U.S. OFFICE OF PERSONNEL MANAGEMENT
OFFICE OF THE INSPECTOR GENERAL
OFFICE OF EVALUATIONS

Final Evaluation Report

EVALUATION OF OPM'S RESPONSE TO THE COVID-19 PANDEMIC

Report Number 4K-FS-00-20-042
May 6, 2021

EXECUTIVE SUMMARY

Evaluation of OPM's Response to the COVID-19 Pandemic

Why Did We Conduct the Evaluation?

In January 2020, the outbreak of the Coronavirus Disease 2019, known as COVID-19, was declared a global public health emergency. The COVID-19 pandemic spread quickly across the United States, forcing cities to impose stay-at-home and shelter-in-place orders in March and April 2020.

In June 2020, Representative Gerald E. Connolly, Chairman of the House Subcommittee on Government Operations, requested that we examine the plans and procedures of the U.S. Office of Personnel Management (OPM) for returning employees to Federal offices during the coronavirus pandemic. As a result, we sought to determine whether OPM's plan for returning employees to its offices followed existing guidance and best practices to reduce the risk of employees' exposure to COVID-19.

William W. Scott, Jr.
Chief, Office of Evaluations

What Did We Find?

In May 2020, OPM issued a *Returning to OPM Facilities Preparedness Guide* (Guide) to assist managers with the transition to reopen its offices during the COVID-19 pandemic. The Guide did not specifically identify when employees would return to the office, but provided a framework to support OPM supervisors with guidelines and planning considerations for evaluating the needs of employees as OPM returns from a maximum telework operating status.

During our evaluation, we determined that:

- Improvements were needed for processing COVID-19 incidents;

- OPM management did not require workers to wear face coverings; and

- OPM needed to implement additional signage for entering, social distancing, and routine cleaning and disinfecting at the Theodore Roosevelt Federal Building (TRB).

We made six recommendations aimed to improve OPM's plan for returning employees to its offices and practices to reduce the risk of employees' exposure to COVID-19. OPM management has taken corrective actions to address our recommendations and we consider all six recommendations closed.
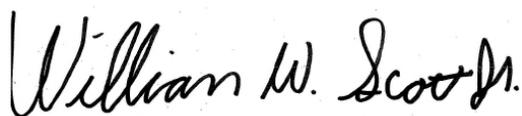
ABBREVIATIONS

CDC	Centers for Disease Control and Prevention
CFO	Chief Financial Officer
CIO	Chief Information Officer
CLIA	Congressional, Legislative, and Intergovernmental Affairs
COVID-19	Coronavirus Disease 2019
DCSA	Defense Counterintelligence and Security Agency
EEO	Equal Employment Opportunity
EO	Executive Order
ES	Employee Services
FSEM	Facilities, Security, and Emergency Management
GSA	General Services Administration
HI	Healthcare Insurance
HRS	Human Resources Solutions
MSAC	Merit System Accountability and Compliance
OC	Office of Communications
OD	Office of the Director
ODI	Office of Diversity and Inclusion
OGC	Office of General Counsel
OIG	Office of the Inspector General
OPIM	Office of Privacy and Information Management
OPM	U.S. Office of Personnel Management
OPMHR	OPM Human Resources
OPO	Office of Procurement Operations
OSDBU	Office of Small and Disadvantaged Business Utilization
PPA	Planning and Policy Analysis
RS	Retirement Services
SEAP	Suitability Executive Agent Programs
SITROOM	Situation Room
TRB	Theodore Roosevelt Federal Building

TABLE OF CONTENTS

I. INTRODUCTION

This final evaluation report details the results from our evaluation of the *OPM's Response to the COVID-19 Pandemic*. This evaluation was conducted by OPM Office of the Inspector General (OIG), as authorized by the Inspector General Act of 1978, as amended.

In January 2020, the outbreak of Coronavirus Disease 2019, known as COVID-19, was declared a global public health emergency. The COVID-19 pandemic spread quickly across the United States, forcing cities to impose stay-at-home and shelter-in-place orders in March and April 2020. OPM's operations at its offices had to adjust to a maximum telework operating status.

In April 2020, the former President announced Federal guidelines to reopen the United States. These guidelines, called *Opening Up America Again,* put the onus on each State Governor to make decisions about reopening their respective States. In addition, the Centers for Disease Control and Prevention (CDC) released guidelines recommending how all Americans can move forward together by practicing social distancing and other public health behaviors to reduce the risk of exposure to COVID-19.

The Director of Facilities, Security, and Emergency Management (FSEM) led the development of OPM's *Returning to OPM Facilities Preparedness Guide* (Guide) following the issuance of the White House guidance on behalf of OPM's Senior Management.[1] The Guide, dated May 29, 2020, provided a framework intended to support OPM supervisors with guidelines and planning considerations to evaluate the needs of employees as OPM returns to a normal operating status.

In June 2020, Representative Gerald E. Connolly, Chairman of the House Subcommittee on Government Operations requested we examine OPM's plans and procedures for returning employees to Federal offices during the coronavirus pandemic.[2]

Since the issuance of our draft report, OPM management has issued a new *COVID-19 Safety Plan* to protect the OPM workforce, contractors, other building occupants, and visitors to OPM facilities and to stop the spread of COVID-19. The new plan was developed in accordance with Executive Order (EO) 13991, *Protecting the Federal Workforce and Requiring Mask-Wearing* 86 Federal Register 7045)*,* and supersedes OPM's Guide*.*

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[1] OPM's FSEM division is responsible for providing a safe and secure environment for OPM's information, personnel, and operations. Emergency Management directs the operations and oversight of OPM's preparedness and emergency response programs, including the Continuity of Operations Program, Occupant Emergency Plan, and Continuity of Government programs. In addition, Emergency Management oversees the OPM Situation Room, a 24/7 operations center that provides situational awareness to the OPM Director regarding events affecting the operating status of the Federal government.

[2] Letter from Chairman Gerald E. Connolly, House Subcommittee on Government Operations, to Norbert E. Vint, Acting Inspector General, Office of Personnel Management (June 15, 2020).

II. RESULTS OF EVALUATION

This section details the results of our evaluation of *OPM's Response to the COVID-19 Pandemic*. We determined that OPM issued a guide to assist managers with the transition to return employees to its offices during the COVID-19 pandemic. OPM's Guide did not specifically identify when employees would return to the office, but provided a framework intended to support OPM's supervisors with guidelines and planning considerations for how to evaluate the needs of employees as OPM returns from a maximum telework operating status. Below, we discuss areas that, if addressed, can reduce the risk of employees' exposure to COVID-19.

1. Improvements Needed For Processing COVID-19 Incidents

The General Services Administration (GSA) defines a COVID-19 incident as an instance when someone confirmed or suspected of having COVID-19 enters or occupies a building.[3] If there is a confirmed or suspected COVID-19 incident in a GSA building, that portion of the facility accessed by the infected individual(s) will be cleaned and disinfected, per the CDC's guidance. Cleaning in response to a COVID-19 incident in a building may require the affected area be isolated until cleaned.

