



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Cleaning up and revitalizing land

EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance

Report No. 20-E-0332

September 28, 2020



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Abbreviations

EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General
OLEM	Office of Land and Emergency Management
OSC	On-Scene Coordinator
PPE	Personal Protective Equipment

Cover Photo: Abandoned drums at the Hall Street Superfund emergency response site in St. Louis, Missouri, on May 6, 2020. (EPA image)

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At a Glance

Why We Did This Project

We performed this evaluation to determine whether the U.S. Environmental Protection Agency managed its resources for emergency responses to provide continued protection of human health and the environment during the coronavirus pandemic—that is, the SARS-CoV-2 virus and resultant COVID-19 disease. We also sought to examine whether the EPA provided sufficient protective measures to its on-scene coordinators, or OSCs, who respond to emergency incidents.

We sent surveys to 239 OSCs in June 2020 and received responses from 127—a 53 percent response rate. We also interviewed all ten EPA regional Superfund and Emergency Management Division directors, as well as directors from the EPA’s Office of Emergency Management.

This report addresses the following:

- *Cleaning up and revitalizing land.*

This report addresses a top EPA management challenge:

- *Maintaining operations during pandemic and natural disaster responses.*

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EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance

What We Found

EPA regions sufficiently protected human health and the environment by responding to emergencies or assisting in emergency responses during the coronavirus pandemic. In addition, the Agency took some initial measures to protect OSCs. For example, starting in March 2020, when the EPA began adjusting its operations because of the coronavirus pandemic, the Agency reviewed its ongoing and time-critical emergency responses, delaying responses when possible to do so without further detriment to public health or the environment. Also, some OSCs who normally would have been deployed were instead able to work remotely with state and local responders to verify that the emergency responses were adequate. The OSCs who responded to our survey, however, expressed concerns that the EPA did not provide sufficient protective measures or effectively manage its emergency responses:

OSCs may not be safe deploying during the pandemic without sufficient personal protective equipment and clear guidance.

- About half reported that the coronavirus pandemic impacted their ability to respond to emergencies. Some cited delays in procuring personal protective equipment and cleaning supplies, while some said there were delays due to the additional time needed to obtain approval for deployment.
- All said that the EPA did not provide COVID-19 tests to them before or after deployment.
- Although almost all indicated that they were familiar with the EPA’s health and safety guidance, some said that they had issues complying with the guidance, and some said that they needed clarifications on the guidance.

OSCs and management sometimes had different observations. For example, regional Superfund and Emergency Management Division directors said that personal protective equipment and other supplies were provided to OSCs. These directors also told us about the implications of the coronavirus pandemic on the Agency’s impending emergency responses. Specifically, a director in one western region stated that the region may be unable to respond to large incidents because of a lack of N95 masks, which the region deems necessary for wildfire responses.

Recommendations and Planned Agency Corrective Actions

We recommend that the EPA implement a strategy to provide necessary personal protective equipment and cleaning supplies to OSCs, including N95 masks; develop communications mechanisms to address OSCs’ safety concerns; clarify its pandemic guidance; and provide COVID-19 tests to OSCs being deployed. The Agency agreed with one recommendation but disagreed with the other three.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

September 28, 2020

MEMORANDUM

SUBJECT: EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance
Report No. 20-E-0332

FROM: Sean W. O'Donnell 

TO: Peter Wright, Assistant Administrator
Office of Land and Emergency Management

This is our report on the subject evaluation conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. The project number for this evaluation was OA&E-FY20-0240. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

We make four recommendations in this report. In accordance with EPA Manual 2750, your office provided acceptable planned corrective actions and estimated milestone dates in response to Recommendation 2. This recommendation is therefore resolved.

Action Required

The Office of Land and Emergency Management disagreed with Recommendations 1, 3, and 4, and provided alternate recommendations, but these alternate recommendations either did not include specific planned corrective actions or did not adequately address our findings. These recommendations therefore remain unresolved. We request a written response to the final report within 60 days of this memorandum. Your response will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification. If resolution is still not reached, the Office of Land and Emergency Management is required to complete and submit a dispute resolution request to the chief financial officer.

We will post this report to our website at www.epa.gov/oig.

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Purpose

The Office of Inspector General conducted this evaluation to determine whether the U.S. Environmental Protection Agency managed its resources for emergency responses to provide the continued protection of human health and the environment during the coronavirus pandemic—that is, the SARS-CoV-2 virus and resultant COVID-19 disease. We also sought to determine whether sufficient protective measures were provided to on-scene coordinators, or OSCs.

Top Management Challenge

This evaluation addresses the following top management challenge for the Agency, as identified in OIG Report No. [20-N-0231](#), *EPA's FYs 2020–2021 Top Management Challenges*, issued July 21, 2020:

- Maintaining operations during pandemic and natural disaster responses.

Background

In response to the coronavirus pandemic, every level of government—federal, state, tribal, territorial, and local—has engaged in efforts to slow and stop the spread of the COVID-19 disease through a multitude of initiatives, including stay-at-home orders; travel restrictions; use of personal protective equipment, or PPE; and adherence to guidelines issued by the Centers for Disease Control and Prevention. At the same time, EPA emergency response and support capabilities need to be available to support natural disaster responses, including those needed during the 2020 hurricane and wildfire seasons. The Agency's responsibilities for implementing federal environmental laws also continue, even as resources and capabilities shift to address the ongoing pandemic and any emergency responses. According to the EPA's website:

EPA's emergency response program responds to oil spills, chemical, biological, radiological, and nuclear incidents and large-scale national emergencies, including homeland security incidents. EPA provides support when requested or when state and local first responder capabilities have been exceeded. Through coordinating and implementing a wide range of activities, EPA conducts removal actions to protect human health and the environment.

The EPA's emergency responses are managed through the deployment of OSCs, who are located in all ten EPA regions. The Agency's OSCs are responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs also coordinate responses with local, state, and regional response authorities.

EPA Issued Multiple Coronavirus Pandemic Guidance Documents

The Office of Land and Emergency Management, along with other EPA offices, produced four key documents to guide OSC work during the coronavirus pandemic.

On March 19, 2020, OLEM published the *Office of Land and Emergency Management Considerations and Posture for COVID-19 Pandemic* to ensure that it could carry out its Primary Mission Essential Function, which is “to prevent, limit, mitigate or contain chemical, oil, radiological, biological, and hazardous materials during and in the aftermath of an accident, natural or man-made disaster in the United States, and provide environmental monitoring.”

