

From: [Shelby Qualls](#)
To: [Jessie Roberson](#); [Joyce Connery](#); [Thomas Summers](#)
Cc: [REDACTED]
Subject: Approved Unanimous Consent for "UC-2020-025, Approve the attached Pandemic Response and Recovery Plan"
Date: Tuesday, September 15, 2020 9:10:47 AM
Attachments: [UC-2020-025 Requesting Unanimous Consent of the Board Subject.msg](#)

All,

The Board Members have unanimously consented to [Board Member's Connery's request "UC-2020-025, Approve the attached Pandemic Response and Recovery Plan."

No other Board Action is needed. ExSec will coordinate with OGC to finalize what gets posted to the public website.

Shelby Qualls | Executive Secretary | RiVidium, Inc.
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From: Shelby Qualls
Sent: Monday, September 14, 2020 3:33 PM
To: Bruce Hamilton; Jessie Roberson; Joyce Connery; Thomas Summers
Cc: ExSec
Subject: UC-2020-025, Requesting Unanimous Consent of the Board: Subject
Attachments: DNFSB Pandemic Response and Recovery Plan 09142020 clean.docx

Board Member Joyce Connery requests the Unanimous Consent of the Board to approve the attached Pandemic Response and Recovery Plan outlining the conditions for and actions to be taken to allow for a gradual reconstitution of on-site activities as the area recovers from impacts of the COVID-19 Pandemic. Once the plan is approved, staff may adjust the plan to reflect lessons learned and shall inform the Board of any changes. The plan will be revisited in early calendar year 2021 and revised, if necessary.

As to the Agency movement between phases, entry into the next phase will be agreed by the Board either through a consensus or majority vote, only after the quantitative/objective criteria have been met. Board may take qualitative information into account when making its decision. Similarly, if any controls will need to be re-instated after having passed to a different phase and noting deteriorating conditions, the Board will consider all the facts and mitigating factors prior to making a decision.

Approval of this action shall empower the staff to enact the plan, as currently written.

The Board requires that this vote and associated documentation be published on the Board's external website.

Shelby Qualls | Executive Secretary | RiVidium, Inc.
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Pandemic Response and Recovery Plan *Health, Safety and People First*

Revision 0
September 14th, 2020

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I. OVERVIEW

Background. On March 13, 2020, the Chairman activated the Continuity of Operations (COOP) plan in response to the COVID-19 (coronavirus disease 2019) pandemic. Subsequently, the Chairman has provided additional direction to the Board's staff for returning to DNFSB headquarters offices using the Board's COOP. Until now, the Board's staff has operated in a maximum telework posture.

Objective. This pandemic response and recovery plan is designed to protect the health and safety of all DNFSB employees and contractors while they fulfill the agency's mission.

Staffing and Organization Succession. All Directorates will review staffing and organizational lines of succession to determine minimum on-site staffing level requirements to perform essential functions during COVID-19. Organization succession will be documented in the COOP.

Decisions regarding which federal employees and support service contractors may return to the workplace will be based on phase, the nature of their work, and other limiting factors for returning to work.

Remote Employees. Elements of this return to workplace plan also apply to DNFSB employees working in field locations, including resident inspectors. Those elements include, but are not necessarily limited to, the following:

- Entrance screening criteria and protocols
- Social distancing protocols
- Contact tracing
- Post-exposure re-entry procedure

Given the unique circumstances at each field location, the responsible Office Director will issue supplementary direction as needed.

Reporting Unsafe Conditions. Section 5(a)(1) of the Occupational Safety and Health Act (OSHA) requires the DNFSB to provide a place of employment free from recognized hazards that are "causing or are likely to cause death or serious physical harm." Employees may disclose health or safety violations or concerns about workplace safety and health to DNFSB management officials, OSHA, or the Office of Inspector General (OIG) without fear of reprisal. The DNFSB will not retaliate against an employee for raising any workplace and safety concerns.

If an employee believes that he or she has been retaliated against for raising substantial and specific safety or health violations to management, OSHA, and/or the OIG, he or she may file a complaint with the Office of Special Counsel (OSC). In addition to filing a complaint with OSC, federal employees may also contact OSHA's Office of Federal Agency Programs if they believe that they are being retaliated against for filing with OSHA.

Approval Authority. The General Manager, Technical Director, and General Counsel will ensure the completion of all phase transition prerequisites and will make a recommendation to the Board for a transition to the next phase or changes to the phased approach. The Board will make any decisions on any changes to the phased approach and decisions to transition between phases.

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II. PHASED APPROACH

DNFSB will use a disciplined, phased approach for re-occupancy of building 625 Indiana Avenue N.W., Washington, DC 20004. This return to the facility will meet the goal of safely returning Federal employees and support service contractors to the workplace in accordance with White House guidance in *Opening Up America Again* and OMB memo M-20-23, *Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again*.

