

# American Battle Monuments Commission

## COVID-19 Safety Plan

*The Administration is committed to ensuring that the Federal Government is a model employer, with the health, safety, and physical and mental wellbeing of its workforce paramount.*

[ OMB Memo M-21-25 ]

The American Battle Monuments Commission (ABMC) is committed to protecting the health and safety of our employees, our visitors, our partners, our facilities, and our communities. With facilities and commemorative cemeteries and monuments located worldwide, the Commission carefully monitors the evolving COVID-19 outbreak on a global, regional, and local level. This plan documents Commission policies and procedures relevant to the ongoing COVID-19 pandemic. It is grounded in principles and practices proven effective within the agency since the outbreak of the pandemic in early 2020 and complies with the most recent guidance published by the Office of Management and Budget (OMB) and Safer Federal Workforce Task Force.

### **Guiding Principles**

1. ABMC will strive to create a sense of safety as employees return to their workplaces and visitors return to the Commission's commemorative sites.
2. Leadership must understand employee concerns, recognizing that employees will be reluctant to engage if they do not feel physically and psychologically safe. Employee accommodations will be liberally and equitably applied.
3. Timely and effective internal and external communication and messaging is critical.
4. Personal Protective Equipment (PPE) will be readily available in workspaces.
5. The wearing of masks and social distancing in accordance with the latest CDC and OMB guidance will be enforced in public and private facilities and office spaces.
6. Before directing employees to return to ABMC offices, senior leaders will consider what is not getting done or being provided in a maximum telework environment and what is to be gained by recalling employees to ABMC offices.
7. Leadership must model desired behaviors – "lead from the front."

### **Covid Safety Team / Covid Task Force**

The agency has appointed a **Covid Safety Team** to monitor pandemic conditions and take necessary precautions to protect staff and visitors. The Covid Safety Team is comprised of the Chief of Staff, the Chief of Human Resources and Administration, the Director of Public Affairs, the Chief Financial Officer, the General Counsel, the Safety Officer, and the Director of Cemetery Operations. The Covid Safety Team is chaired by the Chief of Staff.

The Covid Safety Team is responsible for conducting assessments to establish, implement, and monitor compliance with safety protocols for physical space and masking, and determinations of on-site or telework/remote working. The team will review compliance with agency safety plans and protocols and consider potential revisions and other operational needs as pandemic conditions evolve.

Complementing the Covid Safety Team is the overseas **Covid Task Force** that was formed in immediate reaction to the pandemic. With similar representation as the Covid Safety Team, the Covid Task Force will monitor pandemic conditions within the countries in which ABMC offices and commemorative sites are located, taking necessary precautions to protect staff and visitors. The Covid Task Force is chaired by the Director of Cemetery Operations.

### **General Guidance**

The following general guidance applies to all ABMC employees, contractors, and sites. This guidance will be revised as needed to remain in compliance with OMB instructions and host nation COVID-19 protocols.

### **Health and Safety**

1. ABMC employees and contractors working remotely on a frequent or regular basis will be given advance notice and guidance before being asked to return to the physical workplace.
2. ABMC will utilize telework and remote work consistent with the principles set forth in OMB Memorandum M-21-25 during reentry and post-reentry.

#### *Masking*

1. Federal employees, onsite contractors, and visitors to Federal buildings and offices who are fully vaccinated (at least 2 weeks past their final dose) are not required to wear masks in areas of low transmission. Fully vaccinated individuals must wear their masks inside Federal buildings and offices in areas of high or substantial transmission, consistent with paragraph 2.a. below.
2. Federal employees, onsite contractors, and visitors who are not fully vaccinated (at least 2 weeks past their final dose), or who decline to disclose their vaccination status, must wear a mask in Federal facilities regardless of transmission level. This will be consistent with the following requirements:
  - a. Face coverings are required in areas such as walkways, hallways, elevators, staircases, bathrooms, cafeterias, kitchenettes, conference rooms, visitor centers, multi-occupancy offices, and maintenance areas. Face coverings may be removed when working alone in a private office with the door closed, in an individual cubicle with suitable separation, when working outdoors where physical distancing

can be maintained, and when eating. Overseas Operations locations will comply with host-nation rules where these are more restrictive.

