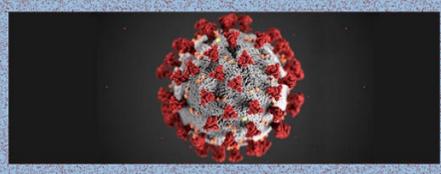




EPA's Initial Plans for Returning to the Office Incorporate CDC Guidance but Differ by Location

EPA OIG's [Response](#) to the **COVID-19** Pandemic



Source: Centers for Disease Control and Prevention image.

Evaluation Purpose:

Determine the EPA's national strategy for implementing federal guidelines to protect the health and safety of its workforce when reopening its locations that were closed due to the coronavirus pandemic.

This report addresses the following:

- *Operating efficiently and effectively.*

This evaluation addresses a top EPA [management challenge](#):

- *Maintaining operations during pandemic responses.*

Address inquiries to our public affairs office at (202) 566-2391 or OIG_WEBCOMMENTS@epa.gov.

Full list of [EPA OIG reports](#).

Why We Did This Evaluation

The Office of Inspector General for the U.S. Environmental Protection Agency initiated work in July 2020 under Project No. [OA&E-FY20-0241](#) to determine the EPA's national strategy for implementing federal guidelines to protect the health and safety of its workforce when reopening its locations that were closed due to the coronavirus pandemic.

While conducting our evaluation, we identified disparity among the 13 reopening plans we reviewed for Phases 1 and 2. We are therefore issuing this report to inform the EPA of this matter before locations begin to enter Phase 3. We plan to review implementation of the reopening plans as Agency locations advance to Phase 3 and more staff return to their offices.

Background

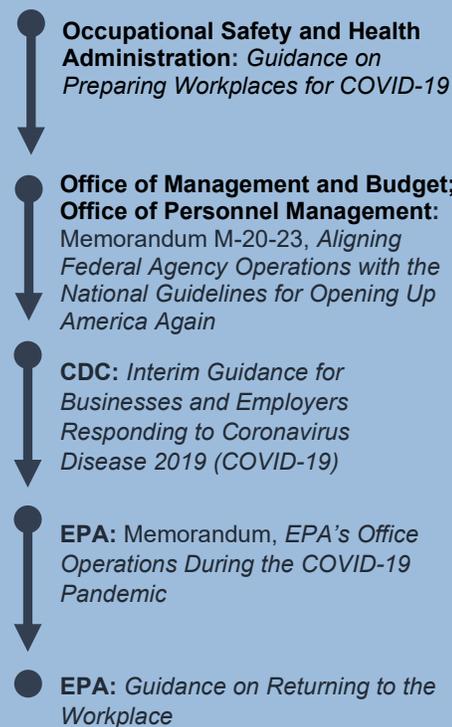
In response to the coronavirus pandemic—that is, the SARS-CoV-2 virus and resultant COVID-19 disease—the EPA closed most Agency facilities to all but mission-critical personnel. The EPA continued its operations remotely, with most of its workforce teleworking. The Agency estimated that 97 percent of its workforce was teleworking in August 2020.

Federal and EPA Guidelines on Reopening Operations

In March 2020, the Occupational Safety and Health Administration developed "COVID-19 planning guidance based on traditional infection prevention and industrial hygiene practices. It focuses on the need for employers to implement engineering, administrative, and work practice controls and personal protective equipment (PPE), as well as considerations for doing so."

In April 2020, the White House released nationwide guidelines for [Guidelines: Opening Up America Again](#), which comprise "a three-phased approach based on the advice of public health experts ... to

Reopening the EPA workplace criteria:



Source: OIG analysis of federal guidance. (EPA OIG image)

help state and local officials when reopening their economies, getting people back to work, and continuing to protect American lives.”

On April 20, 2020, the Office of Management and Budget and the U.S. Office of Personnel Management jointly issued Memorandum [M-20-23](#), *Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again*. This memorandum provides the framework for agencies to begin a controllable, steady return to normal operations that is in compliance with the three phases outlined in the White House’s *Guidelines: Opening Up America Again*. This memorandum was supplemented on May 6, 2020, by the Centers for Disease Control and Prevention’s *Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19)*, which provides general safety and health measures that businesses and employers can implement when reopening operations.

In May 2020, the EPA administrator issued a memorandum to all staff informing them of the Agency’s reopening plans and phased approach to reopening EPA locations. The EPA also developed guidance for a phased reopening of the Agency’s facilities, which outlined how to safely reoccupy offices to meet the reopening criteria defined in federal guidance. Figure 1 summarizes federal and EPA reopening guidance.