According to OPM's Guide, agency leadership has implemented an incident reporting strategy to ensure the health and well-being of OPM employees and contractors. Supervisors have been trained to provide all employees direction on the reporting strategy, which is designed to inform a facilities management response (via the OPM Situation Room) and ensure accurate reporting to OPM leaders, affected personnel, and the agency as a whole for evidence-based decision-making.

OPM reported 72 COVID-19 incidents at OPM facilities between March 18, 2020, and September 25, 2020. We selected a sample of 10 COVID-19 incidents to review. We sought to determine if the incident reporting strategy provided timely notification of COVID-19 incidents to employees and building occupants and led to timely cleaning and disinfecting of affected areas.

We found that FSEM management did not always provide notification of COVID-19 incidents to employees and building occupants. In 6 of 10 COVID-19 incidents reviewed, we could not determine whether OPM notified employees and building occupants who shared space or worked in the areas of possible exposure. Table 1 on the following page provides a list of the six COVID-19 incidents where we could not determine whether OPM

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[3] In its *Return to Workplace Strategy Book: Preparing for Reopening.*

notified employees and building occupants of possible exposure and includes the date captured, case number, and if the incident was confirmed or suspected.[4]

	Table 1 – COVID-19 Incidents Where OPM Notification of Other Employees and Building Occupants Could not be Confirmed		
	Date	Case Number	Confirmed or Suspected
1	3/18/2020	Case #5	Confirmed
2	4/28/2020	Case #20	Confirmed
3	6/15/2020	Case #35	Confirmed
4	7/17/2020	Case #49	Suspected
5	8/13/2020	Case #62	Suspected
6	9/21/2020	Case #71	Confirmed

Source: OIG Analysis of Supporting Documentation Provided on COVID-19 Incidents

In addition, we were unable to determine if FSEM has an inspection process for COVID-19 cleaning and disinfection. We could not confirm the performance of cleaning and disinfecting services for 3 of the 10 COVID-19 incidents reviewed. Table 2 below lists the three COVID-19 incidents where we could not confirm if cleaning and disinfecting services were completed and includes the date captured, case number, and if the incident was confirmed or suspected.

	Table 2 – COVID-19 Incidents Where Cleaning and Disinfecting Services Were Not Confirmed		
	Date	Case Number	Confirmed or Suspected
1	3/18/2020	Case #5	Confirmed
2	3/18/2020	Case #6	Confirmed
3	7/17/2020	Case #49	Suspected

Source: OIG Analysis of Supporting Documentation Provided on COVID-19 Incidents

The CDC Interim Guidance for Businesses and Employers Responding to COVID-19, updated May 2020, states that if an employee is suspected or confirmed to have a COVID-19 infection, employers should inform fellow employees of possible exposure and follow the CDC cleaning and disinfecting recommendations.

Employers have a general duty to provide a safe workplace. As COVID-19 cases continue across the country and with Federal employees moving towards returning to facilities in greater numbers, it is critical that OPM follow its own guidance and the CDC cleaning and

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[4] Confirmed incident is defined as a laboratory confirmed of COVID-19. A suspected incident occurs when the individual has a recent onset of new continuous cough, fever, or loss of and/or change in sense of taste or smell.

disinfecting recommendations, as well as provide timely notification to employees and building occupants of their possible exposure to COVID-19.

Recommendation 1

We recommend the FSEM Director, in coordination with OPM human resources, take steps to ensure timely notification of COVID-19 incidents to employees and building occupants of their possible exposure.

Management Response:

OPM has taken steps to provide appropriate and timely notifications to employees and building occupants of possible exposure of COVID-19 incidents. OPM developed a streamlined process to log, collect, and track incident reporting, notification, and contact tracing. OPM has continued to make improvements that have been incorporated in the *OPM COVID-19 Safety Plan*. In addition, OPM clarified in its *COVID-19 Incident Notification and Cleaning Protocol* (Protocol) how supporting documentation will be maintain for employee notification to COVID-19 exposures and will continue to maintain documentation as such.

After further collaboration with OPM Human Resources, management found that of the nine incidents cited by the OIG, an appropriate OPM official quickly notified impacted individuals in six of these cases. For Table 1, management provided an explanation of the six incidents—case numbers 5, 20, 35, 49, 62, and 71—in its response.

OIG Comments:

We agree that the processes implemented in the new *OPM COVID-19 Safety Plan* address the issues identified in this finding. In our analysis of the additional information OPM provided to address the cases we identified, we still did not find sufficient support that actual notification occurred. For the six cases identified in Table 1, OPM management provided documentation that showed discussions of the incidents. However, we were not provided documentation that showed employees were notified. Therefore, we will continue to report these cases.

The actions taken in the *OPM COVID-19 Safety Plan* to develop the Protocol and the Incident Reporting Checklist satisfy the intent of the recommendation and we consider it closed.

Recommendation 2

We recommend the FSEM Director institute a quality assurance plan to ensure the completion of cleaning and disinfecting services for COVID-19 incidents.

Management Response:

OPM did implement procedures to confirm that cleaning activities are being completed in a timely way. Management updated the Protocol to include documents the SITROOM will maintain (i.e., emails relative to the completion of cleanings, incident reports and other emails relative to the reporting of incidents, and the COVID-19 Incident Report Form .

The requirements of the cleaning staff were adjusted so they would be notified in a timely fashion and required to respond immediately to disinfect the areas. After the cleaning is complete, the appropriate facilities manager notifies the SITROOM personnel of the need to document the requirement and maintain a log when cleaning and disinfection are completed at impacted areas. This record is stored on a drive where access is granted only to SITROOM personnel. Each incident report has a unique identifier to capture all follow-up data associated with it and is accessible only by key designated employees. The Protocol lays out the steps taken by the SITROOM to initiate the tracking of incidents reported, key personnel involved in the process, and the types of records that will be stored.

Management requested that OIG reflect in its final report that OPM provided email documentation pertaining to five cases referenced in the OIG's finding that show email communications that reference cleaning made at impacted areas where there were OPM-managed facilities, and that an appropriate OPM official contacted the GSA-managed facility to communicate cleaning needed at their facility. For Table 2, management provided an explanation and e-mail documentation of three incidents—case numbers 5, 6, and 49—in its response.

OIG Comments:

We agree that the updates implemented in the Protocol and adjusted requirements for cleaning staff addresses the issues identified in this finding. Our analysis of additional information still shows three incidents where FSEM did not provided support documentation indicating cleaning was completed. For the three cases identified in Table 2, management provided documentation that showed discussions of the incidents; however, we

were not provided documentation that showed cleaning was completed. Therefore, we will continue to report these cases.

The actions taken to update the Protocol and adjust requirements for cleaning staff satisfy the intent of the recommendation and we consider it closed.

2. OPM Management Not Requiring Workers to Wear Face Coverings

In a July 14, 2020, press release, the CDC affirmed that face coverings are a critical tool in the fight against COVID-19. The CDC recommended that people wear masks in public settings, like on public and mass transportation, at events and gatherings, and anywhere they will be around other people. The CDC's recommendation is based on its understanding of the role respiratory droplets play in the spread of COVID-19, paired with emerging evidence from clinical and laboratory studies showing face coverings reduce the spray of droplets when worn over the nose and mouth. COVID-19 spreads mainly among people who are in close contact with one another (within about 6 feet), so the use of face coverings is particularly important in settings where social distancing is difficult to maintain.