- b. CDC recommends the following: Non-medical disposable masks, masks that fit properly (snugly around the nose and chin with no large gaps around the sides of the face), masks made with breathable fabric (such as cotton), masks made with tightly woven fabric (i.e., fabrics that do not let light pass through when held up to a light source), masks with two or three layers, and masks with inner filter pockets.
- c. ABMC employees will not wear novelty/non-protective masks, masks with ventilation valves, or face shields as a substitute for masks.
- d. Individuals may be asked to lower their masks briefly for identification purposes in compliance with safety and security requirements.
- e. Masks do not provide the same level of protection as respirators and should not replace personal protective equipment required or recommended at the workplace.
- f. ABMC guidance does not preclude an employee from wearing a mask if they so choose.
- g. In the vast majority of cases, employees who are not vaccinated due to disability or religious practices or beliefs will be able to follow the safety protocols for not fully vaccinated individuals as a reasonable accommodation. Any additional accommodation requests will be considered by management, on a case-by-case basis, IAW applicable law and EEO Commission guidance.

### *Vaccines and Testing*

#### 1. Federal Employees and Onsite Contractors

- a. ABMC will ask about the vaccination status of Federal employees and onsite contractors. Employees and onsite contractors must sign an attestation confirming their vaccination status. Those who decline to confirm their vaccination status will be treated as not fully vaccinated for purposes of safety protocols.
- b. Federal employees must email their attestation forms to the Chief of HR and Administration at [smyserj@abmc.gov](mailto:smyserj@abmc.gov). ABMC will not collect attestation forms from onsite contractors. Instead, onsite contractors must retain the forms on their possession for showing when required.

- c. Employees will receive paid time off to be vaccinated and to recover from any side effects they may experience.
- d. ABMC has established a program to test not fully vaccinated Federal employees and onsite contractors on a weekly basis. Federal employee tests will be paid for by ABMC.
- e. Employees and onsite contractors who are not fully vaccinated must present a dated negative COVID-19 test, taken within the 3 days prior to reporting to work each week. Federal employees working in the Arlington, Va. headquarters must email their dated test results to the Chief of HR and Administration at [smyserj@abmc.gov](mailto:smyserj@abmc.gov). Federal employees working in the Paris, France operations office or in an ABMC cemetery must email their dated test results to the Director of Human Resources at [blackburng@abmc.gov](mailto:blackburng@abmc.gov).
- f. ABMC will not collect dated test results from onsite contractors. Instead, onsite contractors must retain the results on their possession for showing when required.
- g. ABMC will not test employees and onsite contractors who are fully vaccinated.

## 2. Family Members

Employees will receive paid time off to accompany a family member being vaccinated. A “family member” is an individual who meets the definition of that term in [5 CFR 630.201](#).

## 3. Visitors and Contractors

- a. Visitors and contractors must provide an attestation confirming their vaccination status and comply with the requisite safety protocols.
- b. Visitors who are not fully vaccinated or decline to provide their vaccination status must provide proof of a negative COVID-19 test, dated within the previous 3 days, that will be shown to their ABMC escort prior to entry to an ABMC office space or building, or participation in an ABMC-hosted meeting, event, or conference.
- c. Visiting contractors who are not vaccinated or decline to confirm vaccination status must produce a negative COVID test, dated within the previous 3 days, that will be shown to their ABMC escort prior to entering an ABMC office space or building to perform their contracted work.

- d. ABMC will not collect attestation forms or test results from contractors and visitors. Instead, contractors and visitors must retain the forms in their possession for showing when required.
- e. The requirement to provide information on vaccination status and a negative COVID-19 test result does not apply to members of the public entering an ABMC office or facility to obtain a public service or benefit. Hence, it is not required of visitors to our cemeteries or visitor centers. However, these visitors must comply with all relevant CDC guidance, including wearing a mask and physically distancing as required.

