

**COVID-19**

**Adaptive Operations Recovery Plan**

**Indian Affairs**

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May 19, 2020

President Trump announced the [Guidelines for Opening Up America Again](#) (White House guidance), providing a three-phased data-based approach to assist state and local officials in safely reopening and continuing to protect American lives. In accordance with the White House guidance and that of the [Centers for Disease Control and Prevention \(CDC\)](#) and State public health authorities, the Department of the Interior (DOI) and Bureau of Indian Affairs (BIA) are working to return employees to duty stations in a safe and deliberate manner. Concurrently, bureaus are actively working to increase access and services across all Federal lands, facilities, and offices based on conditions in the respective State, tribal and local community.

## **Table of Contents**

<b>Introduction and Purpose</b> .....	<b>1</b>
<b>Mission Essential Functions and Mission Critical Work</b> .....	<b>2</b>
<b>Phased Recovery</b> .....	<b>4</b>
<b>Recovery Principles for All Phases</b> .....	<b>4</b>
Phase I Approach .....	5
Phase II Approach .....	9
Phase III Approach .....	11
<b>IA Roles and Responsibilities</b> .....	<b>12</b>
<b>Employee Health and Wellness</b> .....	<b>13</b>
<b>Internal Communications</b> .....	<b>13</b>
<b>Collective Bargaining Obligations</b> .....	<b>14</b>
<b>Resources and References</b> .....	<b>14</b>
<b>Attachments</b> .....	<b>15</b>

## Introduction and Purpose

The Indian Affairs (IA) COVID-19 Adaptive Operations Recovery Plan (Plan) provides strategic direction and guidance to IA offices to resume phased operations consistent with State and tribal guidance. The information in this Plan is consistent with the [White House guidance](#) and the [Office of Management and Budget \(OMB\)/Office of Personnel Management \(OPM\) Memorandum for Heads of Executive Departments and Agencies](#). Decisions on operations should occur at the local/tribal and regional level, subject to consultation with IA leadership and the Department of the Interior (DOI). It is incumbent on leaders in IA offices to exercise discretion to implement action plans based generally on State, tribal, and/or local guidance on reopening and conditions at each IA site.

In an effort to preserve our government-to-government relationship with tribes, decision makers should honor the tribe's jurisdiction. For example, if an office is located on tribal land and that office meets the criteria for Phase 1, but the tribe has issued a shelter in place order, that IA office should defer to the tribe's stay at home order.

The Plan informs and guides appropriate transitions from wide-scale restrictions and closures imposed to slow COVID-19 infections, to scalable operations that allows for routine office operations and public visitation that sustain communities and local economies, but do not compromise public and employee health and safety. This Plan provides an adaptive, decision-making framework to enable IA managers to scale operations in a manner that best supports the visiting public under evolving recommendations from the Centers for Disease Control and Prevention (CDC), OMB/OPM, and State/tribal/local public health officials.

Operational considerations should be consistent IA-wide. For that reason, IA leadership assumes the following:

- ② IA facilities and operations that have been closed should resume operations in stages when the risk to employees and the public can be sufficiently mitigated. Resuming IA operations requires a flexible, creative and phased approach that can adapt to a changing environment.
- ② Contractor employees are not Federal employees and are not subject to the terms of this Plan. Contractor employees will instead be subject to the terms of their contracts, including any modifications to the contract made by the Contracting Officer to address resumption of phased operations.
- ② The pandemic scenarios for 2020 are expected to persist at some level into 2021 and planning should reflect that reality.
- ② The IA will continue to maintain situational awareness of all employee confirmed and recovered COVID-19 cases and follow [CDC guidance](#) to clear them to return to work.

