

MSPB COVID-19 Workplace Safety Plan
June 30, 2021

The health and safety of employees, interns, contractors, and visitors at the Merit Systems Protection Board (MSPB) are always our highest priorities. This COVID-19 Workplace Safety Plan supports [Executive Order \(EO\) 13991](#), “Protecting the Federal Workforce and Requiring Mask-Wearing” (Jan. 20, 2021), Office of Management and Budget (OMB) memorandum [M-21-15](#), “COVID-19 Safe Federal Workplace: Agency Model Safety Principles” (Jan. 24, 2021), and guidance provided by the [Safer Federal Workforce Task Force](#). This plan is a living document that will be updated as new information becomes available and requirements change.

1. COVID-19 Coordination Team

In accordance with M-21-15, MSPB’s COVID-19 Coordination Team members are:

- Tristan Leavitt, Acting Chief Executive and Administrative Officer & General Counsel
- Bill Spencer, Acting Executive Director
- Kevin Nash, Director of Financial and Administrative Management

The team will consult with the [Centers for Disease Control](#) (CDC) through the President’s Safer Federal Workforce Task Force, as needed. Where appropriate, the team will consult with the General Services Administration (GSA), the Office of Personnel Management, and OMB.

The team is responsible for conducting assessments to establish, implement, and monitor compliance with: (a) safety protocols for physical space and masking; and (b) determinations of on-site and telework/remote working. The team has met at least weekly throughout the pandemic to review compliance with MSPB COVID-19 workplace safety plans and protocols, consider potential revisions to them, and address any other operational needs. The team will continue to coordinate and communicate with office directors, the professional association, and all employees as we move forward.

Questions about this plan should be directed to the COVID-19 Coordination Team. Employees who require a Reasonable Accommodation should contact [Jess Lang](#), Director of Equal Employment Opportunity (EEO), for information about submitting a request.

2. Health and Safety

a. Telework and Remote Work

MSPB continues to operate in a maximum telework status. As a general principle, every effort will be made to maximize the use of remote work during widespread community transmission and to provide flexibility given ongoing caregiving responsibilities for many of you at home. Employees will be given advance notice and guidance before returning to the physical workplace in accordance with this plan.

Until the pandemic ends, or a new Board makes a different determination, we do not plan to return to the operating status, and individual and office work schedules, that were the norm prior to the pandemic. However, each office has functions which either require or are facilitated by employees coming into the office regularly, including preparing for the arrival of new Board members and helping Board members once they arrive. Those decisions will be made by individual managers for their offices based upon their determination of what is best for the functioning of their offices.

b. Face Masks

[Current guidance from the CDC](#) indicates that fully vaccinated individuals (at least two weeks past the final dose) can resume outdoor and indoor activities without wearing a mask or physically distancing. Accordingly, OMB's guidance is that fully vaccinated Federal employees are no longer required to wear a mask on Government property. If you are vaccinated, you may inform your supervisor of this and enter the workplace without a mask. If you are not vaccinated or would prefer not to inform your supervisor of your vaccine status, you are perfectly free not to, but please be aware that you will be required to wear a mask and social distance in the office, per CDC guidelines. Our overall goal is to make the workplace as safe as possible, and we want to do all we can to provide assurance to those going into the office that those they will come into contact with have either been vaccinated or are wearing a mask. Vaccinated employees may continue to wear masks in the office if they so choose.

For unvaccinated individuals (at least two weeks past the final dose), the requirement remains intact that *at all times inside the building and MSPB office space you must wear a [properly fitting mask](#) that covers your nose and mouth* and is in accordance with any current guidance from the [CDC](#) and the [Occupational Health and Safety Administration](#). Masks should also be worn in outdoor shared spaces when physical distancing cannot be maintained. You may remove your mask only when you are in your own office with the door closed. If you have any questions about this requirement, please contact EEO Director [Jess Lang](#).

Each of us has a personal responsibility to ourselves and our loved ones, each other as colleagues, and those who work in our buildings and in our space, to protect each other. For unvaccinated individuals, wearing a mask, ***and wearing it properly***, in addition to the other requirements described in this plan, is critical to preventing the further spread of COVID-19. Although MSPB has taken steps to manage the number of people in any office at any time – and it may seem like you are the only person present when you are in the office – we must remember that other MSPB colleagues may have to pass through our office space (e.g., to deliver mail, move files, get supplies, etc.) to perform their in-office work, in addition to building personnel (cleaning staff, security guards, building engineers, etc.) who may come through the space. We simply cannot be complacent in our individual efforts to stop the spread.

