



Pension Benefit
Guaranty Corporation

COVID-19 WORKPLACE SAFETY PLAN

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Introduction

The Pension Benefit Guaranty Corporation's (PBGC) Workplace Safety Plan was created in response to a memorandum issued by the Office of Management and Budget (OMB) on January 24, 2021, ([M-21-15](#)) in response to the [Executive Order 13991](#), *Protecting the Federal Workforce and Requiring Mask-Wearing*, which is part of the *National Strategy for the COVID-19 Response and Pandemic Preparedness*. The National Strategy initiates a coordinated pandemic response intended to improve the effectiveness of the country's fight against coronavirus disease 2019 (COVID-19). The federal government is committed to addressing essential work requirements consistent with best public health practices. PBGC's paramount concern is the health and safety of its federal employees, onsite contractors, and individuals interacting with PBGC.

This document provides safety guidance for all PBGC federal employees and onsite contractors (referred to as "PBGC's workforce") and is primarily focused on application of the Centers for Disease Control and Prevention (CDC) and OMB guidelines at all PBGC facilities to mitigate the spread of COVID-19 in the workplace. This plan references communication with and requires notification to the "supervisor" or "manager" in certain circumstances. The "supervisor" or "manager" of onsite contractors is the contractor employee who serves as the Program Manager (PM) (i.e., the contractor's PM). The contractor's PM is responsible for communicating on behalf of all onsite contractors under their supervision to the PBGC Contracting Officer's Representative (COR).

These guidelines apply to buildings wholly managed by PBGC and buildings (or areas within buildings) controlled by PBGC (referred to as "PBGC facilities"). This document is not meant to be comprehensive and is organized by subject consistent with OMB guidance. This guidance supersedes any conflicting information in any previously published PBGC guidance on COVID-19.

To ensure alignment with the latest health standards, PBGC may provide additional and supplemental guidance based on updates from CDC and OMB.

Telework

PBGC successfully transitioned to maximum telework with minimal issues and/or disruption. Employees/contractors, with approved telework agreements, should continue to telework until further notice. PBGC continues to operate under a maximum telework status as an effective workplace safety measure until further guidance from the CDC and OMB is issued. Maximum telework will be assessed continually, and employees will be notified of any changes. Information about telework can be found on PBGC's [Human Resources Department's \(HRD\) Intranet Telework site](#).

As a general principle, every effort will be made to maximize the use of telework during widespread community transmission. In addition to maximizing telework, PBGC continues to make available other flexibilities for use by PBGC employees to help sustain their workday while managing their dependent care responsibilities. These flexibilities include, but are not limited to, alternative and compressed work schedules and a flexible workday (6:00 a.m. to 8:00 p.m.).

It is understood that certain PBGC program functions may require onsite work. PBGC Federal Emergency Response Officials (F/ERO) employees are considered key personnel in PBGC's Continuity of Operations Plan (COOP). F/ERO personnel may be expected to continue to report onsite to perform certain business functions. F/ERO staff should consult with their supervisors or managers for work-related guidance.

Employees currently teleworking on a frequent or regular basis will be given reasonable advance notice and guidance before being required to return to the physical workplace.

Health and Safety

Masks

Federal employees, onsite contractors, and all visitors are expected to follow [CDC](#), Occupational Safety and Health Administration (OSHA), and OMB guidelines on wearing masks (also called face coverings), physical distancing, and hygiene.

[Executive Order 13991](#), *Protecting the Federal Workforce and Requiring Mask-Wearing*, charged federal agencies to “require compliance with CDC guidelines with respect to wearing masks;” and OMB memorandum [M-21-15](#) noted in its guidance on face masks that “agencies may provide for exceptions consistent with CDC guidelines.” Updated CDC *guidance, dated May 13, 2021, Interim Public Health Recommendations for Fully Vaccinated People*, states that fully vaccinated federal employees, fully vaccinated onsite contractors, and fully vaccinated visitors to federal buildings are no longer required to wear masks. To clarify what this announcement means for individuals:

- If you are fully vaccinated (at least two weeks past your final dose), you are no longer required to wear a mask.
- If you are not fully vaccinated (at least two weeks past your final dose), please continue to wear a mask.