- ❑ Modifications to operations will be continually evaluated and adjusted. Bureaus should remain nimble and able to scale indoor facilities, outdoor facilities, and activities to State/tribal guidance as it may be adjusted on a regional or State-wide basis.
- ❑ As COVID-19 is mitigated and concerns around the pandemic recede, impacts on public visitation will not be easy to predict. Each facility should consider local visitation and staffing capacities in determining the appropriate operational level.
- ❑ Bureau of Indian Education (BIE) has developed a school reopening work plan, approved by the Assistant Secretary-Indian Affairs, that should be activated by the Director of BIE and executed at the local level. Interim reopening guidance is included as an attachment to this document.

## **Mission Essential Functions and Mission Critical Work**

IA currently provides services (directly or through contracts, grants, or compacts) to approximately 1.9 million American Indians and Alaska Natives. There are 574 federally recognized American Indian tribes and Alaska Native Villages in the United States. IA recognizes its responsibility to continue mission essential functions and mission critical work through the COVID-19 pandemic. In addition to executing and providing support for [DOI PRIMARY MISSION ESSENTIAL FUNCTIONS \(PMEFs\)](#), [MISSION ESSENTIAL FUNCTIONS \(MEFs\)](#), AND [ESSENTIAL SUPPORT ACTIVITIES \(ESAs\)](#) there are activities or functions that do not lend themselves to telework and should continue to be performed on-site throughout a disruption or change to normal operations. Since the onset of the COVID-19 pandemic, approximately 8% of IA's workforce (6,700 employees) has continued to perform mission critical functions on-site and all remaining employees have been encouraged to telework from their homes, the vast majority of whom have been successfully doing so since early March.

- The Assistant Secretary – Indian Affairs advises the Secretary of the Interior on Indian Affairs policy issues, communicates policy to and oversees the programs of the BIA and the BIE, provides leadership in consultations with tribes, and serves as the DOI official for intra- and inter-departmental coordination and liaison within the Executive Branch on Indian matters, and provides support across Indian Affairs for business function such as budget and accounting, acquisitions, facilities and safety, information technology and human capital management.
- Bureau of Indian Affairs (BIA) is responsible for the administration and management of 55 million surface acres and 57 million acres of subsurface minerals estates held in trust by the United States for American Indian, Indian tribes, and Alaska Natives. Their missions is to: "... enhance the quality of life, to promote economic opportunity, and to carry out the responsibility to protect and improve the trust assets of American Indians, Indian tribes, and Alaska Natives."
- Bureau of Indian Education (BIE) provides education services to approximately 42,000 Indian students. Their mission is to: "... provide quality education opportunities from early

childhood through life in accordance with the tribes’ needs to cultural and economic well-being in keeping with the wide diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities. The Bureau considers the whole person (spiritual, mental, physical and cultural aspects.)"

Mission Essential Functions (MEFs) are those functions that should be continued regardless of the pandemic. MEFs enable Indian Affairs offices and bureaus to provide vital services, exercise civil authority, maintain the safety of the general public, and sustain the industrial/economic base during disruption of normal operations. MEFs have been derived from government functions of AS-IA Offices and the BIA and the BIE. Indian Affairs MEFs reflect continuity priorities for AS-IA leadership and support Departmental Primary MEF to “Provide essential law enforcement and critical infrastructure protection services on Department of the Interior administered public lands and on tribal and individually owned Indian lands.”

### **AS-IA’s Mission Essential Functions**

<b>Mission Essential Functions</b>
Coordinate emergency response and recovery activities on tribal lands
Coordinate critical services that address health, safety, welfare and financial security of tribes
Protect and provide a safe environment in Indian schools, dormitories, and post-secondary institutions

### **Essential Support Activities**

In addition to PMEFS and MEFs, there are certain activities IA employees should strive to continue. Essential Support Activities are support services that are not MEFs, but are necessary to enable the execution of MEFs.