Figure 1: Federal and EPA guidance on reopening the workplace

<p>Issued by Occupational Safety and Health Administration</p> <p>Date March 2020</p>	<p>Guidance on Preparing Workplaces for COVID-19: Contains recommendations and information to help employers “identify risk levels in workplace settings & to determine any appropriate control measures to implement.”</p>
<p>Issued by The White House</p> <p>Date April 2020</p>	<p>Guidelines: Opening Up America Again: Contains a health-based vision for putting the nation back to work and presents guidelines on a three-phased approach, based on the advice of public health experts.</p>
<p>Issued by Office of Management and Budget; Office of Personnel Management</p> <p>Date April 20, 2020</p>	<p>Memorandum M-20-23, Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again: Outlines data-driven approach for agencies to evaluate site-specific conditions and comply with state and local health department requirements and the White House’s <i>Guidelines: Opening Up America Again</i>.</p>
<p>Issued by CDC</p> <p>Date May 6, 2020</p>	<p>Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19): Emphasizes the White House’s <i>Guidelines: Opening Up America Again</i>, as well as a phased approach based on state or local levels of transmission and healthcare capacity.</p>

Protocols for EPA’s phased reopening:

Phase 0

Facility closed for at least seven days for cleaning

CLOSED

Phase 1

- Optional return to workplace
- Encouraged telework
- Expanded work hours
- Self-screening
- Social distancing in common areas
- Essential travel only
- Special accommodations for vulnerable individuals
- No visitors

Phase 2

- Encouraged telework if feasible
- Normal work hours
- Special accommodations for vulnerable individuals
- Self-screening
- Social distancing in common areas
- Mission-essential visitors allowed
- Unrestricted travel (requires management review)

Phase 3

- Resume normal workplace status
- Maintain health and safety protocols

Source: OIG analysis of EPA data. (EPA OIG Image)

Issued by
EPA Administrator

Date
May 21, 2020

Memorandum, EPA’s Office Operations During the COVID-19 Pandemic:

Provides a plan for an eventual phased return to EPA offices using a data-driven approach for a “rolling reopening” to ensure staff health and safety.

Issued by
EPA, Office of Mission Support Principal Deputy Assistant Administrator

Date
May 27, 2020

Guidance on Returning to the Workplace: Outlines how to safely reoccupy offices that meet the criteria defined in the White House’s *Guidelines: Opening Up America Again*, identifies new resources that reflect the Agency’s adoption of the CDC’s Interim Guidance, and recommends strategies for offices that are resuming normal or phased business operations.

Source: OIG analysis of reopening guidance. (EPA OIG figure)

EPA’s Phased Reopening Strategy

When making decisions about whether to reopen specific Agency locations, the EPA reviews the White House’s *Guidelines: Opening Up America Again*, which references adherence to CDC guidelines, and Memorandum M-20-23. These guidelines incorporate “gating” criteria, which are conditions that, per the White House’s guidelines, “must be met in a state or county (in addition to core preparedness responsibilities)” before an entity can proceed to the next phase in the overall three-phased reopening process (Table 1).

Table 1: Gating criteria

Symptoms	Cases	Hospitals
Downward trajectory of influenza-like illnesses reported within a 14-day period.	Downward trajectory of documented cases within a 14-day period.	Treatment of all patients without crisis care.
AND	OR	AND
Downward trajectory of COVID-like syndromic cases reported within a 14-day period.	Downward trajectory of positive tests as a percent of total tests within a 14-day period (flat or increasing volume of tests).	Robust testing program in place for at-risk healthcare workers, including emerging antibody testing.

Source: EPA OIG representation of the White House’s *Guidelines: Opening Up America Again*. (EPA OIG table)

In line with the White House’s guidance, the Agency’s strategy provides for a phased reopening of its locations. All EPA locations with plans to reopen—including laboratories and satellite offices—must begin in Phase 0, an EPA-specific phase that requires locations to be unoccupied for seven days for cleaning before proceeding to Phase 1. The EPA’s reopening process ends with Phase 3, when locations may resume their normal workplace status with workplace flexibilities and social distancing plans in place.



Congressional interest in federal reopening during 2020:

- June 15: Subcommittee on Government Operations requests the OIG to review the EPA's reopening plans and procedures.
- July 10: The OIG replies to the Subcommittee, agreeing to review "certain aspects" of its request within the scope of an already OIG-initiated evaluation.
- July 14: The Homeland Security and Governmental Affairs Committee requests information from several agencies, including the EPA, about their reopening plans.
- July 27: The OIG requests a copy of the EPA's response to the July 14 request for information.
- As of August 31: The EPA has not responded to the July 14 request for information.