Decisions regarding phase transitions will take into account federal, state and local government orders and conditions and the current operating conditions. Additionally, phase transitions will require agency-specific prerequisite actions to be completed (see Section VIII, Phase Transition Prerequisites). As the plan is executed, the agency will continually monitor conditions that may indicate a resurgence in COVID-19 and may re-implement controls or re-enter prior phases if warranted.

Phase 0 - Pre-planning

During this phase, DNFSB will plan and prepare the HQ workplace to mitigate risk. In Phase 0, all employees are required to telework unless explicitly directed by an Office Director. Completion of most pre-planning actions will take an estimated two to three weeks.

Phase 0 Key Actions

During Phase 0 and prior to transitioning to Phase 1, all applicable criteria in Section VIII, Phase Transition Prerequisites, will be completed. The following key actions will define the actions taken during Phase 0. Key actions may carry over into subsequent phases.

- **Guidance for Managers and Returning Employees.** Standard guidance will be developed to facilitate consistent messaging to employees who are returning to the workplace. Messages will include, for example, instructions that personnel stay home if they have flu-like symptoms, expectations for social distancing, and any new entry procedures.

Management will identify employees to return to the workplace in each phase. Employees will also be provided with instructions on how to self-identify as being vulnerable so they may be permitted maximum workplace flexibilities as appropriate. For contact tracing purposes, supervisors will be expected to maintain a daily record of employees who reported to DNFSB HQ or to a DOE site.

- **Monitor local conditions.** DNFSB will continuously monitor the state and local conditions to help determine when to initiate Phase 1 and subsequent phases.
- **Communications.** DNFSB will maintain transparent communication with the workforce and key external stakeholders as it plans and initiates remobilization activities. DNFSB will continue to use a variety of communication methods to help connect the workforce to information about the return-to-workplace process.
- **Sanitize and secure all DNFSB leased space.** DNFSB HQ common areas will continue to be cleaned and sanitized daily by building custodial services vendor (Red Coats) using EPA-approved products and following CDC standards directed to building lessors from GSA. These standards include the routine cleaning and disinfecting of high-touch surfaces in common and high-traffic areas. These high-touch surfaces include, but are not limited to: handrails, door knobs, light switches, countertops, table tops, water faucets and handles, elevator buttons, sinks, toilets and control handles, restroom stall handles, toilet paper and other paper dispensers, door handles and push plates, and drinking fountain controls in common and high-traffic areas.

Additionally, all employees will be expected to disinfect touched surfaces in common areas after use.

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Prior to the DNFSB entering into Phase 2, and following CDC recommended guidance, the Office of the General Manager will contract with an outside vendor to perform disinfecting service of all spaces. The vendor will use a Clorox Total 360 Disinfectant Cleaning System (or equivalent) to disinfect all offices, open works spaces, conference rooms, kitchens, reception areas, and locker/shower rooms. Disinfecting will include agency-owned personal property such as office furniture, workstations, computer accessories, window dressings, and telephones.

- **Entrance screening criteria and protocols.** DNFSB HQ will use CDC-informed entrance screening criteria to determine whether an individual (e.g., federal employee, onsite support service contractor, or visitor) may enter a facility. Personnel commuting to the office will be required to perform this self-screening and document its satisfactory completion (e.g., through an email to their supervisor) **while at home prior to commuting.** In addition, personnel should periodically monitor their health throughout the workday for any onset of these symptoms. All commuting personnel will be reminded by receiving emails and reading posters/signage instructing that they may not enter the workplace if they have flu-like symptoms, including a temperature over 100.4 degrees. Notices to this effect will be posted outside all building entrances. Refer to Section IX, COVID-19 Self-Screening Checklist, for additional information.

Individuals not meeting any of the self-screening criteria will not be permitted to enter the facility. DNFSB federal employees will be returned to an appropriate work status until they are able to answer the questions satisfactorily. Support service contractor employees will report back to their employer who will coordinate with the appropriate Contracting Officer Representative (COR) or Contracting Officer.

Any employee who does not meet all self-screening criteria for three or more consecutive days should out of an abundance of caution be conservatively considered to have a suspected case of COVID-19 per this plan (regardless of which criteria are not met) and should follow applicable guidance for contact tracing and post-exposure re-entry.

- **Implement social distancing protocols.** Social distancing protocols will be implemented prior to Phase 1 and will be revisited prior to transitioning to subsequent phases. For HQ, this includes:

- **Face Coverings.**

- *Building requirements.* The wearing of face coverings will be made mandatory for all persons (i.e., employees, contractors, vendors, delivery personnel, etc.) in all the common areas (i.e., main lobby, elevators, stairwells, common bathrooms, common hallways and corridors, parking garage, loading dock) of 625 Indiana Avenue.

The Federal Protective Service, Protective Security Officers will report to the different agencies' FSC representatives those employees, contractors, vendors, visitors, delivery personnel who refuse to wear a mask in the common areas even after one has been offered to them for corrective action.

The United States Court of Appeals for Veterans Claims will provide temporary face coverings which will be made available on a table in the main lobby of the building.

