



Export-Import Bank of the United States

COVID-19 Workplace Safety Plan

December 6, 2021

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EXIM COVID-19 Safety Plan Overview

EXECUTIVE SUMMARY

EXIM's COVID-19 Workplace Safety Plan ("Plan") is intended to protect the health and safety of EXIM's workforce, to include contractors, as well as visitors and other building occupants at EXIM's facilities. This Plan implements the Executive Order (EO) 13991, signed January 20, 2021, on Protecting the Federal Workforce and Requiring Mask-Wearing as part of the [National Strategy for the COVID-19 Response and Pandemic Preparedness](#).

Since then, this Plan has been updated in accordance with the Office of Management and Budget (OMB) memorandum M-21-15, COVID-19 Safe Federal Workplace: Agency Model Safety Principles, issued January 24, 2021; M-21-25, Integrating Planning for a Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment, issued June 10, 2021; Safer Federal Workforce Task Force - COVID-19 Workplace Safety: Guidance for Federal Contractors and Subcontractors, issued September 24, 2021; COVID-19 Workplace Safety: Agency Model Safety Principles, issued September 13, 2021; and the FAQs from the Safer Federal Workforce Task Force; the President's Executive Order on Requiring Coronavirus Disease 2019 Vaccination for Federal Employees and the President's Executive Order on Ensuring Adequate COVID Safety Protocols for Federal Contractors, both signed September 9, 2021; updated U.S. Centers for Disease Control and Prevention (CDC) guidance; Occupational Safety and Health Administration (OSHA) guidelines; and other Federal guidance.

The EXIM Reconstitution Plan dated June 8, 2020 has been superseded and replaced with the EXIM's Reentry and Post-Reentry Plan dated December 6, 2021 which complement this Plan with return to workplace information.

The Federal Government has a responsibility to protect the health and safety of its workforce, as well as everyone who enters Federal property. EXIM headquarters and all regional offices understand the importance of implementing the safety principles of this Plan and continuing to follow the recommendations of the CDC and other agencies with a role in promoting public health and workplace safety. As we have done since the start of the pandemic, EXIM strives to balance the delivery of critical mission services with the constantly evolving challenges that COVID-19 presents to the workforce and the organization. EXIM's paramount concern is the health and safety of all Federal employees, onsite contractors, and individuals interacting with the Federal workforce.

The provisions of this COVID-19 Safety Plan continue to apply to all employees, contractors, and visitors.

AUTHORITIES

EXIM's Plan follows the President's EO 13991 on Protecting the Federal Workforce and Requiring Mask-Wearing and the Office of Management and Budget Memorandum 21-25, COVID-19 Safe Federal Workplace: Agency Model Safety Principles. This Plan adheres to the National Strategy for the COVID-19 Response and Pandemic Preparedness and includes the latest guidance from the CDC, the General Services Administration (GSA), the Office of Personnel Management (OPM), and the Safer Federal Workforce Task Force.

The Plan is a living document that will be updated as needed to account for changing COVID-19 conditions and updated guidance from the President's EO, CDC, OMB, OPM, OSHA and the Safer Federal Workforce Task Force. Additionally, state and local governments may provide guidance that differs from this Plan, and when it does and imposes additional pandemic-related requirements more protective than those set forth in this Plan, those more protective requirements should be followed in Federal buildings.

PROTECTING THE EXIM WORKFORCE

EXIM is committed to protecting the health and safety of its workforce – Federal employees, contractors, subcontractors, and visitors by using data and science-based approaches that are appropriate to the risks each person faces in their job.

GUIDING PRINCIPLES

HEALTH AND SAFETY:

EXIM's re-entry strategy ensures minimal risk to the health of the workforce, their families, and their communities, keeping in mind those who are most vulnerable. EXIM will observe workplaces and monitor changes in the surrounding community to ensure its ability to maintain personnel health and safety.

TAILORED APPROACH:

EXIM Headquarters and regional offices will make workplace re-occupancy decisions based on the community's environmental, medical, and health conditions for each facility. EXIM will follow all applicable laws and guidelines, update plans as needed, and provide notice when plans have changed.

At the time of publishing and until such time as EXIM determines otherwise and notifies all employees of such determination, the provisions in this Plan apply to all employees regardless of whether they have received the COVID-19 vaccination.

EXIM is committed to maintaining workplace operations in a manner that enables mission-critical responsibilities to be met while protecting the workforce. While this guidance is not intended to address every practical situation that may arise, this framework provides basic guidance within which each component can work to maintain operations. Where available information is not abundant or consistent, the EXIM COVID-19 Coordination Team members (see next section) are available to discuss such situations or decisions.

Of note, where a locality has imposed additional pandemic-related requirements more protective than those set forth in the EXIM Safety Plan, those requirements should be followed in Federal buildings and on Federal land in that locality.

COVID-19 COORDINATION TEAM

EXIM has established a cross-functional COVID-19 Coordination Team responsible for implementing health and safety guidance and developing health and safety protocols. The EXIM COVID-19 Coordination Team meets bi-weekly to discuss compliance with COVID-19 workplace safety plans and protocols, consider potential revisions to EXIM's COVID-19 workplace safety plans and protocols pursuant to guidance from the Safer Federal Workforce Task Force and current CDC guidelines, and evaluate any other operational needs related to COVID-19 workplace safety. As appropriate, certain members of the COVID-19 Coordination Team may consult with GSA, OPM, and OMB.

RESPONSIBILITIES:

- Review draft COVID-19 workplace safety plans and protocols for EXIM, make any necessary changes, and submit required plans to the Safer Federal Workforce Task Force for review and comment.
- Prioritize the health and safety of EXIM employees, contractors and visitors when guiding actions related to physically opening the workplace to EXIM employees across the country.
- Ensure EXIM's mission is effectively delivered while enforcing health and safety protocols.
- Share information on the COVID-19 pandemic and its impact on EXIM's actions to staff through EXIM Connect (intranet site), all-staff emails, Know EXIM online presentations, and all-hands meetings.
- Ensure EXIM's regional offices are aligned with actions and protocols being taken at headquarters.
- Monitor guidance from the CDC, OPM and OMB regarding use of telework to mitigate risk and use this information in determining safe levels of occupancy within EXIM facilities.
- Exercise confidentiality on matters related to health and safety when applicable.
- Periodically review the Plan and consider potential revisions, as necessary.
- Consult with GSA, building security, and safety committees on health and safety protocols.
- Assist the Office of Human Capital (OHC) in collaborating with, and supporting, the contact tracing programs of local health departments to help identify, track, and manage contacts of COVID-19 cases.
- Assist OHC in determining appropriate next steps, including contact tracing, if COVID-19 cases occur within the EXIM workspace in alignment with local public health official guidelines.
- Coordinate with Chief Acquisition Officers/staff given application of safety protocols to onsite contractor employees.

- The team will engage in coordination with facilities staff to implement infection control and workplace safety efforts once informed of a known or suspected case of COVID-19 (due either to specific symptoms or a positive test).

MEMBERS:

The EXIM COVID-19 Coordination Team has the required representation, including human resources office(s); occupational safety and health experts; executive leadership; legal counsel; and a public health expert. (See Appendix I for names and contact information):

Office of the Chief Management Officer

- Office of Resource Management
- ◆ Facilities and Capital Planning Office
- ◆ Security and Continuity of Operations Office
- Chief Human Capital Officer
- Office of General Counsel Administrative Law Group
- Occupational and Public Health Expert¹

COMMUNICATIONS:

Effective communications are vital to protecting the workforce. Employees, contractors and visitors must understand the policies and procedures that have been implemented in the workplace. They also need to be aware of CDC and local health department guidance and recommendations to keep them safe outside of Federal buildings. EXIM is committed to transparency about the measures that are in place, the science relied upon, and the limitations and challenges in addressing the COVID-19 pandemic.