To implement the Agency's overarching reopening strategy, the EPA's locations across the country developed their own specific reopening plans. To aid Agency facility managers in evaluating their preparedness to reopen locations and protect the health and safety of the EPA workforce, the Agency developed nationwide guidance for Agency facility managers to follow when evaluating their preparedness to reopen locations and to protect the health and safety of the EPA workforce. This guidance is posted on the Agency's COVID-19 intranet site:

- *Facility Management Checklist*, May 2020. Addresses building operations, services, and amenities, among other areas. The checklist recommends protocols for facility preparation and entry screening to facilitate the safe return of nonessential employees to their physical EPA duty stations.
- *EPA Return to the Workplace: Employee Information*, May 2020. Summarizes the Agency's plan and process to reopen its facilities. This information sheet states, "Each facility should follow the EPA Facility Checklist."
- *EPA COVID-19 Guidance for Contact Tracing and Employee Notification Guidance for EPA Managers and Supervisors*, May 2020. Provides information and email templates for communication about and reporting COVID-19 cases affecting the Agency.
- *EPA Self Assessment to Stop the Spread of COVID-19*, updated July 2020. Asks a series of health-related questions to help employees determine whether they should stay home or return to the office.

Congressional Interest in EPA's Reopening Plans

On June 15, 2020, the Subcommittee on Government Operations requested that the "Office of Inspector General examine the plans and procedures of the U.S. Environmental Protection Agency for returning employees to federal offices in the wake of the coronavirus pandemic." On July 10, 2020, the OIG informed the Subcommittee that "aspects of your request will be considered within the scope of a self-initiated OIG evaluation of the EPA's response to the White House's *Guidelines for Opening Up America Again*."

On July 14, 2020, Senator Gary Peters, ranking member of the Homeland Security and Governmental Affairs Committee, sent letters to several agencies, including the EPA, seeking details on their plans to safely reopen offices. On July 27, 2020, we requested the EPA to provide us with a copy of its response to Senator Peters. As of October 7, 2020, the Agency had not responded to Senator Peters, and we have therefore not received a copy of the Agency's response.

Scope and Methodology

We conducted this evaluation from July 2020 to September 2020. This evaluation was conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. These 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 evaluation objective. We adhered to the OIG's quality control procedures for ensuring that the information in this report is accurate and supported. More information on our scope and methodology is in Appendix B.

Responsible Office

According to its [website](#), the EPA's Office of Mission Support, or OMS, "leads the agency's core mission support functions including protection of EPA's facilities and other critical assets nationwide." As such, the OMS is responsible for administration and resources.

What We Found

All 13 locations we reviewed developed reopening plans to protect the health and safety of their returning workforces. These reopening plans incorporate the elements outlined in the CDC's Interim Guidance, but how they implement the following health and safety measures outlined in the CDC's Interim Guidance differs substantially in many respects:

- Face coverings.
- Social distancing.
- Ventilation systems.
- Cleaning and disinfecting.
- Interaction with visitors and non-EPA employees.
- Public transportation.

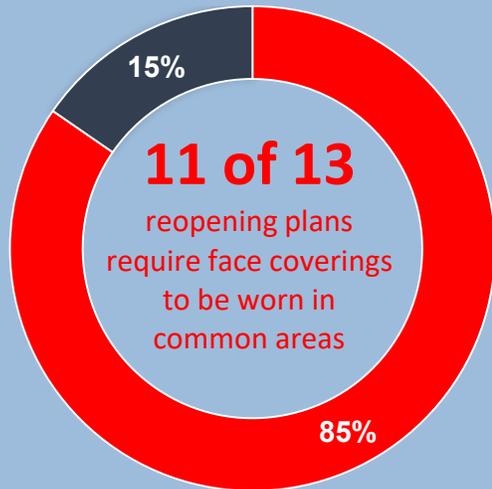
Four (31 percent) of the 13 reopening plans we reviewed refer to the EPA's *Facility Management Checklist*, which references certain aspects of the CDC guidelines. OMS staff told us that EPA locations were provided flexibility to develop their plans based on varying state and local conditions. Also, in response to our findings, Agency management said that facility managers were not required to follow or refer to the *Facility Management Checklist* in the location-specific written plans. The checklist, however, says that it "should be used by EPA facilities, offices, laboratories, or sites prior to allowing non-essential employees to return to their EPA physical duty station," although it acknowledges that not all checklist items are applicable to all EPA locations.



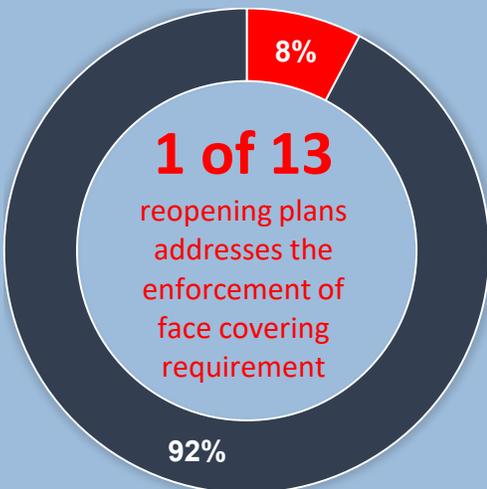
Source: OIG analysis of EPA data.
(EPA OIG image)



How to wear a mask correctly.
Source: CDC.gov. (CDC image)



Source: OIG analysis of EPA data.
(EPA OIG image)



Source: OIG analysis of EPA data.
(EPA OIG image)



How to social distance.
Source: CDC.gov. (CDC image)

Face Coverings

The CDC’s Interim Guidance states that the “CDC recommends wearing a cloth face covering as a measure to contain the wearer’s respiratory droplets and help protect their co-workers and members of the general public.”

