

COVID-19 FAQs for Contractors and Subcontractors with Employees Working at SSA Facilities

08/19/2022

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

The needs of the Agency may require specific contractor employees to report to the SSA facility. Contractors should check with their COR-COTR to determine which of their employees may work from home.

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 work from home.

If the contractor/subcontractor employees meet the qualifications above but have equipment issues that impede working from home, they should alert their employer who will, in turn, inform the COR-COTR (COR-COTR will consult with the designated Contracting Officer as necessary).

Q#2 - Must a contractor require its employees and subcontractor employees to report any international travel upon returning from said travel?

Yes, a contractor and its subcontractors must require employees to report to them any international travel (except land travel by means such as car, bus, ferry, or train) before physically returning to an SSA facility. 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#3 - Must a contractor notify SSA when contractor/subcontractor employees return from international travel?

Yes, upon returning from international travel (except land travel by means such as car, bus, ferry, or train), 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 SSA

Contracting Officer's Representative (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.

Please note that this report is only relevant for COVID-19 when the employee will be working in SSA facilities. In those cases, see #4 below.

Q#4 - After the completion of international travel, travel by cruise ship, and some domestic travel, must the contractor/subcontractor employee receive clearance from SSA prior to returning to work at an SSA facility?

Yes, the contractor/subcontractor employee may return to work at an SSA facility only after receiving clearance by the agency to do so. Contractor employees should plan for any necessary quarantines or requirements to remain at home and be prepared to take additional personal leave to cover those periods and other delays. Contractor employees returning from international travel (except land travel by means such as car, bus, ferry, or train) and any travel by cruise ship may not work onsite at an SSA facility for the immediate 14 days after their return to the U.S. Employees in certain states may also be subject to quarantines or requirements to remain at home after returning from domestic locations and should observe these requirements for that state in which they are reporting for work onsite. During this 14-day period, contractors should allow employees to work from home if the work being performed under contract is portable.

When considering travel, contractor/subcontractor employees should adhere to CDC guidelines, before, during, and after travel, including the following precautions: carefully assessing travel risk prior to travel; wearing a mask during all portions of a trip; 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 planning to quarantine before returning to the workplace. The CDC has extensive guidelines for both domestic and international travel, and contractor/subcontractor employees should consult these resources carefully before deciding to travel:

- <https://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html>
- <https://www.cdc.gov/coronavirus/2019-ncov/travelers/after-travel-precautions.html>
- <https://wwwnc.cdc.gov/travel/notices/warning/coronavirus-cruise-ship>
- https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-during-covid19.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Ftravelers%2Ftravel-in-the-us.html
- <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories.html/>

Q#5 - If a contractor/subcontractor employee has been in close contact (i.e., within 6 feet for a cumulative 15 minutes or more) with a person diagnosed (laboratory-confirmed case) or advised (probable case) by a licensed health-care professional to self-quarantine due to COVID-19, what options are available for contract performance?

The options available depends upon the potential impact on the workplace.

Potential Workplace Impact:

The contractor employee should remain at home for 14 days from the date of potential exposure (laboratory-confirmed case) or the last date of exposure (probable case). Therefore, contractor employees may not work onsite at an SSA facility during this time even if the employee receives a negative COVID-19 test during that time. Contractors and COR-COTRs must not ask the contractor employee to get a COVID-19 test since the test outcome would not change the need for the employee to remain out of the office for 14 days. The employee may continue to work at home on portable work as long as the employee remains able to do so (e.g., does not become sick and need to take leave).

A contractor/subcontractor employee who is quarantined or must remain home due to close contact with 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 to the contractor. The contractor, in turn, must notify the COR-COTR of the quarantine or need to remain home at least 24 hours prior to the contractor/subcontractor employee reporting for work at an SSA facility. The contractor/subcontractor employee may return to the SSA facility only after the period of quarantine or requirement to stay home has expired and the contractor/subcontractor is exhibiting no symptoms of COVID-19 infection.

No Workplace Impact: Contractor/subcontractor employee will not be reporting to an SSA facility in the next 30 days:

For employees who will not be reporting onsite at an SSA facility within the next 30 days (e.g., will be working at home), contractors do not need to report information to SSA because this information has no impact on SSA facilities.

Q#6 - If a contractor/subcontractor employee is diagnosed with COVID-19, what options does the contractor/subcontractor employee have for continuing contract performance?

It depends upon the potential impact on the workplace.