MSPB staff who do not adhere to this requirement will be notified along with their office director, and they may be subject to discipline.

c. Physical Distancing

To the extent practicable, always maintain a distance of at least 6 feet from others, consistent with CDC guidelines, including in offices, conference rooms, and all other communal and workspaces. Distance and testing are not substitutes for wearing a mask (if unvaccinated). You should maintain distance AND properly wear a mask. One-way walkways, reconfiguration of workspaces or office assignments, and other mitigation strategies may be implemented to minimize interactions.

d. Staffing

Office directors are encouraged to stagger work times to reduce density, minimize traffic volume in elevators, and avoid crowds during commuting. Please consider cohort-based scheduling to help reduce potential exposure.

1. Over the course of the pandemic, based on existing guidance and as determined by the COVID-19 Coordination Team, MSPB office locations have operated in one of three phases:
 - Phase 0: One person in the office at a time on a voluntary basis for mission-essential purposes.
 - Phase 1: One person in the office at a time at the office director's discretion for mission-essential purposes.
 - Phase 2: Two people in the office at a time at the office director's discretion for mission-essential purposes.
2. Once an office location reaches Phase 2, if there is no significant increase in the COVID-19 data for that metropolitan area, the COVID-19 Coordination Team may authorize the office to move to Phase 3. This allows an office director to schedule up to 25% of staff¹ to be in the office at the same time, taking into consideration the proximity of individual offices, hearing schedules, work that is more efficiently and effectively performed in the office, the number of entrances to MSPB space at their location, the use of varying arrival and departure times, etc. Examples include, but are not limited to:
 - Providing employees with the option to have scheduled days to be in the office with their supervisor, should they require assistance that would be provided better in person.
 - Providing employees with the opportunity to reconnect with each other for in-person conversations and collaboration with colleagues and supervisors on ongoing assignments.
 - Establishing work schedules for employees before the new Board members arrive so that any issues can be worked through in advance.

¹ Offices will be provided a 25% in-office staffing cap based upon their authorized staffing level, including vacancies. Interns are not included in that calculation since their numbers vary by office and over time.

- Establishing routines and habits under this plan for when working in the office space, including mask wearing in the office if you're unvaccinated, cleaning and disinfecting routines, and moving about the workspace where others are present consistent with social distancing.
 - Establishing work routines and in-office procedures prior to the arrival of new Board members so that we are prepared to assist them immediately.
 - Prioritizing the organization of cases at headquarters and being able to do even more to digitize those case files.
 - Returning to in-office routines and reconstituting team cohesion.
 - Providing training, including for newly hired employees who have not yet been into the office.
 - Providing additional staff with essential duties and skills to enable additional progress on in-office work that others have performed for many months.
3. Once an office location reaches Phase 3, if there is no significant increase in the COVID-19 data for that metropolitan area, the COVID-19 Coordination Team may after a period of time authorize the office to move to Phase 4. This allows an office director to schedule up to 50% of staff to be in the office at the same time, subject to the same considerations in section 2.d.2., above.
 4. An office director may schedule an employee to routinely work in the office for the employee's personal convenience. However, such a schedule is subject to change in order to prioritize other work that can only be done in the office or to allow other employees appropriate access to the office.
 5. To the extent possible, meetings should be conducted by Zoom for Government, conference call, or other audio- or video-conferencing means, even among employees in the office. Exceptions may include training a new employee or a conversation that cannot easily be accomplished remotely, while adhering to applicable protocols.
 6. The COVID-19 Coordination Team is planning for reentry and post-reentry after September 6, 2021, which is dependent in part on guidance from OMB and other agencies. As of now, Phase 4 will be the agency's highest operating level at any authorized location. We will update this plan as circumstances and guidance dictate in coordination with office directors and the professional association.
 7. Regardless of the phasing above, and in accordance with [M-21-15](#), no MSPB workplace will operate above 25% of normal occupancy standards at any given time during periods of high community prevalence or transmission. Levels of community transmission can be established by consulting CDC's COVID Data Tracker County View. Exceptions to that policy must be cleared by the head of the agency as advised by MSPB's COVID-19 Coordination Team and in consultation with the President's Safer Federal Workforce Task Force.

