

EVALUATION OF SBA'S CORONAVIRUS RECONSTITUTION PLAN

REPORT NUMBER 21-18 | JULY 12, 2021





EXECUTIVE SUMMARY

EVALUATION OF SBA'S CORONAVIRUS RECONSTITUTION PLAN

Report No.
21-18

July 12, 2021

What OIG Reviewed

We evaluated actions the Small Business Administration (SBA) took to responsibly return employees, contractors, and visitors to SBA offices.

Our objectives were to determine (1) whether the agency established a COVID-19 reconstitution plan in accordance with applicable federal guidance and (2) if the agency adhered to that plan.

To answer our objectives, we reviewed SBA's Coronavirus Disease 2019 (COVID-19) Reconstitution Plan, White House and Centers for Disease Control and Prevention (CDC) Opening Up America Again guidelines. We also reviewed other federal guidelines from the Office of Personnel Management, the Office of Management and Budget, and the Occupational Safety and Health Administration. In addition, we reviewed SBA's policies and procedures used to mitigate the risk of COVID-19 exposure to SBA employees to include the February 2021 COVID-19 Workplace Safety Plan which replaced the Agency's COVID-19 Reconstitution Plan established in May 2020. We interviewed the SBA officials who established and implemented the plans and obtained supporting documentation. We selected the only two occupancy decisions for SBA's Washington DC headquarters available to verify whether SBA adhered to its procedures. We also selected 19 of the 231 individual COVID-19 cases that SBA reported in its COVID-19 tracker as of January 4, 2021, to verify whether SBA adhered to its exposure tracking procedures.

What OIG Found

SBA established its May 2020 COVID-19 Reconstitution Plan in accordance with applicable federal guidance. The SBA replaced the reconstitution plan with its new COVID-19

Workplace Safety Plan in February 2021. We identified issues with the implementation of the May 2020 reconstitution plan that should be addressed to help the agency safeguard its employees from contracting and spreading COVID-19 in the workplace. Specifically, we found agency did not follow occupancy procedures for advancing, or reverting phases at the Washington, DC headquarters. SBA also did not implement exposure tracking protocols to ensure it consistently traced COVID-19 cases. We found the agency did not consistently notify its staff of presumed or confirmed COVID-19 cases in the sampling of cases we analyzed. SBA did not consistently contact potentially exposed personnel and ensure employees completed 14-day quarantine periods.

OIG Recommendation

We recommend SBA enforce the requirements of the February 2021 COVID-19 Workplace Safety Plan by consistently applying procedures for occupancy and exposure tracking and accurately record and maintain supporting documentation for all reported COVID-19 cases.

Agency Response

SBA management concurred with our recommendation to enforce the requirements of its February 2021 COVID-19 Workplace Safety Plan and its planned actions resolve the recommendation. SBA officials plan to track and document cases of exposure with an emphasis on maintaining both workforce safety and individual privacy



Office of Inspector General

U.S. Small Business Administration

DATE: July 12, 2021

TO: Isabella Casillas Guzman
Administrator

FROM: Hannibal "Mike" Ware
Inspector General

SUBJECT: Evaluation of SBA's Coronavirus Reconstitution Plan

This report represents the results of our evaluation of SBA's Coronavirus Reconstitution Plan. We considered management comments on the draft when preparing the final report and SBA management agreed with our recommendation. Based on management's comments, we have updated finding 2 to consistently describe SBA's efforts to trace and isolate COVID-19 cases as exposure tracking instead of contact tracing.

We appreciate the courtesies and cooperation extended to us during this evaluation. If you have any questions, please contact me or Andrea Deadwyler, Assistant Inspector General for Audits, at (202) 205-6586.

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Introduction

On March 11, 2020, the World Health Organization declared the Coronavirus Disease 2019 (COVID-19) a pandemic. Following this declaration, federal agencies issued health, safety, and travel guidelines for employers to use in developing plans to help identify risk levels in workplace settings and to determine appropriate control measures.