On April 10, 2020, OLEM and the Office of Enforcement and Compliance Assurance published *Interim Guidance on Site Field Work Decisions Due to Impacts of COVID-19*. This interim guidance supplements the March 19, 2020 guidance and provides additional criteria to be considered when determining whether site fieldwork should continue or be suspended at emergency response sites where the EPA is the lead agency or has direct oversight of the cleanup work. According to this interim guidance, the EPA should make decisions about continuing on-site activities on a case-by-case basis based on following priorities:

- Protecting the health and safety of the public, as well as maintaining the health and safety of EPA staff and cleanup partners. Integral to the protection of health and safety is the adherence to any federal, state, tribal, or local health declarations and restrictions, to the extent possible.
- Maintaining the EPA’s ability to prevent and respond to environmental emergencies, or in any situation necessary to protect public health and welfare and the environment.

On April 21, 2020, the EPA published the *Interim Health and Safety Guidelines Related to COVID-19 for Conducting Superfund Site Work*. OLEM’s EPA Response Health and Safety Workgroup developed these guidelines to provide a consolidated list of safety and health practices for OSCs and other EPA field staff to implement during the COVID-19 public health emergency. The guidelines include recommendations on:

- Medical clearances, including up-to-date medical and respiratory protection clearances.
- Deployment considerations, such as assessing the work environment and wearing PPE.
- Site safety, including monitoring for illnesses, enforcing safety measures, and implementing procedures for illness or injury.

- Workplace exposure to COVID-19, including instructions on when cases must be recorded.
- Travel-related recommendations, such as advising that staff obtain EPA-approved disinfectants and instructing staff how to disinfect cars and hotel rooms.
- Workers' compensation, including information on medical treatment, wage loss, or disability insurance for federal employees who contract COVID-19.
- General considerations for reducing exposure, such as avoiding groups and practicing social distancing.

On July 6, 2020, OLEM published the *Interim EPA COVID-19 Health & Safety Guidelines for Field Activities*. These guidelines, which were issued after we surveyed OSCs for our evaluation:

[R]epresent an integrated set of safety and health guidance that provide timely and consistent information for employees conducting field activities. These Guidelines merge several Agency program-specific COVID-19 health and safety guidance documents into an overall document to address COVID-19-related concerns applicable to field activities.

Multiple EPA regions have also developed their own guidance documents. These were typically developed prior to the OLEM guidance documents and address region-specific issues.

Federal Emergency Management Agency Developed Pandemic Operational Guidance for 2020 Hurricane Season

To help federal, state, local, tribal, and territorial emergency managers and public health officials respond to incidents during the 2020 hurricane season amid the coronavirus pandemic, the Federal Emergency Management Agency released the *COVID-19 Pandemic Operational Guidance for the 2020 Hurricane Season* in May 2020.

The purpose of this document was to provide actionable guidance to federal, state, local, tribal, and territorial officials to prepare for response and recovery operations. It encourages that personal preparedness measures be taken during the coronavirus pandemic. While the guidance focuses on hurricane season preparedness, most of the planning considerations within the guidance are intended to also apply to any disaster operation during the coronavirus pandemic, including no-notice incidents, spring flooding, wildfires, and typhoons. The guidance includes a checklist for state, local, tribal, and territorial officials and

addresses issues such as stockpiling PPE, deciding which staff will be deployed, and determining how staff will be protected.

Responsible Offices

The Office of Emergency Management within OLEM and the Superfund and Emergency Management divisions in the EPA regions are responsible for the subjects covered in this report.

The Office of Emergency Management works with federal partners to prevent accidents and maintain incident response capabilities. The regional Superfund and Emergency Management divisions identify, investigate, and clean up contaminated sites and protect public health and the environment from releases of hazardous substances.

The EPA's **Superfund program** is "responsible for cleaning up some of the nation's most contaminated land and responding to environmental emergencies, oil spills and natural disasters."
—EPA's Superfund [website](#)

Scope and Methodology

We conducted this evaluation from May to August 2020 in accordance with the *Quality Standards for Inspection and Evaluation* published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our review objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations.

We reviewed EPA emergency response activities and guidance from March through July 2020. We interviewed regional Superfund and Emergency Management Division directors from all ten EPA regions and from headquarters, as well as Office of Emergency Management managers, to determine whether the EPA:

- Managed its resources to provide continued protection of human health and the environment at emergency response sites during the coronavirus pandemic.
- Provided sufficient protective measures to OSCs responding to emergency incidents.

We sent a survey to 239 OSCs on June 9, 2020, to determine whether the EPA provided sufficient protective measures to those OSCs responding to incidents. The survey closed on June 23, 2020, and 127 OSCs across all ten EPA regions responded—a response rate of 53 percent. Appendix A contains the OSC survey results.

Results

EPA regions sufficiently protected human health and the environment by responding to or assisting in responses during the coronavirus pandemic. In addition, the Agency took some initial measures to protect OSCs. For example, starting in March 2020, when the EPA began adjusting its operations in response to the coronavirus pandemic, the Agency reviewed its ongoing and time-critical emergency responses, delaying its response actions when possible to do so without further detriment to public health or the environment. Also, some OSCs who normally would have been deployed were instead able to work remotely with state and local responders to verify that emergency responses were adequate.

Some OSCs who responded to our survey, however, expressed concerns that the EPA did not provide sufficient protective measures or effectively manage its emergency responses during the pandemic:

- About half of the OSCs reported that the coronavirus pandemic impacted their ability to respond to emergencies. Some cited delays in procuring PPE and cleaning supplies, while some said there were delays due to the additional time needed to obtain approval for deployment. Other OSCs said that they were unable to obtain PPE or cleaning supplies or that some received PPE was expired. No survey responses indicated that the delays caused an impact on public health or the environment.
- All of the OSCs said that the EPA did not provide COVID-19 tests to them before or after deployment.
- Although almost all of the OSCs indicated that they were familiar with OLEM's health and safety guidance, some said that they had issues complying with the guidance. For example, some OSCs said that it was difficult to make sure an emergency medical technician was on-site, as required. Other OSCs said that they needed clarification on the guidance, such as what procedures to follow if they became sick during deployment and which face coverings to wear.

OSCs and management sometimes had different observations on the availability of PPE and cleaning supplies. For example, regional Superfund and Emergency Management Division directors told us during interviews that PPE and other supplies were provided to OSCs, while some OSCs indicated that they could not obtain some PPE and supplies.

Superfund and Emergency Management Division directors also told us about the implications of the coronavirus pandemic on the Agency's impending emergency responses during the 2020 hurricane and wildfire seasons. One western region indicated that it may be unable to respond to large incidents because of a lack of and supplies, especially N95 masks, which it deems necessary for wildfire responses.

