

March 18, 2022

To: All Udall Foundation Employees
From: David Brown, Executive Director
Subject: Udall Foundation COVID-19 Agency Safety Plan

This memo outlines the processes and protocols that will guide the safe operations of the Morris K. Udall and Stewart L. Udall Foundation (Udall Foundation) during the remainder of the COVID-19 pandemic. This agency safety plan is issued in accordance with the Office of Management and Budget (OMB) memorandum [M-21-15](#); in response to the Executive Order [Protecting the Federal Workforce and Requiring Mask-Wearing](#); and consistent with the [National Strategy for the COVID-19 Response and Pandemic Preparedness](#).

This agency safety plan supersedes all previous OMB guidance regarding the safe operations of the Udall Foundation during the COVID-19 pandemic. A copy of this memo shall be placed on the Udall Foundation's public website at www.udall.gov.

This agency safety plan may be updated in the future at the direction of OMB or by agency leadership, in response to evolving pandemic conditions and preparedness requirements and consistent with guidelines established by the Safer Federal Workforce Task Force.



David P. Brown, Ph.D.
Executive Director

Udall Foundation COVID-19 Agency Safety Plan

The Udall Foundation created this agency safety plan to guide its employees in implementing public health best practices as determined by the Centers for Disease Control and Prevention (CDC). The Udall Foundation will balance delivery of its authorized mission with adaptation to the everyday challenges that the COVID-19 pandemic presents to its workforce.

1. Health and Safety

a. COVID-19 Coordination Team

The Udall Foundation has established an agency COVID-19 Coordination Team (Section 5) which includes representatives from each program area as well as the agency's General Counsel. Due to the Udall Foundation's small size it is impractical to hire new, public health staff into its workforce; instead the COVID-19 Coordination Team will maintain awareness of national, state, and local public health guidance as appropriate and needed for any decision-making.

The COVID-19 Coordination Team is responsible for establishing, implementing, and monitoring compliance with COVID-19 safety protocols as well as making determinations regarding telework, remote duty stations, and travel. The COVID-19 Coordination Team meets weekly and as appropriate may consult with OMB, the Office of Personnel Management (OPM), and the General Services Administration (GSA) on specific questions or issues. Because the Udall Foundation leases privately owned office space, the COVID-19 Coordination Team will also consult with property management and ownership as needed regarding this plan.

The COVID-19 Coordination Team, through the Executive Director, will provide COVID-19 safety updates to Udall Foundation employees on a regular basis. Distribution of safety information may occur via all-office emails, at all-hands meetings, and on the agency's Intranet and public website.

b. Telework and Remote Duty Stations

The agency transitioned to a "situational telework" posture beginning February 14, 2022. Udall Foundation employees continue to have the benefit of situational telework, consistent with the agency's telework policy and supervisor approval. Most employees who are required to come into the agency's offices will have the opportunity for situational telework of up to 50% of their overall work schedule. The Udall Foundation has designated certain agency positions to be eligible for permanent remote duty stations; those employees are also eligible for situational telework consistent with agency policy and supervisor approval.

Should OMB require a future maximum telework posture for Federal agencies, the Udall Foundation will adhere to a 25% building occupancy limitation at its offices, excepting any case-by-case requirements for mission critical activities. The Executive Director will approve any exceptions to the occupancy limitation.

c. Physical Distancing and Face Coverings

Udall Foundation employees and visitors should adhere to current public health guidance from the CDC, in accordance with appropriate Federal, State, and Local public health directives including CDC's [Community Levels Guidance](#) and the Safer Federal Workforce Task Force's [Initial Implementation Guidance](#) for Federal agencies. The Udall Foundation COVID-19 Coordination Team will communicate changes to agency safety protocols such as physical distancing requirements, the use of face coverings, occupancy limitations, and the provision of personal protective equipment (PPE) to employees and visitors.

Employees and visitors to the agency's Tucson, Arizona headquarters and Washington, D.C. offices must wear face coverings and adhere to physical distancing requirements when the CDC Community Level is High, regardless of vaccination status.

Udall Foundation employees should considerately make visitors aware of the agency's safety requirements. If a visitor refuses to adhere to the agency's safety requirements, he or she must be directed to conduct business with the agency off-site (i.e., via phone or online) and to depart the premises.

Reasonable accommodations to the above requirements will be made for qualifying individuals in accordance with Udall Foundation and Equal Opportunity Employment Commission (EEOC) guidance and procedures.

d. Environmental Cleaning and Disinfection

Cleaning services at the Udall Foundation's Tucson, Arizona headquarters are provided by JAN-PRO commercial cleaning. The University of Arizona is responsible for cleaning services at the agency's Washington, D.C. office. Regular cleaning services at both locations include enhanced cleaning and disinfection in common use, high-touch, and high-density spaces such as lobbies, restrooms, and stairwells. Office spaces are cleaned and disinfected regularly in accordance with best sanitation practices.