As local conditions, mission requirements, and the scientific understanding of COVID-19 change, this Plan and workplace safety policies and protocols will also change. EXIM expects that CDC, OSHA, the Environmental Protection Agency (EPA), the GSA, the OPM, and the Safer Federal Workforce Task Force will continue to issue updated guidance and recommendations. The COVID-19 Coordination Team will communicate changes to this Plan internally by posting to the EXIMConnect intranet site and communicate them publicly on the EXIM.gov website. EXIM also posts signage and key messages at gateways of entry, doors, reception desks, common areas such as restrooms and hallways, and

¹ EXIM has engaged the services of [Building Health Sciences, Inc. \(BHS\)](#). BHS provides a combination of medical expertise and building science/engineering expertise to help organizations protect their workforce in the indoor environment through science, experience, and policy implementation. Karen Singleton, MD, MPH is Board Certified by the American Board of Preventive Medicine, Occupational and Environmental Medicine and holds a Master's in Public Health.

conference rooms, that provide information about policies and procedures related to COVID-19 for staff and contractors alike.

Disclosures of COVID-19 cases. EXIM will be transparent in communicating related information to the workforce, as relevant and appropriate. Disclosures by EXIM regarding COVID-19 cases is consistent with Federal, State, and local privacy and confidentiality laws and regulations.

CONFIDENTIALITY AND PRIVACY

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing and symptom monitoring, is treated by EXIM in accordance with applicable laws and policies on confidentiality and privacy, and is accessible only to those with a need to know. EXIM has consulted with their Senior Agency Official for Privacy on matters related to the handling of personally identifiable and medical information.

EXIM has identified the OHC as the point of contact for all questions relating to EXIM's treatment of information protected under Privacy Act.

MONITORING COMMUNITY SAFETY:

The EXIM COVID-19 Coordination Team will monitor the health and safety of the communities in which the EXIM workforce lives and operates. As part of our science-based approach, the Team (which includes occupational health and safety public health experts from Building Health Sciences, Inc. [BHS]) will assess and determine the impact of different levels of community transmission on workplace health and safety policies and protocols in alignment with assessment and coordination with the Biden-Harris Administration guidelines and directives. During periods of significant and high community transmission, occupancy in Federal workplaces should be limited and maximum telework utilized to the greatest extent possible. Levels of community transmission can be determined by consulting [CDC COVID-19 Data Tracker County View](#). Available metrics include Reported Cases; Viral Laboratory Tests; Deaths; and Hospital Utilization. EXIM will also consider transit and parking availability, school and daycare closures, and other health and community infrastructure indicators in making on-site staffing decisions.

For purposes of transparency, EXIM exercises discretion in determining relevant local areas in

determining the counties relevant to the determination of the level of community transmission related to each EXIM facility. For example, EXIM may consider the county in which our leased facilities are located. EXIM may also consider the transmission levels of the surrounding local counties from which employees or visitors may travel in order to get to the facility.

EXIM assesses transmission rates at least weekly in relevant local areas to EXIM's operating location to determine proper mask-wearing requirements.

- When the level of transmission related to an EXIM operating location increases from low or moderate to substantial or high, EXIM will promptly put in place more protective safety protocols consistent with CDC guidelines and guidance from the Safer Federal Workforce Task Force as soon as operationally feasible. EXIM will not wait, for example, for a multi-day or multi-week trend to be established.
- When the level of transmission related to an EXIM operating location is reduced from high or substantial to moderate or low, the level of transmission must remain at that lower level for at least two consecutive weeks before EXIM will utilize those protocols recommended for areas of moderate or low transmission by CDC guidelines and guidance from the Safer Federal Workforce Task Force.

EXIM acknowledges when a locality imposes more protective pandemic-related safety requirements, those requirements will be followed by EXIM employees and onsite contractor employees, in EXIM buildings, in EXIM-controlled indoor worksites, and on EXIM lands within that locality.

Collective Bargaining Obligations:

EXIM communicates regularly with employee representatives on workplace safety matters. Consistent with President Biden's policy to support collective bargaining, EXIM works to satisfy applicable collective bargaining obligations under 5 U.S.C. Chapter 71 when implementing workplace safety plans.

- There may be collective bargaining obligations over the impact and implementation of the Agency Model Safety Principles and CDC guidelines. Section 2(c) of the EO requires EXIM to promptly consult, as appropriate, with employee unions. EXIM has been in consultation with its union regarding actions it intends to take in compliance with orders and CDC guidelines.

- EXIM has provided draft plans to the union enabling a meaningful opportunity for consultation.
- EXIM understands and has implemented the Federal Safety Workplace Task Force principles and guidelines which are essential in protecting the health and safety of all Federal employees, onsite contractor employees, and individuals interacting with the Federal workforce in Federal buildings, in federally controlled worksites, and on Federal lands. These principles and guidelines constitute Government-wide policy that is in effect for employees subject to the requirements of Executive Order 13991 and Executive Order 14043.
- EXIM will satisfy any applicable collective bargaining obligations under the law at the earliest opportunity, including on a post-implementation basis where appropriate. EXIM management, in consultation with OHC and the Office of General Counsel, will determine the appropriate labor-relations obligations.

To the extent that existing safety plans are already codified in the collective bargaining agreement (CBA), the CBA will satisfy EXIM's labor relations obligations, as appropriate, under Section 2(c) of EO 13991. To the extent that the CBA's safety plan contains more stringent safety standards than provided in CDC guidance, EXIM will operate under the CBA. EXIM shall acknowledge any CBA safety plans in its COVID-19 Workplace Safety Plan.

Health and Safety: Telework

TELEWORK AND WORK SCHEDULE FLEXIBILITIES

EXIM utilizes telework, flexible work schedules, and remote work consistent with the principles set forth in OMB Memorandum M-21-25 and EXIM's plans for reentry and post-reentry.

EXIM follows CDC and OPM guidance. During current maximum telework posture, EXIM employees are expected to telework unless otherwise directed by their supervisor for essential business needs.

Employees working remotely on a frequent or regular basis (including on the current expanded remote work schedule of "maximum telework") will be given advance notice and guidance in writing before returning to the physical workplace. EXIM understands that changes in telework, and work schedule may impact an employee's commute and child/dependent care arrangements. EXIM will provide a minimum of 30 days of advance notice whenever possible and provide flexibility as employees transition back into the workplace. In some cases, mission critical work may require a shorter notification period. In determining the advance notice provided to employees, EXIM will ensure labor management obligations are met.

PEOPLE AT INCREASED RISK AND OTHER PEOPLE WHO NEED TO TAKE EXTRA PRECAUTIONS

EXIM recognizes that some employees are more likely than others to become severely ill or are caring for family members or others in these groups. The CDC provides information about these populations as needing to take extra precautions: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html>. Those at higher risk for severe illness as defined by the CDC include older adults, pregnant people, and people of all ages with underlying medical conditions- particularly if not well controlled- including those who suffer from chronic lung disease, moderate to severe asthma, serious heart conditions, immune disorders, obesity, diabetes, or chronic kidney or liver disease, should work with supervisors to continue telework if they are concerned about returning to the office. Severe illness means that a person with COVID-19 may require hospitalization, intensive care, or a ventilator to help them breathe.