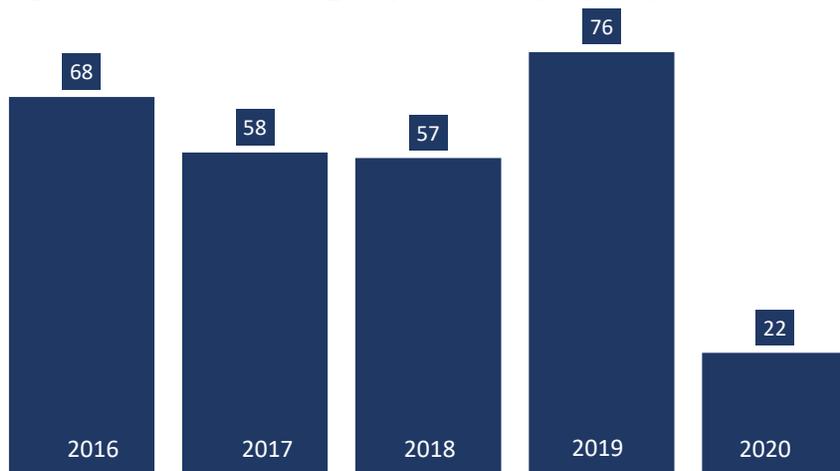
While the effect of the pandemic on emergency responses to large, nonpandemic incidents was not explicitly part of our project scope, we posed the question to regional Superfund and Emergency Management Division directors because of its relevance to the OSCs' ability to effectively deploy during the pandemic. Given the issues described by the OSCs in obtaining supplies, large-scale mobilization of OSCs and other EPA staff from multiple regions in response to large incidents, such as hurricanes or wildfires, may prove challenging. Such an event would further increase demands for pandemic-related supplies and require additional logistics planning, such as travel and housing arrangements.

EPA Has Sufficiently Managed Emergency Responses During the Coronavirus Pandemic

Since March 2020, EPA regions reviewed their ongoing and time-critical emergency responses, delaying response actions when possible to do so without further detriment to public health or the environment. In addition, some OSCs who normally would have been deployed were instead able to remotely coordinate emergency responses with state and local responders.

We found that OSCs had been deployed to fewer emergencies since March 2020. While this may have been partially due to regions eliminating nonessential deployments, most regions indicated that the number of emergency response incidents was reduced during the pandemic. According to the *EPA On-Scene Coordinator (OSC) Response Website*, the number of emergency removals conducted in 2020 from March 15 through June 15 was significantly below those conducted in the same months in prior years (Figure 1). "Emergency removals" are also referred to as "classic emergencies," which the EPA defines as situations that require "on-site activities be initiated within minutes or hours of a determination that ... action is appropriate."

Figure 1: Number of emergency removals per year (March 15–June 15)



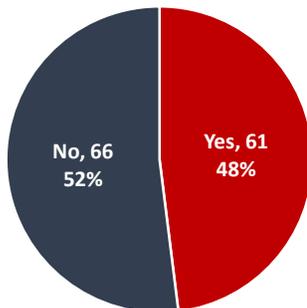
Source: OIG analysis of *EPA On-Scene Coordinator (OSC) Response Website* data. (EPA OIG image)

Some OSCs Experienced Delays in Obtaining PPE and Supplies

Despite the initial protective measures taken by the EPA, many OSCs reported concerns about protection during the coronavirus pandemic. For example, about half (61 of 127) of the OSCs responding to our survey reported that the pandemic impacted their ability to respond to emergencies (Figure 2). These OSCs cited delays in procuring PPE and cleaning supplies or the inability to obtain these

Figure 2: Pandemic impact on OSCs to respond to emergencies

Survey Question:
Has the coronavirus pandemic impacted your ability to respond to emergencies?



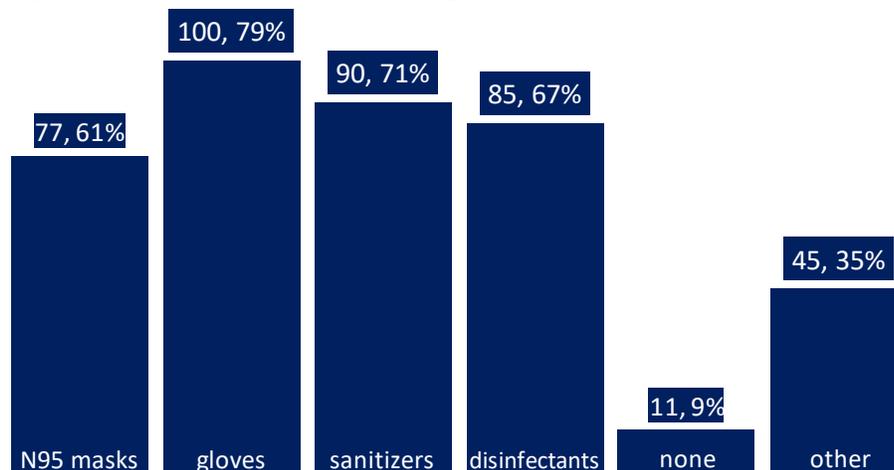
Source: OIG OSC survey. (EPA OIG image)

supplies altogether; the receipt of expired PPE; and delays due to the additional time needed to obtain approval for deployment. Moreover, OSCs and some Superfund and Emergency Management Division directors reported that the EPA did not provide COVID-19 tests to any of the OSCs before or after deployment.

Our OSC survey results and interviews with regional Superfund and Emergency Management Division directors revealed differing perceptions regarding the availability of needed supplies. While the regional directors indicated that they provided these supplies to OSCs, some OSCs reported difficulty obtaining them. Our survey results showed that most OSCs who responded to our survey were provided with most—but not all—of the needed supplies. As Figure 3

shows, more than 60 percent of the 127 OSCs who responded to our survey reported that the EPA had provided N95 masks (77), gloves (100), sanitizers (90), and disinfectants (85). However, about 9 percent (11) reported that the EPA did not provide any of the needed supplies.