Hearings:

1. In coordination with their regional or office director, administrative judges may conduct video hearings in the office.
2. More than one hearing may be conducted at the same time.
3. Two employees may be in the hearing room at the same time, provided they adhere to the social distancing and masking guidelines, and follow the other requirements of this plan.
4. In-person hearings with parties and witnesses will not be conducted until further notice.
5. If it is necessary for a non-employee to be present for a hearing, permission may be granted by the regional director and the Director of the Office of Regional Operations on a case-by-case basis, considering all the circumstances, including the physical layout of the office as well as case-related details.

e. Shared Spaces

Do not use common areas, including kitchens, for eating or drinking. Instead, eat in your office and access common areas only to obtain water or retrieve food. Only one person at a time should be in a kitchen area unless social distancing is possible.

Shared items and equipment must be disinfected by users anytime the equipment is used by or transferred to a new person, and disinfectant wipes and cleaning supplies are provided at each MSPB location. This includes phones, computers and other communication devices, kitchen implements, and other office equipment. Refrigerators, water coolers, and coffee makers with disposable cups (or a personal reusable cup/container) and single-serve condiments and creamers may be used with proper hand hygiene. Visual markers may be installed to promote physical distancing within common spaces, and furniture may be removed.

f. Visitors

Currently, MSPB is not allowing visitors. The COVID-19 Coordination Team, in consultation with an office director(s), will decide when visitors will be allowed into MSPB workspace and communicate that to employees. Visitors will be asked symptom screening questions before entering. Mask wearing requirements also will apply to any visitors to Federal or federally leased facilities, where applicable. Even after visitors are allowed, the number of visitors to MSPB offices should be minimized, and efforts should be made to conduct visits virtually where possible.

g. Symptom Monitoring

If an MSPB employee, intern, on-site contractor or visitor is not feeling well, they must not enter the workplace.

Employees and MSPB contractors working on site will be asked to complete symptom screening daily or upon entry to the workplace. The employee's supervisor or MSPB project manager will use this information to assess the individual's risk level and to determine whether they should be allowed entry to the workplace. MSPB staff who oversee or meet with an MSPB contractor(s) onsite are responsible for reviewing the questionnaire below with contractor personnel before they arrive. ***Any individual who develops any symptoms consistent with COVID-19 during the workday must immediately isolate, notify their supervisor, and promptly leave the workplace.***

A symptom list requiring immediate medical attention can be accessed on the CDC website [here](#).

Questionnaire for MSPB Employees and Contractors:

1. Please complete the CDC symptom screening questionnaire at <https://www.cdc.gov/screening/paper-version.pdf>. Based on your answers, are you approved to go into the office? (If no, stop here. If yes, proceed to the next step.)
2. If you are not fully vaccinated, do you have a mask or cloth face covering consistent with CDC recommendations to wear to and from the office? (If no, stop here. If yes, proceed to the next step.)
3. Do you have your proximity card (Datawatch, HSPD-12, etc.) to access the building and to show as identification if questioned? (If no, stop here. If yes, proceed to the office.)

Protocols While in the Office:

1. To the extent possible, maintain social distancing of 6 feet from anyone you encounter on your way to or from your office or in the building.
2. Personal protective equipment (disposable masks and gloves) and sanitizing wipes are available when entering the office lobby. Reminder: *If you are not fully vaccinated, at all times inside the building and MSPB office space you must wear a properly fitting mask that covers your **nose and mouth**.* You may only remove your mask when you are in your own office with the door closed. Gloves are optional.
3. Wash your hands as soon as possible after arriving at the office.
4. Wash your hands before you leave the building.

If you go into the office and begin to feel ill in any way with [symptoms consistent with COVID-19](#), within 5 days thereafter, you must notify your office director so that others who were in the office after you can be notified. See "Contact Tracing" below.

Staff must coordinate visits with their office director prior to going to the office. They must go through the questionnaire above with their office director or attest by email that they meet the health and wellness criteria prior to arriving at the office and receive approval to go in. The office director will manage the schedule. This can be modified based on the number and timing of requests to go into the

office on a given day. Access on nights and weekends is permissible with approval. (HQ office directors on the same floor and quadrant should continue to use the HQ Office Visits calendar on the Portal and communicate with each other about schedules for situational awareness.)