Employees who live with or provide care for vulnerable individuals shall be afforded available workplace flexibilities to help reduce the chances that they could carry the virus to these vulnerable individuals. EXIM supervisors should continue to allow telework or alternative work schedules for these

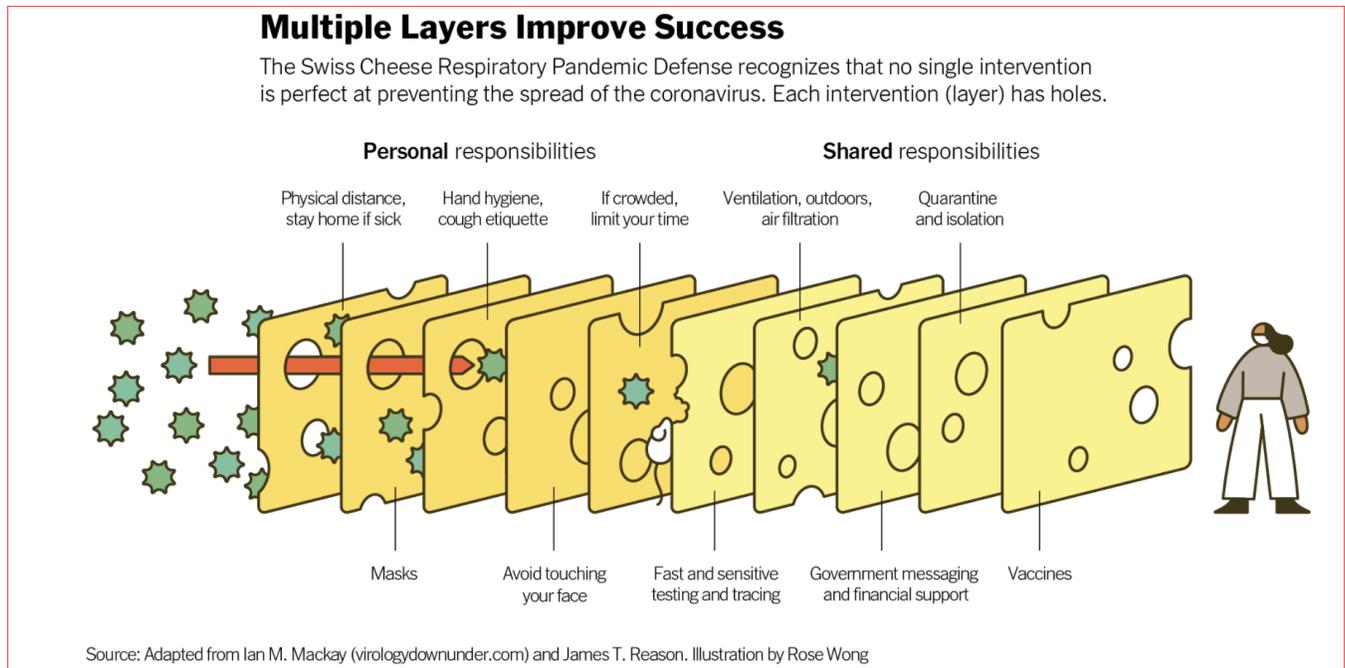
employees. Employees are encouraged to consult with supervisors or human resources personnel regarding workplace flexibilities.

In accordance with OMB [M-20-13](#) and OPM [M-20-23](#), certification by a medical professional is not required and EXIM will accept employee self-identification that they are part of the vulnerable populations as defined by the CDC. However, when Federal guidance provides for all Federal workers and contractors to return to the workplace, with concurrence from the COVID-19 Coordination Team, all EXIM employees, including those identified as being at higher risk, will be expected to return to their assigned EXIM facility. Individual requests for special accommodations will be evaluated on a case-by-case basis through EXIM's reasonable accommodation process.

Health and Safety: Layered Approach

LAYERED APPROACH TO HEALTH AND SAFETY

The CDC emphasizes the importance of a layered approach to health and safety during the COVID-19 pandemic. Layering strategies across settings and sectors where people live, work, and gather provides greater safeguards to reduce exposure among individuals, transmission, and burden on the health care system.



The workplace strategies contained in this Plan are an important layer in protecting the EXIM workforce and other occupants of EXIM facilities. Just as wearing masks is not a substitute for distancing, they are meant to be used in concert with other CDC-recommended measures, not a replacement. Everyone should continue to follow these simple CDC-recommended steps like wearing a mask, staying six feet apart, avoiding crowds and poorly ventilated indoor spaces, washing hands often, monitoring regularly for symptoms, and taking extra precautions around those at risk of getting very sick – both in and outside the workplace. This includes after receiving a COVID-19 vaccination, which significantly reduces but does not eliminate the possibility of contracting the virus.

Health and Safety: Vaccination Status

VACCINATION STATUS FOR EMPLOYEES

To ensure the safety of the Federal Executive Branch employees, including the EXIM workforce, all Federal employees must be fully vaccinated by November 22, 2021, except in limited circumstances where an employee is legally entitled to an accommodation.

Definition of fully vaccinated.

For purposes of this Plan, EXIM considers employees, onsite contractor employees, and visitors fully vaccinated for COVID-19 2 weeks after they have received the requisite number of doses of a COVID-19 vaccine approved or authorized for emergency use by the U.S. Food and Drug Administration or that has been listed for emergency use by the World Health Organization.

- For Pfizer-BioNTech, Moderna, or AstraZeneca/Oxford, that is 2 weeks after an employee has received the second dose in a 2-dose series.
- For Johnson and Johnson (J&J)/Janssen, that is 2 weeks after an employee has received a single-dose.
- For clinical trial participants from a U.S. site who are documented to have received the full series of an “active” (not placebo) COVID-19 vaccine candidate, for which vaccine efficacy has been independently confirmed (e.g., by a data and safety monitoring board), can be considered fully vaccinated 2 weeks after they have completed the vaccine series. Currently, the Novavax COVID-19 vaccine meets these criteria.

Per the Safer Federal Workforce Task Force FAQs, “Agencies should require documentation to prove vaccination prior to the enter on-duty date.”

Fully vaccinated Federal employees do not need to physically distance or participate in weekly screening testing (if any). Fully vaccinated Federal employees are not subject to any Government-wide restrictions on official travel, although EXIM travel policies still apply.

The Safer Federal Workforce Task Force guidance released on September 24, 2021 does not include a testing option in lieu of vaccination. In other words, vaccination is the only means for compliance.

Federal employees who are on maximum telework or working remotely are not excused from this requirement, and without a legally required exception need to be fully vaccinated by November 22, 2021, regardless of where they are working. This is to protect the health and safety of the Federal workforce as employees who are on maximum telework or working remotely may need to be recalled

to the workplace. Also, remote workers may need to interact with the public as part of their duties.

When a Federal employee is required to be vaccinated, the time the employee spends to get any COVID-19 vaccination or booster (including travel time) is administrative leave. Employees may take up to four hours to travel to the vaccination site, complete a vaccination dose, and return to work; thus, up to eight hours of duty time for employees receiving two doses.

EXIM requires employees taking longer than four hours to document the reasons for the additional time (e.g., they may need to travel long distances to get the vaccine). If, due to unforeseen circumstances, the employee is unable to obtain the vaccine during basic tour of duty hours, the normal overtime hours of work rules apply.

Reasonable transportation costs that are incurred as a result of obtaining the vaccine from a site preapproved by EXIM are handled in accordance with EXIM's reimbursement policy.

Employees who have an adverse reaction to the vaccination or booster will receive administrative leave paid time off for up to two days if the adverse reaction prevents them from working (i.e., no more than 2 workdays for reactions associated with a single dose). Employees should work with their supervisor and OHC for answers to any specific questions they might have.

- If an employee requests more than 2 workdays to recover, EXIM OHC shall make a determination to grant emergency paid leave under the American Rescue Plan Act —if available—or the employee may take other appropriate leave (e.g. sick leave) to cover any additional absence.

Employees impacted by this mandate who receive required COVID-19 vaccinations on or after the date of the Executive Order (September 9, 2021) may be afforded coverage under the Federal Employees' Compensation Act (FECA) for any adverse reactions to the vaccine itself, and for any injuries sustained while obtaining the vaccination.

Employees will also receive up to four hours of administrative leave per dose to accompany a family member being vaccinated after July 29, 2021. For this purpose, a "family member" is an individual who meets the definition of that term in OPM's leave regulations (see 5 CFR 630.201). Employees should obtain advance approval from their supervisor before being permitted to use administrative leave for "family member" COVID-19 vaccination purposes.

EXIM employees must submit their Vaccination Attestation Forms to Office of Human Capital (OHC) as this form is required to ensure compliance with the federal mandate issued July 29, 2021. Questions regarding the vaccination attestation form may be directed to OHC.

Additionally, the Safer Federal Workplace Task Force is requiring EXIM to begin collecting proof of vaccination to support your vaccination attestation form. Employees must provide a copy of their record of immunization document. The data that must be on an official document that contains the following information: the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s). Employees must certify under penalty of perjury that the information you are submitting is true and correct.