### *Contact Tracing*

- 1. The ABMC COVID-19 Safety Team will cooperate with and support the contact tracing programs of local health departments to help identify, track, and manage contacts of COVID-19 cases.
- 2. Human Resources will—
  - a. Coordinate with facilities staff to implement infection control and workplace safety efforts once informed of a case of COVID-19, either due to specific symptoms or a positive test.
  - b. Make disclosures to local or Embassy public health officials as required or necessary to provide for the public health and safety of Federal employees, contractors, and visitors, in accordance with local public health mandates.

### *Travel*

- 1. Official travel must be authorized by the Chief of Staff, Director of Cemetery Operations, or the Director of Support Operations.
- 2. ABMC employees will adhere strictly to CDC [guidelines](#) before, during, and after travel, regardless of whether the travel is personal or for official business.
  - a. CDC guidelines include the following precautions: carefully assessing travel risk prior to travel, wearing a mask during all portions of a trip if not fully vaccinated, maintaining physical distance from non-household members, maintaining good hand hygiene by regularly washing hands with soap and water, or using alcohol-based hand sanitizer if soap and water are not available, and getting tested and staying home after higher-risk travel before returning to the workplace.
  - b. For Federal employees who are fully vaccinated, there are no Government-wide restrictions on travel.

- c. For Federal employees who are not fully vaccinated or who decline to provide information about their vaccination status, official domestic and international travel should be limited to only necessary mission-critical trips. The ABMC Secretary/Acting Secretary is the sole approval authority in these cases. Upon appointment of a permanent Secretary, this can be delegated to the Deputy Secretary.
3. When returning from official or personal travel, ABMC employees will adhere to current CDC and Mission/host nation quarantine requirements and testing guidance before returning to the workplace.
4. If feasible, private transportation for official travel is preferred to the use of public or other communal transportation, in combination with other safety and security guidance.

#### *Meetings, Events, and Conferences*

1. Whenever ABMC hosts an in-person meeting, conference, or event that will be attended by 50 or more participants, regardless of whether participants include members of the public, the approval must come from the Secretary/Acting Secretary in consultation with the ABMC COVID-19 Safety Team. Upon appointment of a permanent Secretary, this can be delegated to the Deputy Secretary.
2. In-person attendees at any meetings, conferences, and events hosted by ABMC, regardless of size, will be asked to provide information about vaccination status. Any 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 within the previous 3 days and comply with masking and physical distancing requirements.
3. All in-person attendees in areas of high or substantial transmission must wear a mask in public indoor settings regardless of vaccination status.

#### *Symptom Monitoring*

1. If ABMC employees, onsite contractors, or visitors are not feeling well, they should not enter ABMC offices or sites.
  - a. At the Arlington, Va., headquarters office, ABMC employees and contractors working on site will complete symptom screening daily or upon entry to the workplace. ABMC will use this information to assess the individual's risk level and determine whether they should be allowed entry to the workplace. Visitors will also be asked to complete symptom screening before entering an ABMC facility.
  - b. Overseas Operations and Cemetery staff will complete a symptom screening daily or upon entry to the worksite.

2. ABMC employees or contractors working on site who develop [any symptoms consistent with COVID-19](#) during the workday must immediately isolate, notify their supervisor, and promptly leave the workplace.

### *Quarantine and Isolation*

1. ABMC employees and contractors with a suspected or confirmed COVID-19 diagnosis will isolate, [pursuant to CDC guidelines](#), and in compliance with local laws/regulations.
2. Individuals who have been fully vaccinated and have had close contact with someone with suspected or confirmed COVID-19 must get tested 3-5 days after exposure, even if they do not have symptoms. These individuals must also wear a mask indoors for 14 days following exposure or until their test result is negative. If their test result is positive, they should isolate for 10 days.

### *Confidentiality*

1. All medical information collected from Federal employees, including attestation of vaccination status and test results, and any other information obtained as a result of testing and symptom monitoring will be treated confidentially in accordance with applicable law, and accessible only by those with a need to know in order to protect the health and safety of personnel. All questions relating to personal medical data should be referred to the Chief of Human Resources and Administration.
2. ABMC will not retain in its records copies of contractor and visitor attestations and test results. These records must be retained by the individual contractor and visitor for examination by ABMC personnel as needed.