### **AS-IA’s Essential Support Activities**

<b>Essential Support Activities</b>
Provide finance and accounting activities, including payroll, purchasing, and reporting
Provide acquisition and logistics support for emergency activities
Coordinate emergency travel support as needed to execute mission essential functions
Continue vital human resources operations including emergency hiring and employee assistance
Communicate with IA employees, providing information on the status of departmental and bureau operations
Provide timely and accurate information to the media and the public detailing the impact of incident on Trust lands and facilities as well as IA response activities
Operate and maintain facilities required to execute MEFs
Provide occupational safety and health guidance and support for emergency responders and other employees
Account for status of the workforce and recall employees to duty, as required
Protect and provide access to vital records to support emergency operations and to fulfill legal, financial and trust management responsibilities of the Department
Provide communications and information technology service to support execution of the Department’s Mission Essential Functions
Interpret legal authorities and provide legal services to Departmental officials

Provide legal services and policy guidance in connection with the formulation of proposed legislation
Coordinate approval of emergency funding transfers, supplementals and reprogramming requests to ensure funding is in place to sustain emergency operations
Collect, assess, analyze, process, display, and disseminate incident and recovery related information to perform critical missions, support decision making, and maintain situational awareness

## Phased Recovery

Per the White House guidance, State and community leaders should follow a three-phased process to re-open America. As recognized in the OMB/OPM guidance that aligns Federal agency operations with the national [Guidelines for Opening Up America Again](#), the Federal government should generally calibrate its transitional reopening strategy to the phase determined by State/tribal guidance where the IA work location is situated. The timeline for moving through the three-phased approach should generally rely on a State/tribal government's State/tribe-wide or regional assessment of which phase or phases the location of the DOI station or facility may be in at any given time.

Each IA office's decision to restore operations should be informed by a State/tribal decision to enter a reopening process. This Plan establishes near- to mid-term processes to align agency operations with the national guidelines, and supports the phased resumption of on-site IA operations while maintaining practices which have proven successful in mitigating the impact of the virus. The IA is committed to immediately implementing a transitional strategy consistent with the White House, OMB and tribal guidance.

## Recovery Principles for All Phases

The [CDC guidance](#) includes a primary objective of disease mitigation through good hygiene, staying home when sick, and social distancing for both employees and bureaus that maintain visitor services. The IA remains committed to facilitating efforts that support these objectives to limit and/or eliminate disease resurgence. It is understood that if there is a resurgence of cases in the locality, and the State moves back to a more conservative posture, IA offices in that geography may do so as well. Bureaus may find that reduced staffing/seasonal capacity and increased public health protocols may impact the IA office's ability to advance certain operations into the next phase of recovery. These staffing and capacity limitations should be documented, and mitigation considered in order to bring a facility in line with the next stage of recovery.

All IA offices, regardless of their level in a recovery phase should implement the following adaptive recovery principles:

- ❑ Staff should comply with [CDC recommendations](#) for the specific functions they perform and utilize general DOI guidance on employee health screening, recommendations for appropriate ways to achieve social distancing, cleaning requirements and any necessary Personal Protective Equipment (PPE).

- ❑ The IA Emergency Management Team (EMT) should work with regions, agencies, and Education Resource Centers to coordinate logistical support with distribution centers for establishing inventories and continued supplies.
- IA offices should continue to report changes in operational status to IA’s EMT who should continue providing updates to DOI and posting the status on associated websites as a unit enters a new phase.
- ❑ Field level supervisors should evaluate their conditions locally; discuss status with local Tribes, Regional Directors and Associate Deputy Directors to guide their determination if their location meets the qualifiers to proceed to a phase.

Additionally, the IA should continue to maintain a privacy-protected data collection tool of case positive and recovered employees and daily report this aggregated information to the DOI Watch Office to support a Department-wide view of the workforce.

### **Phased Approach**

As recognized in the [OMB/OPM guidance](#) that aligns federal agency operations with the national [Guidelines for Opening Up America Again](#), the Federal government should generally calibrate its transitional reopening strategy to the phase determined by a State’s/ tribal assessment and guidance. IA should reopen its public-facing facilities, where access is limited or curtailed, by performing a [COVID-19 Station Risk Assessment](#) and identifying reasonable mitigation techniques to protect IA employees, volunteers, contractors, and visitors.