Potential Workplace Impact: Contractor/subcontractor employee has been onsite at an SSA facility during the past 14 days and will be reporting to an SSA facility in the next 30 days:

The contractor employee should not return to the SSA facility until: after 10 days from the date of symptom onset or, if no symptoms after 10 days from the collection of a positive test result, being fever free for 24 hours without fever reducing medication, and have had an improvement in

symptoms. Individuals with continuing symptoms must be cleared by a medical provider. Therefore, you may not require the contractor employee to work onsite at an SSA facility during this time. The employee may continue to work at home on portable work as long as the employee remains able to do so (e.g., does not become sick and need to take leave).

The contractor/subcontractor employee must report the COVID-19 diagnosis to his/her employer. In the case of a subcontractor employee, the subcontractor must report the diagnosis to the contractor. The contractor, in turn, must notify the COR-COTR of the diagnosis 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. The COR-COTR must notify the OPE Medical Office at [^DCHR OPE Medical Office](#) for appropriate contact tracing.

No Workplace Impact: Contractor/subcontractor employee has not physically been onsite at an SSA facility during the past 14 days and will not be reporting to an SSA facility in the next 30 days (e.g., will be working at home):

Contractors do not need to report information to SSA because this information has no impact on SSA facilities.

Q#7 – Does a contractor need to report when a contract employee was in an SSA facility while positive with COVID-19?

Yes. The contractor/subcontractor employee must notify the COR-COTR of the incident immediately. The COR-COTR must notify the OPE Medical Office at [^DCHR OPE Medical Office](#) for appropriate contact tracing.

Q#8 - What should onsite contractor/subcontractor employees who develop symptoms of a respiratory illness or fever during the workday do?

Onsite contractor/subcontractor employees who develop symptoms potentially associated with COVID-19 during the workday will immediately notify their employer, promptly leave the worksite, and may not report onsite until they receive permission from their employer. The contractor/subcontractor must immediately notify the COR-COTR of the incident. The COR/COTR will assess and advise the contractor/subcontractor on reporting to the worksite according to Q#9 below and may consult the agency's Medical Office if they have questions. As with any illness, the contractor employee should call their medical provider, as warranted.

Q#9 - Does SSA have requirements to prevent the spread of COVID-19 when working or visiting SSA facilities?

Yes. On January 24, 2021, the Office of Management and Budget issued guidance on protecting the Federal workforce during the COVID-19 pandemic. Following this guidance, SSA will continue to maximize the use of remote work during widespread community transmission.

Additionally, the agency requires masks, self-screening, and social distancing for employees,

contractors, guards, and visitors to SSA facilities. The agency is providing hand sanitizer, cleaning supplies, additional Plexiglas barriers (where needed and approved), and cleaning in accordance with CDC guidelines for all facilities.

See Q#10 below for instruction regarding masks.

When in an SSA facility, everyone **must** adhere to physical distancing of 6 feet or more **at all times**. It is the agency’s expectation that the contractor will implement solutions – like handoff tables where employees place and pick up material in a contactless fashion—to avoid close contact. Seating must continue to be at least 6 feet apart and should be farther apart when feasible to minimize incidental contact. Contractor employees may not gather at each other’s workstations, in aisles, or common areas. Visitors must be served at a distance of 6 feet even when a barrier is used, so contractor employees should monitor seating accordingly.

Important note: the CDC has revised the definition of close contact to a **cumulative** (not consecutive) of 15 minutes in a 24hour period. Therefore, contractor employees should strive to prevent even limited contact like handing off paper directly from one employee to another.

Contractor employees must conduct a health self-screening assessment before entering SSA facilities in accordance with the following posted guidance at facility entrances:

<p>Do you have any symptoms of COVID-19 including:</p> <ul style="list-style-type: none"><input type="checkbox"/> Cough or sore throat<input type="checkbox"/> Fever (100.4 degrees or higher)<input type="checkbox"/> Chills<input type="checkbox"/> Shortness of breath or difficulty breathing<input type="checkbox"/> Muscle pain or body aches<input type="checkbox"/> Headache<input type="checkbox"/> New loss of taste or smell<input type="checkbox"/> Gastrointestinal symptoms like nausea, vomiting, or diarrhea <p>Within the last 14 days, have you:</p> <ul style="list-style-type: none"><input type="checkbox"/> Been diagnosed with COVID-19<input type="checkbox"/> Received instructions to self-monitor for symptoms or self-quarantine<input type="checkbox"/> Traveled outside the country (by means other than land travel, such as car, bus, ferry, or train) and any travel by cruise ship; or<input type="checkbox"/> Been within six feet of a person who was diagnosed with COVID-19