Federal Guidance

On April 16, 2020, the White House in conjunction with the Centers for Disease Control and Prevention (CDC) issued the Opening Up America Again guidelines.¹ It outlined a three-phased, data-driven approach to help federal, state, and local officials reopen their economies and get people back to work safely.

Federal agencies were required to develop and implement agency-specific policies and procedures in accordance with federal regulations and industry best practices regarding:

- social distancing and personal protective equipment (PPE);
- temperature checks;
- testing, isolation, and contact tracing;
- sanitation;
- use and disinfection of common and high-traffic areas; and
- business travel.

On May 26, 2020, in support of Opening Up America Again, the CDC provided guidelines for federal agencies to safely return their employees to the workplace.² The CDC guide explained a three-phased re-entry strategy based on analysis of community infection rate trends and healthcare system capacities. Table 1 shows the CDC gating criteria, which describes six conditions and thresholds to be considered as federal agencies progress toward reoccupying workplaces.

Table 1. CDC Gating Criteria

No.	Condition	Threshold for Phase 1 Occupancy
1.	Decrease in newly identified COVID-19 cases	14-day downward trajectory (or near-zero incidence) of COVID-19 cases
2.	Decrease in emergency room visits for COVID-like illness	14-day downward trajectory (or near-zero incidence) of COVID-19 cases
3.	Decrease in emergency room visits for influenza-like illness	14-day downward trajectory (or near-zero incidence) of influenza-like illness

¹ Opening Up America Again (April 2020).

² CDC Activities and Initiatives Supporting the COVID-19 Response and the President's Plan for Opening America Up Again (May 2020).

4.	Decrease in percentage of positive severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2, the virus that causes COVID-19) tests	14-day downward trajectory (or near-zero incidence) of positive tests as a percentage of total tests
5.	Treat all patients without crisis care	Intensive care beds less than 80 percent full, more than 4-day supply of personal protective equipment
6.	Robust testing	Test results available in less than 4 days

Source: OIG generated based on CDC Activities and Initiatives Supporting the COVID-19 Response and the President’s Plan for Opening America Up Again.

Federal guidance recommends agencies to develop policies and procedures for employees to report when they are sick or experiencing symptoms of COVID-19 and actively encourage sick employees to stay home. In addition, federal guidance recommended employers implement a contact tracing process so appropriate restrictions could be implemented.

COVID-19 Agency-wide Pandemic Reconstitution Plan Issued May 2020

In response to the COVID-19 pandemic, the former SBA Administrator established a command center to oversee all COVID-19 related efforts, including the safe return of the workforce to SBA offices. The command center consisted of three teams that drafted and finalized the SBA COVID-19 Agency-Wide Pandemic Reconstitution Plan.³ On May 15, 2020, the then Administrator approved and distributed the plan. The purpose of the plan was to provide SBA leaders with guidance to safely return SBA employees to their workplaces. SBA has over 177 offices located throughout the 50 states, District of Columbia, and 5 territories with workplace occupancy ranging from 1 to 900. The reconstitution plan allowed SBA management the flexibility to establish health and safety strategies specific to each SBA office.

At a minimum, the plan required SBA managers to consider community infection trends, to include state and region as described in the CDC gating criteria, prior to advancing to the next occupancy phase.

- Phase 1 – Maximum of up to 25 percent staff occupancy
- Phase 2 – Maximum of up to 50 percent staff occupancy
- Phase 3 – Maximum of up to 75 percent staff occupancy

The plan also required all SBA offices to be sanitized using commercial-grade disinfectant on accessible surfaces before the start of phase 1 for staff occupancy. The plan further required that following occupancy, the building’s common area will continue to be regularly cleaned in accordance with General Services Administration’s guidelines.

The SBA reconstitution plan included workforce health and safety protocols necessary to control the spread of COVID-19. The protocols included social distancing practices, personnel security to protect employees from verbal or physical threats, and health

³ SBA COVID-19 Agency-Wide Pandemic Reconstitution Plan (May 2020).

screening services to prevent staff who have COVID-19 symptoms from entering the workplace.