If mutually agreeable, staff members can pick up items for colleagues and deliver them to their residence. In doing so, applicable health and safety protocols still apply.

h. Contact Tracing

If an MSPB employee contracts COVID-19 and has been in the workplace, MSPB's COVID-19 Coordination Team or a designee will collaborate with and support the contact tracing programs of local health departments and determine next steps. The team also will 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). The team will be transparent in communicating information to employees, as relevant and appropriate, consistent with local and Federal privacy and confidentiality regulations and laws. ***If an employee is notified of a positive COVID-19 test result, and they have been in the workplace within 7 days prior to becoming symptomatic or a positive test, they must notify their office director as soon as possible*** and provide contact information for their local health department. The office director will coordinate next steps with the COVID-19 Coordination Team. There is no obligation to notify MSPB if an employee who has not been in the workplace tests positive for COVID-19.

i. Quarantine and Isolation

Please consult [CDC guidelines](#) and local laws/regulations on when to quarantine or isolate and depending on your vaccination status, whether you have tested positive for COVID-19 in the past, etc.

j. Travel

To the maximum extent possible, hearings, training, conference attendance, etc., should be conducted virtually. Official travel is limited to ***only mission-critical trips*** and must be approved in advance by the COVID-19 Coordination Team. MSPB employees should adhere strictly to CDC guidelines before, during, and after travel, regardless of whether the travel is personal or for official business. The CDC has extensive guidelines for both domestic and international travel, and employees should consult these resources carefully before deciding to travel. In addition, the Safer Federal Workforce Task Force posted an [FAQ](#) for fully vaccinated Federal employees on official travel.

Please be aware that you may be required to stay at home for a period after official or personal travel before you can return to the workplace.

k. Vaccines

MSPB encourages employees to get vaccinated for COVID-19 to protect themselves, their families, and their colleagues.

Employees are authorized up to 4 hours of administrative leave per dose to get vaccinated. Please only request the amount of administrative leave it takes you to get the vaccine. The leave may be applied retroactively if you already received a dose. Please notify your supervisor before using (not just claiming) the leave.

I. Testing

As required in EO 13991, the CDC developed a [Federal Testing Plan for the Federal Workforce](#). At this time, given our current operating posture, agency size, vaccine availability, and the widespread availability of COVID-19 testing, MSPB does not plan to implement a separate testing plan for our employees.

m. Confidentiality

If our current plan changes, and MSPB deems it necessary to collect such information, all medical information collected from MSPB personnel, including 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.² MSPB's point of contact for all questions relating to personal medical data is EEO Director [Jess Lang](#).

n. Employee Assistance Program

In addition to the protocols set out in this plan, we remind all employees that the Employee Assistance Program (EAP) is available 24 hours a day, 365 days a year. The EAP can be reached at 1-800-222-0364 or at www.FOH4you.com.

3. Workplace Operations

a. Environmental Cleaning

Enhanced cleaning and disinfection within a building's common use and high traffic areas, such as lobbies, restrooms, elevators, and stairwells, will be provided daily. Routine cleaning of frequently touched surfaces in common areas, conference rooms, and office spaces within an MSPB facility will be cleaned regularly and in accordance with CDC guidelines. Wipes, gloves, and other EPA-approved disinfectants have been made available for employees who wish to use them to wipe down their individual workstations and personal property when in their workspace.

² In response to multiple inquiries about whether asking about vaccination status is a violation of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), we note that HIPAA "only applies to HIPAA-covered entities – healthcare providers, health plans, and healthcare clearinghouses – and their business associates. If an employer asks an employee to provide proof that they have been vaccinated in order to allow that individual to work without wearing a facemask, that is not a HIPAA violation as HIPAA does not apply to most employers." See "[Is it a HIPAA Violation to Ask for Proof of Vaccine Status?](http://hipaajournal.com)" (hipaajournal.com).

In the event of a suspected or confirmed case of COVID-19 in an MSPB workplace (if the employee or visitor had been in the building up to 7 days prior), enhanced environmental cleaning will be performed in accordance with CDC guidelines. In GSA-controlled facilities, GSA will perform the enhanced environmental cleaning under GSA guidance and in accordance with CDC guidelines.

Cleaners may wait up to 24 hours before cleaning and disinfecting the workplace. Personnel and visitors will be required to vacate the affected space until the cleaning is completed.

b. Elevators

Unvaccinated individuals must wear masks in elevators and in elevator lobbies. At MSPB locations where employees can access the elevator lobby on our floor from the stairwell, the use of stairs by those who are physically able to do so is strongly encouraged. Signage will be posted to explain current procedures.

c. Ventilation and Air Filtration

Reoccupying a building during the COVID-19 pandemic requires healthy, code-compliant indoor air quality. Viral particles spread between people more readily indoors than outdoors. Therefore, CDC recommends improvements to building ventilation to reduce the spread of the disease and lower the risk of exposure. In accordance with CDC guidance, ventilation system upgrades or improvements increase the delivery of clean air and dilute potential contaminants by reducing the concentration of virus particles in the air. To achieve this, the following measures are being taken.