Figure 3: Percent of OSCs reporting EPA provided supplies*

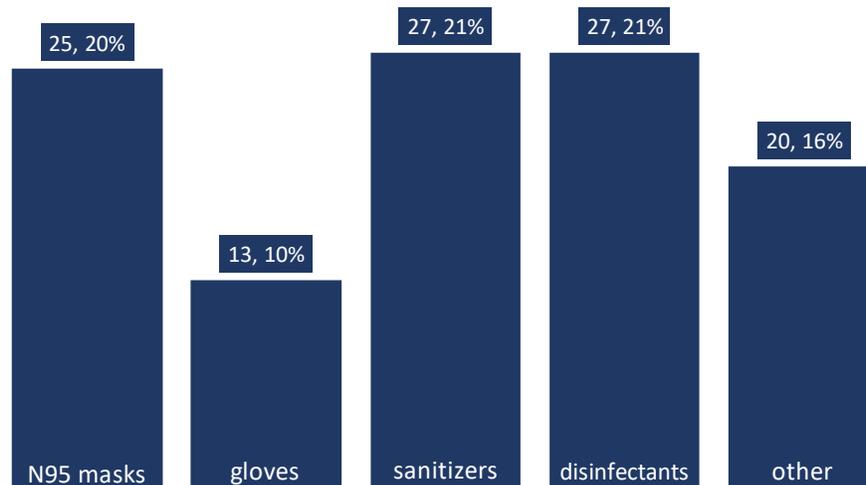


Source: OIG OSC survey responses. (EPA OIG image)

* Percent of the 127 respondents. Respondents could choose more than one option to indicate all supplies provided by the EPA. Note: The *Interim EPA COVID-19 Health & Safety Guidelines for Field Activities*, published after this survey was completed, indicates that cloth masks are acceptable in most conditions and that “N95 respirators should not be recommended for use without being identified through a hazard assessment.”

When asked whether they were unable to obtain any supplies, almost 65 percent (82) of our 127 survey respondents indicated that obtaining supplies was not an issue. However, the 35 percent (45) who could not obtain some supplies said that N95 masks, sanitizers, and disinfectants were the most difficult for them to obtain (Figure 4). Figure 4 documents supplies that could not be obtained, not whether they were supplied by the EPA, as illustrated in Figure 3.

Figure 4: Supplies OSCs could not obtain*



Source: OIG OSC survey responses. (EPA OIG image)

* Percent of the 127 respondents. Respondents could choose more than one option to indicate all supplies they were not able to obtain. *Note:* The *Interim EPA COVID-19 Health & Safety Guidelines for Field Activities*, published after this survey was completed, indicates that cloth masks are acceptable in most conditions and that “N95 respirators should not be recommended for use without being identified through a hazard assessment.”

EPA Needs to Plan for Large Natural Disaster Incidents

All regions indicated that they would follow normal procedures if they experienced a shortage of OSCs. Based on our survey and interviews, no region experienced such a shortage as of June 2020. Normal procedures during an OSC shortage involve requesting assistance from designated backup regions. In addition, for a large incident, such as a wildfire or hurricane, the EPA would deploy OSCs from regions beyond the designated backup regions. Regional management told us, however, that large-scale responses would be complicated by restrictions due to the coronavirus pandemic, such as limited travel and the unavailability of supplies.

For example, the Superfund and Emergency Management Division director in one region identified a potentially critical issue regarding PPE availability. According to the director, N95 masks are necessary to protect OSCs during wildfire incidents, and without N95 masks the region cannot safely deploy OSCs to respond. The director said that although N95 masks were readily available prior to the coronavirus pandemic, the masks have become more difficult to obtain because of the increased demand for these masks for medical personnel. Without

a sufficient inventory of N95 masks, consistent with Federal Emergency Management Agency guidance to stockpile PPE, effective deployment of OSCs during a wildfire would be impaired. This issue primarily concerns EPA Regions 8, 9, and 10.

Office of Emergency Management managers indicated that procurement of all supplies was up to EPA regions and that there was no national strategy for procurement and distribution of supplies to the regions.

Given the OSCs' issues in obtaining supplies and the potential unavailability of N95 masks for wildfire responses, planning for impending responses to large incidents during the pandemic is imperative. Issues that need to be addressed include the sufficient availability of supplies to provide pandemic protection to OSCs while responding to large incidents, as well as additional guidance for the deployment and safety of large numbers of OSCs and other EPA personnel.

OSCs Familiar with Guidance but Need Some Clarifications

Almost all OSCs who responded to our survey (123 of 127, or 97 percent) reported that they were familiar with the OLEM health and safety guidelines. Most of the OSCs (100 of 123 who answered the question, or 81 percent) reported that the guidelines available at the time adequately protected OSCs.

Some OSCs reported issues complying with the guidelines. For example, they had difficulty obtaining emergency management technicians to assist at each site and accessing PPE and supplies. In addition, some OSCs said that they needed clarifications on the guidelines, specifically:

- How to protect family members.
- Which procedures to follow if they became sick while deployed, and whether and how to fly home.
- Which face coverings to use, and when.
- How long an N95 mask remains effective.
- How and when to be tested for COVID-19.
- How to operate safely in indoor spaces.
- How to apply for workers' compensation as it relates to the coronavirus pandemic.
- Who makes decisions on when OSCs should quarantine.
- Whether federally or privately owned vehicles can be used during a pandemic.

Due to details or nuances in the comments provided by our survey respondents, we could not readily determine whether the issues have been explicitly addressed in the July 6, 2020 *Interim EPA COVID-19 Health & Safety Guidelines for Field Activities*, which was issued by OLEM after the OSC survey was completed.

Conclusions

EPA regions acted to protect OSCs and provide them with some needed supplies while retaining emergency response capabilities. However, 35 percent of the OSCs responding to our survey reported that they were unable to obtain some supplies. We identified areas of concern for OSCs and regional emergency response capabilities. OSCs may not be safe deploying during the coronavirus pandemic without receiving clarifications on the guidelines, and they will be at risk if they cannot obtain sufficient PPE or other supplies. Their specific concerns about safety may not be explicitly addressed in the EPA's guidelines issued as of July 2020.

A director from one EPA region indicated that the region may be unable to safely deploy OSCs in the event of major wildfires because of the lack of N95 masks. Moreover, there is no national EPA strategy for the procurement and distribution of PPE and cleaning supplies to regions and OSCs. Without a national strategy or coordination of regional efforts, some OSCs may not be able to readily obtain adequate PPE and supplies to deploy safely. Responses to large incidents are not explicitly addressed in the guidance documents and may be difficult because of limited travel and other complications arising from the coronavirus pandemic.

Recommendations

We recommend that the assistant administrator for Land and Emergency Management, in coordination with all EPA regions:

1. Develop and implement a strategy to provide and distribute necessary personal protective equipment and cleaning supplies to on-scene coordinators, including the N95 masks needed to respond to wildfires.
2. Develop and implement communication mechanisms to identify and clarify concerns that on-scene coordinators have that are not addressed in the existing guidelines, and make these communications available to all on-scene coordinators.
3. Ensure that guidance and planning address deployment of on-scene coordinators in the event of large incidents during pandemics, including overcoming travel restrictions to respond to large incidents.
4. Pursue the acquisition of COVID-19 tests for all on-scene coordinators prior to and immediately after deployment.