On a daily basis, prior to reporting onsite to an SSA facility, contractor employees must assess their health status using the checklist above and contact their employer if they meet any of the criteria. The contractor (employer) will advise the employee as to whether they should work at

home and notify the COR-COTR accordingly. If the contractor employee is still symptomatic after 72 hours, the contractor (employer) will ask the employee to contact a medical provider and provide medical documentation to the employer before returning to an SSA facility. The medical provider, not the contractor, will determine whether to test for COVID-19.

Please note that if an individual has been within 6 feet of a person who was diagnosed with COVID-19 within the last 14 days, a negative test does not clear the person to enter SSA facilities. Therefore, contractor employees must remain home for the full 14-day period from their date of last exposure.

Q#10 - What is our policy for masks and will the agency provide them for employees and contractors?

Beginning July 20, 2020, all contractors/subcontractor employees must wear a mask when in an SSA facility, and must also wear masks in outdoor spaces when physical distancing cannot be maintained. It is important that everyone wear the mask properly, which means always keeping both the nose and mouth covered and not lowering the mask to speak, etc. Employees, contractors, guards, and visitors may wear their own mask, as long as it meets [CDC recommendations](#) to cover their nose and mouth and does not have a ventilation valve. CDC also provides guidance on [increasing mask effectiveness](#), such as layering a cloth mask over a disposable one or improving mask fit to the face. Alternatively, the agency will provide an initial supply of 5 washable/reusable cloth masks to contractor employees.

If a contractor employee reports being unable to wear a mask due to a medical reason, the contractor will engage the reasonable accommodation process. If a contract employee reports being unable to wear a mask for a religious reason, the contractor will engage the religious accommodation process. Contractor employees who require a reasonable accommodation should contact their supervisors and request that the supervisor discuss the need with the contracting officer's representative (COR) or contracting officer as appropriate.

If a contractor employee does not provide a valid reason for not wearing a mask and refuses to wear one, the manager will contact the COR-COTR, who will initiate a conversation between the contractor employer, employee, and contracting officer. Following discussion with the COR-COTR and contracting officer, the contractor (employer) will require the contractor employee to leave SSA's facility and not return until the contractor employee agrees to comply with SSA's safety protocols and screening guidance. Any contractor employee who refuses to follow SSA's COVID policies may be removed from duty under the contract pursuant to the agency's Security and Suitability Requirements clause; paragraph (n)(12).

Contractors/subcontractor employees may not wear a face shield in lieu of a mask. [CDC](#) does not recommend substituting a face shield for a mask as face shields are not known to stop respiratory particles. If a contractor employee requests to use a face shield for a medical, disability, or religious reason, contractors should engage in the interactive reasonable accommodation process to find an effective alternative.

Contractor employees will be permitted to remove their mask in limited circumstances when it is reasonable to do so—e.g., to eat or drink—but must adhere to social distancing of at least 6 feet during this time.

General information: Cover your mouth and nose with a face mask 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 physical distancing measures are difficult to maintain (e.g., grocery stores and pharmacies). Masks are intended to protect other people and slow the spread of COVID-19 in case you are infected. The CDC poster below provides information on How to Safely Wear and Take Off a Cloth Face Covering.



cloth-face-covering.pdf

Q#11 - If a contractor employee was diagnosed with or suspected to have COVID-19 (or had close contact with a person diagnosed with or suspected to have COVID-19), should he/she sanitize agency-provided equipment (e.g., laptop, softphone headset, etc.) prior to returning the equipment to SSA?

Yes. Contractor employees should sanitize SSA equipment using the instructions in the document below.



Electronic Equipment
Cleaning Guidance - N

Q#12 - May contractor employees with disabilities whose work situation is changing due to COVID-19 request a reasonable accommodation?

Yes, under the Americans with Disabilities Act, contractor employees may request reasonable accommodations through their employer. For example, employees who rely on lip reading may request reasonable accommodations regarding SSA's mask policy. Contractor employees without portable work who have medical conditions that increase their risk for serious illness may also request telework as a reasonable accommodation. Contractors should engage in the interactive process to determine the employee's needs (e.g., communicating through other methods such as email or Skype, or purchasing masks with a plastic window for employees with whom the person regularly communicates, or temporary reassignment to portable work that can be performed at home). Contractors should consult their COR-COTR and Contracting Officer for technical assistance as necessary.