Eleven of the 13 reopening plans we evaluated require face coverings to be worn in common areas, while two only recommend it. Both the OMS principal deputy assistant administrator and the OMS chief of staff provided us with the same rationale for these differences on two separate occasions: the EPA is following state and local requirements with respect to face coverings, and it is expected that there would be differences.

Ten of the reopening plans that require face coverings do not discuss how this requirement will be enforced. The Research Triangle Park, North Carolina, reopening plan is the only one that specifically addresses how the location will enforce its face covering mandate:

Face coverings are required on campus in all public areas in the building. Individuals observed out of compliance will be asked to use a face covering and reported to their supervisor or COR [contracting officer’s representative]. A second offense may result in the individual being removed from campus.

In response to our findings, the Agency indicated that enforcement is addressed in *EPA Return to the Workplace Supervisory FAQs*, which outlines possible EPA enforcement action when employees refuse to wear a cloth face covering in the EPA workspace where a cloth face covering is required.

Social Distancing

The CDC defines social distancing as “staying at least six feet from other people who are not from your household.” The CDC’s Interim Guidance states that employers should “establish policies and practices for social distancing” and outlines possible strategies to help employees maintain social distancing. These strategies include closing or limiting access to common areas and implementing flexible work schedules—such as staggered shifts—to limit the number of employees in the workplace at the same time.

The majority of the 13 reopening plans we reviewed are specific as to how many people can be in an elevator (ten plans) or restroom (nine plans) in the buildings in their specific locations, while the others generally recommend that people “limit occupancy,” provide varying guidance, or do not address occupancy limits at all.

Flexible work schedules were implemented agencywide on March 17, 2020, via a mass mailer from the EPA administrator. Yet, only four of the 13 locations we evaluated either employ or plan to employ

staggered work shifts to help with social distancing. The other locations have either not comprehensively adopted this approach or remained silent regarding this approach.

Ventilation Systems

The CDC's Interim Guidance says that employers should "[c]onsider improving the engineering controls using the building ventilation system," such as increasing the ventilation rates, ensuring that ventilation systems operate properly and provide acceptable indoor air quality, and increasing outdoor air ventilation.

Two of the 13 reopening plans we reviewed require facility managers to confer with the U.S. General Services Administration to ensure that building ventilation is adequate: Regions 5 and 6. Five apply the CDC's Interim Guidance: Regions 1, 2, 4, and 7, and Cincinnati. Three apply unique guidelines that they developed: Regions 3, 9, and 10. And three do not address ventilation: Region 8, headquarters, and Research Triangle Park. In addition, only Regions 9 and 10 address the maximization of outside air. For example, the Region 10 reopening plan states:

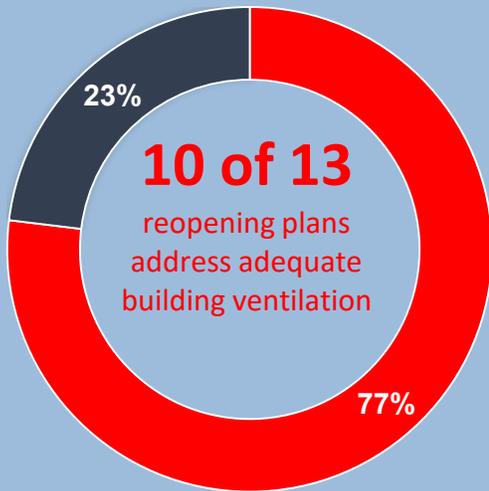
The air intake currently uses MERV 13 filters in all office buildings, which will be replaced by MERV 14 filters prior to staff returning. According to the American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) "MERV 13 filters are efficient at capturing airborne viruses, but MERV 14 rated filters are preferred."

The OMS principal deputy assistant administrator told us that even though not all plans discuss building ventilation, all facility managers for facilities leased from the General Services Administration have conferred with that agency regarding adequate ventilation. According to the OMS principal deputy assistant administrator, in EPA-owned buildings for which the EPA has administrative control, facility managers have taken the measures recommended by the CDC.