During our review, we found OPM's Guide did not require employees and other building occupants to wear face coverings as recommended by the CDC. We asked the FSEM Director why face covering were not required as recommended by the CDC and required by State and local jurisdictions. The FSEM Director explained that although face coverings are recommended by the CDC and supported by OPM's leadership, they are not required at OPM facilities. However, face coverings are recommended when social distancing cannot be observed, and OPM will continue to follow the CDC's guidance.

According to the FSEM Director, OPM ordered and distributed cloth face coverings and disposable face masks to OPM facilities to make them available to employees (if they would like to wear them such as the security staff, staff who engage with the public, staff who provide services to building occupants (e.g., staff who handle mail, support facilities, Personal Identification, PIV, badging, etc.), or other staff identified by department heads. Face coverings are available to anyone who enters the OPM Headquarters, TRB, and wants one. Security staff has face coverings on hand and will arrange to obtain a face covering for employees who would like to wear them. OPM's Guide references face coverings and face masks on pages 3, 5, and 8. However, during our walk through of the TRB, we saw multiple workers and security guards without face coverings.

According to the *Return to Workplace Strategy Book* issued by GSA on September 9, 2020, each occupant agency is responsible for establishing any requirements or guidance for face

covering usage among its employees, contractors, and visitors within agency space. The CDC data indicates face covering usage is critical for safe operations of workspaces, particularly indoors and especially when social distancing is difficult to maintain. The absence of the expectation for employees and other occupants to wear face coverings at OPM facilities jeopardizes the health and safety of workers, building occupants, and the public.

Recommendation 3

We recommend that the FSEM Director update OPM's Guide to require employees and other building occupants to wear face coverings as recommended by the CDC guidance.

Management Response:

OPM's Guide is obsolete and was replaced with the *OPM COVID-19 Safety Plan*, which requires the wearing of face masks/coverings. On Wednesday, January 20, 2021, the new Acting OPM Director informed OPM employees and employees of contractors via email that effective immediately they were required to wear face masks/coverings in OPM facilities. OPM has implemented this mandate for all OPM facilities in a manner consistent with EO 13991, *Protecting the Federal Workforce and Requiring Mask-Wearing*.

OIG Comments:

The actions taken to require employees and contractors to wear face masks/coverings in all OPM facilities satisfy this recommendation and we consider it closed.

3. OPM Needs to Implement Additional Signage for Entering, Social Distancing, and Routine Cleaning and Disinfecting at the Theodore Roosevelt Federal Building

During our walk through of the TRB, we found that additional signage was needed for the general areas within the building to reinforce employees' behavior in mitigating the spread of COVID-19. Specifically, we found that OPM did not:

- Consistently display signage at the TRB entrances. We found one sign at the entrance from the garage indicating that if employees experiencing COVID-19 symptoms, not feeling well, or have a temperature, should stay home; however, this signage was not displayed at the other building entrances. A picture of the sign is below.

Excerpts from page 9 of OPM's Guide, which is a sign outlining COVID-19 symptoms (fever, cough, and shortness of breath and requesting employees who are not feeling well, please stay home and contact their supervisor.

- Display signs in the hallways, stairways, or bathrooms reminding employees about cleaning or employing recommended hygiene practices and social distancing protocols, to stay home when sick, and to report any COVID-like symptoms.

- Display any directional signs in the hallways or stairways.

- Indicate maximum capacity for elevators or bathrooms.

Signs were displayed in and outside of elevators indicating that they would be cleaned every 2 hours during core business hours (7 a.m. to 5 p.m.). However, we were unable to identify any signs concerning the cleaning of the bathrooms. No signage (i.e., cleaning log) was posted stating that the cleaning took place in either the elevators or bathrooms.

OPM has 22 program offices in the TRB, located in Washington, DC. Office staffing ranges from 1 to over 300 people per program office. Graph 1, on the following page, shows the breakdown of current total staff in the TRB per office, including contractors.

Report No. 4K-FS-00-20-042

Graph 1: Theodore Roosevelt Federal Building Occupancy by Program Office

Bar chart values by program office:
CFO 144, CIO 311, CLIA 16, DCSA 63, EEO 5, ES 169, FSEM 37, HI 147, HRS 113, MSAC 22, OC 15, ODI 4, OD 26, OGC 33, OIG 94, OPMHR 23, OPO 14, OSDBU 1, PPA 55, OPIM 7, RS 261, SEAP 23

■ Total Existing Staff
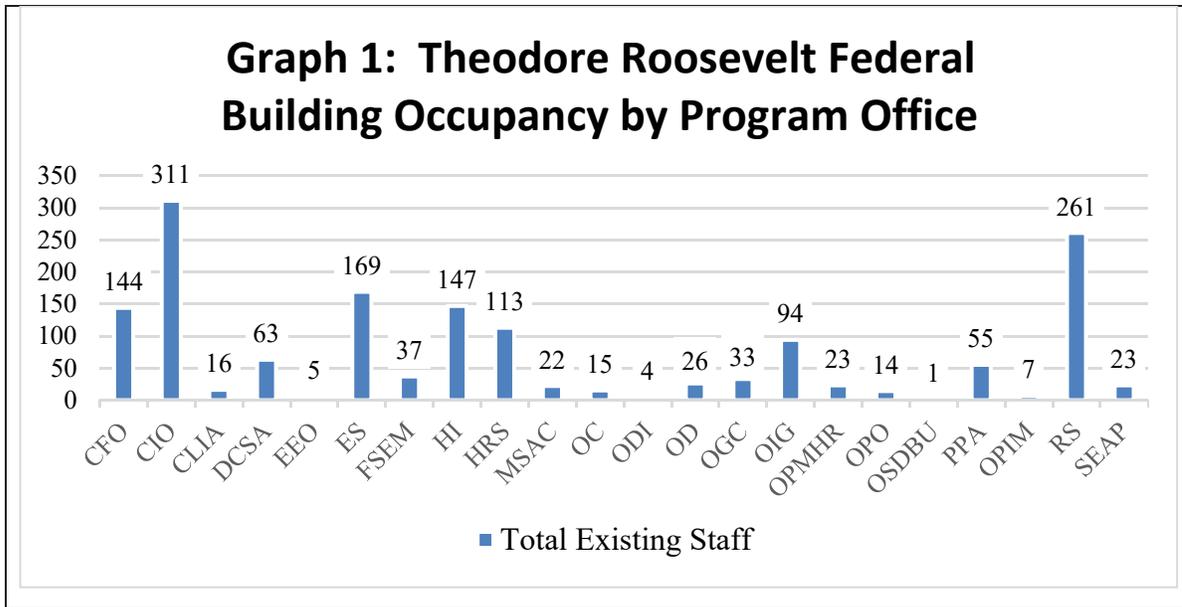
Source: OIG Analysis of TRB Building Group Occupancy utilization rates data (office space only).

We identified varying levels of preparedness for returning employees to the TRB within the program offices. Program offices did not always display:

- Maximum occupancy signs for closed in shared spaces, such as conference, training, break, file/mail, or team rooms and kitchens/pantries;

- Reminder signs for social distancing and cleaning/sanitizing in shared locations such as conference, training, break, file/mail, and team rooms as well as kitchens/pantries; and

- Directional signs or arrows for entrances, exits, pathways, and hallways.

