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Laura Glading
 FAA Executive Director, Labor & Employee Relations AHL-001

April 22, 2020

Subject: AFGE 200 Coronavirus Questions and Proposals for Repopulating the WJHTC

Dear Ms. Glading,

The Executive Board of AFGE Local 200 is deeply concerned about the ongoing threat to our employees, their families and their communities as a result of the COVID-19 Pandemic. Based on our correspondence and meetings with the Agency to date, returning to work at the WJHTC prematurely without proper safeguards would represent a significant risk to our employees. It appears the Agency as a whole is practicing the safest courses of action at this time and that is greatly appreciated. But to be blunt, if a premature return to the WJHTC were to result in any employee injury or death, the FAA will have failed our work force.

We are sending a formal request for information in the form of questions (Attachment 1) relating to the FAA plans and policies related to managing the COVID-19 outbreak and our employees' eventual return to work at the WJHTC. We have submitted these questions to our Line Of Business (LOB) managers, WJHTC Management and WJHTC Labor Relations. They have been discussed, but no answers have been provided (**other than preliminary temporary verbal answers reflected in part in red**).

We are also sending proposals (Attachment 2) to minimize all WJHTC employee risks posed by COVID-19 if any return to the WJHTC is implemented.

- NOTES:** 1) AFGE Local 200 requires written answers as soon as possible, but not later than 30 days prior to our employees returning to the WJHTC for work.
 2) Please identify our proposals to the FAA Crisis Management Group and/or Incident Management Team

With Respect,



Robert Challender
 President, AFGE Local 200
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ATTACHMENT 1 - AFGE 200 Coronavirus Questions

1. When a person has symptoms and/or is tested positive, with respect given to HIPPA/PII, **what rights do other employees have in knowing that they may have been exposed?** (person's work location, meetings attended, lab systems they use, break areas/rest rooms they frequent, etc.)

WJHTC is represented on the CMG/IMT – executives, General Counsel, Flight Surgeons, etc are evolving processing and notification details. Lower level team is translating strategy to policies/procedures for notification and repopulating facilities.

It was verbalized that ATO at FAAHQ had more extensive contact tracing than what the WJHTC has done.

HOWEVER, "Contact Tracing" appears to be poorly defined and as verbalized is inadequate to give employees a sense that their risk of infection is mitigated. Inconsistencies and/or inadequate practices include: 1) timing of tracing – 48 hours versus 14 days; 2) location of employee physical presence; 3) Personnel employees may be in contact with and when, 4) etc.

Please provide details on our employees' right to know that their risk of infection from other employees is at the lowest level possible.

2. What measures for deep cleaning/mitigation are taken in those areas over and above the current continued "enhanced cleaning"?

Our LOB Managers and WJHTC management have given verbal indication of enhanced cleaning

- Three levels of cleaning – they will do the most stringent on a case by case basis. For instance, Cleaning Level 1 for 'minor risk', but WJHTC is doing Level 2
- Laboratory cleaning is largely done by custodial staff using CDC and NAS (Maintenance Alert, etc) guidelines. That said, the WJHTC is trying to provide disinfectant wipes at all laboratories.

HOWEVER, details on cleaning policies and procedures at the WJHTC are apparently not yet in writing.

Please provide details on our employee right to know their risk of infection from WJHTC surface or airborne sources is at the lowest level possible due to effective cleaning.

3. The FAA has provided interim guidance for verification requirements for employees who were: 1) infected, 2) simply symptomatic or 3) just quarantined to return to work

Will the FAA provide testing (infection or antibody) of all employees to ensure a "virus free" workplace? Or at least fever monitoring?

Zero response

4. What is the Return To Work Plan? Timing? Rotational return to WJHTC versus all at once?

Zero response. See AFGE Proposals in Attachment 2.

5. Will the WJHTC provide employees with masks, gloves and disinfectant wipes?

LOB and WJHTC – Wipes and gloves are being made available in laboratories (though not known how widely)

TBD on wider availability

6. What is the policy on telework moving forward? Extended?

Zero response. See AFGE Proposals in Attachment 2.

7. Will “social distancing” continue in meetings, etc.?

Zero response. See AFGE Proposals in Attachment 2.

ATTACHMENT 2 - PROPOSALS TO ENSURE THE LEAST RISK OF EMPLOYEE COVID-19 INFECTION:

BACKGROUND:

Relaxing “stay at home orders” and “social distancing guidelines” is being increasingly discussed in America. As recognized by a **CDC and FEMA plan that warns of ‘significant risk of resurgence of the virus’ with phased reopening**, the risks to our employees of premature return to the WJHTC is great. AFGE 200 believes the Agency must take clear action on the following factors developed by the World Health Organization in deciding to ‘repopulate’ the WJHTC:

Any government that wants to start lifting restrictions must first meet six conditions:

1. Disease transmission is under control
2. **Health systems are able to "detect, test, isolate and treat every case and trace every contact"**
3. Hot spot risks are minimized in vulnerable places, such as nursing homes
4. **Schools, workplaces and other essential places have established preventive measures**
5. The risk of importing new cases "can be managed"
6. Communities are fully educated, engaged and empowered to live under a new normal

AFGE 200 makes the following proposals for consideration in the Agency plans to return workers to the WJHTC once the above conditions are met. This is **especially true for #2 and #4** which the Agency has a major role in establishing.

