travel request is put forward for consideration. Staff should include the status of COVID restrictions related to the proposed travel in their request for travel approval. If a staff member has engaged in personal travel that results in the requirement of isolation, and if the staff member is unable to telework during the isolation period, the staff member should take appropriate leave, consistent with current guidance. Staff who need to isolate after work-related travel, and who are not able to telework, may request administrative leave or weather/safety leave, as appropriate.

There are currently no government-wide limits on official travel, regardless of an individual's vaccination status.

## **Symptom Monitoring**

If USTDA staff or visitors are not feeling well, they should not enter the USTDA workplace. All USTDA staff and visitors are required to review and complete the [USTDA COVID-19 Facilities Screening](#) self-assessment before entering USTDA office spaces. USTDA does not collect the self-assessment or any required testing information. Any individual who develops any [symptoms consistent with COVID-19](#) during the workday must immediately isolate, notify their supervisor, and promptly leave the workplace. USTDA will follow the guidance of and consult with the Task Force with questions related to symptom monitoring.

## **Quarantine and Isolation**

USTDA staff who were exposed to COVID-19 will follow the CDC [exposure guidance](#).

USTDA staff who have COVID-19 symptoms or have tested positive for COVID-19 will follow CDC [isolation guidance](#).

As mentioned above, staff who receive a positive COVID test result within seven (7) days of being in the office, must report the positive COVID test result to the Director of Management Operations.

### **Confidentiality**

All medical information collected from staff, including test results and any other information obtained as a result of testing or 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. The Director of Management Operations is the point of contact for all questions relating to personal medical information. Staff will be asked to refer questions related to reasonable accommodation to the Reasonable Accommodation Manager (the Director of Management Operations), who is familiar with protecting medical data.

### **Compliance**

Compliance with the safety protocols described in this Workplace Safety Plan are required to be authorized entry into USTDA offices. Failure of a USTDA federal employee to comply with these safety protocols could result in administrative action including an adverse personnel action up to and including removal, in conformity with USTDA's Discipline and Adverse Actions Policy.

### **Workplace Operations**

As mentioned above, USTDA will require all staff and all persons in the USTDA office to comply with CDC guidance and take other public health measures as appropriate (see guidance above in Face Masks and other PPE section).

### **Occupancy**

The USTDA workplace capacity will be aligned with the government-wide guidance from OMB and OPM. Any occupancy limitations must be approved by the Director, as advised by the COVID Coordination Team, and in consultation with the Safer Federal Workforce Task Force, as appropriate.

### **Environmental Cleaning and Disinfection**

Enhanced cleaning and disinfection in common use/high touch/high density spaces, such as lobbies, restrooms, elevators, and stairwells will be provided. Office space that is in regular use will be cleaned and disinfected regularly, and in accordance with [CDC guidelines](#). Wipes and [EPA-approved disinfectants](#) will be made available for individuals to wipe down their workstation and related personal property. Physical barriers such as plexiglass shields may be installed where appropriate.

Enhanced environmental cleaning and disinfection will be performed in accordance with [CDC](#) and [GSA](#) guidance, when deemed appropriate by the USTDA COVID-19 Coordination Team. In order to minimize exposure risk to cleaning personnel, if such enhanced cleaning is required, we will wait 24 hours, and possibly longer, as conditions necessitate, before cleaning or disinfecting the area. Personnel and visitors may be asked to vacate the affected space until cleaning and disinfection is completed.

USTDA's COVID-19 Coordination Team will determine the suitable scope of workplace closures—in some cases, it may be a suite of offices or part of a floor, in other cases, it may include the entire office. Affected staff will be informed when it is safe to return to the office after cleaning and disinfection is complete.

## **Hygiene**

Hand sanitizer stations will be available throughout the workspace, and will contain FDA-approved hand sanitizer, with at least 60% ethanol. Staff are also encouraged to follow [CDC handwashing guidance](#) including before eating, or drinking, and after using the restroom.

## **Ventilation and Air Filtration**

The Administrative Office has coordinated with Monday Properties, landlord of the USTDA office space, to ensure appropriate ventilation and air filtration processes are in place. Monday Properties has worked with their portfolio Mechanical Engineering Firm to ensure HVAC operations in the building exceed the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) recommendations, which are aligned with CDC guidelines, in response to COVID-19. Monday Property engineering teams have implemented the following:

- Performed necessary preventative maintenance and confirmed optimal communication with the building automation system (BAS).
- Increased outside air levels beyond what is typically recommended by ASHRAE and building codes to promote the dilution of indoor contaminants.
- Programmed air flushing sequences before and after operating hours via BAS.
- Increased inspections and replacement of filters.
- Installed the highest MERV rating on filters allowable per specifications of the HVAC equipment (MERV-13).

Monday Properties will continue to closely monitor COVID-19 guidelines related to operations of HVAC systems.

## **Visitors**

All visitors to USTDA's office spaces are required to comply with all the safety protocols described above. Additionally, visitors are requested to notify their USTDA host if they test positive for COVID-19 within seven days of being in USTDA office spaces. The USTDA host will then notify the Director of Management Operations, who will take appropriate action.

It is the responsibility of the USTDA employee who is hosting the visitors to ensure the visitors are aware of the safety protocols before allowing the visitor to enter the USTDA office.

### **Agency communication plan to inform staff and visitors of current and upcoming policy changes**

USTDA educates and informs staff and visitors to USTDA facilities in a variety of ways.

#### **Staff**

USTDA uses All Staff meetings, email, and our Intranet for communicating internal messages to staff. USTDA also posts signage and key messages at main office entrances and in common areas that provide information about policies and procedures related to COVID-19 for all staff.

#### **Visitors**

USTDA posts signage and key messages at main office entrances and in common areas that provide information about policies and procedures related to COVID-19. Additionally, the USTDA staff member who is hosting a visitor should convey to them the agency's current policies and procedures in advance of their visit.

### **Timeline for any updates to existing agency policies**

Any subsequent policy updates or building/facility-specific policy updates will be made in accordance with changes to CDC guidelines and guidance from the Safer Federal Workforce Task Force.