

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 and are aligned with the latest guidance from the Centers for Disease Control and Prevention (CDC).

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, OMB, Department of State, and applicable foreign government guidance will be enforced in public and private facilities and office spaces.
6. 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, the Director of Support

Operations, 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.

The Centers for Disease Control and Prevention (CDC) has set recommendations related to [COVID-19 by County | CDC Community Levels](#), which measure the impact of COVID-19 illness on health and healthcare systems and inform the appropriate prevention strategies to utilize at a given time.

CDC has provided county-level data showing the COVID-19 Community Level for each county in the United States, as determined by CDC. ABMC will use this data to determine the COVID-19 Community Level in Arlington, Va.

ABMC will review the COVID-19 Community Level on a weekly basis to determine changes that must be made to agency COVID-19 workplace safety protocols for the upcoming week.

COVID-19 Community Level signs will be posted at the entry doors in the Arlington headquarters, depicting the level and corresponding actions that should be adhered to.

Federal Facility COVID-19 Safety Protocols	When COVID-19 Community Level is LOW	When COVID-19 Community Level is MEDIUM	When COVID-19 Community Level is HIGH
Agencies must instruct all individuals known to be exposed to COVID-19 to wear a high-quality mask or respirator (such as an N95), take other post-exposure precautions, and watch for symptoms for 10 full days after exposure , consistent with CDC guidance—instead of at-home quarantine and regardless of vaccination status. Agencies must require individuals exposed to COVID-19 be tested at least 5 full days (ideally, on or after day 6) after their last exposure .	YES	YES	YES
Agencies must instruct all individuals with probable or confirmed COVID-19 to follow agency isolation protocols and take other precautions consistent with CDC guidance.	YES	YES	YES
To be consistent with Task Force guidance, agencies would need to make and maintain improvements to indoor ventilation and air filtration to the maximum extent feasible .	YES	YES	YES
To be consistent with Task Force guidance, agencies would need to post signage encouraging individuals, regardless of vaccination status, to consider physically distancing themselves from others and avoiding crowding in indoor common areas, meeting rooms, and high-risk settings in Federal facilities. ⁶	NO	YES	YES

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 are not required to wear masks in a COVID-19 Community level of LOW. Individuals who are at a high risk should wear a mask with a COVID-19 Community level of MEDIUM. All individuals regardless of vaccination status must wear their masks inside Federal buildings and offices in areas of HIGH COVID-19 Community levels, consistent with paragraph 2.a. below. ABMC will determine the level of transmission by using the CDC COVID-19 Community Tracker in the United States and rely upon country specific information provided by the applicable embassy. ABMC will assess Community levels weekly.
2. Federal employees, onsite contractors, and visitors, regardless of vaccination status, must wear a mask and physically distance in Federal facilities when the COVID-19 Community level is HIGH. 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.

Signage

1. When the COVID-19 Community Level is HIGH in Arlington County, ABMC will post physical signs providing notice of the requirement for all individuals to wear a high-quality mask or respirator (such as N95) indoors in the facility pursuant to E.O. 13991.
2. When the COVID-19 Community Level is LOW or MEDIUM in Arlington county, ABMC will post physical signs providing notice that mask-wearing is optional.

Vaccines and Testing

1. Federal Employees

- a. Employees who seek any non-required dose of FDA-authorized COVID-19 vaccine during work hours should be granted administrative leave and not use duty time. This includes employees who are not required to be vaccinated due to the nationwide preliminary injunction on implementation and enforcement of E.O. 14043.
- b. Employees will receive paid time off to be vaccinated or receive boosters (including travel time) and to recover from any side effects they may experience.
- c. ABMC has established a program for new employees requiring an exception to the vaccination requirement because of a disability. Individuals should review ABMC's Reasonable Accommodation Policy and contact the Director of HR at staplerj@abmc.gov for assistance.
- d. If a new employee requires an exception to the vaccination requirement for a sincerely held religious belief, practice, or observance, then they should contact the General Counsel at fontaine@abmc.gov.
- e. ABMC will take no action to require or request employees and potential employees to provide information about their COVID-19 vaccination status solely for purposes of implementing the vaccination requirement pursuant to E.O. 14043, due to the nationwide preliminary injunction on implementation and enforcement of E.O. 14043.