Agency Response and OIG Assessment

The assistant administrator for Land and Emergency Management responded to our draft report. We included this response, as well as our full analysis of this response, in Appendix B. The Agency agreed with Recommendation 2 and provided an acceptable planned corrective action and estimated completion date. This recommendation is resolved with corrective action pending. The Agency disagreed with Recommendations 1, 3, and 4. The Agency provided alternate recommendations, but these alternate recommendations either did not include specific planned corrective actions or did not adequately address our findings. These recommendations therefore remain unresolved.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	10	In coordination with all EPA regions, develop and implement a strategy to provide and distribute necessary personal protective equipment and cleaning supplies to on-scene coordinators, including the N95 masks needed to respond to wildfires.	U	Assistant Administrator for Land and Emergency Management		
2	10	In coordination with all EPA regions, develop and implement communication mechanisms to identify and clarify concerns that on-scene coordinators have that are not addressed in the existing guidelines, and make these communications available to all on-scene coordinators.	R	Assistant Administrator for Land and Emergency Management	3/31/21	
3	10	In coordination with all EPA regions, ensure that guidance and planning address deployment of on-scene coordinators in the event of large incidents during pandemics, including overcoming travel restrictions to respond to large incidents.	U	Assistant Administrator for Land and Emergency Management		
4	10	In coordination with all EPA regions, pursue the acquisition of COVID-19 tests for all on-scene coordinators prior to and immediately after deployment.	U	Assistant Administrator for Land and Emergency Management		

¹ C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

OSC Survey Results

The OIG distributed an electronic survey to 239 OSCs on June 9, 2020, and asked them to respond within two weeks. We received 127 responses, a 53 percent response rate. Not all respondents answered every question. The results included 11 responders who were on the OSC email lists but self-identified in the survey as a “manager” or “other.” The data source for all figures and tables presented in this appendix, which are EPA OIG images and tables, is the survey results.

Question 1: Has the coronavirus pandemic impacted your ability to respond to emergencies?

The results of the first question were split, with 52 percent (66 responses) indicating there was no impact and 48 percent (61 responses) indicating there was an impact. See Figure 2 in the report.

Question 2: (If “Yes” to the first question) Select all that apply.

For those respondents indicating that there was an impact, the reasons were:

Impact	Number
Delays in obtaining cleaning supplies such as sanitizers or disinfectants	24
Delayed due to obtaining personal protective equipment, such as masks or gloves	20
Delayed because you were quarantined	15
Delays due to contractor availability	3
Your or others on your team were ill due to COVID-19	2
Other	44

The “Other” category included the following types of responses:

“Other” Responses	Number
Administrative policies including additional approval needed	21
Concerns over exposure to COVID-19	5
Lack of plans	5
Policy to not respond to minor incidents	4
No or limited PPE availability	4
OSC declined to deploy due to health concerns	3
Delays in obtaining government owned vehicles	2

Question 3: What supplies has the EPA provided the OSCs during the coronavirus pandemic?

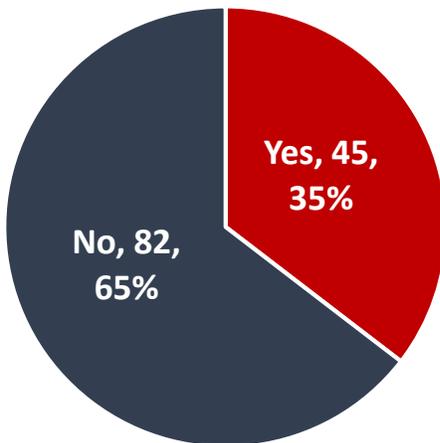
Many OSCs indicated that the EPA provided many of the supplies needed for emergency response during the pandemic. A majority of the respondents indicated that they received masks, gloves, sanitizers, and disinfectants from the EPA. About 9 percent of OSCs indicated that they did not receive any supplies from the EPA. See Figure 3 in the report.

Questions:

4: Were you unable to obtain any supplies?

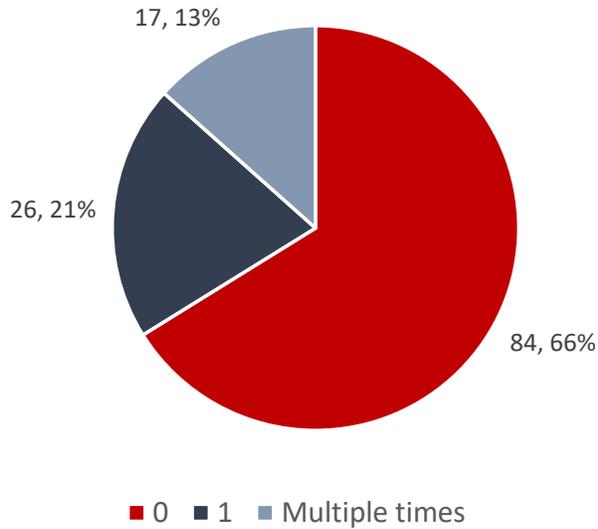
5: Select all that apply: (For “No” responses to Question 4.)

A majority, 82 of 127, or 65 percent, of respondents indicated that they were able to obtain the supplies they needed from the EPA, while 35 percent stated that they were unable to obtain needed supplies from the EPA. More than 20 percent of respondents indicated they could not obtain N95 masks, sanitizers, or disinfectants. See Figure 4 in the report.



Question 6: How many times have you been deployed since March 15, 2020?

Of the 127 respondents, 84 (66 percent) were not deployed, while 43 (34 percent) were deployed at least once. Seventeen (13 percent) were deployed multiple times.



Questions:

7: In your official capacity, have you been tested for COVID-19 in deployments since March 15, 2020?

8: How many times were you tested prior to deployment?

9: How many times were you tested after deployment?

10: Did the EPA arrange for or provide the testing?

11: How quickly did you receive your test results?

12: Please provide any relevant details.

All respondents stated that they had not been tested in their official capacity for COVID-19 either before or after deployments.

Questions:

13: Have you been asked to respond to emergencies because of a state's or local municipality's inability to provide emergency response due to the coronavirus pandemic?

14: Have you been deployed to another EPA region due to depleted resources in that region due to the coronavirus pandemic?

Almost all (94 percent) respondents stated that they had not been asked to respond to emergencies because of a state or local municipality's inability to provide emergency response due to the coronavirus pandemic. All respondents stated that they had not been deployed to another EPA region due to depleted resources in that region.

Question 15: Have the funds available from the Coronavirus Aid, Relief, and Economic Security Act, known as the CARES Act, been used to clean and disinfect equipment?

No OSCs indicated that funds from the Act were used to clean and disinfect equipment. Most (90 percent) indicated that they did not know.

