

**September 1, 2021**

**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](http://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**

At the time of issuance of this memo the Udall Foundation is operating in a "maximum telework" posture. Agency employees are only required to come to the office to fulfill operational requirements that cannot be conducted remotely.

The Udall Foundation has designated certain agency positions to be eligible for permanent remote duty stations. Employees in those positions who elect to implement permanent remote duty station status will not be required to return to the workplace on a full-time basis after the COVID-19 pandemic ends. The agency has provided separate guidance to those employees regarding implementation of and timelines for permanent remote duty station status.

All other Udall Foundation employees will be given at least 30 days' notice before the discontinuation of maximum telework. In determining when to issue such notice to employees, the Udall Foundation will take into account the state and local public health guidance for Tucson, Arizona and Washington, D.C. where the agency's offices are located as well as directives from

OMB, OPM, and GSA. After maximum telework is discontinued, Udall Foundation employees will continue to have the benefit of situational telework, consistent with the agency's telework 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. 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.

Udall Foundation employees should maintain appropriate physical distance from others whenever practical, consistent with current CDC guidelines. This applies to employee offices, conference rooms, and communal spaces. Because the building capacity of its Tucson, Arizona and Washington, D.C. offices greatly exceeds the number of agency employees, the Udall Foundation does not anticipate needing to reconfigure workspaces or common areas to accommodate physical distancing requirements.

At the time of issuance of this memo, all Udall Foundation employees, regardless of vaccination status, are required to wear a face covering (mask) when at the agency offices, consistent with CDC guidance during periods of high or substantial community transmission. Face coverings are not required when an employee is alone in his or her office or otherwise not interacting with colleagues and visitors. When used, face coverings should be worn properly and be constructed of appropriate material. Examples of CDC-approved face coverings include medical disposable masks; masks that fit properly (i.e., 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 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. Novelty masks, masks with exhalation valves, and face shields are not permitted as substitutes for masks. Inappropriate or offensive images and messages are not permitted on face coverings.

Visitors to the Udall Foundation's offices must adhere to the agency's physical distancing and face covering requirements as described above. 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 will work with its property managers to optimize the proportion of outdoor ventilation, improve filtration, and reduce or eliminate recirculation.

## **2. Vaccinations, Testing, and Contact Tracing**

#### 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.

Employee vaccination attestation information is collected by Udall Foundation supervisors and maintained in a limited access location on the agency's internal network. Employees who do not provide attestation information may be subject to disciplinary measures.

Employees who attest to being fully vaccinated adhere to the following protocols:

- Do not need to wear a mask or maintain physical distance, for areas of low or moderate community transmission as defined by the CDC (in areas of substantial or high transmission, everyone including fully vaccinated people must wear a mask);
- 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:

- Wear masks regardless of community transmission rate;
- Maintain physical distancing;
- Comply with regular testing;
- Can travel for mission critical purposes only, with supervisor approval.

Visitors to the Udall Foundation’s Tucson, Arizona headquarters and Washington, D.C. office are required to attest to their vaccination status at time of entry to the office and follow either the fully vaccinated or not fully vaccinated protocol accordingly.

The agency will continue monitor OMB, OPM, and CDC guidance regarding attestation of vaccination status and determine whether any future adjustments to this requirement are needed.

#### b. Testing

Consistent with guidance from the CDC and Safer Federal Workforce Task Force, the Udall Foundation is establishing a screening testing program for agency employees and visitors who are unvaccinated, are not fully vaccinated, or who choose not to provide vaccine information.

Approved COVID-19 tests include any viral test, such as PCR or antigen, that (a) has been authorized by the Food and Drug Administration to detect current COVID-19 infection, and (b) includes information documenting the date that the test was administered. Pooled test results are acceptable; however, at-home test results are not.

Employees who are unvaccinated, are not fully vaccinated, or who choose not to provide vaccine information must provide evidence of a negative COVID-19 test at least once per week. This requirement only applies to Udall Foundation employees who are accessing the agency’s Tucson, Arizona headquarters or Washington, D.C. office.

Employee test result information shall be collected by Udall Foundation supervisors and maintained in a limited access location on the agency’s internal network. Employees who do not provide evidence of a negative test result may be subject to disciplinary measures.

Employees in the Tucson, Arizona commuting area requiring testing should, whenever possible, receive a COVID-19 test from an authorized no-cost provider such as [Pima County](#) or the [Arizona Department of Health Services](#). Employees may receive testing during normal work hours with the approval of their supervisors.

Visitors who are unvaccinated, are not fully vaccinated, or who choose not to provide vaccine information must provide evidence of a negative COVID-19 test taken no more than three days prior to entering the agency's Tucson, Arizona headquarters or Washington, D.C. office. Visitor test result information shall be made available to the appropriate Udall Foundation official at the time of entry to the office. The Udall Foundation will not reimburse visitors for testing costs.

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

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.

Udall Foundation employees who have not recently (within the prior 14 days) accessed the agency's offices, and who test positive for COVID-19 or are deemed a close contact of someone who has, may choose to voluntarily disclose that information to their supervisor. Such employees should not return to the agency's offices until they have been cleared to do so consistent with appropriate medical and public health guidance regarding quarantine or isolation.

Udall Foundation employees who have recently (within the prior 14 days) accessed the agency's offices are required to notify their supervisor if they test positive for COVID-19 or if they have been identified as a close contact of someone who has. The employee should leave the workplace immediately, if applicable, and follow appropriate medical and public health guidance regarding quarantine or isolation. The employee's supervisor will advise the Udall Foundation Executive Director who, in consultation with the agency's COVID-19 Coordination Team, will determine if any mitigation measures are required such as notifying agency employees or visitors who may be designated as close contacts.

#### 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**

At the time of issuance of this memo, there are no restrictions on official travel for Udall Foundation employees who have attested to being 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 have not attested to being vaccinated, and to approve invitational travel (i.e., visitors to Udall Foundation offices) 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.

Udall Foundation employees and invitational travelers of the agency should adhere to CDC guidelines before, during, and after travel. Appropriate travel precautions 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 will remain open for agency operations. Visitors are permitted at both locations; Udall Foundation employees should exercise discretion when determining whether a meeting needs to take place in person rather than virtually. The number of visitors to the agency's offices should be minimized during periods of high or substantial COVID-19 community transmission.

Visitors are required to adhere to the same safety protocols as Udall Foundation employees, including vaccination attestation and COVID-19 testing as described in Section 2.

### **5. Udall Foundation COVID-19 Coordination Team**

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