In the event of a suspected or confirmed case of COVID-19 in the agency's offices, enhanced environmental cleaning and disinfection may be performed in accordance with CDC guidance. Udall Foundation employees and visitors may be asked to vacate any affected spaces until cleaning and disinfection is completed. The Udall Foundation COVID-19 Coordination Team will determine the suitable scope of any workplace closures that may be necessary following a suspected or confirmed COVID-19 case.

e. Hygiene

Hand sanitizer stations are available throughout the agency's Tucson, Arizona and Washington, D.C. offices. Udall Foundation employees and visitors are encouraged to frequently wash their hands with soap and water for at least 20 seconds, or to use hand sanitizer, in accordance with CDC guidance on hand hygiene including before eating, drinking, or smoking and after using the

restroom. To the extent funds are available, the Udall Foundation will provide approved disposable masks on request to employees and visitors.

f. Ventilation and Air Filtration

The Udall Foundation leases privately owned space for both its Tucson, Arizona and Washington, D.C. offices. To the maximum extent practicable the agency works with its property managers to optimize the proportion of outdoor ventilation, improve filtration, and reduce or eliminate recirculation.

2. Vaccinations; Testing; Symptom Monitoring; Contact Tracing, Isolation, and Quarantine; and Confidentiality

a. Vaccinations

Consistent with guidance from the CDC and Safer Federal Workforce Task Force, the Udall Foundation has established safety protocols for fully vaccinated people and not fully vaccinated people, respectively.

Proof of employee vaccination is collected by Udall Foundation supervisors and maintained in a limited access location on the agency's internal network. Employees who do not provide proof of vaccination may be subject to disciplinary measures unless a request for reasonable accommodation has been granted or is under review.

Employees who are fully vaccinated adhere to the following protocols:

- Can travel without restrictions for official agency business;
- Do not need to undertake regular COVID-19 testing.

Employees who are unvaccinated, are not fully vaccinated, or who choose not to provide vaccine information adhere to the following protocols:

- Comply with regular testing, when the CDC Community Level is Medium or High;
- Can travel for mission critical purposes only, with supervisor approval.

b. Testing

The Udall Foundation has established a COVID-19 screening testing program for employees who are unvaccinated or not fully vaccinated. This includes employees who have a pending or approved reasonable accommodation request for exception or extension to the COVID-19 vaccination requirement for Federal employees.

When the CDC Community Level is Medium or High, Udall Foundation employees who are unvaccinated or not fully vaccinated are required to provide proof of a negative COVID-19 test result for any week during which they work onsite at the agency's Tucson, Arizona headquarters or Washington, D.C. office or interact with members of the public as part of their official job duties (e.g., while on official agency travel). A negative test result is only required to be provided once per week, i.e., employees participating in the agency's screening testing program do not

need to provide a negative test result each time they access agency facilities or engage with the public, as long as a negative test result has been provided to the employee's supervisor for that particular week.

Udall Foundation employees with remote duty stations, or who are not accessing the agency's offices or engaging with members of the public as part of their official job duties during a given week, do not need to provide proof of a negative COVID-19 test result even if they are unvaccinated or not fully vaccinated. Should an unvaccinated or not fully vaccinated Udall Foundation employee need to be onsite at another Federal agency facility, he or she would generally be treated as a visitor for the duration of their visit and should be able to show proof of a negative COVID-19 test result administered within the prior 72 hours, if required based on CDC Community Levels.

Udall Foundation employees participating in the agency's screening testing program may utilize any viral tests authorized by the Food and Drug Administration to detect current COVID-19 infection, including both antigen tests and polymerase chain reaction (PCR) tests. Options for testing methods include:

- In-store or drive-thru point-of-care tests, such as at pharmacies or state- or locally-run testing sites;
- Self-administered swab tests that enable an employee to collect a specimen and drop it off at a designated collection location or ship it to a laboratory;
- Over-the-counter tests, at long as the tests are not both self-administered and self-read by the employee unless observed by the employee's supervisor or an authorized telehealth provider;
- Other self-administered tests, as long as those tests are not also self-read by the employee unless observed by the employee's supervisor or an authorized telehealth provider.

Udall Foundation employees participating in the screening testing program are highly encouraged to use a free testing center or free self-administered test. These include testing sites such as those administered by [Pima County](#) and the [State of Arizona](#) and at-home tests such as those provided through covidtests.gov. The agency will provide reimbursement for the cost of a COVID-19 test if an employee is unable to access a free testing center or self-administered test.

Udall Foundation employees participating in the screening testing program are considered to be on duty when obtaining a COVID-19 test. This includes time required to travel to a testing site (if needed), complete testing, and return to work. Employees participating in the screening testing program should record their time as regular hours in PMD, consistent with the agency's Maxiflex policy; requests for administrative leave to obtain COVID-19 tests are not necessary.