Some program offices, as of our walk through, had yet to implement any measures for returning employees.

OPM's Guide did address protocols implemented in general during Phases 1 and 2 for signage and building management/cleaning. Excerpts from pages 3–5 and 7 of the Guide are below.

Excerpts (Phases 1 and 2)
Signage: Facilities will increase signage reminding employees to employ recommended hygiene practices and social distancing protocols, to stay home when sick, and to report any COVID-like symptoms.

> **Building Management/Cleaning**: Routine building management activities and cleaning services with additional cleaning of high-touch areas i.e., handrails, elevators, bathrooms) will be initiated or will continue. All facilities will be sanitized using EPA-approved products. Once cleaned, each suite or work area, including locked and secured areas, will be closed and have signage posted stating that the sanitization took place.

> **Building Management/Cleaning**: Building management/cleaning schedules and services are maintained at normal operations with additional cleaning provided for all high touch/building-wide use areas (i.e. elevators, restrooms, building entrances/exits, etc.) multiple times throughout the day. Surge capacity is available to perform deep cleaning in accordance with CDC guidelines when needed.

Guidance provided in the GSA's *Return to Workplace Strategy Book: Preparing for Reopening* state that:

- Occupant agencies are responsible for:

  - Posting any additional signage in their immediate work areas, and

  - Cleaning and disinfecting its individual workspaces. Cleaning staff must wipe down all solid frequently touched surfaces in building common areas at least daily.

- Physical distancing is a key factor in mitigating the spread of COVID-19. Planning for physical distancing is a key principle in creating facility readiness.

According to CDC's *Interim Guidance for Businesses and Employers Responding to COVID-19*, updated May 2020, all employers need to consider how best to decrease the spread of COVID-19 and lower the impact in their facilities. Therefore, actions considered should include activities to:

- Prevent and reduce transmission among employees, businesses and employers should consider conducting daily in-person or virtual health checks of employees before they enter facilities, educate employees about steps they can take to protect themselves at work and at home, and follow CDC cleaning and disinfection recommendations. As employees return to the workplace, signage offers a clear, effective way of communicating, educating, and encouraging healthy behavior.

- Protect employees at higher risk for severe illness through supportive policies and practices.

- Communicate supportive workplace polices clearly, frequently, and via multiple methods.

- Establish policies and practices for social distancing.

- Place posters that encourage hand hygiene at the entrance and in other workplace areas where they are likely to be seen.

- Routinely clean all frequently touched surfaces in the workplace to include but not be limited to handrails and doorknobs.

Employees deserve to know that their work environments are clean and protected as much as possible from exposure to COVID-19. OPM should follow its own guide to help prevent workplace exposures to COVID-19 by increasing signage reminding employees to employ recommended hygiene practices and social distancing protocols, stay home when sick, report any COVID-like symptoms, ensure cleaning/disinfecting is done, and offer additional signage to program offices. Of course, each program office will have its own unique considerations given the nature of its operations. There is no one-size-fits-all solution.

Recommendation 4

We recommend that the FSEM Director implement additional signage, as follows:

a. Display signs consistently at each entrance.

b. Display signs in shared/common areas such as restrooms, elevators, hallways, and stairways. These measures should include but not be limited to directional signs for social distancing, signage for maximum capacity, and reminders to employ recommended hygiene practices and social distancing protocols, to stay home when sick, and to report any COVID-like symptoms.

Management Response:

On January 20, 2021, when the President's EO on Protecting the Federal Workforce and Requiring Mask-Wearing was issued, OPM promptly posted additional signage that indicates face masks/coverings are required. Management included signage covered in its response.

OIG Comments:

OPM's actions indicated in the management response to display additional signage, post maximum occupancy signs in the elevators, and continue to inform employees in agency-wide emails of social distancing measures satisfy the intent of the recommendation and we consider it closed.

Recommendation 5

We recommend that the FSEM Director implement procedures to communicate to building occupants that cleaning/disinfecting of high-touch areas throughout the building had been completed. High-touch areas include but are not be limited to elevator buttons, rails in the stairways, and faucets and knobs in bathrooms throughout TRB.

Management Response:

FSEM manages the custodial services contract but not the contractor's personnel. The vendor is fulfilling the facilities contract as agreed. Through its custodial services contract, OPM increased the frequency of cleaning and disinfecting of the multi-touch surfaces in common areas (i.e., handrails, elevators and elevator buttons, handicap push paddles, vending machines, door handles, and water fountains) to every two (2) hours and began deep cleaning services in office suites as requested for incidents of confirmed or suspected exposure to COVID-19.

To allay concerns of employees who are on maximum telework, this has been communicated by the Acting Director in routine messages through emails and postings on the Intranet. OPM will continue to keep employees and building occupants informed through OPM's emails, throughout the facilities of cleaning and any changes to the cleaning services. Management will also consider other agencies' best practices such as GSA's *Return to Workplace Strategy Book* that were published and updated in September [2020], the later stages of the pandemic.

OIG Comments:

The actions taken to post additional cleaning and disinfecting signs and the use of routine email messages, Intranet, periodic meetings, and additional signage to keep employees and building occupants informed satisfy the intent of the recommendation and we consider it closed.

Recommendation 6

We recommend that the FSEM Director offer additional signage to program offices to include behavior and etiquette at workspaces and suggestions for cleaning and disinfecting workspaces.

The signage should include displaying: (a) the maximum capacity for shared spaces; (b) directional movement signs for entrances, exits, hallways, and pathways; (c) reminders throughout shared locations for social distancing and cleaning/sanitization practices; (d) reminders to employ recommended hygiene practices and social distancing protocols, and (e) reminders to stay home when sick and report any COVID-like symptoms to mangers.

Management Response:

Management believes that OPM has appropriate signage throughout all of its locations. FSEM updated approved signage at OPM locations and provided them to program offices to display within their offices and locations. Signage, approved by OPM leadership, is being displayed and is visible at OPM locations. In addition, management will continue to refresh signage as new signs become available.

OIG Comments:

The actions taken to update approved signage at OPM locations and provide signage to program offices satisfies the intent of the recommendation and we consider it closed.

We conducted this evaluation in accordance with the *Quality Standards for Inspection and Evaluation*, January 2012, approved by the Council of the Inspectors General on Integrity and Efficiency.

The objective of this evaluation was to determine whether OPM's plan for returning employees to its offices followed existing guidance and best practices to reduce the risk of employees' exposure to COVID-19.

We performed this evaluation at the OPM Headquarters in Washington, DC, between July 2020 and December 2020. Our evaluation included information and statistics from April 1, 2019, to the present. Other periods were used as deemed necessary to satisfy the evaluation objective.

As part of the planning phase of this evaluation, we met with key officials responsible for the management and oversight of OPM's Guide to gain an understanding of its current state, surrounding activities, and communications. We gathered information to verify operations and obtained statistics to identify OPM facilities and numbers of Federal employees. We also reviewed Federal COVID-19 guidelines, as well as OPM policies and procedures relevant to the development and implementation of OPM's Guide. In addition, we examined reports and other documentation received to identify leads and areas of concern. Our results are limited by the scope and methodology that we employed to meet our evaluation objectives and not to verify FSEM past conditions or predict future actions.