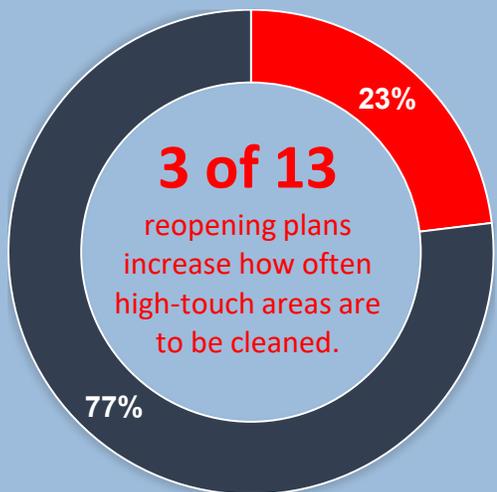
Cleaning and Disinfecting

The CDC's *Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes* provides the following information related to cleaning and disinfecting facilities:

- "Normal routine cleaning with soap and water will decrease how much of the virus is on surfaces and objects, which reduces the risk of exposure."
- "Disinfection using EPA-approved disinfectants against COVID-19 can also help reduce the risk. Frequent disinfection of surfaces and objects touched by multiple people is important."



Source: OIG analysis of EPA data. (EPA OIG image)



Source: OIG analysis of EPA data.
(EPA OIG image)

Key Takeaway:

Visitor access parameters varied across the reopening plans and were often not dependent on the phase, as outlined in the *EPA Return to the Workplace: Employee Information* message.

- “When EPA-approved disinfectants are not available, alternative disinfectants can be used (for example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions).”

Agency staff indicated that all plans refer to following CDC guidelines for cleaning and disinfecting. Of the 13 reopening plans we evaluated, however, only those for Regions 2, 8, and 9 increase—over pre-pandemic cleaning standards—how often high-touch areas are cleaned. All other locations state that they will disinfect such areas but do not mention an increase in the frequency of cleaning. In addition, even the locations that increase the frequency of cleaning do not outline specific or consistent courses of action. For example, although Region 4’s reopening plan states that its facilities will be cleaned and disinfected more often, it does not detail how or specify how often. While Region 9’s reopening plan states that “high-touch surfaces in common areas, including elevators and elevator lobbies” in its main facility will be cleaned three times per day, it only provides for daily cleaning in other Region 9 facilities, with additional cleaning as requested. Appendix C shows some of the location-specific variations for cleaning and disinfecting.

Interaction with Visitors and Non-EPA Employees

The CDC’s Interim Guidance states that employers could “adjust ... business practices to reduce close contact with customers” as one strategy to maintain social distancing. The CDC’s Interim Guidance also states that agencies should “[a]lter your workspace to help workers and customers maintain social distancing and physically separate employees from each other and from customers, when possible.” In addition, according to the *EPA Return to the Workplace: Employee Information* message, visitor access to EPA facilities will generally be controlled by phase:

- Phase 1. No visitors are allowed.
- Phase 2. Visitors are allowed for mission-essential reasons and must conduct a self-assessment prior to entering the facility.
- Phase 3. Visitors are not restricted.

We noted, however, that visitor access parameters varied across the reopening plans and were often not dependent on the phase. For instance, regardless of the reopening phase, Cincinnati’s reopening plan permits visitors to access the facility’s credit union by appointment, while the EPA headquarters’ reopening plan allows visitors if there is a “statutory, legal, or emergency requirement.” See Appendix D for other differences.

In response to our findings, the OMS principal deputy assistant administrator informed us that the “‘visitor access parameters’ for all locations follow the national guidance developed and issued by the OMS. Local application of the national guidance may result in differences depending on the facility (e.g. labs).”

Seven of the 13 EPA offices we reviewed are colocated with other entities in the same building and share common areas, such as elevators, with the general public: Regions 1, 2, 3, 6, and 9; Cincinnati; and headquarters. These seven offices are open to the general public, who access places such as credit unions, bankruptcy courts, immigration courts, the Internal Revenue Service, and more. None of the plans for these seven locations discuss how the Agency plans to reduce close contact and interaction with the public.

Public Transportation

The CDC’s Interim Guidance states that agencies should consider offering support to employees who commute to work using public transportation, including offering “incentives to use forms of transportation that minimize close contact with others” and “allowing employees to shift their hours so they can commute during less busy times.”

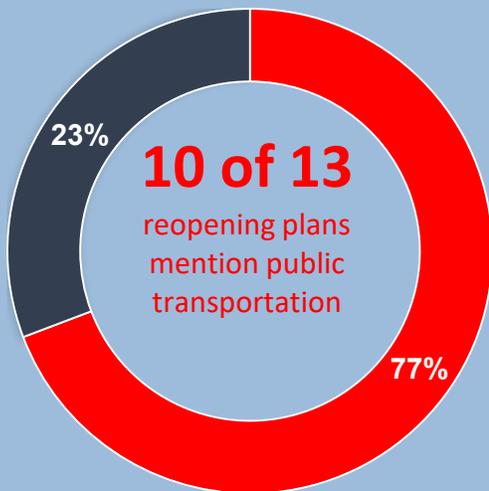
Even though ten of the 13 reopening plans we reviewed mention public transportation, which many employees rely on to travel to and from their offices, eight of those plans mainly address the availability of public transportation and not the risks associated with potential exposure to SARS-CoV-2 during the commute to work. In response to our findings, the Agency indicated that in a June 11, 2020 message, Administrator Wheeler outlined Agency guidance regarding mass transit, although it too is focused on availability, not risk:

In Phase 3 we will also consider the availability of mass transit and extend unscheduled telework for offices if mass transit during normal operating hours is significantly impaired. I know that for many of our offices mass transit can be the major, if not the sole, source of transportation for employees. If there are ongoing interruptions of service which materially impact the ability of employees to travel to work, we will adjust including allowing for enhanced telework.