The plan promoted the maximization of telework and other workforce flexibilities as authorized by the Office of Personnel Management and Office of Management and Budget (OMB) guidelines.⁴ In addition, the plan include Occupational Safety and Health Administration (OSHA) guidelines on infection controls through the enforcement of social distancing requirements.⁵

SBA provided virtual COVID-19 training designed to educate, inform, and prepare its employees and supervisors on returning to the workplace. The supervisor training included instructions on handling COVID-19 matters during occupancy phases.

Updated Federal Guidance

On January 20, 2021, the Administration issued new federal guidance requiring agencies to develop agency-tailored COVID-19 workplace safety plans.⁶ It also asked agencies to designate their own individual COVID-19 coordination teams. The new guidance provided model safety principles for federal agencies to follow, including:

- requiring mask wearing and social distancing in all federal buildings and land;
- establishing testing methodologies and protocols;
- investigating cases and contact tracing; and
- accessing and acquiring sufficient equipment, including PPE.

To protect the safety of the federal workforce and reduce community spread of COVID-19, the updated guidance mandated agencies establish a staffing plan and limit occupancy levels at or below 25 percent of normal occupancy standards during periods of high community infection transmission.

Updated COVID-19 Workplace Safety Plan Issued February 2021

In response to the new federal guidance, agency management issued the SBA COVID-19 Workplace Safety Plan in February 2021, replacing the COVID-19 Reconstitution Plan established in May 2020. The new plan outlined the Agency policies and requirements regarding COVID-19 related matters that may affect the health and safety and workplace operations.

To implement the new plan, SBA established the COVID-19 coordination team. The coordination team consists of several agency senior leaders from SBA Headquarters and field offices. The SBA coordination team is responsible for:

⁴ OMB Memorandum M-20-13, Updated Guidance on Telework Flexibilities in Response to Coronavirus (March 2020).

⁵ OSHA 3990-03, Guidance on Preparing Workplaces for COVID-19 (March 2020).

⁶ Executive Order 13991, Protecting the Federal Workforce and Requiring Mask-Wearing (January 2021); White House National Strategy for the COVID-19 Response and Pandemic Preparedness (January 2021); OMB Memorandum M-21-15, COVID-19 Safe Federal Workplace: Agency Model Safety Principles (January 2021).

- establishing, implementing, and monitoring compliance with safety protocols.
- updating the current COVID-19 workplace safety plan as necessary in consultation with the Safer Federal Workforce Task Force, established to provide ongoing guidance to heads of agencies.
- developing staffing plans that outlines which employee will work on-site full time, on-site occasionally, or fully remote.
- determining appropriate workplace closures for suspected or confirmed cases of COVID-19 in the workplace.
- collaborating and supporting local health departments' contact tracing programs to help identify, track, and manage contacts of COVID-19 cases.

The February 2021 plan identified specific roles and responsibilities for SBA employees and supervisors. SBA managers are expected to take proper precautions to maintain occupancy levels when community-level transmission is high. SBA management notified staff that noncompliance with the planned safety protocols may result in disciplinary action or penalties.

SBA provided virtual training on the February 2021 plan, which included question and answer sessions. Similar sessions were done for the May 2020 plan.

Previous Work

We have not completed previous work of the evaluation subject matter.

Objectives

Our objectives were to determine (1) whether the agency established a COVID-19 reconstitution plan in accordance with applicable federal guidance and (2) if the agency was adhering to that plan.

SBA's COVID-19 Reconstitution Plan Incorporated Federal Guidance Allowing for the Safe Return of its Workforce

SBA incorporated federal guidance in its May 2020 COVID-19 Reconstitution Plan. The reconstitution plan identified roles and responsibilities for SBA officials and included the following pandemic prevention measures:

- expanding and maximizing telework policy;
- limiting workspace in accordance with occupancy phases;
- cleaning and sanitizing facilities;
- providing adequate personal protective equipment;
- restricting common areas;
- limiting non-essential business travel throughout all occupancy phases;
- installing social distancing markings and signage; and
- staffing health screeners at entrances.

As a result of incorporating the federal guidance, SBA appropriately planned for the safe and gradual return of SBA workers to offices.