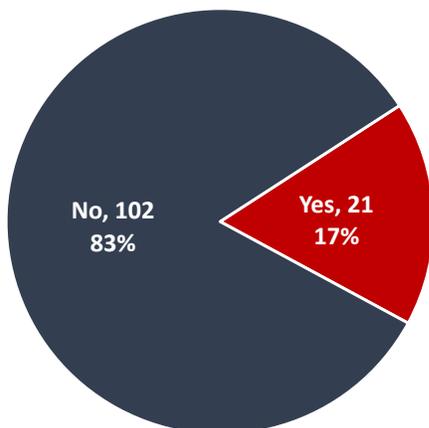
Questions:

16: Are you familiar with the EPA's "Interim Health and Safety Guidelines Related to COVID-19 for Conducting Superfund Site Work – 4/21/2020"?

17: Do you have any issues or difficulties complying with the guidelines?

18: Please elaborate: (For "Yes" responses to Question 17)

Almost all (97 percent) respondents were familiar with the *Interim Health and Safety Guidelines Related to COVID-19 for Conducting Superfund Site Work – 4/21/2020*. Most (83 percent) indicated that they had no issues or difficulties in complying with the guidelines. Some respondents (17 percent) stated that they had issues or difficulties in complying with the guidelines. Those that had difficulty cited various reasons.



Issues with or difficulties complying with the guidelines	Total respondents
Presence of an emergency medical technician – Difficult or impossible to ensure an emergency medical technician was on-site.	5
Travel – Concerns about how OSCs take care of themselves and who pays if they are quarantined or sick.	3
Supplies – Concerns about the availability of masks, gloves, disinfectants, sanitizers, and thermometers.	14
Testing – Questions about why no testing is available for OSCs.	2
General comments – Guidelines were late and unrealistic for real world field use.	5

Most (81 percent) respondents also indicated that, in their opinion, the guidelines adequately protected OSCs. In addition, almost all (91 percent) respondents stated that their individual region provided additional guidance for OSCs, with 9 percent in six different regions stating that their region did not.

Questions:

19: In your opinion, do the guidelines adequately protect OSCs?

20: Please elaborate: (For “No” responses to Question 19)

Some respondents (19 percent) stated that, in their opinion, the guidelines did not adequately protect OSCs.

Reasons OSCs believed guidelines did not adequately protect OSCs	Total respondents
Travel – Unclear about how OSCs would take care of themselves and who pays if they are quarantined or sick.	6
Supplies – Unclear about the availability of masks, gloves, disinfectants, sanitizers, and thermometers. Noncommittal about what type of masks to use and whether N95 masks can be reused.	8
Testing – Unclear about whether COVID-19 testing with rapid response times is needed for OSCs.	6
General comments – Do not adequately address when or whether OSCs should deploy.	7

In addition to specific questions, OSCs were asked to provide any additional relevant information not explicitly covered in the survey.

Additional relevant information	Total respondents
Travel – Guidelines unclear about who makes the decision to quarantine and who helps provide protection for OSCs and their families	3
Supplies – Guidelines do not address the availability of supplies, with an emphasis on N95 masks.	11
Testing – Guidelines do not address EPA provided testing	3
General comments – A wide range of comments, such as difficulties in deciding to deploy or not.	17
Positive comments – Some of the respondents commented that management and supervisors have done their best to protect OSCs	9

Agency Response to Draft Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

September 9, 2020

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report “EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance” No. OA&E-FY20-0240, dated August 20, 2020

FROM: Peter C. Wright
Assistant Administrator

TO: Sean O'Donnell, Inspector General
Office of Inspector General

Wright, Peter

Digitally signed by Wright,
Peter
Date: 2020.09.09
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Thank you for the opportunity to respond to the issues and recommendations in the subject report. The following is a summary of the Office of Land and Emergency Management’s (OLEM) overall position, along with its position on each of the report recommendations. Note that this preliminary response may not reflect the views of other Agency organizations such as the Office of the Chief Financial Officer (OCFO) and the Office of Mission Support (OMS).

EPA agrees with one of the report recommendations and has provided high-level corrective actions and estimated completion dates to the extent possible. EPA disagrees with the other three report recommendations and has provided a response and proposed alternative recommendations as appropriate.

EPA recognizes that the COVID-19 pandemic is a very fluid situation, and the agency is committed to continually providing timely and adequate guidance to the evolving circumstances. To that extent, OLEM has also contacted several other federal agencies to gain a better understanding of their internal guidances pertaining to COVID-19 and their responders. The results of those inquiries were not readily available to meet this response deadline.

AGENCY'S OVERALL POSITION

EPA appreciates the Office of Inspector General's interest in conducting an evaluation of the Agency's efforts to protect human health and the environment by responding to emergencies or assisting in emergency responses during the coronavirus pandemic, and its established protective measures for EPA's On-Scene Coordinators (OSCs). However, EPA views the methodology and evidence that support the recommendations flawed in two ways:

- 1) Despite the report acknowledging that additional EPA guidance had been published, within the scope of the evaluation, the recommendations and statements in the report do not reflect elements that the guidance successfully addressed.
- 2) A survey, particularly one containing broad prompts that do not apply to a significant number of respondents, is not a sufficient evaluative methodology to support the conclusions within the report.

OIG Response 1: As stated in the report, we could not readily confirm whether the July 6, 2020 guidance explicitly addressed the concerns expressed by the OSCs in our survey because of details or nuances in their survey responses. Further, we note that the survey was completed prior to the release of the guidance. Our conclusions are based on the survey responses and on our interviews with all ten regional Superfund and Emergency Management Division directors, as defined in the "Scope and Methodology" section of the report.

Guidance governing employee health and safety is a significant concern for all federal agencies during this pandemic, and, given the frontline nature of the response duties of the Agency's On-Scene Coordinators, even more critical to the EPA. It is for this reason that the EPA Response Program is leveraging the best available information from the Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), Federal Emergency Management Agency (FEMA), and EPA's own agency guidance to provide the best information and guidance to those OSCs in the field.

EPA's latest and most comprehensive guidance on field operations during the COVID-19 pandemic was published on July 6, 2020. This guidance falls well into the scope of the report which states it "conducted this evaluation from May to August 2020"¹. The guidance, entitled, *COVID-19 Health and Safety Guidelines for Field Activities*, incorporates employee safety recommendations from CDC, OSHA, and FEMA as well as previous EPA guidance. Many of the issues raised in this OIG report are comprehensively addressed in this July 6th guidance. That guidance provides actionable and specific operational guidance on respiratory protection, safety training and medical clearance, pre-travel considerations, travel related recommendations, and workplace illness and injuries. In addition, offices responsible for workforce health and safety, such as Office of Mission Support's Safety and Sustainability Division, were not consulted at

¹ "EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance". Office of the Inspector General. Page 4.

any point during the evaluation. The evolving nature of the pandemic has been a challenge that the EPA has met with evidence-based management and decision-making.