## **Workplace Operations**

### *Occupancy*

1. No ABMC office space, visitor building, or visitor center will operate above the number or percentage of personnel dictated by the local country, state, or community. Exceptions to this policy must be approved by the Secretary/Acting Secretary, as advised by the Covid Safety Team and in consultation with the Safer Federal Workforce Task Force.
2. ABMC encourages supervisors of employees and contractors who report to their work location to stagger work times to reduce density, minimize traffic volume in elevators, and avoid crowds during commuting.

### *Physical Distancing*

ABMC employees and contractors will maintain, to the extent possible, a distance of at least six feet from others at all times, including in offices, conference rooms, and all other communal and

work-spaces. Distance and testing are not a substitute for wearing masks if not fully vaccinated or in areas of high or substantial transmission. ABMC personnel will maintain distance AND properly wear masks at all times in ABMC office spaces if not fully vaccinated or in areas of high or substantial transmission. Physical barriers such as plexiglass shields that have been installed will be kept in place where appropriate.

### *Environmental Cleaning*

1. ABMC office space that is in regular use will be cleaned regularly and in accordance with CDC guidelines. Wipes, gloves, and other EPA-approved disinfectants will be available for individuals to wipe down their workstation and related personal property.
2. In the event of a suspected or confirmed case of COVID-19 in the workplace (if the individual had been in the building up to seven days prior), enhanced environmental cleaning will be performed in accordance with [CDC](#) and GSA guidance. If such enhanced cleaning is required, office managers will wait 24 hours before cleaning or disinfecting. If 24 hours is not feasible, they will wait as long as possible.
3. Employees, contractors, and visitors will be asked to vacate the affected space until sufficient time has gone by to allow the virus to become non harmful. The ABMC Covid Safety Team and/or Covid Task Force will determine the appropriate scope and duration of workplace closures, whether an office, a suite of offices, common space, an entire floor, or an entire building (visitor building, visitor center, service area, etc.).

### *Hygiene*

Hand sanitizer stations or bottles will be made available at office or building entrances and throughout workspaces and will contain FDA-approved hand sanitizer with at least 60 percent ethanol. All personnel are encouraged to wash their hands with soap and water or use hand sanitizer or alcohol-based hand rubs frequently.

### *Shared Spaces*

1. Shared tools and equipment will be disinfected by users anytime the equipment is used by or transferred to a new person. This includes phones, computers, copiers, printers, scanners, and other communication devices; kitchen implements; and other office equipment.
2. Breakrooms / Kitchens: Employees may use refrigerators to store personally identifiable food containers and drink, but water coolers and coffee brewers will not be used. Employees should use individual water bottles and must bring their own utensils, containers, and hydration source. Employees will use only cookware brought from their household and must clean before and after using refrigerators and microwave ovens.

3. Employees in the Headquarters and Overseas Operations Office are encouraged to bring their own meals to the office and should eat at their individual workstations or outside. In the Overseas Operations Office, individuals can eat their meal in the break room, but should socially distance. Cemetery break rooms will be configured to allow meals while conforming to social distancing guidelines. Masks will be worn at all times if not fully vaccinated or if the facility is in a region defined as a high or substantial transmission area, other than when eating a meal.
4. Use of conference rooms in high or substantial transmission areas will be limited. Conference rooms will be cleaned by the individual who ran the meeting.
5. Lobby chairs and couches will be labeled with “Do Not Sit” signs in high or substantial transmission areas. Doors to executive office suites will be kept closed to limit foot traffic through the area to essential business only.
6. Only one employee at a time should be in an individual office or cubicle station. While engaging in conversation, visitors should remain in the hall outside of the office. Employees and on-site contractors will keep office doors shut while working or out of the office. This is not required if individuals are fully vaccinated, and they are in a low transmission area.
7. Posters will be placed at entrances and throughout common areas of ABMC offices and buildings to remind employees and visitors of entry screening protocols and best practices for proper hygiene.