To answer our objective, we performed the following procedures:

- Obtained clarification and factual information on OPM's Guide;

- Reviewed relevant guidance that governs plans to reopen OPM offices during the COVID-19 pandemic and guidance and instructions disseminated to program offices;

- Gathered information from program offices to determine their roles and responsibilities, including coordination with and information communicated to OPM FSEM;

- Evaluated OPM's Guide against existing CDC and Occupational Safety and Health Administration guidance; and

- Walked through selected offices and common areas within the TRB located in Washington, DC, to determine whether OPM was complying with existing guidance and

managers were employing best practices to reduce the risk of employee exposure to COVID-19.

We selected a judgmental sample of 10 COVID incidents (out of 72) as of September 30, 2020, to determine whether OPM provided timely notification of COVID-19 incidents to employees and building occupants and to verify that the affected areas were cleaned and disinfected. We selected a variety of dates, locations, and program offices, as well as employees and contractors. In addition, we verified data captured by FSEM of the incidents to ensure the data were supported by source documents.

We determined the data we used to support our findings, conclusions, and recommendations were reliable. The evidence obtained provides a reasonable basis for our findings and conclusions based upon our objective.

We only reviewed the new *COVID-19 Safety Plan* as it related to the findings and recommendations mentioned. We did not review it for compliance with the Executive Order or other requirements mentioned in this final report.

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

Facilities, Security
and Emergency
Management

March 26, 2021

Mr. William W. Scott, Jr.
Chief, Office of Evaluations and Inspections
Office of the Inspector General
U.S. Office of Personnel Management
1900 E Street, NW
Washington, DC 20415

Dear Mr. Scott:

Thank you for providing the U.S. Office of Personnel Management (OPM) the opportunity to respond to the Office of the Inspector General (OIG) draft report, *Evaluation of OPM's Plan to Reopen Offices During the COVID-19 Pandemic*, 4K-FS-00-20-042, dated December 23, 2020.

For most of us, the coronavirus disease 2019 (COVID-19) pandemic is unlike any other serious outbreak of disease that we have experienced. Federal agencies, including OPM, have developed pandemic plans and shared best practices to help address this public health crisis. OPM's priority during COVID-19 has been to protect the health and safety of our employees and stakeholders while continuing to operate prudently and efficiently with minimal disruptions to the agency's essential functions.

On February 19, 2021, OPM issued the COVID-19 Safety Workforce Plan ("Plan"),[1] to protect the OPM workforce, contractors, other building occupants, and visitors to OPM facilities and to stop the spread of COVID-19. The plan was developed in accordance with Executive Order (EO) 13991 (86 FR 7045), *Protecting the Federal Workforce and Requiring Mask-Wearing*[2] and supersedes the *Returning to OPM Facilities Preparedness Guide*, dated May 29, 2020.

Pursuant to the EO 13991 and the Plan, OPM has remained in maximum telework operating status in all of our locations, directed that only organizations that have onsite responsibilities currently not suitable for telework are required to work onsite at OPM duty locations, implemented a 25% occupancy limit, and mandated mask-wearing for OPM employees; contractors; and, visitors and comport with any current Center for Disease Control (CDC) and Occupational Safety and Health Administration (OSHA) guidance. Additionally, signs communicating this requirement were placed conspicuously at the entrance to every OPM facility and in common spaces.

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[1] https://www.opm.gov/policy-data-oversight/covid-19/opmcovid19safetyplan.pdf
[2] https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html

OPM originally adopted a maximum telework posture in mid-March 2020 in response to the COVID-19 pandemic, which significantly reduced the number of employees on-site at our locations. Since March 2020 and prior to issuance of the February 2021 Plan, some OPM's facilities moved between phase 3 or 2 of OPM's reopening guidance, based on local health conditions, but none fully reopened.

Statement removed by OPM OIG. It is no longer relevant to this final report.

We note, at the outset, that notwithstanding the pandemic, and the need to employ a maximum telework stance, the OPM workforce has remained committed to carrying out its responsibilities by working throughout the maximum telework operating status. We have continued to evaluate the needs of our employees during this public health crisis and have implemented safety principles OPM-wide at all official worksites around the nation that applies to all on-duty or on-site Federal OPM employees, on-site Federal contractors, and any other person in OPM space.

OPM's COVID-19 Coordination Team, under the direction of the Safer Federal Workforce Task Force,[3] will continue to monitor updates to guidance from the CDC and OSHA, and will make modifications to our policies and procedures as appropriate. Due to these unprecedented times, we thoroughly reviewed mandates, recommendations, and best practices while simultaneously striking a balance to demonstrate that we were addressing the needs of our employees, building occupants, and stakeholders. We have achieved our objectives and followed the applicable guidance cited by the OIG in its draft evaluation report, including guidance from subject matter experts at the White House, CDC, and General Services Administration (GSA).

The draft OIG evaluation report identifies 3 findings and issues 6 recommendations to improve OPM's plan to reopen offices during the COVID-19 pandemic. OPM has developed our plans and procedures to effectively and safely take steps to protect on-site Federal OPM employees, on-site Federal contractors, and any other person in OPM space, as well as prepare for a safe, healthy, and effective return to the workplace at the appropriate times.[4]

Recommendation 1: We recommend that the Director, FSEM in coordination with OPM HR take steps to ensure timely notification of COVID-19 incidents to employees and building occupants of their possible exposure.

Management Response:

OPM has taken steps quickly to provide appropriate and timely notifications to employees and building occupants of possible exposure of COVID-19 incidents, in accordance with our policies and procedures and with an abundance of caution. OPM understands the urgency and importance of responding in a timely fashion to incident cases and will continue to document our notifications to demonstrate our compliance with OPM policies and procedures. We believe we

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[3] The task force was established under Executive Order 13991.
[4] OPM recognizes that different OPM facilities may reopen at different times, depending on the conditions in their communities.

have met the notification requirements. The COVID-19 Incident Notification and Cleaning Protocol document (Attachment 1) lays out steps taken to initiate the tracking of incidents reported and the key personnel involved in the process, and has been updated to include the types of records that will be stored by the FSEM/Situation Room (SITROOM). These records were already noted on the COVID-19 Incident Response Checklist (Attachment 6) but have also been added to the COVID-19 Incident Notification and Cleaning Protocol document.

The supervisor reports the incident to the SITROOM, and immediately, upon receipt of a COVID-19 Incident Report Form (Attachment 7), the SITROOM follows the protocol in the COVID-19 Incident Notification and Cleaning Protocol (Attachment 1) and COVID-19 Incident Response Checklist (Attachment 6). The SITROOM removes specific information from the incident report form before notifying key personnel (i.e., OPM HR, FSEM Director, and FSEM/Facilities Management) who will then take appropriate actions to begin the notification, contact tracing, and cleaning processes. This notification informs OPM HR to initiate contacting the supervisor who reported the incident to begin the contact tracing process. An individual who tests positive for COVID-19; was exposed to an individual who tested positive for COVID-19; or suspects that he or she has COVID-19 or was possibly exposed to COVID19, will report the situation to his or her supervisor (or, for an employee of an OPM contractor, the onsite supervisor).