PBGC can provide masks to employees, contractors, and visitors to the extent permitted by law and subject to the availability of resources. The PBGC Workplace Solutions Department will provide, as requested, clear masks to those who work with the deaf and hard-of-hearing.

Signs or notices are posted prominently at the entrances to PBGC-controlled spaces to inform employees and visitors of the mask requirement for those not vaccinated. Individuals may be asked to lower their masks briefly for identification purposes in compliance with safety and security requirements.

Symptom Monitoring

The PBGC workforce shares in the responsibility for limiting the spread of COVID-19. One of the best ways to limit the transmission of the virus is to stay home if sick. **PBGC federal employees, onsite contractors, or visitors who are not feeling well should stay home and not enter the workplace.**

PBGC federal employees and contractors **working onsite** are expected to perform a [CDC self-health screening](#), which is symptom screening, at home prior to coming to a PBGC worksite. Symptom screening is being done in accordance with OMB guidelines to reduce the risk of exposure or potential infection at a PBGC facility. Visitors will also be asked to complete symptom screening before entering a PBGC facility. These tools may be updated based on CDC and OMB guidance.

Any individual who develops any symptoms consistent with COVID-19 during the day while at work (at a PBGC workplace) should separate from others and promptly leave the workplace, giving appropriate notice of departure to his or her supervisor. Supervisors should consult with the Human Resources Department about the appropriate use of leave for PBGC federal employees. PBGC employees must comply with existing procedures for required reports of cases involving COVID-19 exposure or illness.

PBGC's COVID-19 Coordination Team shall collaborate with and support the contact tracing programs of local health departments to identify, track, and manage contacts of COVID-19 cases. In situations of a potential or confirmed COVID-19 case, the impacted individual or supervisor may receive a communication from the Workplace Solutions Department asking for information to make a determination about whether the office needs to be temporarily closed, and what type of cleaning needs to be done in accordance with CDC guidelines. PBGC will safeguard the privacy of all PBGC federal employees, contractors, and visitors while also discharging its responsibility to protect the safety and health of all individuals by notifying them when they may have had an exposure or potential exposure at work.

Quarantine and Isolation

Any individual with a suspected or confirmed COVID-19 infection will be advised to follow his or her healthcare provider's instructions, comply with the local public health authority, and follow CDC's [quarantine](#) and [isolation](#) guidelines.

PBGC federal employees and contractors who are in isolation or quarantine should not return to the workplace until approval is given from the individual's physician or local public health authority in accordance with [CDC guidelines](#). Employees who self-certify that they have completed all conditions of isolation or quarantine are permitted to return to work.

Fully vaccinated people with no COVID-like symptoms who have been exposed to someone with suspected or confirmed COVID-19 should review updated CDC guidance on [Isolation, Quarantine and Testing for Fully Vaccinated People](#).

Confidentiality

All information collected from PBGC federal employees, contractors, and visitors to PBGC facilities in connection with the implementation of PBGC's Workplace Safety Plan — including but not limited to names and contact information, COVID-19 screening information, test results, any information obtained as a result of testing and symptom monitoring, and any other personal and/or medical information — will be treated confidentially and in accordance with applicable law and government-wide policy. Within PBGC, this information will be accessible by and disclosed only to those who have a need to know the information to carry out the requirements of this plan.

PBGC shall identify a point of contact for all questions relating to personal medical data. When in receipt of confidential and private information, PBGC will safeguard the information in a way consistent with applicable local, state, and federal privacy, health/medical, and workplace laws and regulations (e.g., U.S. Equal Employment Opportunity Commission (EEOC) and Americans with Disabilities Act (ADA)). In addition, this information may be disclosed outside of PBGC (for example, to other federal agencies and local public health officials) only as permitted by applicable law and policy and only to those individuals and entities with a need to know to protect health and safety.