2. Family Members

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

3. Visitors and Contractors

- a. To be consistent with Safer Federal Workforce Task Force guidance, ABMC will pause asking onsite contractor employees to provide information about their COVID-19 vaccination status, regardless of COVID-19 Community Levels, where COVID-19 safety protocols do not vary based on vaccination status. This is true regardless of COVID-19 Community Levels.
- b. If any individual, including contractors, has fever or chills, or if they have other new or unexplained symptoms consistent with COVID-19 such as new or unexplained

onset of cough, shortness of breath, or difficulty breathing, new or unexplained loss of taste or smell, or new or unexplained muscle aches, they should not enter a Federal workplace. If an individual suspects that they have COVID-19, such as because they have new or unexplained COVID-19 symptoms, but they do not yet have test results, they should not enter a Federal workplace and should get tested if they have not already done so. ABMC will require that all individuals, including all contractor employees working onsite at an agency workplace, complete a self-conducted screening before entering a Federal facility. This screening does not need to be verified by agency personnel.

- c. ABMC will allow contractors who test positive for COVID-19 and had symptoms to return to working onsite at an agency workplace after 5 full days from the onset of symptoms (day 0 being the day of symptom onset, regardless of when the individual tested positive), once they are fever-free for 24 hours without the use of fever-reducing medication and their other symptoms are improving. Note that loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation. If at any point their COVID-19 symptoms recur or worsen, agencies must instruct the individual to again not enter a Federal facility, restarting at day 0, consistent with Executive Order 13991 and CDC recommendations on isolation and the protocols set forth by the agency
- d. Visitors to ABMC facilities must comply with all relevant CDC and host-nation guidance, including wearing a mask and physically distancing as required.

Contact Tracing

The ABMC COVID-19 Safety Team will cooperate with and support the contact tracing programs of local health departments to include Embassy guidance to help identify, track, and manage contacts of COVID-19 cases.

- 1. If you are notified that you were in close contact with a COVID positive individual :
 - a. Call or email your supervisor and inform them of the situation as soon as possible.
 - b. You may come to work as long as you do not exhibit any flu-like symptoms.
 - c. You must:
 - 1) Wear a mask indoors and in public for 10 days following exposure or until a negative test result, AND
 - 2) Get tested **5 days** after the close contact with someone with suspected or confirmed COVID. If during the 10-day period, you develop COVID symptoms and/or test positive for COVID **do not** come to work. Call/email your supervisor immediately and refer to the "Positive COVID Test" section above for additional information.

In addition—

- a. You must get tested **5 days** after the close contact with someone with suspected or confirmed COVID, or immediately if symptoms develop.
- b. LES and GS staff should always follow the directions of their physician, the work doctor and/or the Embassy MED unit (for overseas staff) as appropriate.
- c. You may return to work (with a mask) after 5 days so long as you exhibit no COVID symptoms. If during the quarantine period, you develop COVID symptoms and/or test positive for COVID do **not** come to work. Call/email your supervisor immediately and refer to the "Positive COVID Test" document for additional information.

Ex. If you are vaccinated and your last close contact was on Saturday, you should plan on masking until Thursday and getting tested then. You *may* return to work.

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.

Official Travel

1. ABMC employees will adhere strictly to CDC and Mission/host nation guidelines before, during, and after travel, regardless of whether the travel is personal or for official business.
 - a. There are no Government-wide limits on official travel (i.e., travel conducted under an official travel authorization) for Federal employees, regardless of their vaccination status.
 - b. ABMC personnel must—
 - i. Inform the traveling individual that CDC recommends that they should be up to date with COVID-19 vaccines before travel;
 - ii. Recommend that the traveling individual consider being tested for current infection with a viral test as close to the time of departure as possible (no more than 3 days) before travel;
 - iii. Instruct the traveler to adhere strictly to CDC guidance for domestic and international travel before, during and after official travel;
 - iv. Instruct the traveling individual to check their destination's COVID-19 Community Level before traveling, and to wear a high-quality mask or

respirator (such as an N95) while on-duty and around others indoors at their destination, if the COVID-19 Community Level in the county where their destination is located is HIGH;

- v. Instruct the traveling individual to make sure they understand and follow all travel restrictions put in place by State, Tribal, local, and territorial governments; and
2. 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.
3. 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

There are currently no Government-wide restrictions in regard to meetings, events and conferences. ABMC personnel do not need to first seek approval of the agency head, regardless of the expected number of in-person participants or local COVID-19 Community Levels. ABMC must comply with relevant COVID-19 safety protocols, including as it relates to any mask-wearing when COVID-19 Community Levels are HIGH, pursuant to Executive Order 13991 and consistent with CDC guidance.

Symptom Monitoring

1. If ABMC employees, onsite contractors, or visitors are not feeling well, they should not enter ABMC offices or sites.
2. ABMC employees or contractors working on site who develop any symptoms consistent with COVID-19 during the workday must immediately isolate, wear a mask, notify their supervisor, and promptly leave the workplace. ABMC will then provide advice and support to supervisors on any related reporting or human resource requirements.