The following immunization documents are acceptable

- A copy of the record of immunization from a health care provider or pharmacy,
- A copy of the COVID-19 Vaccination Record Card,
- A copy of medical records documenting the vaccination,
- A copy of immunization records from a public health or state immunization information system, or
- A copy of any other official documentation containing required data points (e.g.: Your name, the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s), etc.).

EXIM will provide employees with a [Privacy Act statement](#) at the point of collection of their vaccination information. The Privacy Act permits disclosure to EXIM employees “who have a need for the record in the performance of their duties.” 5 U.S.C. 552a(b)(1).

EXIM takes steps to promote privacy and IT security. Only persons with a need to know in order to implement safety protocols will have access to an employee's vaccine verification information. For example, the information would be shared with the people responsible for ensuring the effective implementation of the workplace safety protocols, which, in many cases, will include the employee's supervisor.

EXIM will collect and maintain employee vaccination information in accordance with all applicable laws, including the Privacy Act and Rehabilitation Act of 1973. EXIM does not maintain this information in the Official Personnel Folder of any employee.

EXIM employees are covered by Executive Order 14043 and those who fail to comply with a requirement to be fully vaccinated or provide proof of vaccination and have neither received an exception nor have an exception request under consideration, are in violation of a lawful order. Employees who violate lawful orders are subject to discipline, up to and including termination or removal from Federal service. Consistent with the Administration's policy, EXIM will initiate an enforcement process to work with employees to encourage their compliance. EXIM may initiate the enforcement process as soon as November 9, 2021, for employees who have not received their

required vaccination dose by November 8, 2021, unless the employee has received an exception, or EXIM is in the process of considering an exception request from the employee.

Individuals who are unvaccinated must wear masks and physically distance from others.

Individuals—including employees, onsite contractor employees, visitors, and members of the public who are seeking a public service or benefit—who are not fully vaccinated, or who have declined to provide their vaccination information when requested, must maintain a distance of at least six feet from others at all times, consistent with CDC guidelines, including in offices, conference rooms, and all other communal and work spaces) and properly wear a mask regardless of community transmission level, consistent with CDC guidelines. Consistent with CDC guidance, those who are not fully vaccinated are advised to wear a mask in crowded outdoor settings or during outdoor activities that involve sustained close contact with other people who are not fully vaccinated.

Individuals who start their Government service prior to November 22, 2021 must be fully vaccinated by November 22, 2021, except in limited circumstances where a reasonable accommodation is granted. Individuals who start their Government service after November 22, 2021, need to be fully vaccinated prior to their start date, except in limited circumstances where a reasonable accommodation is granted. If EXIM has an urgent, mission-critical hiring need to onboard a new employee who cannot be fully vaccinated by November 22, 2021, such new hires must be fully vaccinated within 60 days of their start date (except in limited circumstances where a reasonable accommodation is granted), and they must follow safety protocols for not fully vaccinated individuals until they are fully vaccinated.

If an employee has provided notice that they are leaving Federal employment and are on leave until the date they depart, EXIM will not enforce the vaccine requirement of Executive Order 14043.

VACCINATION STATUS FOR CONTRACTORS

Pursuant to the Safer Federal Workforce Task Force's COVID-19 Workplace Safety: Guidance for Federal Contractors and Subcontractors (Guidance) issued on September 24, 2021, and in addition to any requirements or workplace safety protocols that are applicable because a contractor or subcontractor employee is present at a Federal workplace, Federal contractors and subcontractors with a covered contract for construction or services above the simplified acquisition threshold (now generally set at \$250,000) will be contractually required to include a contract clause requiring contractors to conform to the following workplace safety protocols:

- Covered Contractor Employees must be fully vaccinated for COVID-19 by January 18, 2022, except in limited circumstances where an employee is legally entitled to an accommodation.
- Compliance by individuals, including covered contractor employees and visitors, with the

Guidance related to Masking and Physical Distancing while in covered contractor workplaces; and

- Designation of a Point Person to coordinate COVID-19 workplace safety efforts at covered-contractor workplaces.

This new clause applies to contracts under the following timelines:

- New contracts awarded on or after November 14, 2021 from solicitations issued before October 15, 2021 (this includes new orders awarded on or after November 14 from solicitations issued before October 15 under existing indefinite-delivery contracts);
- New solicitations issued on or after October 15, 2021 and contracts awarded pursuant to those solicitations (this includes new solicitations issued on or after October 15 for orders awarded pursuant to those solicitations under existing indefinite-delivery contracts);
- Extensions or renewals of existing contracts and orders awarded on or after October 15, 2021; and
- Options on existing contracts and orders exercised on or after October 15, 2021.

Vaccination of Covered Contractor Employees: Contractors

Fully vaccinated onsite covered contractor employees do not need to physically distance or participate in weekly screening testing (if any). Fully vaccinated onsite covered contractor employees are not subject to any Government-wide restrictions on official travel, although EXIM travel policies still apply.

Covered contractors must review their covered employees' documentation and ensure that all of their covered employees are fully vaccinated for COVID-19 no later than January 4, 2022, unless the employee is legally entitled to an accommodation. After that date, all covered contractor employees must be fully vaccinated by the first day of the period of performance on a newly awarded covered contract, and by the first day of the period of performance on an exercised option or extended or renewed contract when the clause has been incorporated into the covered contract.

Pursuant to the Guidance, the Executive Order applies to all procurement contracts and contract-like instruments for services or construction, including services covered by the Service Contract Act. The term contract or contract-like instrument also includes lease agreements, cooperative agreements, licenses, and permits. The Executive Order also applies to solicitations, extensions or renewals, and exercises of options for these types of contracts and contract-like instruments.

The Executive Order, however, exempts the following: (1) grants; (2) contracts, contract-like instruments, and agreements with Indian Tribes under the Indian Self-Determination and Education

Assistance Act; (3) contracts or subcontracts below the simplified acquisition threshold; (4) employees who perform work outside the United States or its outlying areas; and (5) contracts or subcontracts solely for the provision of products (including commodity purchases).

EXIM strongly encourages all contractors to incorporate these requirements into their contracts even though they may be excluded by the Executive Order, such as contracts under the simplified acquisition threshold and contracts and subcontracts for products.

Vaccination of Covered Contractor Employees: Employees

"Covered contractor employee" means any full-time or part-time employee of a covered contractor working on or in connection with a covered contract. The Guidance also applies to all contractor employees who are working at a "covered contractor workplace," defined as a "location controlled by a covered contractor at which any employee of a covered contractor working on or in connection with a covered contract is likely to be present during the period of performance for a covered contract." The Guidance requirements, including COVID-19 vaccination(s), will apply to these types of contractor employees unless the contractor can affirmatively determine that there will be no interactions between covered contractor employees and non-covered contractor employees in common areas such as security clearance areas, elevators, stairwells, meeting rooms, and parking garages.

Prior to being subject to the January 4, 2022 requirement for covered contractor employees to be vaccinated, onsite covered contractor employees should be provided with a paper [Certification of Vaccination form](#) at the building entrance.

EXIM will NOT collect the Certification of Vaccination forms on any covered contractor employees. EXIM will direct onsite covered contractor employees to complete the Certification of Vaccination form and keep it with them during their time on EXIM's premises—they may be asked to show the form upon entry to a federal building or federally controlled indoor worksite and to a Federal employee who oversees their work.

Prior to being subject to a contractual requirement to be vaccinated, onsite covered contractor employees who are not fully vaccinated (or who decline to disclose vaccination status) are required to show proof of a negative COVID-19 test result from within the previous 3 days before entry to EXIM's workspace.

Prior to having a contractual requirement for its employees to be vaccinated and if authorized and consistent with the terms of the contract, EXIM may request a contractor to facilitate compliance by its onsite covered employees with EXIM's safety protocols, such as by having the company attest that all

onsite covered contractor employees are fully vaccinated.

Covered contractor employees working remotely or performing outdoors are still subject to vaccination requirements if they work "on or in connection with" a "covered contract," even if they work separately from where covered employees perform the federal contract work.