OIG Response 2: The statement “conducted this evaluation from May to August 2020” refers to the entrance conference in May and the issuance of the draft report in August. We began drafting our report after the survey closed on June 29, and the report reflects the information available at that time. We recognize that Agency operations and guidance have evolved during the pandemic. However, it is valuable to report on what OSCs and regional Superfund and Emergency Management Division directors were experiencing early during the pandemic for use in future guidance. In addition, when we provided OLEM with the scope of our work at the entrance conference in May, OLEM did not indicate that we should meet with the Office of Mission Support. When we interviewed Office of Emergency Management staff in June, they referenced some of their interactions with the Office of Mission Support but did not suggest that we consult with that office.

The OIG report and recommendations include several courses of action that diverge substantially from both EPA guidance and guidance from other Federal Agencies:

- Usage of N95 respirators and other PPE
- Overcoming travel restrictions
- COVID-19 testing pre- and post- deployment

This response document includes specific explanations and proposed actions to these issues below. Generally, the effectiveness of the EPA Response Program’s OSC safety guidance should be evaluated on the basis of the current guidance, the evidence that supports it, and the Agency’s implementation of that guidance. By not integrating the EPA’s most comprehensive and current guidance available during the scope of the evaluation or speaking to those offices chiefly responsible for setting health and safety policy, the report and recommendations for the safety protections for OSCs is of significantly diminished value.

The report asserts that the survey data, as evidence, “provides a reasonable basis for our findings, conclusions, and recommendations based on our review”². EPA disputes that assertion. The survey’s methodology is flawed and has limited evaluative value to support the findings and recommendations contained in the report. EPA asserts the report and recommendations’ divergence from established guidance from EPA and other Federal Agencies is due to its reliance on a survey that lacked population control methodology and featured questions not aligned to available evidence-based information.

² “EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance”. Office of the Inspector General. Page 4.

OIG Response 3: The OIG disagrees that the methodology is flawed and has limited evaluative value. The survey questions are unbiased, and the results are direct responses to the survey questions. In addition, the OIG met with all ten regional Superfund and Emergency Management Division directors, whose input was also used to form conclusions in this report. The OIG disagrees that the courses of action diverge substantially from both EPA and other federal guidance. The OIG, with the direct involvement of senior management, took steps to ensure that the survey did not ask leading questions.

Two statements in the EPA’s response need clarification:

- “*lacked population control methodology.*” The survey was distributed to **all** OSCs.
- “*not aligned to available evidence-based information.*” Survey results are a direct form of evidence. **Testimonial evidence** is one of the types of evidence defined in the *Quality Standards for Inspection and Evaluation* and is defined as “obtained through inquiries, interviews or questionnaires.”

The survey’s questions are written without incorporating the evidence-based guidance from EPA and other Federal Agencies. For example, the questions related to PPE do not take into account the May 2020 OSHA guidance, [Guidance on Preparing Workplaces for COVID-19](#), that clearly describes in which situations employees need various respiratory protection for potential exposure to COVID-19. As not every deployment requires respirator protection, according to the OSHA guidance, more detailed questions than the report’s survey asked would be required to establish if there was an actual need for a recommendation.

For example, to establish the report’s recommendation for N95 respirators the survey asked the following: “4: Were you unable to obtain any supplies? 5: Select all that apply: (For “No” responses to Question 4.)”³. To adequately evaluate if the Agency was following OSHA employee safety guidance, the following question would provide more evaluative value: “Were you able to obtain N95 or equivalent respirators, before deployment, if the deployment had persons known to be, or suspected of being, infected with SARS-CoV-2 or while performing aerosol-generating procedures?”⁴ OSC answers to this evidenced-based question would have evaluative value. However, the original question provides limited information on which to base a recommendation.

³ “EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance”. Office of the Inspector General. Page 13.

⁴ “Guidance on Preparing Workplaces for COVID-19”. Occupational Safety and Health Administration. Page 15.

OIG Response 4: The use of N95 respirators was standard practice for wildfire responses prior to the pandemic. The Agency’s clarification that cloth masks were acceptable in most conditions was not provided until the EPA issued its July 6, 2020 guidance. More importantly, Recommendation 1 references N95 respirators only for responses to wildfires, which the Agency retained in its proposed revision. In response to Agency comments, we added the following note to Figures 3 and 4:

The Interim EPA COVID-19 Health & Safety Guidelines for Field Activities, published after this survey was completed, indicates that cloth masks are acceptable in most conditions and that “N95 respirators should not be recommended for use without being identified through a hazard assessment.”

In addition to the lack of evidence specificity in the questions, there was a lack of controls for survey population. For example, asking the survey respondent OSCs who had not been deployed (66% of the total) if they received PPE is premature. OSCs who had not yet deployed would not require PPE. This fact was not controlled for in the analysis. In addition, many OSCs were at the time of the survey, and continue to be, teleworking and would not require PPE. Neither of these populations were removed from the survey questions related to PPE or travel. The evaluative value of that data as it has been analyzed is too weak to make the findings or recommendations the report contains.

OIG Response 5: The purpose of the survey was to determine how protected OSCs felt during the pandemic. These results, such as OSC perceptions of the availability of PPE, represent the opinions of the responding OSCs. Some OSCs who indicated that they had difficulty obtaining some or all PPE had been deployed since March 2020, when the EPA began adjusting its operations in response to the pandemic. Further, only nine, or 7 percent, of the respondents said that they had received no PPE or other supplies from the Agency, indicating that almost all OSCs had received some supplies.

The important issue is that many OSCs indicated that they had not received, or could not obtain, PPE and other supplies. The Agency’s general response to our report regarding PPE is inconsistent with its response to our recommendations. Specifically, the Agency’s proposed revisions to Recommendation 1 confirm its commitment to obtaining and distributing PPE and other supplies to OSCs, and the Agency agreed with Recommendation 2 to enhance communication with OSCs to address any concerns they may have.

In sum, EPA has serious concerns about the report’s reliance on survey responses, and the fact that it wholly disregards the Agency’s ongoing efforts to address the very topic upon which it opines.

OIG Response 6: This report addresses whether sufficient protective measures were provided to OSCs based on their survey responses. Further, the report also relies on the interviews of all ten regional Superfund and Emergency Management Division directors. The report does not disregard the Agency’s ongoing efforts to address the topic. The “Background” section describes the guidance that the Agency has issued related to the pandemic, and the body of the report references how regions protected OSCs by not deploying them for time-critical responses if possible and allowing them to support emergency response efforts remotely.

