

COVID-19 FAQs for Contractors and Subcontractors with employees working at SSA facilities

07/14/2020

The term “contractor/subcontractor employees” as used in this document includes:

- 1) a sole proprietorship where the contractor is the sole employee and
- 2) employees of contractors and contractor’s subcontractors.

Q#1 - Must a contractor require its employees and subcontractor employees to report any international travel upon returning from said travel?

Answer - Yes, a contractor and its subcontractors must require employees to report to them any international travel. Failure of a contractor/subcontractor employee to report international travel to its employer may be considered cause for removal from duty under a contract with SSA, pursuant to Agency Specific (AS) clause 2352.204-1, Security and Suitability Requirements, paragraph (n)(12).

Q#2-Must a contractor notify SSA when contractor/subcontractor employees return from international travel?

Answer - Yes, upon returning from international travel, but at least 24 hours prior to reporting to an SSA facility, the contractor must provide the travel history (i.e., name of contractor/subcontractor employee; date the employee left the country; date of return; all cities and countries visited) to the COR-COTR. This notification requirement derives from 2352.204-1, Security and Suitability Requirements, paragraph (j), which imposes on the contractor a requirement to report to SSA any changes in employee status that affect suitability.

Q#3 - After the completion of international travel, must the contractor/subcontractor employee receive clearance from SSA prior to returning to work at an SSA facility?

Answer - Yes, the contractor/subcontractor employee may return to work at an SSA facility only after receiving clearance by the agency to do so. Depending on the details of the travel, a contractor/subcontractor employee may also be required by SSA to refrain from entering an SSA facility for an extended period-of-time (e.g. 14 calendar days), or in accordance with the latest CDC guidance and/or supplemental agency guidance. The contractor/subcontractor employee may return to the SSA facility only when cleared by the agency to do so.

Q#4 - If a contractor/subcontractor employee is quarantined due to possible exposure to COVID-19, what options does that employee have for continuing contract performance?

Answer - A contractor/subcontractor employee who is quarantined due to possible or actual exposure to a person infected by COVID-19 must report the situation to his/her employer. In the case of a subcontractor employee, the subcontractor must report the quarantine to the contractor. The contractor, in turn, must notify the COR-COTR of the quarantine at least 24-hours prior to the contractor/subcontractor employee reporting for work at an SSA facility. The contractor/subcontractor employee must refrain from entering an SSA facility for the duration of the quarantine (e.g. 14 calendar days), or in accordance with latest CDC guidance and/or supplemental agency guidance. The contractor/subcontractor employee may return to the SSA facility only after the period of quarantine has expired and the contractor/subcontractor is exhibiting no symptoms of COVID-19 infection.

Q#5 - If a contractor/subcontractor employee is exposed to COVID-19 from contact with a diagnosed person or becomes ill from COVID-19, what options does the contractor/subcontractor employee have for continuing performance under a contract at SSA?

Answer - The contractor/subcontractor employee must report the illness/"positive" test results/symptoms to his/her employer. In the case of a subcontractor employee, the subcontractor must report the illness/"positive" test results/symptoms to the contractor. The contractor, in turn, must notify the COR-COTR of the illness/"positive" test results/symptoms at least 24-hours prior to the contractor/subcontractor employee reporting for work at an SSA facility. The contractor/subcontractor employee must refrain from entering an SSA facility until cleared by the agency to do so. For those who are ill as a result of COVID-19, or who have tested "positive" for COVID-19, or who are experiencing COVID-19-like symptoms, to be cleared to return, the contractor/subcontractor employee must submit to his/her employer sufficient medical documentation from a physician indicating that the contractor/subcontractor employee no longer poses a threat to the wellbeing, safety and/or health of any other person and may therefore return to his/her place of employment. The employer will then forward the medical documentation to the COR-COTR and the COR-COTR will instruct the employer to allow the contractor/subcontractor employee to return to the SSA facility.

Q#6 - If SSA has instructed its employees to telework in lieu of reporting for work at the SSA facility, should the contractor similarly encourage contractor/subcontractor employees to telework?

Answer - The needs of the Agency may require specific contractor employees to report to the SSA facility. Contractors should check with their SSA Contracting Officer's Representative (COR) to determine which of their employees may telework.

As long as contractor/subcontractor employees are: 1) not needed in the SSA facility; 2) have portable work; and, 3) the necessary equipment to perform their duties at an alternate duty station, they may telework.

If the contractor/subcontractor employees meet the qualifications above but have equipment issues that impede telework, they should alert their employer who will, in turn, inform the COR-COTR.

****NEW** Q#7 – What is SSA’s policy for face coverings and will the agency provide them for contractors/subcontractor employees?**

Beginning **July 20, 2020**, all contractor/subcontractor employees must wear a face covering when in an SSA facility. Contractor/subcontractor employees may wear their own face covering, as long as it meets CDC recommendations to cover their nose and mouth. Alternatively, the agency will provide an initial supply of 5 washable/reusable cloth face coverings to contractor/subcontractor employees.

If a contractor/subcontractor employee reports being unable to wear a face covering due to a medical reason, inform the COR-COTR. If a contractor/subcontractor employee reports being unable to wear a face covering for a religious reason, inform the COR-COTR. If a contractor/subcontractor employee does not provide a valid reason for not wearing a face covering, the COR-COTR should engage the administering Contracting Officer for the requirement in which the contractor/subcontractor works under.

Contractor/subcontractor employees will be permitted to remove their face covering when it is reasonable to do so—e.g., to eat or drink—and should be especially mindful of social distancing of at least 6 feet during this time.

[CDC recommends](#) covering your mouth and nose with [cloth face coverings](#) when around others, as you could spread COVID-19 even if you do not feel sick. This is especially important in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies). Cloth face coverings are intended to protect other people and slow the spread of COVID-19 in case you are infected. Do not use a facemask meant for a healthcare worker and do not use face coverings on anyone who has trouble breathing, or is unconscious, incapacitated, or otherwise unable to remove the mask without assistance. The CDC poster below provides information on How to Safely Wear and Take Off a Cloth Face Covering.



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