- *DNFSB-space requirements.* The wearing of face coverings is mandatory within the DNFSB common areas, kitchens, restrooms and in confined spaces such as conference rooms and the Limited Area (Vault).
- While the Board will provide each staff member with a re-entry kit, which includes a face covering, the staff is allowed to bring and wear their own face covering provided it meets CDC guidelines. Staff should be prepared to bring their own face covering upon initial entry to the building and in the event supplies may not be available. Staff should follow CDC guidance for cleaning and re-use of face coverings.

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- **Common Areas.** Kitchens will be open using social distancing recommendations in the 8th floor main kitchen and 7th floor kitchen. The 8th floor kitchen next to the Boardroom and the 3rd and 4th floor kitchens will be limited to 1 person at a time in the space. The 7th floor locker/shower rooms and the M level fitness center will continue to be closed until Phase 3. Elevator occupancy should be limited to two (2) persons. Restrooms should be limited to three (3) people. The middle stall and middle sink in the rest room will be closed to usage to allow for social distancing.

To ensure social distancing, stairwells use may be directionally restricted except during emergencies. Postings and other guidance will be issued as appropriate.

Additional or revised guidance may be issued at a later time as appropriate.

- **Meetings and other Gatherings.** To the extent practical, meetings will continue to be held using virtual tools. In-person meetings will require a minimum of six feet of social distancing between participants and will include a limited number of attendees. Conference rooms will have modified seating and a posted maximum occupancy number to ensure social distancing.
- **Workspace Redesign.** Open workspaces that do not allow at least six feet between employees will require that employees work on-site in shifts (telework/onsite), if possible, to allow for social distancing. Plexiglass desk shields have been ordered/purchased and will be placed on all open secretary work stations and the 7th floor receptionist desk. DNFSB will consider other mitigation strategies as needed.
- **Hygiene items and services.** Building Management will work to procure and install hand sanitizer stations on each floor's elevator lobbies, facility entrances, and other high traffic areas as needed. DNFSB staff should utilize sanitizer stations when touching common areas such as door handles.
- **Signage.** Building Management will identify and post signage reminding employees to use proven hygiene practices and social distancing protocols, to stay home when ill, and to report any COVID-like symptoms. DNFSB will identify and post any additional signage in DNFSB space, including at the 7th Floor Main Receptionist Area Door and the 3rd & 4th Floor Indiana Avenue-side Main Doors.
For familiarization, all signage will be covered in training prior to employees returning to the office.
- **Parking Garage Access.** The parking garage is temporarily closed to the public. All tenants that have been issued a Datawatch Access Card by their respective agencies will be granted temporary access to the parking garage. DNFSB employees (federal and contractor) may park in any available parking place on P0 and P1, and on P2, outside of the United States Court of Appeals for Veterans Claims parking area. This is only a temporary access and will be removed at the discretion of the property manager. At such time the temporary access is removed, only employees with agency issued or paid monthly accounts will be granted parking garage access.
- **Re-entry Kits.** Each DNFSB employee will be provided a reconstitution kit on their first day back in the office. This kit will contain:
 - One (1) cloth face covering (initial issue only)
 - One (1) personal sized hand sanitizer
 - One (1) container disinfecting wipes or one (1) disinfectant spray and one (1) roll paper towels
 - Two (2) pairs of powder free nitrile gloves
- **Supplies.** Additional supply needs will be based on governmental guidance and risk assessment. Demand for supplies will increase in proportion to the number of personnel re-entering the facility. Due to the nationwide difficulty of obtaining supplies and developing accurate projections with changing CDC and industry guidance, DNFSB's Facilities Manager will continue to work with appropriate governmental authorities in ordering and distributing supplies to employees.

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Phase 1 – Minimum On-site Staffing (i.e., Remote Operations, or Maximum Telework)

Personnel identified to return to the workplace in Phase 1 will be determined by the Office Directors. This includes employees in mission-critical positions where on-site presence may be required. These include, for example, staff that need to perform their duties in a classified workspace and those that are needed to support limited facility operations. Support service contractors may also be included. All others will remain on maximum telework or other prearranged work agreement as appropriate. Employees may not voluntarily return to the workplace without prior approval by their supervisor.

Phase 1 federal employees are expected to return to the workplace upon notification by their supervisor after the Board has approved DNFSB to move to Phase 1. However, self-identified vulnerable federal employees, employees with extenuating circumstances, and employees who live with or provide care for individuals in the vulnerable population, are not required to return to the workplace in Phase 1. Managers should give employees as much advanced notice as possible to make necessary preparations. These employees will also be provided with detailed information regarding return to workplace expectations and new protocols. Support service contractors will be notified that they have been identified to return to the workplace by their employer in coordination with the appropriate COR and Contracting Officer.

DNFSB will continue to monitor information on state and local conditions, including current state/local stay-at-home orders, school closings, day care closings, and availability of public transportation.