Also, WJHTC and LOB management should meet or exceed CDC guidelines for workplaces which are continually updated at: <https://www.cdc.gov/coronavirus/2019-ncov/community/index.html>

It is expected that all mitigations in some form will be required until a COVID-19 vaccine is available to all AFGE 200 employees. At a minimum, strong mitigations are required until an effective treatment to prevent serious illness and/or death is available.

The below specific proposals as a whole, will reduce employee risks of potential sickness or death resulting from COVID-19 infection. All proposals are subject to detailed discussion as needed.

PROPOSALS:

1. Consider a wide ranging VERA/VSIP activity across all AFGE 200 Lines Of Business

- a. To reiterate - Employee voluntary
- b. Release at the discretion of LOB management. However, extra consideration should be given to those at risk or have family members at risk of serious sickness or death.

2. Contact Tracing/Employee rights to know of potential exposure to COVID-19

NOTE: Contact tracing information can and should be provided in a way that is mindful of employee privacy AND the right of employees to be informed of potential exposure.

- a. Ensure all CDC requirements/guidelines are met for individuals confirmed or suspected of COVID-19 infection.

- b. Contact Tracing (employee contacts, common area usage, etc.) should be not less than 14 days prior to an individual testing positive or having shown symptoms whichever is longer.
- c. All employees who had potential exposure must be informed. This notification must be more specific than any “broadcast message” to the WJHTC general population. Examples:
 - i. Employee works closely or attended common meetings with positive employee
 - ii. Employee uses common equipment (labs, coffee mess, copiers, etc.) of positive employee
 - iii. Employee handles materials a positive employee handles (mail and other deliveries, etc)

3. COVID -19 Testing

- a. All testing will meet WHO, CDC and FDA approvals and guidelines for: who, what, when, where, Why and How.
- b. Establish official policy/procedure for preliminary guidance identified in the preliminary FAA “Return to Work” guidance of March 2020.
- c. Depending on the extent of potential employee exposure to COVID-19 at the WJHTC and upon employee request, provide employees with COVID-19 testing.
- d. Consider testing (virus, antibody, fever, etc) for all employees on a voluntary basis.

4. Social Distancing

- a. For all those who can accomplish all tasks via Telework, continue full time Telework until a vaccine for COVID-19 is available. This includes the temporary waiver that negates reporting to the WJHTC at least once per pay period.
- b. For groups/individuals who can accomplish at least 50% of the goals while Teleworking, alternate one week Teleworking with one week of work at the WJHTC. Coordinate to the extent possible in alternating multiple groups to reduce the WJHTC population.
- c. Consider alternating shifts for groups/individuals who cannot accomplish most of their goals while Teleworking. Possible shifts could be 0600-1430 and 1200-2030 with maximum social distancing in the overlap. Coordinate to the extent possible in alternating multiple groups to reduce the WJHTC population.
- d. Continue “on line meetings” via ZOOM, Skype, etc to the maximum extent possible.
- e. For common equipment use and temporary work spaces of close proximity (labs, etc.), ensure employees are not closer than 6 feet during operations. Ensure equipment is cleaned after each session (see cleaning below). To the extent possible, assign ‘positions’ to just one employee to avoid ‘cross contamination’.
- f. Identify guidelines for the WJHTC community to stay within their respective work areas and minimize visitors to the extent possible. For instance, FAA folks in outlying buildings, NJ Air Guard, Coast Guard, TSA and Federal Air Marshalls should be cautioned about coming to WJHTC Building 300 for cafeteria, banking and auditorium events. Operational use of buildings 300/316 are exempt.

- g. Identify guidelines for cafeteria, gym and other common area use, social distancing and/or cleanliness.
- h. If a credit card is used in the cafeteria, allow employees to swipe their own credit card to avoid passing it to the cashier and back.

5. Cleaning

- a. Ensure all cleaning meets or exceeds CDC requirements/guidelines.
- b. Clean areas suspected of exposure as requested by employee reports to the Help Desk or identification of positive or suspected infected employees per CDC guidelines (timing and extent).
- c. Depending on the adoption of some Social Distancing proposals, do an extensive cleaning of all common areas once every Wednesday and once over the weekend. Wednesday could be a target day to reduce WJHTC population to the maximum possible.
- d. Provide disinfecting wipes to employees for their use.
- e. Do not have AFGE 200 employees cleaning their cube or systems without full training and knowledge (MDS) of cleaning agent properties.
- f. Identify all areas in advance of cleaning to the extent possible.
- g. Allow employees to Telework at any time their work area is to be cleaned.

6. Personnel Protective Equipment

- a. Even if not mandatory, provide surgical quality masks, latex free gloves, eye protection and disinfectant wipes to all employees who request the materials.

7. Travel

- a. Follow the guidance in OMB Memorandum M-20-14 issued March 14, 2020 – “Updated Federal Travel Guidance in Response to Coronavirus”.