Management Actions

In response to the new federal guidance, the agency issued the SBA COVID-19 Workplace Safety Plan in February 2021, replacing the COVID-19 Reconstitution Plan of May 2020.

Consistent Application of Occupancy and Exposure Tracking Procedures are Needed to Successfully Implement SBA's Workforce Health and Safety Safeguards

While we recognize SBA instituted its COVID-19 Workplace Safety Plan in February 2021, our review of the May 2020 COVID-19 Agency-wide Pandemic Reconstitution Plan for occupancy, identified issues that should be addressed for successful implementation of the new plan. SBA did not always adhere to the original occupancy plan and did not consistently implement COVID-19 exposure tracking procedures to provide for the safe return of its workforce. For instance, SBA decided to return workers to SBA headquarters and advance through occupancy phases but did not provide support that showed all the CDC gating conditions were met. SBA did not downgrade phases during periods of community COVID-19 resurgence or when a case was reported at headquarters. SBA leadership was responsible for making decisions regarding occupancy phases and did not revert phases consistently with available data points. Consequently, SBA employees could not rely on the designated phase of operation to accurately reflect the current pandemic risk environment within headquarters.

SBA could improve its exposure tracking procedures based on the 19 cases of presumed, exposed, or confirmed COVID-19 cases we reviewed. Specifically, SBA should consistently:

- notify staff of presumed or confirmed COVID-19 cases,
- contact potentially exposed personnel, and
- ensure employees completed 14-day quarantine periods before returning to the workplace.

To successfully implement adequate exposure tracking procedures moving forward, the agency should ensure these inconsistencies are addressed to mitigate the risks of spreading COVID-19 infections within its workforce.

The February 2021 SBA COVID-19 Workplace Safety Plan set expectations for the supervisors to implement a range of operational controls that limit occupancy at or below 25 percent of the normal headcount. The plan required the agency to consider surrounding community infection rates as a condition of occupancy, consistent with the new federal guidelines. In addition, the plan included exposure tracking and reporting processes that were similar to the procedures in the May 2020 reconstitution plan. The February 2021 plan established supervisor and employees' responsibilities and required affected staff to quarantine for 14 days. If SBA leadership enforces these operational controls, the agency will be able to better safeguard its employees from contracting and spreading COVID-19.

Occupancy

The May 2020 plan stated SBA managers would make their decisions to advance through office reoccupation phases based on local conditions. The plan said each office location would be evaluated according to CDC gating criteria and other factors, including access to public transportation and building capacity for safe social distancing. To assess the CDC gating criteria for its 177 offices, SBA relied on CDC-endorsed data it received daily from the Department of Health and Human Services.

On June 29, 2020, SBA advanced to phase 1, allowing up to 25 percent of staff to occupy the headquarters building. SBA management cited that Washington Metropolitan Area Transit Authority stations were re-opened, health and safety measures were taken, and employees had access to agency-provided PPE. SBA advanced to phase 2 on September 14, 2020, allowing up to 50 percent of staff to occupy the building. SBA officials asserted that they justified the phase advancement decision by monitoring local conditions, specifically having awareness of downward infection trends, healthcare system capacity, status of public transportation, and status of building projects to improve staff access to the facility. However, they were unable to demonstrate that proper CDC-recommended conditions were met when deciding to advance to phases 1 and 2 at SBA headquarters.

The May 2020 plan also provided authority to SBA officials to revert phases as necessary to lessen the health and safety risk to employees. The plan called for monitoring and assessing multiple factors including local conditions. The plan also required that during any phase, if there is a development of a positive COVID-19 case, the office should revert phases. However, despite detecting incidences of positive COVID-19 cases at SBA headquarters, the agency did not revert from phase 1 or phase 2. Similarly, SBA did not revert from phase 2 despite a resurgence of COVID-19 in the local community in November and December 2020. SBA officials did not provide reasonable justification or rationale on that decision, indicating that they made occupancy decisions based on multiple conditions not a single data point like community infection spread.

The February 2021 plan directs agency management to consider moving to the next phase only when less than 100 new COVID-19 confirmed infections are reported for every 100,000 people in the area of an SBA office. In the event of a resurgence, agency managers should consult with the newly created SBA COVID-19 coordination team. These operational controls, if enforced, should help SBA better safeguard its employees from contracting and spreading the COVID-19.