Phase 1 Key Actions

During Phase 1 and prior to transitioning to Phase 2, all applicable criteria in Section VIII, Phase Transition Prerequisites, will be completed. The following key actions will define the actions taken during Phase 1. Key actions may carry over into subsequent phases.

- **Limited Area (Vault) protocols** – The Limited Area (Vault) is a secured space that consists of two separate internally joined rooms [classified processing room and classified conference/meeting room] with limited ability to maintain social distancing.

The classified processing room consist of 4 work stations that are spaced six (6) feet apart; therefore no more than four employees should be in the room at any given time for the purposes of maintaining social distancing.

The classified conference/meeting room consists of a conference table with eight chairs; however, the seating area of the room is reduced by the furniture; therefore, no more than four (4) employees should be in the room at any given time for the purposes of maintaining social distancing.

The wearing of face coverings is mandatory in the Limited Area (Vault) due to the confined area of the space.

A limited amount of cleaning supplies will be kept inside the Limited Area to wipe down furniture, computer workstations, the fax machine, and printers prior to and after use.

- **Interviews** – It is recommended that interviews be conducted virtually. If not possible to be conducted virtually, the conduct of interviews should follow agency guidance for in-person meetings.
- **Visitor policy** – Visitors shall be limited to federal government and contractor employees and will only permitted entry to DNFSB space with a negative COVID-19 self-certification. The wearing of face coverings is mandatory for all visitors.

In Phase 1, to protect visitors and employees, visitors will only be permitted to DNFSB spaces if pre-approved by the Chairman (or others designated by the Chairman) or if the visitors are contractors performing facility work under the supervision of the Office of the General Manager. To help ensure this, non-DNFSB employees with access to DNFSB space (e.g., Department of Energy, Nuclear Regulatory Commission) may temporarily have their unescorted access disabled.

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Visitor requests must be submitted to Receptionist@dnfsb.gov and Security@dnfsb.gov 24 hours in advance of any visit. Visit request must include the following information:

- Visitor(s) name (Last, First MI)
- Visitor(s) Company/Agency/Affiliation
- Visitor(s) email address.
- Date and time of visit
- Duration of visit
- Name (Last, First MI) and phone number of the sponsor/escort.

The receptionist and/or security will respond with an informational email with COVID-19 self-certification guidance requiring a self-certification response by email. The DNFSB receptionist and/or security will only approve the visit following a negative COVID-19 self-certification response.

As a secondary means of self-certification, visitor(s) will also be required to read and provide verbal self-certification to the COVID-19 Self-Certification Notice posted on the 7th Floor Main Receptionist Area Door in Phases 1 and 2.

Visit requests for Department of Energy's Office of the Departmental Representative should be processed through the Office of the Technical Director. Visit requests for Nuclear Regulatory Commission (NRC) employees should be processed through the Office of Inspector General (OIG) Liaison.

- **Travel Guidance** – Official travel is recognized as presenting unique risks to DNFSB employees during the COVID-19 pandemic. Conditions experienced while travelling are unpredictable, standard controls such as self-isolation may not be available, travelers may not be immediately familiar with where and how to seek testing or medical care if necessary, and state and local conditions and restrictions can change rapidly. Finally, data used to make risk-informed decisions can be untimely, inconsistently available, or not available.

Consequently, in Phases 2 and 3 and until viral countermeasures are widely available, non-essential travel will be strictly voluntary. Further, Office Directors shall develop prioritization criteria for travel, and authorize non-essential travel only if the priority is commensurate with risks posed by conditions likely to be encountered in transit to and at the destination location. Finally, Office Directors should consider additional controls to minimize the risk of transmission between DNFSB employees and the workforce of the Department of Energy or the general public.

Travel designated to be essential by the Chairman and authorized by Office Directors may be permitted on a case-by-case basis regardless of phase.

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Phase 2 – Reduced On-site Staffing (i.e., Intermediate Operations, or Mixed Telework and On-site Work)

Personnel identified to return to the workplace in Phase 2 will be determined by the Office. For Phase 2, additional returning personnel will include employees whose jobs are best performed on-site. These employees will receive advanced notification that they have been identified to return to the workplace in Phase 2. Support service contractors will be notified that they have been identified to return to the workplace by their employer in coordination with the appropriate COR and Contracting Officer.

Supervisors may develop schedules by which employees are expected to work on-site during Phase 2 at a reduced capacity. Phase 2 federal employees are expected to begin working on-site upon notification by their supervisor after the Board has approved DNFSB to move to Phase 2. All others will remain on telework or other prearranged work agreement as appropriate. Employees wishing to work on-site on days they are not scheduled to may not return to the workplace without prior approval by their supervisor. For planning purposes, at the earliest, it is assumed that Phase 2 will begin approximately two weeks after Phase 1.

Self-identified vulnerable federal employees, employees with extenuating circumstances, and employees who live with or provide care for individuals in the vulnerable population, are not required to return to the workplace in Phase 2.