Reasonable Accommodations

A "reasonable accommodation" under the Rehabilitation Act and ADA includes modification to a workplace policy due to a disability-related need of a federal employee.

Unrelated to the establishment of a home office for the purpose of telework, reasonable accommodations may be required and provided to employees working from home.

Accommodations may relate to COVID-19 if the employee acquires the illness and needs modifications to perform the essential functions of his or her position. Additionally, accommodations may relate to other medical conditions that are unrelated to COVID-19 but impact an employee's ability to perform the essential functions of his or her position. These may be the same accommodations as those provided in the office setting, or they may differ based on the office setting or other circumstances. The manner in which employees are accommodated may vary depending on the office setting or other circumstances. Employees should engage their supervisors and the Human Resources Department to initiate an interactive process to determine whether and what accommodations may be provided.

Wellness Resources

PBGC consistently promotes work-life programs and resources through email communications to help employees balance and manage daily home and work responsibilities or deal with life challenges.

Federal employees may reach out to the [Employee Assistance Program](#) (EAP) for help coping with anxiety that may result from this public health crisis. This free, confidential, and professionally staffed service is available to all PBGC federal employees. EAP is a professional resource available to help employees resolve life challenges through confidential counseling and coaching with experienced, licensed counselors — including legal and financial consultation.

EAP is available 24 hours a day/7 days per week/365 days per year at 800-222-0364. When in-person sessions are limited, phone consultations will be provided right away.

[WorkLife4You](#) is another resource, a referral program, designed to help PBGC federal employees and their dependents better manage daily responsibilities and life events. Services include expert guidance from work-life specialists, personalized referrals to helpful resources nationwide, and online tools to help with topics such as childcare and parenting, adult care and aging, education, career development, financial and legal, health and wellness, and other everyday needs.

Travel

Pursuant to [OMB Memorandum M-21-15](#), federal employees should adhere strictly to [CDC guidelines](#) before, during, and after travel, regardless of whether the travel is personal or for official business.

Given currently high levels of transmission in the United States, **official domestic travel should be limited to only mission-critical trips.** International official travel should also be avoided, unless it is mission-critical.

PBGC supervisors will determine what official travel meets the mission-critical threshold. When making these determinations, supervisors must consider information available from the CDC and from the [Safer Federal Workforce](#).

Workplace Operations

PBGC is committed to protecting the PBGC workforce and stakeholders from the effects of the COVID-19 pandemic while preserving the Corporation's ability to complete its mission.

Occupancy

Unless it is physically impossible, in general, occupancy in PBGC worksites should be no more than 25% of normal capacity during periods of significant or high community transmission. Occupancy limits may change per updated OMB or General Services Administration (GSA) guidance. This capacity limit must be used in combination with other controls, including flexible work schedules, and for those unvaccinated, physical distancing and the use of masks. PBGC supervisors are responsible for ensuring that workplace flexibilities are used to maintain safe workspaces.

The Workplace Solutions Department and PBGC's COVID-19 Coordination Team will review the process and controls for monitoring compliance with occupancy requirements. Levels of community transmission can be established by consulting CDC's [COVID Data Tracker County View](#).

Exceptions to the 25% occupancy capacity limit policy must be cleared by the PBGC Director as advised by PBGC's COVID-19 Coordination Team and in consultation with the Safer Federal Workforce Task Force. Exceptions to this policy must nevertheless be supported by physical distancing and mask-wearing in the workplace for those not vaccinated.

Ventilation and Air Filtration

To the extent feasible, PBGC's facilities have made changes to their heating, ventilation, and air conditioning (HVAC) systems to optimize indoor ventilation by increasing the proportion of outdoor ventilation, improving filtration to a filter rated at least MERV-13 (or the highest efficiency filter that the HVAC system can handle), or reducing/eliminating recirculation. All PBGC facilities have had their HVAC systems tested and modified to maximize the mix of outside air and to run continuously to increase circulation of fresh air.