COVID-19 Exposure Tracking and Notifications

The May 2020 plan outlined supervisor and employee expectations when faced with a COVID-19 case. Employees who experience symptoms, are exposed, or test positive for COVID-19 should report it immediately to their supervisor. The plan required that the supervisor report the case to the command center. The command center was required to notify colleagues who may have been exposed. The plan instructed exposed and sick employees to remain at home for 14 days. SBA's Office of Administrative Services coordinates with the SBA facility management on cleaning and sanitizing affected areas.

SBA did not consistently adhere to its exposure tracking procedures. Of the 19 cases we reviewed, SBA adhered to these procedures 34 percent of the time. None of the presumed, exposed, or confirmed case files contained all supporting documentation. Although the May 2020 reconstitution plan required employees who were exposed, presumed, or confirmed to have COVID-19 to telework or use sick leave, employees and supervisors did not consistently adhere or enforce the requirement respectively. We requested time sheets for the 19 cases we selected for review. The command center told us that they were unable to provide time sheets for five of the cases because the employee's supervisors reported the exposed, presumed, or confirmed COVID-19 case without identifying the employee's name. The command center provided time sheets for 14 cases. Of the 14 time sheets, only 6

showed the employee was either on telework or sick leave status consistent with completing quarantine period.

As part of its planned COVID-19 exposure mitigation protocols, SBA's command center was required to contact potentially affected employees to inquire on the extent of contact with other employees and requested the employee answer a COVID-19 exposure tracking questionnaire. Of the cases we reviewed, SBA provided evidence that it contacted and obtained responses from only 7 of the 19 potentially affected employees.

Federal standards for internal controls require management to clearly document internal controls and all significant operational transactions in a manner that allows the documentation to be readily available for examination, demonstrating management met its compliance responsibilities.⁷ In the absence of documented exposure tracking efforts, SBA did not provide evidence that its COVID-19 prevention procedures were consistent with the CDC and other federal guidelines.

In addition, we reviewed five notifications SBA sent to DC Headquarters employees and found only two notifications that related to the cases recorded in SBA's COVID-19 Tracker. We determined the COVID-19 Tracker was unreliable because SBA did not provide sufficient support documentation. The COVID-19 Tracker likely underreported the number of reported cases in the agency. SBA used the COVID-19 tracker to manage its exposure tracking responsibilities and relied on this information for making decisions involving COVID-19 infections.

The January 2021 OMB guidance⁸ required employers to support local health departments' contact tracing programs by identifying, tracking, and managing employees' potential contact to exposed colleagues. Following the guidance, SBA established the February 2021 plan. Although SBA recognized contact tracing as a specialized skill requiring training, the new plan established exposure tracking and reporting processes for the following scenarios:

- Employee may have been exposed but has not been in the office within the last 14 days.
- Employee tested positive or is presumed to have contracted COVID-19 in the office within the last 14 days.
- Employee tested or presumed to have contracted COVID-19 but has not been in the office within the last 14 days.

In addition, the February 2021 plan outlined supervisor and employees' roles and responsibilities, as well as mandating all COVID-19 affected employees to quarantine for 14 days. The plan established disciplinary actions to enforce compliance with the required quarantine period. If SBA management follows exposure tracking procedures and ensures employees quarantine according to the plan, they will help mitigate risks of spreading COVID-19 in the workplace.

⁷ Government Accountability Office GAO-14-704G, Standards for Internal Control in the Federal Government (September 2014).

⁸ OMB Memorandum M-21-15, COVID-19 Safe Federal Workplace: Agency Model Safety Principles (January 2021).

Recommendation

We recommend that the Administrator require the SBA COVID-19 coordination team to:
Enforce the requirements of the February 2021 COVID-19 Workplace Safety Plan by consistently applying occupancy and exposure tracking and accurately recording and maintaining supporting documentation for all reported COVID-19 cases.