Contractors and COR-COTRs must not initiate conversations with employees about possible accommodations for known health conditions, and they must not direct or suggest employees with disabilities should not return to the official worksite when that option is available to other employees. Even if out of concern for employees' safety, both of these examples may constitute

discrimination based on disability status.

Q#13 – What are the current COVID-19 vaccination and testing requirements for contractor staff working onsite at an SSA facility?

NOTE: In consideration of the Center for Disease Control and Prevention (CDC) *new* streamlined COVID-19 guidance issued on August 11, 2022, the Social Security Administration (SSA) is *pausing* COVID-19 vaccination attestation requirements (to include *Certification of Vaccination form* requirements) for Contractors, and Subcontractors working onsite at an SSA facility. Specifically, SSA personnel will no longer request or collect vaccination status information (i.e., *Certification of Vaccination form* or negative test results) from Contractors and Subcontractors working onsite at an SSA facility. However, as a reminder, onsite contractor and subcontractor personnel are still required to wear a mask, except for short periods to eat or drink, while inside an SSA facility, as well as maintain physical distancing. Refer to the SSA COVID-19 FAQ guidance on SSA's internet website.

To ensure compliance with a preliminary nationwide injunction prohibiting implementation and enforcement of the vaccination requirement for the Federal contractors no further action will be taken to implement or enforce COVID-19 vaccination at this time. However, contractors may be asked for their vaccination status documentation and should follow all the safety protocols for the unvaccinated if they do not provide documentation of being vaccinated.

SSA has updated its operating procedures for contractor employees working onsite at a Federal facility per the guidance issued by the Administration's Safer Workforce Task Force concerning [COVID-19 Workplace Safety: Agency Model Safety Principles](#). In addition to SSA's current safety measures including wearing masks and physical distancing, contractor employees working onsite are required to comply with vaccination and testing requirements.

Personnel assigned to your contracts should complete the [Certification of Vaccination](#) form and be ready to present the completed form, which will remain in their possession, when working onsite at an SSA occupied facility. SSA encourages that contractor employees who can perform their contracted work off-site do so, provided this does not negatively impact the contract, and that such employees be afforded the flexibility to telework to the maximum extent practicable. However, this will be predicated on proper coordination with the Contracting Officer's Representative to confirm if telework or work off-site is appropriate.

Consistent with this guidance contractor employees who are not fully vaccinated, who do not complete the attestation form, or who decline to provide their vaccination status are required to be tested not less than weekly and show proof of having received a negative COVID-19 [FDA-approved](#) test within the previous 3 days in order to enter an SSA facility. Contractor personnel are required to show either their *Certification of Vaccination* form attesting to being fully vaccinated or their negative COVID-19 test results (no more than 3 days old) to enter an SSA facility. SSA personnel may inspect this documentation upon entry to the facility but will not retain the documentation, make copies, or otherwise record the information. SSA personnel will refuse entry to contractor personnel who are non-compliant. Please note that contractor personnel will not have access to COVID-19 testing services that SSA provides to its employees.

Accordingly, contractors are responsible for identifying suitable testing providers, which must administer an FDA approved test with a dated result.

Contractor personnel must keep a copy of the *Certification of Vaccination* form or proof of a timely negative COVID-19 test on their person while onsite at SSA facilities. SSA CORs will not collect or store information on the vaccination status or test results of individual contractor personnel. Contractors are solely responsible for this information and compliance with these requirements.

As a reminder, onsite contractor personnel are required to wear a mask, except for short periods to eat or drink, while inside an SSA facility, as well as maintain physical distancing (FAQ guidance above remains unchanged). Contractor personnel are required to follow all signage posted in SSA facilities and comply with all instructions by Federal Protective Service officers and facility managers; failure to comply may result in the contractor employee's removal from the facility. Contractors are responsible for ensuring that they staff the contracts with personnel who are willing and able to comply with all COVID-19 requirements; a failure to do so will not constitute an excusable delay or otherwise excuse nonperformance of contract requirements.

Following these procedures helps to ensure SSA's mission readiness, protect all onsite workers, and support public health and safety.

The contractor community plays a vital role in achieving the agency's mission and we thank the contractor employees who have been part of our onsite workforce locations throughout this pandemic.