Physical Distancing

Virtual meetings will occur wherever possible, even for PBGC federal employees and contractors in the same worksite. If a face-to-face meeting is required, furniture shall be removed or marked from conference spaces to prevent exceeding appropriate limits.

All PBGC office workspaces shall enforce occupancy limits by employing staggered work times, cohort-based scheduling, etc. Staggering work schedules is another way to put space between individuals working in the same office.

Environmental Cleaning

Enhanced cleaning in common use/high-touch/high-density spaces — such as lobbies, restrooms, elevators, and stairwells — is conducted in accordance with CDC guidelines. Office spaces used regularly are cleaned on a regular basis, in accordance with CDC guidelines. Wipes, gloves, and other Environmental Protection Agency (EPA)-approved disinfectants are available for individuals to wipe down personal workstations and related personal property.

In accordance with GSA and [CDC guidelines](#), if there has been a sick person or someone who tested positive for COVID-19 in a PBGC facility **within the last 24 hours**, PBGC will clean and disinfect the space. **If more than three days have passed** since the person who is sick or diagnosed with COVID-19 has been in the space, no additional cleaning (beyond regular cleaning practices) is needed.

Hygiene

To prevent the transmission of all respiratory infections, everyone should practice respiratory hygiene.

Cover your cough or sneeze with a tissue or mask or use the inside of your elbow, and then, throw the tissue away in the trash and immediately wash your hands.

- When in public spaces, wear an appropriate mask covering your nose and mouth.
- Do not touch your eyes, nose, or mouth with unwashed hands.
- Wash your hands often with soap and water for at least 20 seconds, especially if you have been in a public space or after blowing your nose, coughing, or sneezing. If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Clean and disinfect frequently touched surfaces daily.

Hand sanitizer stations are available in PBGC facility entrances and throughout workspaces, and contain FDA-approved hand sanitizer, with at least 60% alcohol. Individuals will be encouraged to wash their hands with soap and water or use hand sanitizer or alcohol-based hand rubs frequently.

Visitors

The number of visitors to PBGC's workplace has been minimized to the extent possible, and efforts have been made to conduct visits virtually. PBGC has limited visitor access to PBGC facilities to only visitors who are critical to the performance of current PBGC mission-related functions and who have been pre-approved by a supervisor and the Workplace Solutions Department to ensure PBGC maintains a 25% occupancy limit.

Building visitors will be subject to building screening policies. Unvaccinated individuals will be required to wear a mask and comply with physical distancing requirements. Instructions are posted on the doors of PBGC facilities for staff and visitors specifying that visitors should conduct [CDC self-health screenings](#) prior to coming to a PBGC facility.

Elevators

Unvaccinated individuals must wear masks in elevators and in elevator lobbies. The use of stairs by those who are physically able is strongly encouraged.

Shared Spaces

Shared tools and equipment should be disinfected by users any time the equipment is used by or transferred to a new person, and disinfectant wipes have been provided throughout PBGC facilities. Shared tools and equipment include phones, computers, printers/copiers, scanners, and other office equipment and devices. PBGC-provided refrigerators and water and ice machines may be used with proper hand hygiene. PBGC does not provide agency staff with water coolers and coffee machines. However, they are located throughout PBGC facilities. These may also be used with proper hand hygiene.

Visual markers have been placed on furniture in conference rooms and large common spaces to ensure PBGC maintains a 25% occupancy limit. In some places, collaboration furniture has been removed.

Training and Communications

Information on safety protocols has been provided and communicated to PBGC's workforce. PBGC developed a [COVID-19 Intranet page](#) that provides information and updates to PBGC federal employees and contractors.

PBGC also developed a [COVID-19 self-reporting tool](#) that is a secure, confidential tool where self-identifying employees, contractors, and managers can report possible or confirmed COVID-19 exposures. The COVID-19 self-reporting tool may be accessed from the COVID-19 intranet site.