HEADQUARTERS:

Heating, Ventilation, and Air Conditioning (HVAC) systems are running at maximum outside airflow for 2 hours before and after the building is occupied (or from 5:00 a.m. to 9:00 p.m.) to ensure improved ventilation. Outdoor air dampers remain open beyond minimum settings to reduce or eliminate HVAC air recirculation. Both steps increase total airflow to occupied spaces. On individual HVAC units, where the HVAC fan operation can be controlled at the thermostat, the fan has been set to the "on" position instead of "auto," which will operate the fan continuously, even when heating or air conditioning is not required. In addition, building restroom exhaust fans are functional and operating at full capacity when the building is occupied.

Regular inspections and maintenance on all building Air Handler Units (AHUs) and HVAC systems are being performed to ensure ventilation and filtration effectiveness. Experience has shown that when mechanical and visual inspections are properly conducted, the proportion of outdoor ventilation continues to increase, and recirculation is reduced or eliminated. Likewise, existing air filters have been replaced with Minimum Efficiency Reporting Value 13 (MERV-13) rated filters which improve filtration for all central AHUs that recirculate floor air.

Indoor air quality is tested regularly. This is essential to detect airborne particles, carbon dioxide, and Volatile Organic Compounds (VOCs), which are invisible gases and chemical vapors emitted by office equipment, like printers and fax machines, as well as chemical cleaning agents.

Portable air purification systems with High-Efficiency Particulate Air (HEPA) filters have been installed in common areas by Boston Properties throughout the Headquarters building. These portable HEPA units trap common office pollutants and harmful particles and enhance air cleaning in frequently inhabited and common use areas.

Additional modifications will continue to be considered and evaluated.

ATLANTA REGIONAL OFFICE:

HVAC systems are running at maximum outside airflow for 2 hours before and after the building is occupied to ensure improved ventilation. Air filters have been replaced with MERV-8 rated filters. The HVAC systems are not designed to accommodate any filters rated higher than a MERV-8. Higher rated filters prevent the system from taking in and blowing out enough air and cause the system to shut down.

CHICAGO REGIONAL OFFICE:

HVAC systems are running at maximum outside airflow for 2 hours before and after the building is occupied to ensure improved ventilation. Air filters have been replaced with MERV-15 rated filters.

DALLAS REGIONAL OFFICE:

HVAC systems are running at maximum outside airflow for 2 hours before and after the building is occupied to ensure improved ventilation. Air filters have been replaced with MERV-8 and MERV-10 rated filters in AHUs and MERV-6 rated filters in window units.

DENVER FIELD OFFICE:

The lessor is installing ionization devices for the HVAC systems and elevators. Air filters have been replaced with MERV-13 rated filters.

NEW YORK FIELD OFFICE:

HVAC systems are running at maximum outside airflow for 2 hours before and after the building is occupied to ensure improved ventilation. The HVAC and Building Automation Systems are currently being inspected daily, every 2 hours. Outside airflow for all relevant equipment has been verified per design specifications to ensure appropriate outside air volume and circulation.

All Air Filter Banks have been inspected and sealed as needed to ensure that air does not bypass the filter bank. Air filters have been replaced with MERV-13 rated filters. GSA installed Dynamic electrostatic air filters that are MERV-13 rated or better since November 2017.

PHILADELPHIA REGIONAL OFFICE:

HVAC systems are running at increased outside air flow. Air filters have been replaced with MERV-14 rated filters. The filters were last changed in April 2021. The lessor has used filters that are MERV-14 rated since 2016.

WASHINGTON REGIONAL OFFICE:

HVAC systems are running at maximum outside airflow for 30 minutes before the building is occupied to improve ventilation. Air filters have been replaced with MERV-13 rated filters.

WESTERN REGIONAL OFFICE:

HVAC systems are running at increased outside airflow. The design includes return air grilles in the suspended ceiling, 9 feet above the finished floors in office areas, but they are not ducted. The facility has an open plenum design, so there is separation between the suspended ceiling and the main return air ducts. Air filters have been replaced with MERV-8 rated pre-filters that work in combination with MERV-13 rated primary filters in AHUs to add an extra layer of protection.