Station operating postures should be informed by State, tribal and local determinations and utilize available information when making mission-critical decisions. The below descriptions provide a general overview of how activities should progress. IA’s ability to carry out its mission and prioritize the safety of its workforce should be paramount in its decision making. In an effort to preserve our government-to-government relationship with tribes, decision makers should honor the tribal government determination, where such determination does not interfere with Indian Affairs PMEFS, MEFs and ESAs.

### **Phase I Approach**

If a State, tribal or local entity with designated authority from the Governor/tribal governing body, announces it is entering Phase I, IA offices within that jurisdiction should begin

Primary considerations underlying the resumption of any public-facing operations will be based on the impact to visitors, staff, volunteers, contractors, partners, and concessionaires. Facility decisions will observe CDC and State health guidance, including the following:

- social distancing and ability to manage crowds;
- ability to meet cleaning/sanitation standards;
- availability of necessary PPE;
- capacity of seasonal and permanent staff; and
- capacity of the medical resource in the local communities as determined by State recommendations.

implementing the Phase I operational posture consistent with mission delivery and the health and safety of employees.

***Step 1: Determine where increased and expanded access is feasible***

The entry into Phase I is not an immediate requirement to resume operations. IA stations should assess the feasibility of resuming operations while ensuring employee and visitor safety. IA leadership should ensure the following:

- The Regional Safety Manager should assist the Regional Director, or Associate Deputy Director with collecting public health information to inform decision making. Agency Superintendents and BIE Associate Deputy Directors should closely coordinate with tribal governments and the BIA Regional Director who are coordinating with the regional Field Special Assistant (FSA's) to collect and maintain updated public health guidance and information to aid managerial decisions.
- ☐ Review White House, State and tribal guidance and determine where the office is in the reopening process.
- ☐ Where appropriate, complete a [COVID-19 Station Risk Assessment Tool](#) and identify whether appropriate mitigation techniques can be performed to protect IA employees, volunteers, contractors, and visitors.
- ☐ Work with State/tribal public health officials, such as Indian Health Services (IHS), to ensure expanding public access is done in concert with State/tribal public health guidance.
- When changes to operational status occur, Regional Directors, Deputy Bureau Directors and Bureau Directors should notify the Indian Affairs Emergency Management Team to communicate with the Office of the Assistant Secretary, Indian Affairs, DOI headquarters, Public Affairs and the FSA's so information may be relayed to State/tribal and local partners for awareness.

***Step 2: Determine the Work Sites and Activities that May Safely Accommodate Staff***

Work Sites: The IA should utilize the [Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior \(DOI\) and Work Locations](#), and in accordance with CDC, OSHA, and State or tribal as appropriate, worksite guidance.

While mission essential functions, such as law enforcement, have been maintained throughout this public health emergency, supervisors should also use employment flexibilities when hiring mission essential personnel. It is recognized that in some situations there may be a delay in onboarding seasonal staff and that could affect operational capacity.

Bureaus should follow [Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior \(DOI\) and Work Locations](#) and implement routine cleaning procedures in accordance with CDC guidance.



**Step 3: Implement Mitigation Strategies**

For the outdoor and recreational experiences that are accessible to the public, the IA offices should identify and implement reasonable mitigations, found in [Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior \(DOI\) and Work Locations](#) such as:

- ❑ Post information to promote everyday preventative actions, including social distance protocols (currently six-feet of separation).
- ❑ Discourage groups from gathering in larger numbers and monitor high traffic or popular areas to support social distancing practices.
- ❑ Encourage visitation at off-peak times of the day.
- ❑ Limit gathering sizes in accordance with State, tribal or local orders/recommendations.

Offices should implement consistent signage, web content, and communications protocols to ensure the public understands what is available at the location during this phase, and how to safely visit. Signage, web content, and communications should also notify the public that access and park staffing may be limited during the phased reopening and direct visitors to adjust their expectations accordingly, as well as practice social distancing, personal hygiene, and other recommended behavior to reduce the risk of infection in public areas.