The SITROOM documents and maintains a log of incident reports, emails relative to the reporting of incidents, completion of cleanings, and the COVID-19 Incident Report Form. These documents are stored on a drive that is accessed by designated SITROOM personnel. The following files are maintained by the SITROOM:

- Redacted incident report form with a unique report number that will be used to reference the incident;

- Copy of email communication;

- Record of phone calls to key personnel regarding the incident (i.e., AD/OH, OPM HR, FSEM Director, Situation Room, and OPO (if exposure/infected person is a contractor));

- Record of when cleanings are completed and when key personnel are notified of this action;

- Receipt of updated test results and when key personnel are notified of this activity;

- Updated log of COVID-19 incidents, updated COVID-19 report graph spreadsheets, and updated COVID-19 Daily Situation Report (SITREP).

OPM also provided documentation containing email communication between OPM HR and the supervisor for the impacted employee(s) for six cases referenced in the OIG findings. These emails are in the attachment.

In March 2020, during the early stages of the COVID-19 pandemic, OPM, like many Federal agencies, did not have shelf-ready and comprehensive plan, protocols, and procedures established to manage the COVID-19 specific crisis. As referenced in Table 1- 2(R) (Attachment 4), incidents that occurred when incident reporting was relatively new and in the process of being developed may not have documentation on notifications to OPM employees and building occupants or confirmation of cleaning. Additionally, during this time, some medical facilities were not testing for COVID-19 unless individuals showed severe systems; therefore, some individuals may not have been tested. March 2020 was also the timeframe when the Washington, DC Area Operating Status Maximum Telework was announced (Attachment 5).

Since March 2020, however, OPM developed a streamlined process to log, collect, and track incident reporting, notification, and contact tracing. OPM has continued to make improvements that have been incorporated in the OPM COVID-19 Safety Plan. (Attachment 12).

Response to Finding for Table 1:

After further collaboration with OPM HR, we found that of the nine incidents cited by OIG, an appropriate OPM official quickly notified impacted individuals in six of these cases, rather than the five cases we previously provided to the OIG. Email correspondence for these six cases is attached.

> Statement removed by OPM OIG. It is no longer relevant to this final report.

 See Attachment 3– Notifications from OPM Officials RE COVID-19 Incidents (for cases #5, #20, #35, #49, #62, and #71).

(1) Case #5, dated March 18, 2020, is email correspondence between the OCIO supervisor, OPM HR, and FSEM communicating that notifications would go to the building manager for that facility, the COR, and contract lead, thereby informing them of the incident and providing guidance to have affected individuals telework.

> Statement removed by OPM OIG. It is no longer relevant to this final report.

(4) Case #20, dated April 28, 2020, is email correspondence between the supervisor and OPM HR where OPM HR provides guidance to the supervisor regarding notifying employees.

(5) Case #35, dated June 15/18, 2020, is email correspondence between OPM HR and OC, which includes FSEM and the OCIO, where OC provided an approved message to OPM HR for distribution to the impacted personnel.

(6) Case #49, dated July 17, 2020, is email correspondence between OPM HR and RS, which provides the supervisor with guidance regarding notification to employees.

(7) Case #62, dated August 13, 2020, is email correspondence between the OPM HR in Boyers and the supervisor discussing contact tracing and the determination of notification to another employee.

> Statement removed by OPM OIG. It is no longer relevant to this final report.

(9) Case #71, dated September 21, 2020, is an email between OPM HR and the supervisor in the OCFO where OPM HR advised the supervisor to notify the impacted employees.

We could not locate notification documentation for one case in March 2020, because it was during the early stages of COVID-19, when OPM was beginning to prepare a strategy to manage the situation (and within days of the announcement of maximum telework for employees).

OPM requests that the OIG update its Table 1 to reflect the information OPM provided in Table 1-2(R) (Attachment 4). We also added an explanation for the nine cases to Table 1-2(R) and included documentation that references notifications to impacted building occupants. See HR Notifications RE COVID-19 Exposure (Attachment 2) and Notifications from OPM Officials RE COVID-19 Exposure (Attachment 3).

Recommendation 2: We recommend that the Director, FSEM, institute a quality assurance plan to ensure COVID-19 incident related cleaning and disinfection services are completed.

Management Response:

OPM did implement procedures to confirm that cleaning activities are being completed in a timely way. We updated the COVID-19 Incident Notification and Cleaning Protocol document (Attachment 1) to include documents the SITROOM will maintain (i.e., emails relative to the completion of cleanings, incident reports and other emails relative to the reporting of incidents, and the COVID-19 Incident Report Form).

In March 2020, OPM modified its custodial services contract to include additional deep cleaning and disinfecting services to comply with guidelines set by the Centers for Disease Control and Prevention (CDC) and the Office of Management and Budget (OMB) in response to COVID-19. OPM developed a streamlined process to log and track confirmation of notifications and cleanings for confirmed or suspected COVID-19 incidents using a standardized protocol to capture all details in a centralized location. Documents associated with this are: Attachment 1, Attachment 6, and Attachment 7 – OPM Form 5044 – COVID-19 Incident Report. All designated key employees are notified and informed of the incident to timely respond.

When the FSEM Facilities Division Director is notified of a confirmed or suspected incident, a timely notification is sent to the contractor engaged to clean and disinfect the location(s). OPM directs appropriate vendors and facility management contacts to clean and disinfect all areas where there have been confirmed or suspected COVID-19 incidents, in accordance with our contracts and facility agreements. The vendor is promptly notified of the need for cleaning and disinfecting of the area at the onset of COVID-19 so that the contractor may sanitize it in accordance with guidance by CDC. The requirements of the cleaning staff were adjusted so they would be notified in a timely fashion and required to respond immediately to disinfect the areas. After the cleaning is complete, the appropriate facilities manager notifies the SITROOM personnel of the need to document the requirement and maintain a log when cleaning and disinfection are completed at impacted areas. This record is stored on a drive where access is

granted only to SITROOM personnel. Each incident report has a unique identifier to capture all follow-up data associated with it and is accessible only by key designated employees. The protocol document lays out the steps taken by the SITROOM to initiate the tracking of incidents reported, key personnel involved in the process, and the types of records that will be stored.

In March 2020, during the early stages of the pandemic, we quickly reacted to incidents using oral and email communications with good intentions to expedite instructions to remedy situations. To better manage our operations, we adjusted our protocols to incorporate long-term strategies such as integrating the cleaning information into our notification protocol. We have a more coordinated collaboration approach between program offices and a reporting process where incidents are reported to the Office of the Director as another means of quality assurance. Since that time, we have made improvements to our documentation of email, verbal reports of cleaning, and disinfecting confirmations. The OPM COVID-19 Safety Plan ("the Plan) includes the frequency of cleaning performed in common high touch/high-density spaces, such as lobbies, restrooms, elevators, and stairwells.

Response to Finding for Table 2:

We request the OIG reflect in its final report that OPM provided email documentation pertaining to five cases referenced in the OIG's finding that show email communications that reference cleaning made at impacted areas where there were OPM-managed facilities, and that an appropriate OPM official contacted the GSA-managed facility to communicate cleaning needed at their facility. See Attachment 3 – Notifications from OPM Officials RE COVID-19 Incidents for email correspondence related to cases #5, #6, #20, #49, and #71.