Covered contractor employees also may request an accommodation for a medical condition or a religious accommodation.

Masking and Distancing

The Guidance calls for contractors to ensure that their employees, and visitors, comply with CDC guidance for masking and physical distancing at a covered contractor's workplace. Covered contractors must require individuals in covered contractor workplaces who are required to wear a mask to:

- Wear appropriate masks consistently and correctly (over mouth and nose).
- Wear appropriate masks in any common areas or shared workspaces (including open floorplan office space, cubicle embankments, and conference rooms).
- For individuals who are not fully vaccinated, wear a mask in crowded outdoor settings or during outdoor activities that involve sustained close contact with other people who are not fully vaccinated, consistent with CDC guidance.

Designation of a Point Person

The Guidance requires covered contractors to designate one or more persons to coordinate implementation of and compliance with the Guidance and workplace safety protocols. The designated person must ensure that information on required COVID-19 workplace safety protocols is provided to covered contractor employees and all other individuals likely to be present at covered contractor workplaces. The designated person must also ensure that covered contractor employees comply with the Guidance requirements.

Vaccination Status for Visitors

A visitor is defined anyone who is not an EXIM employee or covered contractor employee. EXIM will provide visitors with a paper [Certification of Vaccination form](#) at the building entrance. The visitors will be directed to complete the Certification of Vaccination form and keep it with them during their time on federal premises—visitors may be asked to show the form upon entry to a federal building or federally controlled indoor worksite.

If a visitor is not fully vaccinated or declines to answer the form, they will be required to show a

negative COVID-19 test result from within the previous three days. Additionally, if they are not fully vaccinated, they must comply with all relevant CDC guidance and safety protocols, including mask-wearing and physical distancing from other people.

EXIM staff in anticipation of their visitor's arrival, may email the Certification of Vaccination form to the visitor in advance of their arrival to enable them to easily complete it, but EXIM will not maintain Certification of Vaccination forms from visitors.

EXIM will not ask visitors for vaccination documentation to verify their attestation.

EXCEPTIONS TO THE VACCINE REQUIREMENT

Federal employees must be fully vaccinated other than in limited circumstances where the law requires EXIM to provide a reasonable accommodation to employees who communicate that they are not vaccinated against COVID-19 because of a disability or because of a sincerely held religious belief, practice, or observance. Determining whether an exception is legally required will include consideration of factors such as the basis for the claim; the nature of the employee's job responsibilities; and the reasonably foreseeable effects on EXIM's operations (undue hardship), including protecting other employees and the public from COVID-19.

Employees who wish to request an accommodation exemption to this requirement for medical or religious belief reasons will need to submit a request for reasonable accommodation to OHC. EXIM will establish the date by which employees should notify EXIM that they are seeking a legally required exception to the requirement to not be fully vaccinated, in order to ensure EXIM management can fully understand the effect of accommodation requests on our operations and to seek to ensure timely review of requests for an accommodation. Employees can submit requests for an exception after this date established.

EXIM's Disability Compliance, Reasonable Accommodation, and Personal Assistance Service Policy and additional resources are available to EXIM staff on EXIM Connect Intranet.

If an employee's request for accommodation is denied, following EXIM's established process for consideration and appeal, the employee is required to receive their first (or, if a one-dose series, only) dose within two weeks of the final determination to deny the accommodation. If receiving a two-dose series, the employee must receive the second dose within 6 weeks of receiving the first dose. If the employee received a first dose of a two-dose series prior to seeking an accommodation, agencies should require that the employee receive their second dose within two weeks of the final determination to deny the accommodation or within a week of the earliest day by which they can receive their second dose, whichever is later.

EXIM employees who are approved for accommodation will need to follow applicable masking, physical distancing, and testing protocols for individuals who are not fully vaccinated, as well as applicable travel guidance.

EXIM will not pursue disciplinary measures for failure to comply with the vaccination requirement against an employee who has a pending request for an accommodation related to the vaccine requirement.

Health and Safety: Face Masks

FACE MASK WEARING

Federal employees must be fully vaccinated by November 22, 2021, except in limited circumstances where an employee is legally entitled to a medical or religious accommodation that provides for an exemption to this vaccine mandate. In addition, government contractors and subcontractors must be fully vaccinated by January 4, 2022, per the Safer Federal Workforce Task Force's September 24, 2021, written Guidance to implement Executive Order 14042 ("Ensuring Adequate COVID Safety Protocols for Federal Contractors"), which was signed by President Biden on September 9, 2021. The Guidance requires Federal agencies to ensure that contractors and subcontractors with covered contracts greater than \$250,000, awarded on or after November 14, 2021, comply with the Guidance published by the Safer Federal Workforce Task Force. The vaccine mandate applies to most full- and part-time contractor and subcontractor employees in covered organizations, with exemptions for those legally entitled to an accommodation.

EXIM employees, on-site contractors, volunteers, customers, and visitors who are fully vaccinated and working in parts of the country characterized as having "high" or "substantial" COVID-19 transmission, as determined by the CDC Covid Data Tracker website, are required to wear a mask in Federal buildings and in government owned or leased vehicles; except for the limited exceptions outlined below.

Regardless of locality, all individuals who are NOT fully vaccinated are required to wear a mask and practice physical distancing in Federal buildings, government owned or leased vehicles, and on Federal property and adhere to applicable CDC quarantine requirements. For all unvaccinated individuals, masks must also be worn in outdoor shared spaces when physical distancing cannot be maintained.

In other parts of the country with "low" or "moderate" COVID-19 transmission, CDC guidance indicates that fully vaccinated people can safely participate in most activities, indoor or outdoor, without wearing a mask or social distancing. Individuals in this scenario may voluntarily decide to wear a mask or practice physical distancing but are not required to do so.

Current EXIM policy is that all employees, contractors, and visitors must wear masks in all EXIM buildings and government owned or leased vehicles, regardless of vaccination status – based on currently not knowing who is vaccinated and who is not.

When required, appropriate masks must be worn consistently and correctly. Masks must cover the nose and mouth in accordance with current CDC and OSHA guidance. See Acceptable Face Masks section below.

Failure to comply with these requirements may lead to appropriate administrative action. This policy is to protect the health and safety of our workforce by limiting the exposure to COVID-19.

EXIM reinforces face mask policies with on-site signage, as seen in Appendix II, working with the Department of Veterans Affairs at Headquarters and Department of Commerce for Regional Offices to ensure they have appropriate signage in place at all facilities. Employees/contractors should immediately report violations of this guidance to their supervisors. Informed by CDC guidelines and its own workplace health and safety research, EXIM requires face masks to be worn in any common areas (including restrooms, corridors, kitchenettes, and elevators) or shared workspaces (including open floorplan office space, cubicles, and conference rooms). Masks should also be worn in outdoor shared spaces when physical distancing cannot be maintained. Wearing a mask is not a substitute for physical distancing or other safety measures.

Employees/contractors may only remove face masks when eating, drinking, when alone in a closed setting such as a personal or enclosed office, or as required for identification. Personnel may be asked to lower their masks briefly for identification purposes in compliance with safety and security requirements.

EXIM will provide face masks to personnel and visitors, as necessary to ensure Plan compliance.

ACCEPTABLE FACE MASKS

In line with CDC recommendations, EXIM defines acceptable and unacceptable masks as follows:

Acceptable	Unacceptable
Non-medical disposable masks	Scarfs or Ski masks
Masks that fit properly (snugly around the nose and chin with no large gaps around the sides of the face)	Masks that do not fit properly (large gaps, too loose or too tight)
Masks made with breathable fabric (such as cotton)	Masks made from materials that are hard to breathe through (such as plastic or leather)
Masks with two or three layers of fabric	Masks with one layer of fabric
Masks made with tightly woven fabric	Masks made from loosely woven fabric or are knitted

Acceptable	Unacceptable
Masks with inner filter pockets	Masks with exhalation valves or vents
Wearing two masks – (a disposable mask underneath AND a cloth mask on top)	Other types of face protection (e.g., face shields, novelty/non-protective masks)
Masks with nose wire to prevent air from leaking out of the top of the mask	Inappropriate, explicit, or otherwise offensive embroidery in a mask

Most people of varying levels of health can safely wear face masks. Pursuant to CDC Guidance on [mask adaptations and alternatives](#), EXIM will make accommodations for individuals in exceptional situations with required documentation approved by EXIM’s Reasonable Accommodations (RA) official, if applicable. Employees should consult with the RA official about any questions on this matter. All exceptions must be documented, and alternative health and safety measures must be implemented to safeguard the health of the individual, granted the exception and others that they may encounter or interact with in the workplace. The COVID-19 Coordination Team should be informed of all exceptions that are granted.