Phase 2 Key Actions

During Phase 2 and prior to transitioning to Phase 3, all applicable criteria in Section VIII, Phase Transition Prerequisites, will be completed. The following key actions will define the actions taken during Phase 2. Key actions may carry over into subsequent phases

In addition to normal program mission activities, HQ staff offices will continue reopening support services as appropriate (see Section III, Support Activities). Also, social distancing protocols will be reviewed as necessary.

- **Agency Directives** – The agency will conduct a gap analysis of current agency policies and directives against known and anticipated long-term impacts of COVID-19. Based on the gap analysis, changes to the directives will be developed and approved, supplemented with temporary guidance as needed.
- **Supplies** – The agency will ensure adequate cleaning supplies and personal protective equipment is available for all employees prior to transitioning to Phase 3.

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Phase 3 – Unrestricted On-site Staffing (i.e., Steady-state Operations)

In Phase 3, unrestricted on-site staffing of DNFSB will resume. Employees will be notified by their supervisor after the Board has approved DNFSB to move to Phase 3. Under Phase 3, DNFSB will resume normal operations where employees are expected to return to the workplace per established policies and processes. Support service contractors will be notified that they have been identified to return to the workplace by their employer in coordination with the appropriate COR and Contracting Officer. All personnel will be expected to resume their pre-COVID-19 work schedules, as deemed appropriate by their supervisor. Requests for accommodations by federal employees will be evaluated through the reasonable accommodation process on a case-by-case basis. Protocols and controls established in earlier phases will be reviewed for long-term applicability and may be relaxed or discontinued.

Resurgence Monitoring

Until such time as adequate viral countermeasures are widely available and with the advice of the Office Directors, the Board will continually assess conditions in the National Capital Region¹ and in DNFSB Headquarters to determine if instating new controls or re-instituting previously-implemented controls are appropriate to ensure the health and safety of DNFSB employees and contractors. If appropriate, the Board may formally revert the agency to an earlier Phase in the plan or to an earlier work posture.

Conditions that may warrant such actions include but are not necessarily limited to:

- New or revised guidance from federal, state, and/or local authorities
- Evidence of community spread of COVID-19 at or around DNFSB Headquarters
- A notable increase in local confirmed cases of COVID-19 per capita
- Closures of schools and/or public transportation due to confirmed or suspected COVID-19 cases

¹ For purposes of this plan, National Capitol Region will be defined as jurisdictions that fall into the DC locality pay rate [in accordance with the Office of Personnel Management](#). As of September 2020, this includes Washington D.C., and select counties in Maryland, Virginia, Pennsylvania and West Virginia.

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III. Support Activities

Support activities will be continuously evaluated based on risk and demand. Adjustments will be made as necessary, including shifting phase-specific activities to other phases.

Phase 1

Facilities Services

- Initiate increased level of custodial services, to include reopening of restrooms, as re-occupancy increases. Continue to clean lobby areas daily. High touch areas are disinfected daily.
- Begin responding to backlog of building operations routine service calls.
- Begin completing deferred routine building maintenance activities.
- Determine process for deliveries, including the loading dock.

Phase 2

Key Services

- Allow visitors to come onsite but subject to enhanced entrance screening protocols, if applicable.

Facilities Services

- Begin major building maintenance projects that had been deferred.
- Begin work on deferred office moves, carpet cleaning requests.

Phase 3

Key Services

- Transition from Virtual Onboarding to in-person onboarding. Ensure those who attended virtual onboarding are included to complete New Employee Orientation and remaining paperwork.
- Transition to in-person training, as appropriate. This will depend on social distancing protocols and availability of vendors.
- Begin scheduling new federal and contractor employees for HSPD-12 PIV enrollments and onsite drug testing for pre-employment and security clearance processing purposes.
- Begin scheduling federal and contractor employees for HSPD-12 PIV reenrollments and certificate updates.
- Allow OTD Staff to resume official travel to DOE sites, where COVID-19 restrictions have been relaxed and, or public health emergencies have expired.

Facilities Services

- Begin addressing backlog of deferred moving services.
- Ensure Help Desk staff is prepared for surge in IT support calls as customers return onsite.

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IV. Contact Tracing

A DNFSB federal employee who has returned to the workplace shall immediately report any suspected or confirmed contraction of COVID-19 to the COVID-19 notification email address (COVID-19Notifications@DNFSB.GOV). If an employee reports their COVID-19 case to a supervisor, the supervisor will ensure the Division of Human Resources (DHR) is notified within two hours. DHR will maintain a Contact Tracing Report for DNFSB, and it will be considered highly sensitive in nature.² DHR will contact an employee who has contracted COVID-19 or is suspected of having COVID-19 to obtain detailed information about his or her work contacts and locations he or she has been within DNFSB facilities 48 hours before the onset of symptoms through the date of contact. DHR will work with supervisors and the OGM security office as appropriate to determine potentially affected locations and other employees who may have been potentially exposed. DHR will immediately make notifications to all employees who have been potentially exposed but will not reveal the identity of the employee who tested positive for COVID-19.