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. Any individual with probable or confirmed COVID-19, regardless of vaccination status, must not enter a Federal facility or interact with members of the public in person as part of their official responsibilities, consistent with CDC guidance on isolation, and must monitor their symptoms. This includes individuals who have an initial positive diagnostic viral test for COVID-19, regardless of whether or not they have symptoms, and people with symptoms of COVID-19, including people who are awaiting test results or have not been tested.

3. These individuals must also wear a mask indoors for 10 days following exposure. If their test result is positive, they should isolate for 5 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/Deputy 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

During periods when COVID-19 Community level is MEDIUM or HIGH, 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.

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, 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

During periods when COVID-19 Community level is MEDIUM or HIGH the following procedures will be enforced:

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. 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

During periods when COVID-19 Community level is MEDIUM or HIGH 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 must adhere to the following social distancing, face mask, and personal hygiene measures:

1. Visitors must have a mask when visiting an ABMC office or facility when COVID-19 Community level is HIGH, and they must disinfect their hands prior to entering the ABMC office suite or building.
2. 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 5 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 or 703-677-5041 (work cell).

Appendix

ABMC Cemetery Guidelines

Current as of: September 20, 2022

Appendix – 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 restrictions result in insufficient staff to safely operate the cemetery. Host nation closes other public sites and facilities that, according to Director of Cemetery Operations (DCO), are equivalent to our cemeteries/buildings. Host nation specifically requests closure of ABMC sites. Host nation enforces other restrictions that impact ABMC operations and persuade DCO 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.
- Commemoration ceremonies are authorized only to the extent that the Superintendent can remain within the limitations established by DCO, IAW host nation guidance.

Yellow – Cemetery gates open with visitor access to grounds only

Trip Wires:

Host nation restrictions are relaxed to the extent that DCO determines outdoor grounds are accessible by the public. Host nation restrictions prevent the access of visitors indoors to cemetery buildings.

Site Conditions:

- Cemetery grounds and plot areas are open to the public.
- Cemetery buildings remain closed to the public (offices and bathrooms at discretion of Superintendent).
- Guides may provide information to members of the public who visit the grounds, in accordance with host-nation social distancing rules. Scheduled tours may be conducted only at the discretion of the Superintendent, IAW host nation restrictions (all social distancing and safety protocols still apply).
- Up to 100% of Green Teams and Guides report back to work (Superintendent will follow applicable host nation COVID labor guidelines and applicable U.S. Federal/Chief of Mission labor guidelines).

- Commemoration ceremonies are authorized only to the extent that the Superintendent can remain within the limitations established by DCO, IAW host nation guidance.

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 (Superintendent will also consider U.S. Federal requirements).
- Guided tours are conducted normally.
- Crews, staff, and seasonal workers return to normal schedules.
- Visitors and employees may always wear masks if they so desire.
- Cemetery will continue to update local COVID measures as required by host-nation.

Attachment:

Cemetery Re-Opening Checklist

Cemetery Re-Opening Checklist

Safety

- Workplace PPE use will be IAW U.S. Federal and ABMC policy unless host nation rules are more restrictive.
- All LES employees will comply with host nation vaccination and/or PPE requirements, unless U.S. Federal PPE requirements are more restrictive.
- Supply stock of hydro-alcoholic solution for hand sanitizing and cleaning of common areas.
- Cleaning contracts will include host nation standard COVID sanitary requirements.
- Installation of Plexiglass screen or marking standoff (tape marker on floor) areas in visitor building and visitor center (as required by host nation).
- Maximum number of visitors allowed in one space posted (as required by host nation).
- Appropriate signage, based on local conditions, to inform visitors and staff regarding social distance, building closures, absence of guided tours, etc.

Maintenance and Site Standards - Horticulture

- When cemetery grounds are open, Superintendents accomplish all essential tasks to maintain sites to ABMC standard.
- In the event host-nation COVID guidance imposes new restrictions, horticulture programs will be modified IAW guidance at Appendix 1, above.

Maintenance and Site Standards – Facility Maintenance

- When cemetery sites are open, Superintendents accomplish all essential maintenance tasks to maintain sites to ABMC standard.
- In the event host-nation COVID guidance imposes new restrictions, maintenance programs will be modified IAW guidance at Appendix 1, above.

Personnel and Administrative

- When cemetery sites are open, Superintendents accomplish all essential personnel and administrative tasks to maintain sites to ABMC standard.
- In the event host-nation COVID guidance imposes new restrictions, personnel and administrative functions will be modified IAW guidance at Appendix 1, above.

Visitor Services

- Follow site status guidelines (Red, Yellow, Green).
- Restrict services if directed by host nation COVID restrictions.
- Receive “all-clear” from DCO before reopening visitor centers or visitor buildings to the public.

Note:

All above procedures may be selectively applied, as required, IAW respective host nation, U.S. Federal, and Chief of Mission changing restrictions and limitations.