Analysis of Agency Response

SBA management provided formal comments to the draft report (see Appendix II). SBA management agreed with the recommendation and the proposed corrective actions resolved the recommendation.

In its response, SBA explained a primary reason for not providing sufficient support documentation for exposure tracking was that SBA supervisors protected their employees' privacy by not providing the specific names of individuals with a positive COVID-19 infection. However, our findings indicate that only 5 of the 19 tested reports lacked the name of the employee. As such, the concerns noted in this report regarding adhering to exposure tracking requirements in the Reconstitution Plan were not limited and not solely attributable to actions taken by supervisors to protect employees' privacy. SBA's February 2021 COVID-19 Workplace Safety Plan states that medical information, including test results and any other medical information, will be treated according to applicable law. It will be accessible only to those who need to protect the health and safety of SBA personnel. It is important that SBA adhere to its exposure tracking procedures, requiring officials to collect information and safeguard employees' privacy.

Summary of Actions Necessary to Close the Recommendation

Recommendation

Enforce the requirements of the February 2021 COVID-19 Workplace Safety Plan by consistently applying occupancy and exposure tracking and accurately recording and maintaining supporting documentation for all reported COVID-19 cases.

Status: Resolved.

SBA management concurred with the recommendation and noted they will follow the protocol established in the February 2021 COVID-19 Workplace Safety plan. Management plans to complete final action on this recommendation by December 31, 2021. This recommendation can be closed when SBA management provides evidence that procedures for occupancy and exposure tracking are being followed in accordance with its February 2021 COVID-19 Workplace Safety plan.

Appendix I: Objectives, Scope, and Methodology

Objectives

Our audit objectives were to determine whether SBA established a COVID-19 reconstitution plan in accordance with applicable federal guidance and if SBA was adhering to that plan.

Scope and Methodology

Our scope covered all actions taken by SBA to prevent workplace exposure to COVID-19 from March 11, 2020 to December 31, 2020. To achieve our objective, we reviewed federal guidance including from the Centers for Disease and Control, Office of Management and Budget, Office of Personnel Management, and Occupational Safety and Health Administration. We reviewed SBA's COVID-19 Reconstitution Plan, procedural notices, and other COVID-19 positive case tracking tools used to comply with CDC requirements.

We interviewed SBA personnel responsible for establishing and implementing the agency-wide Reconstitution Plan. We also reviewed agency actions and its implementation of the occupancy phases. We reviewed supporting documentation and justification provided for management decisions to move to the next phases, including whether management decisions considered CDC gating criteria on community spreads over 14-day downward infection trends.

As of January 4, 2021, the agency's COVID-19 Tracker contained 231 cases, of which 118 were confirmed while the remaining 113 cases were contact-exposures. We judgmentally selected 19 COVID-19 cases to review whether SBA adhered to its planned exposure tracking procedures. Thirteen of 19 individual cases were identified in the Washington DC headquarters location, while the remaining 6 cases were from a Disaster Assistance Processing and Disbursement Center in Fort Worth, Texas.

We also judgmentally selected five of the eight notifications SBA sent to its headquarters employees regarding presumed or confirmed cases of COVID-19 to test the reliability and completeness of SBA's COVID-19 Tracker.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and *Efficiency Quality Standards for Inspection and Evaluation*. These standards require that we adequately plan and perform the evaluation to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence we obtained provides a reasonable basis for our findings and conclusions based on our evaluation objective.

Use of Computer-Processed Data

Although we used computer-processed data throughout this evaluation, we did not rely solely on the data but confirmed its accuracy and completeness through validations to originating source documentation. To determine whether SBA appropriately gathered and managed COVID-19 cases, we tested agency-provided support documentation. We conducted analytical procedures to verify the completeness and accuracy of available data used to support COVID-19 Tracker and agency COVID-19 alerts or email notifications sent to headquarter employees in the Washington DC Metropolitan area. We deemed the

agency's COVID-19 Tracker as unreliable because the agency could not provide all requested source documentation data. As a result, our opinion is solely based on the result of our testing of sampled items for review through source documentation. We made a recommendation to address the completeness and accuracy of the COVID-19 Tracker.