Individuals in the following situations may be considered for exception with required documentation, if applicable:

- People of any age with certain disabilities including cognitive, intellectual, developmental, sensory, and behavioral disorders
- People who are deaf or hard of hearing, and those who interact with people who are hearing impaired
- People with certain underlying medical conditions

Health and Safety: Testing and Contact Tracing

TESTING

At this time, EXIM has not, and is not required to establish a COVID screening testing program.

CDC guidance as of October 4, 2021, states that if you have been in close contact (within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period) with someone who has COVID-19, AND you have been fully vaccinated, then you do NOT need to quarantine unless they have symptoms. However, fully vaccinated people should get tested 3-5 days after their exposure, even if they don't have symptoms, and wear a mask indoors in public for 14 days following exposure or until their test result is negative.

Quarantine if you have been in close contact (within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period) with someone who has COVID-19, AND you are NOT fully vaccinated.

EXIM's process for employee diagnostic testing is as follows:

- Employees purchase FDA Authorized COVID Test Kit (Rapid Antigen Test that produces name, time, result with a witness service) or
- Employees leverage 3rd-party Test Services such as doctor, clinic, CVS, Walgreen, Amazon, drug stores, free testing facility, etc. To get a negative test result.
- Employee will submit the negative test result to OHC and follow EXIM reimbursement process for their diagnostic testing cost so that there is no cost to the employee.
- Testing for those with vaccination exemptions

EXIM will establish a program to test employees who are not vaccinated and have received a medical or religious exemption through the reasonable accommodation process. Such testing will be weekly or twice-weekly based on time at the workplace. Please follow the testing guidance above and contact the OHC for additional questions.

Recordkeeping requirements if an employee tests positive for SARS-CoV-2 infection. Under OSHA's recordkeeping requirements, if an employee tests positive for SARS-CoV-2 infection, the case must be recorded on the OSHA Illness and Injury Log if each of the following conditions are met: (1) the case is a confirmed case of COVID-19; (2) the case is work-related (as defined by 29 CFR 1904.5); and (3) the case involves one or more relevant recording criteria (set forth in 29 CFR 1904.7) (e.g., medical treatment beyond first aid, days away from work). EXIM follows state and county reporting requirements and complies with state and county contact tracing efforts.

EXIM'S process to document COVID-19 test results complies with all applicable laws and in accordance with federal records management policies. EXIM promotes privacy and IT security, while also providing the relevant information to EXIM officials who need to know in order to implement the safety protocols. As appropriate, EXIM management consults with its EXIM's Records Officer, Chief Information Officer, Chief Medical Officer, Senior Management for Privacy, and EXIM legal counsel to determine appropriate information management protocols.

CONTACT TRACING

All employees and contractors who have been at an EXIM facility should report known and suspected COVID-19 exposures to their supervisors so appropriate precautions in the workplace can be taken. Supervisors must then make the EXIM COVID-19 Coordination Team aware of the occurrence of a potential or known exposure. EXIM management and the COVID-19 Coordination Team will work to ensure all employees and contractors are aware of the reporting policy.

Employees who have worked onsite and who test positive for COVID-19 should report their test results to their supervisor, so that appropriate precautions in the workplace can be taken. Employees do not need to provide a copy of a positive test or a doctor's note. Supervisors shall continue to report cases of onsite employees/contractors testing positive for COVID-19 to the EXIM COVID-19 Coordination Team. The identities of affected individuals will be protected and only provided on a need-to-know basis to applicable EXIM or public health officials, as governed by federal, state, or local public health regulations and existing EXIM policy. All positive test notifications shall adhere to EXIM privacy requirements. Under certain "need-to-know" situations, certain members of the EXIM COVID-19 Coordination Team may need to know the identity of the affected person as the EXIM COVID-19 Coordination Team is responsible for making sure an investigation and contact tracing occurs. Again, this information will be kept private from other employees, contractors, visitors, and the public who do not need to know.

The EXIM COVID-19 Coordination Team and HR Officer will collaborate with and support the contract tracing programs of local health departments to identify, track, and manage contacts of COVID-19 cases, as required or necessary, consistent with applicable law. The EXIM HR Officer, or other such HR designee, who has been trained in contact tracing will lead the contract tracing efforts supported by the EXIM COVID-19 Coordination Team for cases identified as having been in the workplace. Internal contact tracing and notifying of potentially exposed individuals will occur as quickly as practicable upon determining that exposures may have occurred. Privacy of all impacted employees will be protected throughout the contact tracing process.

EXIM's Facilities department will implement infection control and workplace safety efforts once informed of a known or suspected case of COVID-19 (either due to specific symptoms or positive test).

MEDICAL SCREENING / SYMPTOM MONITORING

Early detection and diagnosis of COVID-19 is vital to reducing transmission of the disease. Employees, contractors, and visitors should not enter a federal building if they are sick, not feeling well, experiencing symptoms associated with COVID-19, or have been directed by a medical or public health official to quarantine/isolate. Employees, onsite contractors, and visitors should also review the CDC's symptoms questionnaire; Paper version ([paper-version.pdf \(cdc.gov\)](#)) or digital version ([CDC Facilities COVID-19 Screening](#)), and ensure all answers are negative before entering the workplace. If they do have any symptoms consistent with COVID-19, they should not enter a federal workplace.

Any individual, regardless of vaccination status, who develops any symptoms consistent with COVID-19 during the workday must immediately isolate, wear a mask (if the individual is not already doing so and one is available), notify their supervisor, promptly leave the workplace, and isolate themselves from others.

Employees running a temperature of 100.4 degrees or higher or experiencing other symptoms of illness should remain home and telework or use sick leave as appropriate. Employees who exhibit signs of illness at their duty location should notify their supervisor and leave work immediately. Supervisors should remind the employee of leave options, such as requesting sick leave, annual leave, or emergency leave under the Families First Coronavirus Response Act (FFCRA), if available to the employee.

If the employee has no leave available, supervisors are authorized to approve requests for advanced leave or leave without pay in certain circumstances. When an employee opts not to take leave or telework voluntarily, a supervisor can direct the employee's use of leave. Supervisors should consult with appropriate human resources (HR) staff and the Office of General Counsel before taking such a step as enforced leave is an adverse action that imposes procedural requirements.

SELF-QUARANTINE AND SELF-ISOLATION

Any individual with a suspected or confirmed case of COVID-19 will be advised to self-isolate for 14 days, pursuant to CDC guidelines and in compliance with State, local, and Tribal laws and regulations. Isolation is used to separate people infected with COVID-19 from those who are not infected.

Unvaccinated personnel who have had [close contact](#) (Within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period) in the past seven days with someone who has tested

positive for COVID-19 must quarantine following CDC and State, local, and Tribal guidance.

Fully vaccinated employees and onsite contractor employees, who have come into close contact with someone with suspected or confirmed COVID-19, need to be tested 5-7 days after exposure, even if they do not have symptoms. These individuals will need to wear a mask in public indoor settings for 14 days or until they receive a negative test result. If their test result is positive, they should isolate for 10 days.

Unvaccinated individuals should quarantine for 14 days following exposure if they have been in close contact (within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period) with someone who has tested positive for COVID-19.

Leave related to quarantine. Per EXIM's travel policy, EXIM employees are aware that official or personal travel may result in a mandatory quarantine before they are allowed to return to the workplace.