Agency Reopening Strategy Allows Flexibility

According to the OMS chief of staff, the agencywide reopening strategy was not prescriptive but instead provided overarching guidance, leaving each EPA location to determine its own protections based on local conditions. Indeed, Memorandum M-20-23, issued jointly by the Office of Management and Budget and the Office of Personnel Management, states:

Federal government-wide operating decisions will be informed by states' phasing assessments and conditions, but implemented at the direction of agency heads or as delegated by the agency head... Agencies shall review the relevant CDC and U.S. Department of Labor (DOL) guidance, as well as other appropriate resources, when developing and implementing new or modified policies and processes... on the availability of hygiene supplies, facilities cleanliness, and social distancing. In addition, agencies should institute other policies to enforce social distancing and mitigation measures.



Source: OIG analysis of EPA data (EPA OIG image)

Key Takeaway:

Location-based reopening plans should offer consistent health and safety measures in compliance with the CDC's Interim Guidance.

Key Takeaway:

The EPA should determine whether the location-specific reopening plans should be revised to address the differences in how they implement health and safety measures.

Given the severity of the pandemic crisis and the risks associated with the COVID-19 disease, it is imperative employees are assured that the Agency has developed solid plans and that the rules and conditions at all locations will be communicated transparently, implemented consistently, and enforced effectively. As such, the OIG plans to conduct further work in this area as Agency locations advance to Phase 3 in the reopening process.

Conclusion

Providing a safe working environment for employees returning to their physical work locations is a significant challenge facing the EPA as it reopens its facilities. Although the location-specific reopening plans we reviewed incorporate elements of the CDC's Interim Guidance, the specific health and safety measures outlined in the plans often vary. While some differences in the reopening plans could be warranted based on local conditions, the EPA should ensure that such differences do not place employees at an increased risk of contracting or spreading the COVID-19 disease merely as a result of their work location.

Recommendation

We recommend that the assistant administrator for Mission Support:

1. Determine, as Agency locations advance to Phase 3, whether the EPA's location-specific reopening plans should be revised to address differences in how they implement health and safety measures.

Agency Comments and OIG Assessment

The Agency concurred with our recommendation and provided an acceptable corrective action with an estimated completion date. EPA's response states, "Specifically, OMS will work with regions and national program managers to review the supplemental, location-specific Reopening Plans for Phase 3 to ensure that they comply with the Agency Phase 3 guidance, establish unique social distancing plans tailored to the needs of the organization and facility, and provide consistency in health and safety measures, while recognizing that some flexibility is needed given the difference in ownership, use, and ages of Agency buildings." See Appendix A. The Agency, however, disagreed with some of the facts reflected in our report. We considered its comments and revised the report as appropriate.

Agency Response to Draft Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

November 17, 2020

OFFICE OF MISSION SUPPORT

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report No. OA&E-FY20-0241
“EPA’s Initial Plans for Returning to the Office Incorporate CDC Guidance but Differ by Location”

FROM: Donna J. Vizian, Principal Deputy Assistant Administrator

TO: Michael D. Davis, Director
 Efficiency Directorate
 Office of Audit and Evaluation
 Office of Inspector General

Thank you for the opportunity to respond to the subject audit report. The following summarizes the agency’s overall position, along with its position on the report recommendation with additional background information. For the report recommendation with which the agency agrees, we have provided a high-level intended corrective action with completion date. For your consideration, we have included a Technical Comments Attachment to supplement this response.

AGENCY’S OVERALL POSITION

The Office of Mission Support understands that the Office of Inspector General’s recommendation is aimed at ensuring that the Agency’s national strategy for implementing federal guidelines to protect the health and safety of its workforce mitigates agencywide risks as it plans to reopen facilities that were closed due to the coronavirus pandemic. While the Agency does have concerns with some of the findings and content in the OIG’s draft report on the subject audit, as reflected in the Technical Comments Attachment, we agree with the OIG’s recommendation and found that this recommendation is currently being addressed by Agency senior management.

Specifically, on July 16, 2020, the Agency issued supplemental guidance that recognizes returning to the office in Phase 3 would not be under normal circumstances. The July guidance includes the need for continued social distancing and flexibilities for certain communities. OMS is working through the implementation of this guidance with the regions and national program managers. The goal is to provide consistency in health and safety actions while recognizing that some flexibility is needed given the difference in ownership, use and ages of our buildings.