Proof of negative COVID-19 tests is provided by Udall Foundation employees to their supervisors in hard copy or electronic form and maintained in a limited access location on the agency's internal network. Unvaccinated or not fully vaccinated employees who do not provide proof of a negative COVID-19 test to the supervisors before working onsite at the agency's offices or engaging with the public as part of their official job duties may be subject to disciplinary measures.

The agency will monitor OMB, OPM, and CDC guidance regarding COVID-19 testing and determine whether any future adjustments to this requirement are needed.

c. Symptom Monitoring

If Udall Foundation employees or visitors are not feeling well they should not enter the agency's Tucson, Arizona headquarters or Washington, D.C. office. Any Udall Foundation employee who develops symptoms consistent with COVID-19 while at the agency's offices should notify their supervisor and promptly leave the workplace.

d. Contact Tracing, Isolation, and Quarantine

All Udall Foundation employees and visitors are required to sign in when accessing the agency's Tucson, Arizona headquarters. The agency's Operations Coordinator is responsible for maintaining a record of building access. The University of Arizona is responsible for administering and tracking building access for the Udall Foundation's Washington, D.C. office.

In accordance with Safer Federal Workforce Task Force and CDC guidelines, Udall Foundation employees who test positive for COVID-19 or who are determined to be a close contact of someone with COVID-19 should follow the below procedures for isolation and quarantine.

- An employee who tests positive for COVID-19, regardless of vaccination status, should:
 - Isolate at home for five days;
 - Return to the office after five days, if no or resolving symptoms (employees continuing to exhibit a fever should continue isolating until it resolves);
 - Continue to wear a mask around others for an additional five days.
- An employee who is determined to be a close contact of someone with COVID-19, and who has (a) received a booster dose of vaccine, (b) completed the primary series of a two-dose Moderna or Pfizer vaccine within the past six months, (c) completed the primary series of a one-dose J&J vaccine within the past two months, or (d) had a confirmed case of COVID-19 within the last 90 days, should:
 - Wear a mask around others for ten days;
 - Be tested for COVID-19 after five days;
 - Employees meeting these criteria do not need to quarantine.
- An employee who was exposed to someone with COVID-19, and who has not received a booster dose of vaccine or had a confirmed case of COVID-19 within the last 90 days, and either (a) completed the primary series of a two-dose Moderna or Pfizer vaccine more than six months ago, or (b) completed the primary series of a one-dose J&J vaccine more than two months ago, should:
 - Quarantine at home for five days;
 - Continue to wear a mask around others for an additional five days;
 - Be tested for COVID-19 after five days;
 - Employees who are unvaccinated should also follow this guidance.

An employee who is determined to be a close contact of someone with COVID-19, and who has official travel scheduled within the ten-day period following the close contact, should consult with his or her supervisor to determine whether the travel is of a sufficiently mission critical nature to continue as planned.

e. Confidentiality

The Udall Foundation will be transparent in communicating information about an employee's or visitor's positive test or close contact status to its workforce, as relevant and appropriate and consistent with privacy and confidentiality regulations and laws. All medical information collected from agency employees, including test results and any other information obtained from testing and symptom monitoring, will be treated confidentially and accessible only by those with a need to know in order to protect the health and safety of personnel.

3. Travel

There are no restrictions on official travel for Udall Foundation employees who are fully vaccinated against COVID-19. Members of the Udall Foundation COVID-19 Coordination Team have discretion to determine and approve mission critical travel for employees who are not vaccinated, and to approve invitational travel (i.e., for visitors to Udall Foundation offices or events) as appropriate. At the direction of OMB, the Udall Foundation Executive Director must approve employee or visitor travel for all official events at which 50 or more participants will be present when the Community Level at the event location is High.

Udall Foundation employees and invitational travelers of the agency should adhere to CDC guidelines before, during, and after travel. Appropriate travel precautions may include: carefully assessing travel risk prior to travel, including levels of COVID-19 community transmission; wearing a mask at airports, on airplanes, and while using mass transit; maintaining physical distance from non-household members as able; maintaining good hand hygiene by regularly washing hands with soap and water or using an alcohol-based hand sanitizer; and getting tested and staying home after higher-risk travel, as defined by the CDC, before returning to the workplace. The CDC has extensive guidelines for both domestic and international travel and Udall Foundation employees should consult these resources carefully.

4. Visitors

Both the Udall Foundation's Tucson, Arizona headquarters and Washington, D.C. office are open for agency operations. Visitors are required to adhere to the same safety protocols as Udall Foundation employees as articulated in this safety plan. When the CDC Community Level is Medium or High, visitors who are unvaccinated or not fully vaccinated are required to provide proof of a negative COVID-19 test result for any week during which they access the agency's Tucson, Arizona headquarters or Washington, D.C. office.

5. Udall Foundation COVID-19 Coordination Team

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