- If quarantine is required because of official travel or workplace exposure, EXIM shall provide the employee with paid weather and safety leave, or other administrative leave.
- If quarantine is required because of personal travel, and the employee is otherwise expected to be present onsite, the employee may take personal leave while quarantining.
- If an employee refuses to quarantine or refuses to take personal leave while under mandatory quarantine after personal travel, EXIM may elect to bar the employee from the workplace for the safety of others.
- If EXIM elects to bar the employee from the workplace, the employee will be placed on administrative leave until management, as quickly as possible, determines what status the employee should be placed in while on quarantine.

Leave related to isolation due to SARS-CoV-2 infection. If an employee is subject to isolation due to being infected with COVID-19 and is unable to telework, the employee may request sick leave, as weather and safety leave would be unavailable. Employees may also request accrued annual leave and other forms of paid or unpaid leave in this situation as appropriate. (See OPM CPM 2020-02, February 7, 2020)

Health and Safety: Travel and Events

OFFICIAL TRAVEL

Federal employees should adhere strictly to CDC guidelines before, during, and after travel.

For Federal employees who are fully vaccinated, there are no Government-wide restrictions on travel, although EXIM's travel policies still apply.

Federal employees who are fully vaccinated do not need to get tested before or after domestic travel or self-quarantine after travel, unless required by their destination.

- However, all air passengers coming to the United States from abroad, including Federal employees who are fully vaccinated, are required to have a negative SARS-CoV-2 viral test result no more than three days before the flight to the United States departs or must show documentation of recovery from COVID-19 within the previous 90 days before they board a flight to the United States.
- Fully vaccinated travelers are advised that they should also, after traveling abroad, get tested with a viral test 5-7 days after traveling; self-monitor for COVID-19 symptoms; if symptoms develop, isolate and get tested, and follow all recommendations or requirements of their local U.S. destination after travel.

For Federal employees who are not fully vaccinated or who decline to provide information about their vaccination status, official domestic travel should be limited to only necessary mission-critical trips. International travel should also be avoided, if at all possible, unless it is mission critical.

Only mission-critical travel in support of mission essential functions is permissible during periods of high community transmission or until such travel is deemed sufficiently safe by public health agencies and/or EXIM management in consultation with EXIM's COVID-19 Coordination Committee. Travel authorizing officials are responsible for assessing whether travel is mission-critical, consistent with the guidance herein, in consultation with the traveler and executive leadership.

Remote meetings are strongly encouraged over in-person appearances. Staff traveling to areas that have significant levels of COVID-19 cases should be prepared to quarantine at home after official travel, as directed by applicable CDC and state and local public health quarantine guidelines, before returning to the office. Such travel should occur only after means to otherwise accomplish the business have been exhausted (i.e., remote meetings, hearings, or substitution of a local representative for the task).

As more areas open and medical conditions improve, travel between improved areas may be

authorized, but travel to significant outbreak areas should be extremely rare and, as noted above, travelers are subject to CDC and state and local post-travel isolation guidelines, if any. All travelers should comply with guidelines and restrictions imposed by airlines and other carriers, hotels, and host meeting facilities.

Financial commitments for future events should not be made unless the arrangements allow for cancelation without penalty. Questions regarding the appropriateness of scheduling events, training, and conferences shall be raised to the Office of Resource Management.

Multi-person official vehicle travel is discouraged. When a multi-person vehicle trip is required to meet business needs (essential official travel, motor pool use for essential local travel), all vehicle occupants must wear masks at all times and consider other safety measures, such as opening windows to improve air circulation, if possible.

The cost of testing for current infection with SARS-CoV-2, required for official travel and not available through a Federal dispensary or not covered (or reimbursable) through travel insurance, can be claimed in a travel voucher as a Miscellaneous Expense under EXIM'S travel policies.

PERSONAL TRAVEL

EXIM requests that employees engaging in personal travel carefully assess the level of risk prior to travel, wear a mask during all portions of a trip, maintain physical distance from non-household members, maintain good hand hygiene by regularly washing hands with soap and water, or using alcohol-based hand sanitizer if soap and water are not available, get tested, and stay home after higher-risk travel before returning to the workplace. Please follow the CDC guidelines for both domestic and international travel, and employees should consult these resources carefully before deciding to undertake personal travel. Staff traveling to areas that have significant levels of COVID-19 cases should be prepared to quarantine at home after personal travel, as directed by applicable CDC and state and local public health quarantine guidelines, before returning to the office. Employees who have on-site work requirements and responsibilities and will be taking leave to travel for personal reasons should contact their supervisors prior to leaving and returning to discuss telework and other leave options.

OFFICIAL EVENTS / Meetings, Events, and Conferences

EXIM's posture for reaching customers and external partners through conferences and seminars

continues to be virtual. Any in-person meeting, conference, or event that will be hosted by EXIM and attended by more than 50 participants, regardless of whether participants include members of the public, the meeting organizer must first seek the approval of senior management, in consultation with the COVID-19 Coordination Team.

In-person attendees at any meetings, conferences, and events hosted by EXIM , regardless of size, must be asked to provide information about vaccination status. In requesting this information, EXIM will comply with any applicable Federal laws, including requirements under the Privacy Act and the Paperwork Reduction Act.

In-person attendees who are not fully vaccinated or decline to provide information about their vaccination status must provide proof of a negative COVID-19 test completed no later than the previous 3 days and comply with masking and physical distancing requirements for individuals who are not fully vaccinated consistent with the requirements for visitors.

In-person attendees in areas of high or substantial transmission must wear a mask in public indoor settings regardless of vaccination status

Health and Safety: Physical Distancing

PHYSICAL DISTANCING

To the extent practicable, individuals who have not been vaccinated will be asked to maintain distance of at least six feet from others at all times, consistent with CDC guidelines, including in offices, conference rooms, and all other communal areas and workspaces. Distance and testing are not substitutes for wearing masks. Individuals must maintain distance AND properly wear masks (see guidance above). Individuals may remove their masks when eating or drinking in EXIM workplaces, so long as they maintain at least 6 feet physical distance.

In-person meetings should be avoided whenever possible, and video or audio conferencing used to the maximum practical extent. When in-person meetings must be held, they shall be limited to fewer than ten individuals, and held in rooms that permit social distancing protocols and mask requirements to be observed by all meeting participants.

When EXIM determines it is safe to bring employees back to the workplace, at Headquarters, current offices should be limited to a one-on-one meeting. Meetings or conversations with 2 or more need to be conducted at conference rooms or collaboration areas.

Restrooms should not be occupied by multiple people whenever practicable.

Health and Safety: Environmental Cleaning

ENVIRONMENTAL CLEANING

EXIM will continue to work with the General Services Administration (GSA) to ensure that EXIM workspace is properly cleaned and sanitized in accordance with CDC guidelines, including where EXIM has learned that an employee, contractor, or visitor has tested positive for COVID-19 and that individual has been in the workplace. Continued care will be taken to frequently clean and disinfect high-touch and high-traffic areas such as elevator control panels, door handles, conference room tables, pantry counters and restrooms in accordance with CDC guidance and using products from EPA's list of approved products that are effective against COVID-19. Office spaces that are in regular use are cleaned regularly, and in accordance with CDC guidelines. EXIM's Facilities and Capital Planning Office ensures that wipes, gloves, and other EPA-approved disinfectants are made available for individuals to wipe down their work area and related personal property.

If an employee/contractor/visitor reports that they have tested positive for COVID-19 after having been in the office, the area that the positive person works will be closed off to other staff and enhanced environmental cleaning of the spaces, in accordance with CDC and GSA guidance, as follows:

- If fewer than 24 hours have passed since the person who is sick or diagnosed with COVID-19 has been in the space, clean and disinfect the space.
- If more than 24 hours have passed since the person who is sick or diagnosed with COVID-19 has been in the space, cleaning is enough, but we may choose to also disinfect depending on certain conditions or everyday practices required by its facility.
- If more than 3 days have passed since the person who is sick or diagnosed with COVID-19 has been in the space, no additional cleaning (beyond regular cleaning practices) is needed.