We trust that our effort to clarify some of the facts of the Agency’s overall reopening plan and the perceived disparity among the 13 reopening plans in question, along with our description of actions we plan to take with Phase 3 plans, will bridge the remaining differences.

AGENCY’S RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Corrective Action(s)	Estimated Completion Date
1	Determine, as Agency locations advance to Phase 3, whether the EPA’s location-specific reopening plans should be revised to address differences in how they implement health and safety measures.	<p>OMS will determine, as Agency locations advance to Phase 3, whether the EPA’s location-specific reopening plans should be revised to address differences in how they implement health and safety measures.</p> <p>Specifically, OMS will work with regions and national program managers to review the supplemental, location-specific Reopening Plans for Phase 3 to ensure that they comply with the Agency Phase 3 guidance, establish unique social distancing plans tailored to the needs of the organization and facility, and provide consistency in health and safety measures, while recognizing that some flexibility is needed given the difference in ownership, use, and ages of Agency buildings.</p>	Dec 1, 2020

CONTACT INFORMATION

If you have any questions regarding this response, please contact Michell Hauser of the Office of Resources and Business Operations, at (202) 564–7636 or hauser.mitchell@epa.gov.

Attachment

- cc: Katherine Trimble
- James Hatfield
- Michael D. Davis
- Heather Layne
- Juliana Ilieva
- Detravion White
- Lynnam Hitchens
- Marilyn Braxton
- David Zeckman
- Daniel Coogan
- Jan Jablonski
- Monisha Harris
- Marilyn Armstrong
- Mitchell Hauser

Scope and Methodology

To answer our objective, we interviewed the OMS chief of staff to obtain an understanding of the Agency’s efforts and decisions related to the development of its location-based reopening plans. We met and discussed our findings with the OMS principal deputy assistant administrator and OMS staff. We also provided the Agency an advanced copy of the final report prior to issuance.

We reviewed the reopening plans for 13 EPA locations:

- Headquarters (Washington, D.C., and Potomac Yards, Virginia).
- Research Triangle Park, North Carolina.
- Cincinnati, Ohio.
- Regions 1–10.

We selected these 13 locations because they are the primary EPA locations where most staff work. Since these locations continued to enter new phases during our fieldwork, we based our findings on the EPA’s plans and status as of August 7, 2020.

We also reviewed the Agency’s EPA Facility Status Dashboard for the status of EPA locations during our evaluation period. The last time the Agency updated its dashboard before we ended our fieldwork was on August 5, 2020. As of that date, one of the 13 locations we evaluated remained closed, two were in Phase 0, eight were in Phase 1, and two were in Phase 2. Since none of these 13 locations entered Phase 3 by the end of our fieldwork, we focused on Phases 1 and 2 for our evaluation. The table at the end of this appendix provides more information on these 13 locations and their reopening progress.

We analyzed the Agency’s national strategy for reopening facilities, the reopening plans at the 13 locations we reviewed, and applicable supplementation information for consistency with the related guidance issued by the Office of Management and Budget, the Office of Personnel Management, and the CDC. To facilitate our review, we developed a checklist based on the CDC’s Interim Guidance and the Occupational Safety and Health Administration’s Guidance on Preparing Workplaces for COVID-19. We focused our review on the CDC’s Interim Guidance because

Locations we reviewed



Source: EPA data. (EPA OIG image)

Reopening phases for the 13 EPA locations we reviewed



- Phase 0: 7-Day Closure Period
- Phase 1: Facility open, telework encouraged, expanded work schedule
- Phase 2: Return to normal work schedule with telework encouraged
- Phase 3: Return to normal work status
- Closed

Source: OIG analysis of EPA Facility Status Dashboard data as of August 5, 2020. (EPA OIG image)

the EPA’s New Guidance on Returning to the Workplace referred to the “Agency’s adoption of the CDC’s guidance for businesses, including recommended strategies for those that are resuming normal or phased business operations.”

Since announcing our evaluation on July 1, 2020, we received eight OIG Hotline complaints and 12 letters of concern from EPA staff and regional labor union representatives. Many of these hotline complaints and letters of concern relate to the criteria that the EPA is using to reopen facilities. However, this report addresses the consistency of the Agency’s reopening plans with governmentwide guidance on reopening the workplace, not the criteria that the EPA uses to decide when to reopen a location or advance a location to the next reopening phase.

As more EPA locations reopen and advance to Phase 3, we plan to conduct further work and review the EPA’s implementation of health and safety measures.