Employees who have been potentially exposed are defined as those who have had close contact (within 6 feet) for fifteen minutes or more with a person with COVID-19 up to two days before symptoms appeared, or if the person with COVID-19 does not have symptoms, then two days before the specimen was collected for testing. Employees who have been potentially exposed will be required to quarantine for a minimum of 14 days and telework if possible. DHR will advise these employees to self-monitor for [symptoms](#).

DNFSB contracted administrative and IT staff will adhere the COVID-19 reporting protocol as defined by their respective employers. The contractor will inform the DNFSB Contracting Officer and/or COR if their employee was inside DNFSB spaces up to 2 days before the employee's COVID-19 detection or suspected contraction as defined in the above paragraph. If the employee was in DNFSB spaces up to 2 days prior to detection, DNFSB Contracting Officer will inform the COR, Security Office and Facilities Manager. They will initiate contact tracing in DNFSB spaces, and perform required notification and cleaning procedures. Contractor staff DNFSB Contracting Officer will ensure contractor continues to meet contract performance requirements.

² The EEOC considers information about COVID symptoms or a COVID diagnosis a medical record (reference <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>). The Rehabilitation Act and the American with Disabilities Act (ADA) require that all medical records for employees, whether disabled or not, be kept in medical files separate from personnel files and be treated as a confidential medical record. Refer to 29 C.F.R. § 1614.203(e)(4) and 1630.14(c). Failure to keep these records separate and confidential is a violation and entitles the employee to an award of damages. Refer to *Brunnel v. USPS*, EEOC Appeal No. 07A10009 (2001).

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V. Post-Exposure Re-Entry Procedure

Those staff members that have been confirmed (e.g., with a positive test) or suspected of having COVID-19 may return to work if they satisfy one of the following three options.

OPTION 1 (Symptom-based criteria):

If you have a confirmed or suspected case of COVID-19 and you did not get tested for COVID-19, you can leave isolation and go back to work when all the following are true:

- a. You have had at least 3 days in a row with no fever at all; AND
- b. During those 3 days you have not taken any fever-reducing medication (e.g., Tylenol, Acetaminophen, Advil, Ibuprofen, Aleve, or Naproxen); AND
- c. You have had at least 3 days of improved cough or shortness of breath if you had these symptoms; AND
- d. It has been at least 10 days since your symptoms first started.

Note that because people may continue to test positive on a viral test long after they are recovered from COVID-19, you can end isolation/return to work if all of the above criteria are true even if you have one or more positive viral tests beyond 14 days after your symptoms first started. If you meet all the criteria for Option 1 you are considered not contagious, even if you have a positive test.

OPTION 2 (Time-based criteria):

If you have a confirmed case of COVID-19 but never had symptoms, you can return to work 14 days after the date of your positive test.

OPTION 3 (Test-based criteria):

If you have a confirmed case of COVID-19 and have two negative viral test results from at least two consecutive respiratory specimens collected more than 24 hours apart, you can return to work as soon as you get the second negative test result if all of the following are true:

- a. You do not have a fever, AND
- b. You are not using fever reducing medication, AND
- c. Your respiratory symptoms (if you had them) have improved over the previous three days.

Options 1 and 2 are preferred. Most people with a confirmed test for COVID-19 will continue to have positive viral tests for several weeks even though they are not contagious. This is because dead virus particles can still show up as a positive viral test but are not considered contagious. Choosing Option 3 will likely lead to people being out from work for longer than they need to be.

Any staff member may return to work sooner than the timeframes provided in options 1, 2, or 3 if he or she provides a doctor note stating that he or she is healthy and is able to return to workplace.

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VI. DNFSB Space Cleaning After COVID-19 Contraction Notification

Facility Readiness

- The ability to respond quickly with standard, cost-effective, and CDC approved cleaning protocols following a reported case is required to sustain a broad-based reconstitution at a facility.
- The facility must have the ability to report and trace any confirmed or presumptive positive case of COVID-19.
- Notification and Cleaning: DNFSB has the responsibility to inform the building Facility Security Committee (FSC) and GSA of a confirmed or suspected case of COVID-19/Coronavirus. DNFSB will provide date and time of the incident and areas accessed. This notification will not include PII.

GSA Responsibility: GSA will determine if the lessor has a pandemic plan in place that follows CDC guidelines and matches the GSA scope of work for COVID-19/coronavirus cleaning. GSA will fund and provide for detailed deep cleaning and disinfection of those portion(s) of the facility accessed by the infected individual(s) according to CDC guidance, which may exceed GSA's National Custodial Specification or as otherwise described in the lease agreement.

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VII. Limiting Factors for Returning to Work at DNFSB

Limiting factors will limit the agencies staff's ability to fully occupy a space or execute some mission functions at DNFSB HQ or DOE Defense Nuclear Facilities in Phases 1 and 2. These factors will be considered subject to the guidance in the *DNFSB Pandemic Response and Recovery Plan* or other Board-approved guidance.