If enhanced cleaning is required, wait as long as possible (at least several hours) before cleaning and disinfecting. Extended wait periods allow increased opportunity for viral deactivation to occur naturally, while also allowing time for aerosols to settle, prior to surface disinfection. EXIM's COVID-19 Coordination Team will determine the appropriate scope of workplace closures needed—in some cases, it may be a suite or individual offices or part of a floor, in other cases, it may include an entire building.

After enhanced environmental cleaning of the spaces in accordance with CDC and GSA guidance, the area can be reopened for workers to return to that area.

Information on cleaning recommendations from the CDC is available at: [Cleaning and Disinfecting Your Facility \(June 15, 2021\)](#). EXIM's Facilities and Workforce planning Office manages the facilities

contracts and has arranged to have EXIM's workplace areas cleaned and sanitized, including enhanced cleaning, if needed.

ELEVATORS AND STAIRS

Signage is currently posted in elevator lobbies and in elevators describing physical distancing requirements. Elevator use should be limited to no more than two people in the elevator car at a time. Masks must be worn in elevators. Appendix II, Picture 4-5.

SHARED SPACES

EXIM's Facilities and Capital Planning Office shall ensure shared spaces are kept clean and sanitized. Shared tools and equipment must be disinfected by users anytime the equipment is used by or transferred to a new person. This includes phones, computers and other communication devices, kitchen utensils, and other office equipment. Disinfectant wipes are available from EXIM Facilities.

Refrigerators, water coolers, and coffee brewers with disposable cups (or a personal re-usable cup/container) and single serve condiments and creamers may be used with proper hand hygiene. GSA and EXIM have installed visual markers to promote physical distancing within common spaces. Staff should always respect and follow maximum capacity signs. Appendix II, Picture 6.

HYGIENE

Hand sanitizer stations are currently available at building entrances and throughout workspaces which contain FDA-approved hand sanitizer with at least 60% ethanol and manufactured in accordance with the requirements of the U.S. Food and Drug Administration (FDA). Ingredients should be listed on a "Drug Facts" label. EXIM ensures the hand sanitizer is not on the FDA's [do not use](#) list.

Signage currently posted near restrooms and other building locations encourage frequent hand washing with soap and water or use of hand sanitizer or alcohol-based hand rubs.

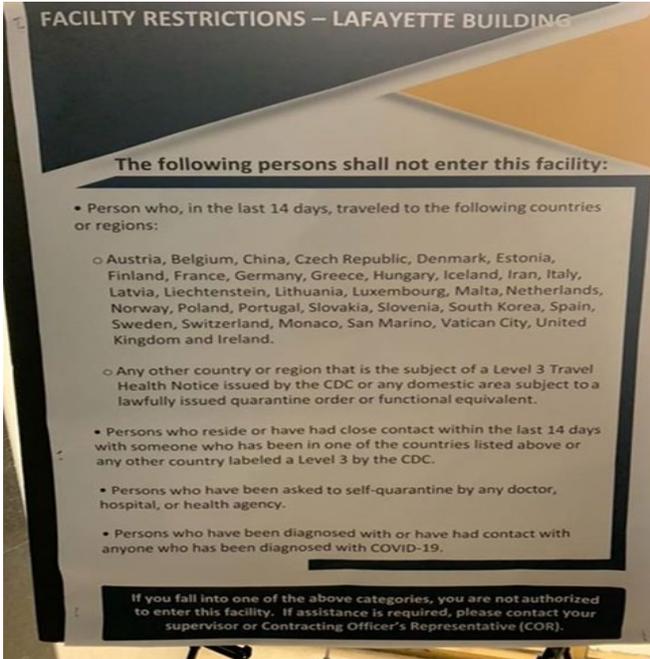
VENTILATION AND AIR FILTRATION

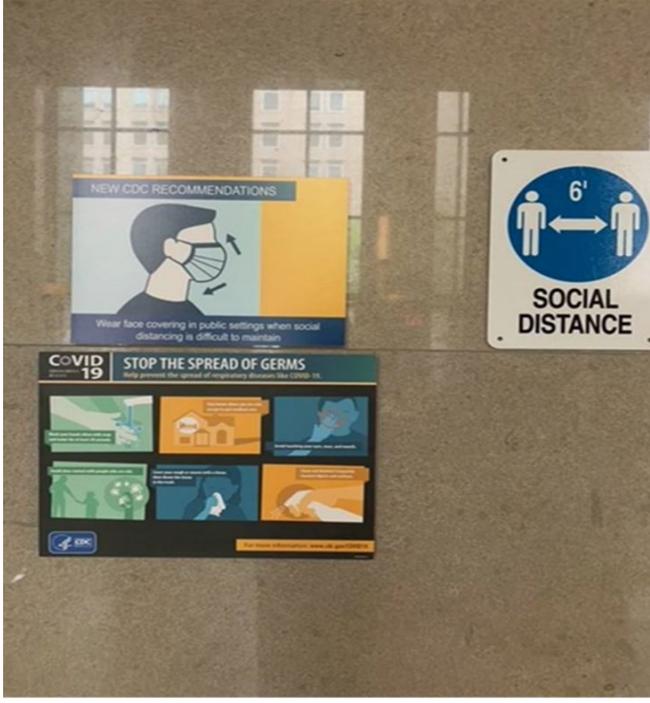
EXIM will continue to work with GSA and building management as appropriate to follow current industry practices and to apply the latest CDC guidance concerning building ventilation systems to include the following: ensuring air filters installed in building are the highest MERV (Minimum Efficiency Reporting Value) rating that can be utilized based on the capacity of that building's equipment and as recommended by the manufacturer; ensuring air filters are changed regularly based on the manufacturer's recommendation; optimizing fresh air and reducing recirculation, and extending operating times if necessary. In summary, to the maximum extent feasible, indoor ventilation has been optimized to increase the proportion of outdoor air and improve filtration.

Appendix I: EXIM COVID-19 Coordination Team

Office	Name	E-mail
Executive Sponsor	Adam Martinez	adam.martinez@exim.gov
Office of Resource Management	Maria Fleetwood Alan Foust Selma Hamilton	maria.fleetwood@exim.gov alan.foust@exim.gov selma.hamilton@exim.gov
Office of Human Capital	Larry Williams	larry.williams@exim.gov
Office of the General Counsel	Jennifer Clark	jennifer.clark@exim.gov
Public Health Expert	Karen Singleton, MD, MPH	
Building Health Services	Don Franklin	

Appendix II: Photos of Current On-site Signage

Title	Description of Sign	Photo of On-Site Sign
<p>1.COVID-19 signs</p>	<p><i>Mask Wearing signs and Social Distancing signs displayed in the lobby of the building. Everyone entering the building must do the following:</i></p> <ul style="list-style-type: none"> ● <i>Wear masks at all times</i> ● <i>Stay 6 feet apart at all times</i> ● <i>Wash hands frequently</i> 	
<p>2. Signage with entrance restrictions</p>	<p>Picture of the Facility Restrictions postage at the entrance of the building. Persons should not enter the building under the following conditions:</p> <ul style="list-style-type: none"> ● Travel outside the United States or exposure in the last 14 days to someone who has traveled outside the United States. ● Persons who have been asked to self-quarantine ● Persons who have been diagnosed or exposed to someone diagnose with COVID-19. 	

Title	Description of Sign	Photo of On-Site Sign
<p>3. Social distancing restrictions</p>	<p>Mask Wearing signs and Social Distance Signs displayed in the lobby of the building. Persons must wear masks and maintain a distance of 6 feet apart.</p>	
<p>4. Stairs</p>	<p>Sign for COVID-19 precautions to use on stairs. Stay 6 feet apart from others on stairs.</p>	

Title	Description of Sign	Photo of On-Site Sign
5. Elevators	Sign at the elevators. Maximum occupancy is 3 people per elevator car.	
6. Conference Rooms	Sample of Maximum Occupancy notices for conference rooms. Please note, Maximum Occupancy will vary by conference room.	