### *Visitors*

The number of visitors to ABMC office spaces will be minimized; visits will be virtual unless a personal visit is the only way to achieve the mission. Visitors to ABMC office spaces will be screened in the same manner as ABMC personnel when entering an ABMC facility and must comply with the procedures and requirements specified in the *Vaccines and Testing* section of this plan, beginning on page 3. Visitors must adhere to the following social distancing, face mask, and personal hygiene measures:

1. Visitors must have a mask if not fully vaccinated or visiting an ABMC office or facility in a high transmission area, and they must disinfect their hands prior to entering the ABMC office suite or building.
2. If a visitor who is not fully vaccinated does not have a mask, one will be provided by the escort hosting the visit or the visit will be rescheduled.
3. When meeting physically, remain at least 6 feet from other people. Do not shake hands.

Visitors will be instructed to promptly report to their ABMC point of contact a positive test for COVID-19 within one day of their visit or within one day of notice of the positive test (if

within 10 days of visiting an ABMC worksite) so that ABMC can implement contact tracing and notifications.

### **Public Affairs**

The Director of Public Affairs will ensure consistent communication to our geographically dispersed staff, external audiences, and global visitors, providing timely updates on the evolution of agency office COVID-19 protocols and the operating status of cemeteries and sites.

All media queries will be forwarded without comment to the Director of Public Affairs, Ali Bettencourt, at [bettencourta@abmc.gov](mailto:bettencourta@abmc.gov) or 703-677-5041 (work cell).

### **Appendices**

1. ABMC Cemetery Guidelines
2. Memorial Day Guidelines

*Current as of: September 1, 2021*

## **Appendix 1 – ABMC Cemetery Guidelines**

The COVID-19 pandemic has created disparate impacts as conditions vary from country-to-country, with different periods of infection resurgence, and various government restrictions. The following guidelines will be used by the ABMC COVID Task Force to determine site closures and restrictions based on host nation government requirements.

### **Red – Cemeteries closed**

#### **Trip Wires:**

Host nation limits personnel movement, resulting in insufficient staff to safely operate the cemetery. Host nation closes other public sites and facilities, such as parks and gardens. Host nation enforces other restrictions that impact ABMC operations and persuade the Director of Cemetery Operations to close the cemetery.

#### **Site Conditions:**

- Sites remain closed to the public
- All required staff (as determined by Superintendent) who are able to travel to work, will report to work. Emergency Telework will be approved as needed when practical.
- Team focuses on priority tasks (as determined by Superintendent)
- Contractual and Seasonal greenspace workers (as determined by Superintendent) who are able to travel, will report as directed
- Conduct *deep cleaning* (in-house or contractual) of buildings and/or structures
- Only abbreviated Memorial Day ceremonies are authorized, IAW COA #1 or COA #2 (Appendix 2)

### **Yellow – Cemetery gates open with visitor access to grounds only**

#### **Trip Wires:**

Host government authorizes the re-opening of public parks, beaches, and cemeteries. Host nation restrictions prevent the access of visitors to cemetery buildings and/or visitor centers.

#### **Site Conditions:**

- Cemetery grounds and plot areas are open to the public
- Visitor centers and visitor buildings remain closed to the public
- Guides may provide information to members of the public who visit the grounds, in accordance with host-nation social distancing rules. Limited scheduled tours may be conducted only at the discretion of the Superintendent, IAW host nation restrictions (all social distancing and safety protocols still apply)

- 100% of Green Team reporting back to work – social distancing and staggered break times implemented as much as possible
- Guides will return to full-time work at the discretion of the Superintendent
- Ceremonies (wreath laying or Next of Kin permitted at the discretion of the cemetery Superintendent, IAW host nation restrictions (all social distancing and safety protocols still apply)

**Green – Cemeteries open fully**

**Trip Wires:**

Host government removes all applicable restrictions, allowing visitor access to all cemetery grounds and buildings

**Site Conditions:**

- Sites return to “normal” operating status
- Visitor centers and visitor buildings are open to the public during regular hours
- Guided tours are conducted normally

Crews, staff, and seasonal workers return to normal schedules

***Attachment:***

Cemetery Re-Opening Checklist

## **Cemetery Re-Opening Checklist**

### **Safety**

- All employees will have gloves, masks if not fully vaccinated (or IAW host-nation requirements), face shields and plexiglass screens for workstations
- Supply stock of hydro-alcoholic solution for hand sanitizing and cleaning of common areas
- Thorough cleaning of all facilities either in-house or via contractor. Subsequent cleaning will be determined by site and in coordination with and approval of Cemetery Operations
- Installation of Plexiglass screen or marking standoff (tape marker on floor) areas in visitor building and visitor center
- Maximum number of visitors allowed in one space posted
- Signage for visitors and staff with instructions on keeping social distance, building closures, absence of guided tours, etc.