There is the potential for fire season to limit the amount of outside air that would be able to be provided and still maintain indoor air quality. Tenants would be notified if that type of situation were to occur.

d. Water Filtration

Many Federally owned facilities under the jurisdiction, custody, and control of GSA are experiencing less than normal tenant occupancy as a result of the COVID-19 pandemic. Because of this reduced occupancy, the use of potable water in MSPB facilities is substantially less than the usage prior to the pandemic. As a result, the reduced usage has heightened the potential for water quality degradation.

GSA has implemented a weekly flushing program designed in coordination with a team of experts from the Environmental Protection Agency (EPA) and the CDC. In Federally owned facilities, the guidance directs facility managers to perform initial and weekly flushing of the drinking water in each facility, randomly test water outlets for surrogates of freshwater treatment (e.g., chlorine levels), and adjust the flushing frequency as necessary to ensure fresh, treated water is always present.

MSPB-owned equipment (such as ice machines, coffee makers, water filters, etc.) that is served by the building's water supply are not covered by the GSA operation and maintenance contracts and are currently not being flushed. It is recommended that tenants properly flush these devices on a recurring basis based on [CDC](#) and [EPA](#) guidelines.

At each MSPB location, the following measures are being taken.

HEADQUARTERS:

Water systems and all common area water fixtures (including toilets, faucets, drinking fountains, sink drains, floor drains, etc.) are being flushed on a regular basis to prevent abnormal biological growth. Distribution systems and equipment are being tested regularly and water sampling is being conducted to check for bacteria levels, residual chlorine and pH, heavy metals, and other contaminants of concern.

In addition, Boston Properties has been recognized with a Fitwel Viral Response Certification at the Sumner Square Office Building. Originally created by the CDC and GSA, Fitwel is a rigorous, third-party

healthy building certification system that sets the industry standard for evidence-based strategies to promote positive health outcomes for building occupants and communities.

This certification confirms that Boston Properties' approach to health security aligns with evidence-based strategies for mitigating the spread of infectious respiratory diseases in the workplace. The implemented programs include managing indoor air and water quality, enhanced cleaning, disinfecting, and maintenance protocols along with clear and consistent communication with customers.

ATLANTA REGIONAL OFFICE:

Water systems and all common area water fixtures (including toilets, sinks, etc.) are being flushed on a routine basis on floors that are unoccupied.

CHICAGO REGIONAL OFFICE:

Water systems and all common area water fixtures (including toilets, sinks, etc.) are being flushed on a routine basis. Water testing is being conducted on a regular basis and in accordance with CDC guidance. New water filters have been installed within the last month on all drinking fountains.

DALLAS REGIONAL OFFICE:

Water systems are operating at a high level of usage. Since the facility has remained open to tenants and all building operations have continued throughout the pandemic, there has been very little reduced occupancy.

Water systems are being tested in accordance with regular preventive maintenance schedules.

DENVER FIELD OFFICE:

Water systems are being flushed daily. Water systems are being tested annually.

NEW YORK FIELD OFFICE:

Water systems are tested monthly. A complete flush of the Domestic Water Systems and all common area water fixtures (including toilets, faucets, drinking fountains, sink drains, floor drains, etc.) are being done daily.

PHILADELPHIA REGIONAL OFFICE:

Water systems are operating at a high level of usage. Since the facility has remained open to tenants and all building operations have continued throughout the pandemic, there has been very little reduced occupancy.

Water systems were tested in June/July 2020 out of an abundance of caution. A complete chlorine mapping study of the domestic water was performed. The results showed no issues.

WASHINGTON REGIONAL OFFICE:

Water systems are being flushed on a regular basis (including both hot and cold water fixtures), to help prevent legionella or elevated lead in water during these periods of low occupancy and low usage. In addition, water testing is being conducted twice a year.

WESTERN REGIONAL OFFICE:

Water systems are operating at the same level of usage as in previous years. Since the facility has remained open to tenants and all building operations have continued throughout the pandemic, there has been very little reduced occupancy. From March 2020 through February 2021, for example, the facility used 6,098,444 gallons of water, which is in line with the amount used prior to the pandemic.

Therefore, it was determined that GSA's weekly flushing program is unnecessary for the building. Testing is only performed if there is a water quality concern.