CDC Defined Vulnerable Population Sets

COVID-19 is a new disease and there is limited information regarding risk factors for severe disease. Based on currently available information and clinical expertise, older adults and people of any age who have serious underlying medical conditions might be at higher risk for severe illness from COVID-19.

Based on what we know now, those at high-risk for severe illness from COVID-19 are:

- People 65 years and older
- People who live in a nursing home or long-term care facility
- People of all ages with underlying medical conditions, particularly if not well controlled, including:
 - People with chronic lung disease or moderate to severe asthma
 - People who have serious heart conditions
 - People who are immunocompromised
- Many conditions can cause a person to be immunocompromised, including cancer treatment,
- smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
- People with severe obesity (body mass index [BMI] of 40 or higher)
- People with diabetes
- People with chronic kidney disease undergoing dialysis
- People with liver disease
- People with disabilities
- Pregnant woman and breastfeeding mothers
- Racial and Ethnic Minority Groups

Employees should refer to the CDC's website for the most up-to-date information.

Dependent Care

- Flexibilities are still necessary for employees, especially those who are caring for children or others who are at higher risk.
- Flexibilities will follow federal guidance for those caring for children or adults where school or dependent care services are not available.

Supervisors will have ultimate responsibility in granting telework activities based on the employees situation and guidance from Human Resources. ***Approved use of leave or telework will not result in discrimination or disparate treatment in terms of ratings, work assignments, or other conditions of employment.***

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VIII. Phase Transition Prerequisites

The following actions are designated as prerequisites to be completed prior to transitioning to a new phase. Any prerequisite actions not completed prior to phase transition should be completed as soon as practicable. Additional prerequisite actions may be identified at a later date.

Prior to each phase transition

- | | |
|--|---|
| | 1. Management has encouraged use of telework flexibilities and extended work flexibility programs. |
| | 2. Brief and encourage all staff to practice CDC hand washing, disinfecting, social distancing and mask wearing guidance at all times. |
| | 3. Monitor state and local conditions and incorporate guidance from Federal Government entities. |
| | 4. Update self-certification guidance and checklist, if needed. |
| | 5. Office Directors have reviewed organization charts and succession plans and made necessary changes. |
| | 6. Human Resources Division is monitoring trends of illness among employees. |
| | 7. Employee surveys have been conducted to measure levels of employee concern about returning to the workplace and possible limitations on their ability to come back to an office environment. |
| | 8. Review floor plans and provide social distancing guidance for shared work spaces, conference rooms, enclosed spaces, mailroom, kitchens, locker/ shower rooms, and rest rooms. |
| | 9. Procure and distribute adequate sanitization and disinfectant supplies and personal protective equipment. |
| | 10. The agency's compliance with applicable federal, state, and local COVID-19 guidance has been reviewed, and all gaps have been identified and addressed. |
| | 11. Local guidance pertaining to availability of public transportation has been disseminated to commuting staff members. |
| | 12. Visitor policies have been developed, reviewed, and updated if appropriate. |
| | 13. Routine enhanced cleaning and sanitizing in Board HQ space has been scheduled. |
| | 14. Identify and address internal and external lessons learned or best practices relating to COVID-19 or the return to workplace plan. |
| | 15. A staff communications plan has been developed or, if appropriate, revised. |
| | 16. Appropriate guidance specific to resident inspectors and remote employees has been developed and promulgated. |

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Prior to Phase 1

- | | |
|--|---|
| | 1. National Capital Region (NCR) Governments have already declared they are in Phase 1. |
| | 2. Department of Energy has already declared both Forrestal and Germantown to be in Phase 1. |
| | 3. Completed all of the criteria applicable to each phase transition. |
| | 4. Telework policies, guidance, and infrastructure adequately support maximum telework |
| | 5. Staff have been provided with adequate opportunity to self-identify as a member of a high-risk group in accordance with N-125.1, <i>Telework Program</i> , or successor document. |
| | 6. Identified mission essential functions that can only be accomplished at HQ Building and DOE/NNSA site locations. |
| | 7. Identified available Essential Personnel capable to perform essential functions at HQ Building and DOE/NNSA Site locations. Authorize limited access to perform essential functions. |
| | 8. Enhanced Cleaning in Board space has begun. |
| | 9. Provide direction that limits staff entry into the building; restrict visitors' access into the building; |
| | 10. Sanitizing and disinfectant supplies made available to staff working in the building. |
| | 11. Provide direction that all outside contractors must wear PPE, and properly escorted in Board space by the building engineer or appropriate DNFSB staff. |
| | 12. Provided direction that on-site Facilities, IT, and Security services will be limited at HQ building. |
| | 13. Human Resources Division has resumed or is performing hiring/staffing. |
| | 14. Provided direction that government essential travel is restricted and subject to Chairman's approval. |
| | 15. Appropriate signage has been posted in Board spaces. |
| | 16. Occupancy limits placed in all conference rooms, kitchens, enclosed spaces |
| | 17. Disseminate Facility Security Committee policies regarding building common areas. |