AGENCY'S RESPONSE TO REPORT RECOMMENDATIONS

Agreements

Recommendation No.	Recommendation	High-level Intended Corrective Action	Estimated Completion Fiscal Year and Quarter
2.	Develop and implement communication mechanisms to identify and clarify concerns that on-scene coordinators have that are not addressed in the existing guidelines, and make these communications available to all on-scene coordinators.	Solicit feedback from OSCs via several different mechanisms, such as Q&A webinars with the OSC community or regular meetings with their management teams. Document and maintain feedback on a commonly accessible location such as SharePoint or Microsoft Teams. Any concerns that are not adequately addressed within existing guidelines will be identified and addressed in a follow-up document, and with follow-up communication.	FY 2021, Q2

OIG Response 7: The planned corrective actions for Recommendation 2 meet the intent of the recommendation. The Agency’s response also includes an estimated completion date. We consider this recommendation resolved.

Disagreements

Recommendation No.	Recommendation	Agency Explanation/Response	Proposed Alternative
1.	In coordination with all EPA regions, develop and implement a	EPA guidance on PPE, COVID-19 Health and Safety Guidelines for Field Activities (Pages 2-5), is in	Regions will continue to develop and implement strategies to provide and distribute

Recommendation No.	Recommendation	Agency Explanation/Response	Proposed Alternative
	<p>strategy to provide and distribute necessary personal protective equipment and cleaning supplies to on-scene coordinators, including the N95 masks needed to respond to wildfires.</p>	<p>accordance with OSHA’s Guidance on Preparing Workplaces for COVID-19. Specifically, prior to deployment field staff, supervisors, and the local Safety, Health and Environmental Management Program (SHEMP) managers should follow OSHA guidelines for conducting a hazard assessment to determine if respirator usage or additional PPE is required.</p> <p>Respirator usage and PPE determinations are made in the Regions, not headquarters. PPE acquisition, inventory management, and distribution prior to and during COVID-19 are Regional responsibilities.</p> <p>EPA does not support shifting this responsibility from the EPA Regions to EPA Headquarters. Longstanding acquisition contracts and distribution logistics in the Regions are in place to provide PPE to OSCs. No regions have reported a shortage of PPE at any point during the pandemic.</p> <p>Of those OSCs surveyed, 9% of them stated that they were not provided any PPE supplies. With many OSCs teleworking and a reduced</p>	<p>necessary personal protective equipment and cleaning supplies to on-scene coordinators, including the N95 masks needed to respond to wildfires.</p>

Recommendation No.	Recommendation	Agency Explanation/Response	Proposed Alternative
		<p>number of deployments some portion of the surveyed population would be expected not to receive PPE at the time of the survey was administered. They would not have had a need for, or recently received, PPE when completing the survey.</p> <p>66% of surveyed OSCs had not been deployed since the pandemic began. This was not controlled for in subsequent survey question on PPE.</p>	
3.	<p>In coordination with all EPA regions, ensure that guidance and planning address deployment of on-scene coordinators in the event of large incidents during pandemics, including overcoming travel restrictions to respond to large incidents.</p>	<p>EPA does not support providing guidance to EPA personnel on “overcoming” travel restrictions put in place to protect public health.</p> <p>EPA has issued specific guidance related to travel in COVID-19 Health and Safety Guidelines for Field Activities (Pages 7-10) as a supplemental to the existent safety assessments.</p> <p>That guidance states that “Field staff traveling to areas outside their home jurisdictions should check for additional (Local, State, territorial, or Tribal) requirements and include them in their field work planning and in the hazard assessment process.”</p> <p>EPA asserts that the OSC, their supervisor, and the</p>	<p>In coordination with all EPA regions, ensure that prior to performing field work at a specific location, the OSC, their supervisor and the local SHEMP manager</p> <ul style="list-style-type: none"> • Perform a supplemental hazard assessment addressing COVID-19. • Account for Local, State, territorial, or Tribal travel restrictions in their work planning.

Recommendation No.	Recommendation	Agency Explanation/Response	Proposed Alternative
		<p>local SHEMP manager are best positioned to make case-by-case evaluations for deployments, consistent with established agency guidance, rather than nationwide operational requirements.</p>	
4.	<p>In coordination with all EPA regions, pursue the acquisition of COVID-19 tests for all OSCs prior to and immediately after deployment.</p>	<p>Guidelines and potential implementation of COVID-19 employee testing is not determined by OLEM. Employee testing would be governed by EPA agency guidance issued by the Office of Mission Support (OMS).</p> <p>EPA has utilized CDC’s “CDC Activities and Initiatives Supporting the COVID-19 Response and the President’s Plan for Opening America Up Again” in developing its own agency guidance.</p> <p>EPA’s current guidance, COVID-19 Health and Safety Guidelines for Field Activities (Page 8, Appendix B), instructs OLEM to follow CDC’s guidance Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 to provide guidance to OSCs. Currently, that CDC guidance is not recommending COVID-19 testing pre- or post-deployment.</p>	<p>In coordination with all EPA regions, ensure:</p> <ul style="list-style-type: none"> • All COVID-19 Testing Guidance for OSCs reflects current EPA and CDC guidance. • Implementation of Employee testing is consistent with current EPA and CDC guidance.

Recommendation No.	Recommendation	Agency Explanation/Response	Proposed Alternative
		<p>This is in accordance with the CDC Testing Guidance which states: “If you do not have COVID-19 symptoms and have not been in close contact with someone known to have a COVID-19 infection: You do not need a test.”</p> <p>In addition, the immediate nature of OSC response deployments would preclude OSCs from completing COVID-19 testing and obtaining results prior to deployment. Waiting to deploy until a test sample is processed could put human lives and property at immediate risk.</p>	

OIG Response 8: We consider Recommendations 1, 3, and 4 unresolved:

- Recommendation 1. The proposed revision appears to meet the intent of the original recommendation but lacks an actionable planned corrective action with an estimated completion date.
- Recommendation 3. The proposed revision does not address additional guidance and planning that may be necessary when responding to large incidents.
- Recommendation 4. The proposed revision is vague and does not indicate whether headquarters or regional pursuit of COVID-19 testing is acceptable, only that testing should be consistent with CDC and EPA guidance. The EPA’s July 6, 2020 guidance does not address testing. Furthermore, we do not agree that CDC guidance states that testing is not necessary. Rather, the CDC considers government hazardous materials responders as “critical infrastructure workers” and states that critical infrastructure workers may need to be tested, according to their employer’s guidelines. Testing is particularly important for regions that have a limited number of OSCs who may be required to quarantine for 14 days post-deployment or who may be deployed for weeks at a time. Depending on state or local restrictions, obtaining COVID-19 testing with rapid results would potentially free quarantined OSCs for subsequent redeployment and verify that OSCs on long deployments do not test positive.

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