Testing

As required in Executive Order 13991, PBGC understands that CDC is developing a testing plan for the federal workforce and that CDC will submit that plan to the COVID-19 Response Coordinator. When the Safer Federal Workforce Task Force notifies agencies of CDC's testing guidance, this Plan will be updated to reflect the new guidance. Currently, employees are encouraged to get tested prior to coming onsite if there is a risk that they have been exposed to COVID-19.

Contact Tracing

PBGC's COVID-19 Coordination Team shall collaborate with and support the contact tracing programs of local health departments to identify, track, and manage contacts of COVID-19 cases, aligned to CDC guidance on [Case Investigation and Contact Tracing in Non-healthcare Workplaces](#). These policies include best practices for reviewing community contact tracing and highlighting the type of information including, but not limited to, locations visited and potential employees working in the same workspace.

In situations of potential or confirmed COVID-19 cases, the impacted individual or supervisor may receive a communication from the Workplace Solutions Department asking for information to triage the situation and to determine whether the office needs to be temporarily closed, what communications need to be sent out, and what type of cleaning needs to be done in accordance with CDC guidelines.

PBGC will continue to be transparent in communicating related information to the workforce while safeguarding the privacy of PBGC employees, contractors, and visitors. Any disclosures must be consistent with local and federal privacy and confidentiality regulations.

Vaccination

COVID-19 vaccines are [now widely available](#).

Executive Order 13991 tasks the Safer Federal Workforce Task Force with providing guidance on vaccine prioritization, distribution, and administration. Once the Task Force has developed appropriate policies and procedures, the Human Resources Department will provide the appropriate support for PBGC employees seeking vaccines.

COVID-19 Coordination Team

PBGC's Office of Management and Administration (OMA) will continue to serve as lead for PBGC's COVID-19 planning and response. PBGC has a core COVID-19 Coordination Team (Team) that meets on a regular basis. The Team consists of eight standing members listed here and supplemented by others from across PBGC as necessary.

- Office of the Director or designee: Kristin Chapman, Chief of Staff
- Office of Administration and Management (OMA) or designee: Alice Maroni, Chief Management Officer
- Workplace Solutions Department (WSD) or designee: Alisa Cottone, Director
- Occupational Safety and Health Administration (OSHA) Manager or designee: Delilah LumHo, Manager
- Human Resources Department (HRD) or designee: Arrie Etheridge, Director
- Office of the General Counsel (OGC) or designee: Russ Dempsey, General Counsel; Paul Chalmers, Deputy General Counsel; and Brian Cooper, Attorney

PBGC's COVID-19 Coordination Team is responsible for advising the PBGC Director on matters including, but not limited to:

- Assessments to establish, implement, and monitor compliance with: (a) occupancy limit requirements and (b) safety protocols for physical space and masking.
- Revisions to the COVID-19 Workplace Safety Plan and protocols.
- Development of an outreach strategy for communicating with the PBGC's workforce that is regular and transparent and complies with PBGC's obligations under federal labor management relations law.
- Identification of COVID-19-related operational compliance issues and development of processes for remediating them and exceptions to policies and procedures for reviewing requests.

The COVID-19 Coordination Team may consult with GSA, the Office of Personnel Management (OPM), and OMB. PBGC's COVID-19 Coordination Team will also participate in the sharing of best and promising practices across government.

Workgroups may be formed to support and inform the work of PBGC's COVID-19 Coordination Team by:

- Completing deliverables as assigned by the Team.
- Updating the Team on new guidelines for COVID-19 mitigation (including updates from CDC, GSA, OPM, OMB, and other authorities).
- Advising the Team when new guidelines for COVID-19 mitigation necessitate changes in PBGC guidance, implementation status, and other operations.
- Advising the Team on priorities and policies.
- Advising the Team on strategies for engaging with employees.
- Serving as subject matter experts (SMEs) for PBGC's leadership on topics related to the workgroup.

Workgroups should meet regularly and as needed.