(1) Case #5, dated March 18, 2020. OPM requests that the OIG remove the cleaning inquiry from the report because case #5 is a GSA-management facility. Attached is email correspondence between the OCIO supervisor, OPM HR, and FSEM. Because this is a GSA-managed facility, OPM would not have the authority to clean this facility. As stated in the OPM COVID-19 Safety Plan, after each reported incident at any GSA-managed facility where OPM employees work, GSA contacts OPM FSEM upon completion of the deep cleaning to confirm that it was done. Once the areas are deep cleaned, FSEM/Facilities notifies the SITROOM to document when the cleaning was completed.

(2) Case #6, dated March 18, 2020, is email correspondence between the Acting FSEM Director and the supervisor regarding contacting GSA regarding cleaning at their facility.

> Statement removed by OPM OIG. It is no longer relevant to this final report.

(4) Case #20, dated April 28, 2020, is email correspondence between OPM HR and the supervisor where OPM HR informs the supervisor on April 30, 2020, that the impacted area had been deep cleaned.

(5) Case #49, dated July 17, 2020, is email correspondence between OPM HR and RS, with FSEM requesting the room number to clean the facilities. However, because FSEM did not receive timely confirmation from the program office, FSEM cleaned the entire suite. We only have oral confirmation from the FSEM/Division Director for Facilities Management.

We have also added an explanation for the five (5) cases and confirmation of cleaning and disinfecting of the impacted areas on Table 1-2(R) and included documentation that references cleaning at impacted locations where appropriate. See HR Notifications RE COVID-19 Exposure (Attachment 2), Notifications from OPM Officials RE COVID-19 Exposure (Attachment 3), and the Cleaning and Disinfecting document (Attachment 8).

Recommendation 3: We recommend that the Director, FSEM update the *Returning to OPM Facilities Preparedness Guide* to require and encourage employees and other building occupants to wear face coverings as recommended in CDC guidance.

Management Response:

The Guide is obsolete and was replaced with the OPM COVID-19 Safety Plan, which requires the wearing of face masks/coverings. On Wednesday, January 20, 2021, the new Acting OPM Director informed OPM employees and employees of contractors via email that effective immediately they were required to wear face masks/coverings in OPM facilities. OPM has implemented this mandate for all OPM facilities in a manner consistent with Executive Order 13991, *Protecting the Federal Workforce and Requiring Mask-Wearing*, issued on January 20, 2021, and will implement any forthcoming implementing guidance. As required by the Executive Order, we will continue to comply with CDC guidelines for physical distancing and other public health measures in all OPM facilities.

The OIG cites that, during the walkthrough of the OPM's headquarters building, multiple workers and security guards were not wearing face coverings. Before January 20, 2021, OPM encouraged, but did not require face coverings. The OIG also cites the lack of leadership support for making this recommendation for a mask mandate. The prior OPM leadership was involved in all activities and decisions made about how we managed the COVID-19 pandemic, including the contents of the former Guide. Most of the leadership communications to employees included references to the CDC guidance and encouragement (but not a requirement) of face masks/coverings when employees were unable to socially distance. As stated above, OPM has now implemented a mask mandate in a manner consistent with a January 20, 2021, Executive Order. Future communications will include the requirement to wear face masks/coverings (unless an accommodation has been authorized), as was stated in the Acting OPM Director's email on January 20, 2021.

Prior to the face mask mandate, OPM ordered and distributed cloth face coverings and disposable face masks to 25 OPM offices in different geographical locations to make them available to employees and building occupants. Security guards at the Theodore Roosevelt Building (TRB) will provide a face covering/mask to anyone entering the building without a mask (and without an accommodation) to enable OPM to comply with the requirements of the Executive Order. In a review of emails from former Acting Director Rigas to "All OPM" between June 9th and December 11th, we found 16 instances where the former Acting Director referenced CDC guidance and/or face masks/coverings. See Attachment 9 - Acting Director Emails. In a review of emails from OPM Human Resources between May 28th and December

29th, we found 7 instances where OPM HR cited CDC guidance and the use of face masks/coverings. See Attachment 2 – OPM HR Notifications RE COVID-19 Exposure.

Recommendation 4: We recommend that the Director, FSEM implement additional signage, as follows:

    a. Signs should consistently be displayed at each entrance.
    b. For shared / common areas such as restrooms, elevators, hallways, and stairways. These measures should include but not be limited to directional signs for social distancing, signage for maximum capacity, and reminders to employ recommended hygiene practices and social distancing protocols, to stay home when sick, and to report any COVID-like symptoms.

Management Response:

We are posting signage consistently at OPM facilities. OPM began posting signage at its facilities in March 2020 and has continued to refresh the signs with updated versions. As this pandemic is on-going, we will continue to update and post additional signage as necessary.

The OIG cites it found one sign at the entrance to the building from the garage asking anyone experiencing COVID-19 symptoms to stay home or contact his or her supervisor. That particular sign has been updated several times. The version cited by OIG was posted in the very early stages of the COVID-19 pandemic at the employee and visitor entrances and parking garage at the TRB. Employees who are currently working in the facility will see an updated version of the pre-screening signage (below) than the one referenced in the draft evaluation report.

On January 20, 2021, when the President's *Executive Order on Protecting the Federal Workforce and Requiring Mask-Wearing* was issued, OPM promptly posted additional signage to inform Federal employees, contractors, and any other building occupant that face

masks/coverings are required in OPM facilities. Face mask required signage (below) was posted promptly at all entrances, to include the garage stairwell entrances, and by the ground and first floor elevator banks. They were also distributed to program offices at OPM facilities. The FSEM Graphics staff supports OPM's program offices that want to create new and customized signs; therefore, OPM can create adequate signage and make them visible at its facilities.
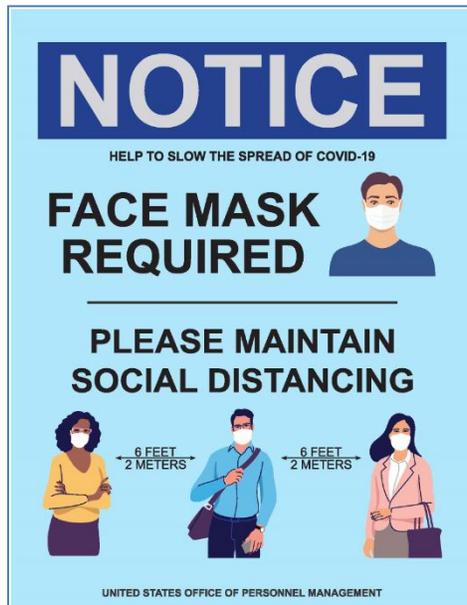
We recently refreshed our signage with 6 feet social distancing signs and placed them on the floors in the facilities, in addition to posting signage in the elevators that show its maximum occupancy is two (2) people at a time.

See Attachment 10 – Signage for an illustration of signage that is posted throughout OPM facilities. Below is a list of the available signs.