Location Status

Location	Date location entered each phase		
	Phase 0	Phase 1	Phase 2
Cincinnati	June 15, 2020	August 4, 2020	-
Headquarters	June 15, 2020	June 23, 2020	August 4, 2020
Research Triangle Park	August 10, 2020	-	-
Region 1	June 1, 2020	June 23, 2020	August 4, 2020
Region 2	June 22, 2020	June 30, 2020	-
Region 3	June 15, 2020	June 23, 2020	-
Region 4	May 21, 2020	May 28, 2020	-
Region 5	June 15, 2020	June 23, 2020	-
Region 6	June 1, 2020	-	-
Region 7	May 22, 2020	May 29, 2020	-
Region 8	June 1, 2020	June 9, 2020	-
Region 9	-	-	-
Region10	May 21,2020	May 29, 2020	-

Source: OIG analysis of *EPA Facility Status Dashboard* data as of August 5, 2020 and facility reopening plans as of August 7, 2020. (EPA OIG table)

Differences in Regional Reopening Plans During Phases 1 and 2

Location	Face coverings (common areas)	Social distancing	Public transportation ^a	Disinfecting (common areas)	Staggered work shifts	Elevators	Restroom limits	Building ventilation system
Cincinnati	Required	Required	Mentioned	Daily disinfection	Suggested	Two people	Signage	Per CDC
Headquarters	Required	Required	Mentioned	Daily disinfection	Suggested	Two people	Two people	No mention
Research Triangle Park	Required	Required	Mentioned	Per CDC	Suggested	Signage	Signage	No mention
Region 1	Required	Per CDC	Mentioned	Disinfect throughout day	Expanded hours	Two people	Signage with occupancy limits	Per CDC
Region 2	Required	Per CDC	Mentioned	Frequent Disinfection	Expanded hours	Two people	Three people	Per CDC
Region 3	Required	Required	Mentioned	Daily cleaning	Will be instituted	Three people	Three people	Thorough cleaning of HVAC* system and components
Region 4	Required	Suggested	No mention	Daily cleaning	Expanded hours	Two people	Two people	Per CDC (email notice)
Region 5	Required	Encouraged	Mentioned	Daily cleaning	Will be instituted	Signage	Two people	Confer with General Services Administration
Region 6	Recommended	Required	Mentioned	Daily cleaning	Will be instituted	Four people	Two to three people	Confer with General Services Administration
Region 7	Recommended	Expected	No mention	Per CDC	Suggested	One person	Three people	Clean and test operation
Region 8	Required	Encouraged	No mention	Increase cleaning	Suggested	Two people	One person	No mention
Region 9 ^b	Required	Required	Mentioned	Varies between buildings ^c	Will be instituted	Varies between buildings ^d	Varies between buildings ^e	Maximize outside air in system
Region 10	Required	Required	Mentioned	Per CDC	Expanded hours	Two People	One to two people depending on size	Maximize outside air in system; replace MERV13 filters with preferred MERV14 filters

Source: OIG analysis of reopening plans and reopening information as of August 5, 2020. (EPA OIG table)

* Note: HVAC stands for "heating, ventilation, and air conditioning."

^a Public transportation includes carpools, vanpools, buses, trains, and subways.

^b Cleaning and disinfecting protocols are specific to each facility within Region 9, with additional guidelines and exceptions for each office.

^c At Region 9's main facility (the Hawthorne facility), cleaning will occur three times per day. The laboratory facilities will be cleaned before and after use. At all other facilities, common-use areas will be wiped down before and after touching using EPA-supplied cleaning products.

^d At the Hawthorne facility: two people. At all other facilities: maintain social distancing.

^e At the Hawthorne facility: one person. At all other facilities: maintain social distancing.

Visitors Access Parameters: Based on Location and Phase

Location	Phase 1	Phase 2	Visitor screening
Cincinnati	Allowed to credit union	Mission essential	Self-assessment
Headquarters	Emergency only	Mission essential	Self-assessment
Research Triangle Park	Emergency only	Mission essential	Self-assessment
Region 1	Not allowed	Mission essential	Self-assessment
Region 2	Not allowed	Mission essential	Self-assessment
Region 3	Not allowed*	Varies by location	No mention
Region 4	Not allowed	Mission essential	No mention
Region 5	No non-EPA visitors	Allowed**	Self-assessment
Region 6	No non-EPA visitors	5th floor only	Self-assessment
Region 7	Not allowed	Mission essential	No mention
Region 8	Not allowed	No mention	No mention
Region 9	Not allowed	Essential visitors	No mention
Region 10	Not allowed	Mission essential	No mention

Source: OIG analysis of reopening plans and reopening information. (EPA OIG table)

* Per May 21, 2020 email to staff, "No visitors in Phase 1."

** "Visitors may be allowed in EPA workspace, where consistent with GSA building access requirements."

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	Determine, as Agency locations advance to Phase 3, whether the EPA's location-specific reopening plans should be revised to address differences in how they implement health and safety measures.	R	Assistant Administrator for Mission Support	12/1/20	

¹ C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

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