To determine whether management decisions were consistent with the CDC's gating criteria regarding community infection rates and improved healthcare conditions, we reviewed agency justifications and support evidence provided to move through occupancy phases. We relied on CDC's published data regarding community spread reported on SBA surrounding area COVID-19 cases to test the validity of SBA management justifications during movements of phases.

Appendix II: Management Comments



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

TO: Hannibal “Mike” Ware
Inspector General

FROM: Stephen Kong
Acting Chief Operating Officer
Elias Hernandez
Chief Human Capital Officer
Joshua Barnes
Acting Director, Office of Continuous Operations and Risk Management

SUBJECT: OIG Project 21003, Evaluation of SBA's Coronavirus Reconstitution Plan

DATE: June 21, 2021

SBA appreciates the role the Office of Inspector General (OIG) plays in working with management in ensuring that SBA's programs are administered effectively and for the feedback provided in this Draft Report. We take the findings and recommendation seriously and understand the importance of the work OIG does to support risk mitigation for the Agency.

This Draft Report presents the results of OIG's *Evaluation of SBA's Coronavirus Reconstitution Plan* (Project 21003). OIG reviewed the actions of SBA to responsibly return employees, contractors, and visitors to SBA offices during the pandemic. In the Draft Report, OIG questions the Agency's implementation of certain aspects of the May 2020 Reconstitution Plan. More specifically, OIG contends that SBA did not follow occupancy procedures for advancing or reverting phases, follow exposure tracking protocols, or consistently contact potentially exposed personnel and ensure employees completed 14-day quarantine periods.

At the outset we must emphasize that SBA has prioritized the safety of our employees throughout the pandemic and provided support in a number of significant ways. Employees indicated on the most recent Federal Employee Viewpoint Survey (FEVS) that 1) senior leaders demonstrated a commitment to health and safety (84% positive) and 2) supported policies and procedures to protect employee health and safety (84% positive). Positive feedback for supervisory support was even higher. In addition, as acknowledged by employees on the FEVS, SBA has supported the well-being of the workforce through a variety of means including: virtual onboarding; maximum telework flexibilities; health screenings (including temperature checks) before entering the worksite; mandating the use of personal protective equipment and social distancing in the office; expanded mental health resources; frequent cleaning and sanitizing of facilities, especially common areas;

training on health and safety protocols; and the frequent use of telework/readiness surveys to ensure that the Agency has addressed on-going staff needs during these trying and uncertain times.

While SBA concurs with the OIG's recommendation that the Agency should enforce the requirements in the February 2021 COVID-19 Workplace Safety plan, we note that there are technical errors in some of the inconsistencies identified by OIG in the Draft Report. Specifically, the Agency does not engage in "contact tracing" as this public health activity is a function that trained public health practitioners should perform. Instead, the Agency implemented a robust and structured process of tracking exposure whenever a positive COVID-19 infection was made known to the Agency by the employee's supervisor or another manager.

In following the Reconstitution Plan, and in isolated cases, supervisors and managers respected the privacy of their staff and did not disclose the specific name of the individual with a positive COVID-19 infection. The supervisor or manager then informed the Agency of those who had contact with the unnamed individual, and the affected employees were notified and directed to telework for 14 days or take leave, as appropriate. It is SBA's position that a lack of documentation to satisfy the continuum of each infection for OIG is primarily a result of supervisors in those cases achieving a balance between sustaining employees' privacy and ensuring the Agency has the information it needs to notify anyone potentially exposed to an infection.

OIG made the following recommendation, and management's response to the recommendation in the Draft Report is noted as follows:

OIG Recommendation 1:

Enforce the requirements of the February 2021 COVID-19 Workplace Safety Plan by consistently applying occupancy and exposure tracking and accurately record and maintain supporting documentation for all reported COVID-19 cases.

SBA's Response to Recommendation 1:

SBA concurs with the recommendation

We thank OIG for acknowledging in the report that the SBA has implemented a new plan that extends further health and safety considerations for SBA employees, contractors, and visitors. SBA will continue to track and document cases of exposure with an emphasis on maintaining both workforce safety and individual privacy.