### **Maintenance and Site Standards - Horticulture**

- Detail, prioritize, and accomplish essential tasks to bring sites back to ABMC standard

### **Maintenance and Site Standards – Facility Maintenance**

- Thorough walkthrough and inspection of all buildings, interior and exterior; security and fire alarm system; smoke detectors; water leaks; and all systems including storm drain and sewage system
- Maintenance and cleaning of the headstones, infrastructure repairs (HVAC, Electrical, Water) necessary to open cemetery to staff and visitors, and fuel diesel and petrol replenishment as needed

### **Personnel and Administrative**

- Manpower staffing, including contractors and seasonal, sufficient to return to normal operations
- Develop work plan for social distancing and staggered break times

### **Visitor Services**

- Follow site status guidelines (Red, Yellow, Green)
- Receive “all-clear” from Cemetery Operations before reopening visitor centers or visitor building to the public

Note:

All above procedures may be selectively applied, as required, IAW respective host-nation changing restrictions and limitations.

## **Appendix 2 – ABMC Memorial Day Guidelines**

### **I. Course of Action #1: Highly Restricted / Very Limited Events**

*This is the current baseline, applicable to all ABMC sites where host nation rules limit public gatherings. Requires approval from a Deputy Director of Cemetery Operations.*

#### **Objective:**

This Course of Action (COA) authorizes Superintendents to organize highly restricted/limited events/ceremonies. This is the ABMC baseline COA unless *both* host-nation and U.S. Chief of Mission (COM) have relaxed COVID restrictions on public gatherings.

#### **Definition:**

- Ceremony closed to the general public
- ABMC Superintendent-led commemoration
- Up to 49 non-ABMC guests, invited by name, may attend the event, provided *both* host-nation and Chief of Mission concur
- Host-nation social-distancing rules apply
- No request for U.S. military support from outside of country
- Minimum required host-nation representation, at Superintendent's discretion
- No reception
- No external media, unless recommended and approved by both ABMC and Embassy PAO
- Headstone flag placement only if ABMC COVID staffing permits
- Follow all host-nation and COM health recommendations

### **II. Course of Action #2: Moderately Restricted / Tailored event**

*This is an exceptional departure from COA #1 and is applicable to ABMC sites where host-nation and COM have approved exemptions on a limited, case-by-case basis. Requires Director of Cemetery Operations approval.*

#### **Objective:**

COA #2 allows Superintendents to organize larger events, when requested by COM and host-nation authorities. COA #2 is valid until COVID restrictions are lifted sufficiently to allow COA #3.

**Definition:**

- Ceremony closed to the general public
- Superintendent-led event, with the option of COM or senior military rep
- Up to 100 non-ABMC guests, invited by name, may attend the event, provided *both* host-nation and COM concur
- Reduced U.S. and local military support; bands/honor guard by exception
- Email invitations
- No reception, unless requested/approved/sponsored by host nation, IAW social distancing and safety protocols
- No external media, unless recommended and approved by both ABMC and Embassy PAO
- Headstone flag placement only if ABMC COVID staffing permits
- Follow all host-nation and COM health recommendations

**III. Course of Action #3: Normal Memorial Day Ceremony**

*COA #3 will only be executed if both host nation and the Executive Branch drop all COVID restrictions for external ceremonies. Requires Chief Operations Officer approval.*

**Objective:**

COA #3 allows Superintendents to organize normal Memorial Day events.

**Definition:**

- Ceremony open to the general public
- No limit to the number of guests
- Normal U.S. and local military support
- Receptions (vin d'honneur) authorized
- External media permitted
- Flags will be placed in front of headstones