- Pre-screening questions
- Hand washing best practices
- Facts about COVID-19
- FSEM contact information to report a shortage of supplies
- Floor markers
- Maximum capacity signs in elevators

- Elevator Cleaning
- The proper way to wear a mask
- What to do if you feel sick at work
- Next steps for employees and contractors if they have symptoms
- Face masks/coverings are required
- Stairwell directional signage
- 6 ft social distance floor signs

Recommendation 5: We recommend that the Director, FSEM implement procedures to indicate how it would communicate to building occupants ensuring that cleaning / disinfecting of high touch areas throughout the building had been completed. The high touched areas include but are not limited to elevator buttons, rails in the stairways, faucets, and knobs in bathrooms throughout TRB.

Management Response:

FSEM manages the custodial services contract but not the contractor's personnel. The vendor is fulfilling the facilities contract as agreed. Through our custodial services contract, OPM increased the frequency of cleaning and disinfecting of the multi-touch surfaces in common areas (i.e., handrails, elevators and elevator buttons, handicap push paddles, vending machines, door handles, and water fountains) to every two (2) hours and began deep cleaning services in office suites as requested for incidents of confirmed or suspected exposure to COVID-19.

Employees who currently report to the workplace see the cleaning staff working diligently to keep the facilities clean and see signage posted as a reminder to use proper hygiene practices. To allay concerns of employees who are on maximum telework, this has been communicated by the Acting Director in routine messages through emails and postings on the Intranet. See Acting Director Emails (Attachment 9).

OPM will continue to keep employees and building occupants informed through OPM's emails, intranet, periodic meetings, and signage throughout the facilities of cleaning and any changes to the cleaning services. In fact, on February 25th of this year, FSEM and OPM HR held an OPM COVID-19 Safety Plan Lunch and Learn session with employees to introduce the newly updated and issued plan. During that session, employees asked questions and we provided answers about the plan and our cleaning protocols. The Acting Director has also re-implemented monthly Town Hall meetings with all OPM employees. These Town Hall meetings have been and will continue to be used to communicate with OPM employees to provide information about how we are addressing the COVID situation at all OPM locations including cleaning protocols and how we are working hard to keep employees safe. After every reported exposure and possible exposure, the SITROOM receives cleaning confirmation once complete by email, the information is documented in the log, and a copy of the email is filed. OPM also considers other agencies' best practices such as GSA's *Return to Workplace Strategy Book* that was published in the later stages of the pandemic in September 2020.

Recommendation 6: We recommend that the Director, FSEM offer additional signage to program offices to include behavior and etiquette at workspaces, cleaning and disinfecting workspaces. The signage should include displaying: (a) the maximum capacity for shared spaces; (b) directional movement signs for entrances, exits, hallways, and pathways; (c) reminders throughout shared locations for social distancing and cleaning / sanitize; (d) reminders to employ recommended hygiene practices and social distancing protocols, and (e) reminders to stay home when sick, reporting any COVID-like symptoms to mangers.

Management Response:

OPM has appropriate signage throughout all of our locations, in compliance with CDC and GSA guidance. FSEM updated approved signage at our locations and provided them to program offices to display within their offices and locations. Signage, approved by OPM leadership, is being displayed and is visible at OPM locations. Signage is posted at the following locations and

has been up since March 2020. As previously mentioned, we continue to refresh signage as new signs become available at the following locations.

- Prescreening signs direct TRB occupants (employees, contractors, and visitors) to review the questions and determine if they should enter the TRB, and also inform them of the next steps they should take. These signs are located at the TRB main entrances (E Street Employee and Visitor entrances, Virginia Avenue entrance, and the breezeway entrance to the parking garage.

- Various versions of hand washing signs show the best practice for keeping hands clean. These signs are in every restroom.

- Facts about COVID-19 signs provide 5 facts about the disease to help stop rumors. This sign is posted throughout the TRB and other OPM facilities.

- Directional signs consisting of arrows to help control traffic flow through the building and offices. They are posted at the main entrances on the floors in the E Street Lobby, Virginia Avenue, and the Breezeway.

- The elevator cleaning sign shows the frequency of cleaning in high-touch areas such as the elevators, call buttons, and the lobbies. These signs are posted in the elevator banks and on the elevators.

- "Feeling sick" signs inform building occupants what to do if they feel sick while at work. These signs are posted on every floor in the office suites, halls, and stairwells.

- The "stop the spread of germs" signs encourage employees to socially distance themselves, wear a mask, wash hands, clean and disinfect when touching high-touch surfaces, and stay home when sick. These signs are in the elevator banks and on the restroom doors.

- "Seat closed" signs encourage employees to limit the capacity within an area (office, conference room, etc.). "Seat closed" signs are placed in conference rooms and were distributed to program offices to use in their office suites.

- "Mask wearing tips for your protection" signs are in the elevator banks, breezeway entrance, and on the E street entrances.

- "Symptoms of Coronavirus (COVID-19)" signs inform building occupants of symptoms of the virus and are at OPM facilities.

- "Face masks/coverings required" signs inform building occupants they must comply and wear a face mask when in OPM facilities.

- Maximum capacity signs in elevators encourage social distancing.

- Stairwell directional signage encourage social distancing.

- 6 ft social distance floor signs encourage social distancing.

See Attachment 10 – Signage to see an illustration of signs. When signs become damaged, FSEM staff replace them. As this pandemic is on-going, we will continue to update and post additional signage as necessary.

OPM's goal remains responding to and recovering from the COVID-19 pandemic. The FSEM essential employees have been functioning effectively in an initially uncertain environment through a flexible and adaptable posture that has evolved over the past 12 months, reporting on-site to work while many of their colleagues are on maximum telework operating status. The essential employees are operating during these unprecedented times to keep the facilities operational and secure. These invaluable employees continue to return to the workplace and endure each day despite the myriad uncertainties of the COVID-19 pandemic – never asking for the "Thank you" they deserve.

I appreciate the opportunity to respond to the draft evaluation report. We have also provided technical comments on the draft evaluation report – See Attachment 11 – Technical Comments. If you have any questions regarding our response, please contact me.

Sincerely,

EVERETTE HILLIARD
Digitally signed by EVERETTE HILLIARD
Date: 2021.03.26 17:55:38 -04'00'

Mr. Everette (Reid) Hilliard
Director
Facilities, Security, and Emergency Management
U.S. Office of Personnel Management
1900 E Street, NW, Room 1310
Washington, DC 20415

Attachment 1 - COVID-19 Incident Notification and Cleaning Protocol

Attachment 2 - HR Notifications RE COVID-19 Exposure

Attachment 3 - Notifications from OPM Officials RE COVID-19 Exposure

Attachment 4 - Table 1-2(R)

Attachment 5 - Washington DC Area Operating Status - Maximum Telework

Attachment 6 - COVID-19 Incident Reporting Checklist

Attachment 7 - OPM Form 5044 - COVID-19 Incident Report

Attachment 8 - Case #9 Cleaning and Disinfecting

Attachment 9 - Acting Director Emails

Attachment 10 - Signage

Attachment 11 - Technical Comments

Attachment 12 - OPM COVID-19 Safety Plan

Report Fraud, Waste, and Mismanagement

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Washington Metro Area: (202) 606-2423

By Mail: Office of the Inspector General
U.S. Office of Personnel Management
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Room 6400
Washington, DC 20415-1100