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Prior to Phase 2

- | | |
|--------------------------|--|
| <input type="checkbox"/> | 1. NCR Governments have already declared they are in Phase 2. |
| <input type="checkbox"/> | 2. Department of Energy has already declared both Forrestal and Germantown to be in Phase 2. |
| <input type="checkbox"/> | 3. NCR's new case total over last 14 days per 100,000 people is less than or equal to 100. |
| <input type="checkbox"/> | 4. Completed all criteria applicable to each phase transition and all criteria for prior to Phase 1. |
| <input type="checkbox"/> | 5. Telework policies, guidance, and infrastructure have been reviewed and, if appropriate, updated and communicated to staff. |
| <input type="checkbox"/> | 6. Staff have been trained on flexible work arrangements and have been provided with adequate opportunity to self-identify as a member of a high risk group in accordance with N-125.1, <i>Telework Program</i> , or successor document, and to request reasonable accommodations or other flexible work arrangements. |
| <input type="checkbox"/> | 7. Office Directors and Managers have developed a reduced work schedule by which eligible staff return to their workplaces. Schedule has been communicated to applicable staff. |
| <input type="checkbox"/> | 8. Re-entry kits have been issued to staff. |
| <input type="checkbox"/> | 9. Appropriate COVID-19 controls (e.g., social distancing, facial coverings) have been established for Board common areas. |
| <input type="checkbox"/> | 10. Office Directors have developed guidance for resumption of non-essential travel. |
| <input type="checkbox"/> | 11. Adequate on-site customer service is available at IT Help Desk, Security Office, and Human Resources Division. |
| <input type="checkbox"/> | 12. Adequate on-site facilities maintenance support, office moves, and other related support is available. |
| <input type="checkbox"/> | 13. Appropriate occupancy limits posted in all conference rooms, kitchens, enclosed spaces. |
| <input type="checkbox"/> | 14. If appropriate, Specialized Electro-Static Clorox Total 360 Cleaning or other deep cleaning service(s) has been performed. |
| <input type="checkbox"/> | 15. Review HQ building ventilation system, determine if additional controls need to be implemented. |
| <input type="checkbox"/> | 16. Contact tracing procedures have been implemented and staff has been notified of the procedures. |
| <input type="checkbox"/> | 17. Supervisors are ensuring that personnel perform self-screenings on days they enter the office. |
| <input type="checkbox"/> | 18. Ensure self-screening protocols for visitors to the DNSB spaces have been established and implemented. |

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Prior to Phase 3

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|--|---|
| | 1. NCR Governments have already declared they are in Phase 3. |
| | 2. Department of Energy has already declared both Forrestal and Germantown to be in Phase 3. |
| | 3. NCR's new case total over last 14 days per 100,000 people is less than or equal to 10. |
| | 4. Completed all criteria applicable to each transition and all criteria prior to Phases 1 and 2. |
| | 5. Appropriate amounts of cleaning supplies and PPE are available for all employees with processes in place to ensure they are restocked as needed. |
| | 6. Completed a gap analysis of current agency policies and directives against known and anticipated long-term impacts of COVID-19. |
| | 7. Based on gap analysis, necessary changes to directives have been developed and approved, supplemented with temporary guidance as needed. |

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IX. COVID-19 Self-Screening Checklist

Review this each day before reporting to work. If you have newly or unexpectedly experienced any of the following symptoms in the past 24 hours or answer yes to any other question, **STAY HOME** and call your supervisor or office director to let them know. You should call your primary care physician for further direction.

Do you have a fever (temperature over 100.4°F) without having taken any fever reducing medications?

Yes No

New Loss of Taste or Smell?

Yes

No

Muscle Aches?

Yes

No

Sore Throat?

Yes

No

Cough?

Yes

No

Shortness of Breath?

Yes

No

Repeated Shaking/Chills?

Yes

No

Headache?

Yes

No

Fatigue?

Yes

No

Have you had any of these symptoms in the past 24 hours not related to allergies?

Runny Nose?

Yes

No

Congestion?

Yes

No

Have you experienced any GI symptoms such as nausea/ vomiting, diarrhea, or loss of appetite?

Yes No

Have you, or anyone you have been in close contact with (within 6 feet for 15 or more minutes) been diagnosed with COVID-19, or been placed on quarantine for possible contact with COVID-19?

Yes No

Have you been asked to self-isolate or quarantine by a medical professional or by a local public health official?

Yes No

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X. References

Ref. 1 - NIH Safety Guidance for Return to Physical Workplace, June 2020

Ref. 2 - CDC COVID-19 Guidance for Businesses and Employers, May 2020

Ref. 3 - Johns Hopkins Self-Assessment Tool, [<https://www.hopkinsmedicine.org/coronavirus/covid-19-self-checker.html>]

Ref. 4 - Office of Management and Budget and Office of Personnel Management memorandum, *Opening up America Again*, April 20, 2020

Ref. 5 - Department of Energy, *COVID-19 Return To the Federal Workplace Framework*, May 18, 2020.