In addition to the steps above, IA work locations should consider the guidelines found in Table 1: Phase I Guidelines . These guidelines are aligned with the [White House guidance](#), but tailored to the mission of the IA.

**Table 1: Phase I Guidelines**

Topic	Guidance
<b>Vulnerable/high risk populations</b>	In States/Tribes that remain in the Gating period, Phase I, or Phase II, and as appropriate and consistent with Departmental policies, managers and supervisors should maximize telework and leave options for eligible employees who express a need to remain away from the official workplace, including but not limited to 1) employees whom <a href="#">CDC guidance</a> defines as being at higher risk for serious complications from COVID-19; 2) employees who are part of CDC-identified special populations; and 3) employees who request telework or leave flexibilities to protect vulnerable household members who are at higher risk for severe illness from COVID-19. Without soliciting protected information related to age or underlying medical condition(s), managers and supervisors should continue to rely on information voluntarily provided and self-certified as accurate by employees who express a need to remain away from the official workplace.
<b>Social distancing</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</a>
<b>Socializing/gathering</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</a>

Topic	Guidance
<b>Face covering</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</a>
<b>Travel</b>	Minimize non-essential travel and adhere to <a href="#">CDC guidelines</a> regarding isolation following travel.
<b>Telework</b>	Continue telework whenever possible and feasible with business operations. Central office, State or regional office, and stations telework-approved functions should continue to maximize telework operations.
<b>Work site or facility</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</a> . Return to work in phases.
<b>Detention center and corrections staff</b>	<p><b>CONTRACTORS:</b> Contractor access to BIA OJS facilities will continue to be restricted to only those performing essential services or those who perform necessary maintenance on essential systems. Contractors who require access will be screened using the same procedures as staff prior to entry. Delivery of goods to include food and supplies will be receipt by a supervisor outside of the facility. Delivery of services such as laundry will be in receipt by a supervisor outside of the facility. Maintenance contractors who are approved for access, by the BIA Supervisory Correctional Officer/Supervisor will be screened using the same procedures as staff prior to entry. These practices will be re-evaluated in 30-60 days.</p> <p><b>SCREENING OF STAFF:</b> BIA OJS will continue to practice enhanced health screening of staff. Such screening includes self-reporting and temperature checks. These screening practices will be re-evaluated in 30-60 days.</p> <p><b>SCREENING OF INMATES:</b> BIA OJS will continue to screen inmates by using the following practices and will re-evaluate the practices in 30-60 days:</p> <ul style="list-style-type: none"> <li>• All newly-arriving OJS or Tribal inmates are being screened for COVID-19 exposure risk factors and symptoms. All newly-arriving inmates shall be screened in the Sallyport or designated room outside of the booking area.</li> <li>• Asymptomatic inmates with exposure risk factors are quarantined.</li> <li>• Symptomatic inmates with exposure risk factors are isolated and tested for COVID-19 per local health authority protocols.</li> </ul> <p><b>MODIFIED OPERATIONS:</b> BIA OJS will continue to implement nationwide modified operations to maximize social distancing and limit group gatherings in our facilities. For example, depending on the facility's population and physical layout, the institution may implement staggered meal times, recreation, etc. These modifications will be re-evaluated in 30-60 days</p>
<b>Common areas</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for DOI and Work Locations</a>

Topic	Guidance
<b>Organized education and kids/youth activities</b>	The activities (e.g., daycare, camps, programs) that are currently closed should generally follow State, tribal and local guidance and OPH recommendations.
<b>Visitor experiences</b>	Formal exhibits, and tight spaces (such as historic homes or museums) are closed if social distancing and cleaning protocols cannot be maintained.
<b>Housing</b>	Follow <a href="#">CDC guidance</a> for shared or congregate housing. Social distancing requirements in shared housing remains in effect. Housing and operations guidance may change for particular locations as they progress through the recovery phases and improved recommendations are developed.
<b>Seasonal onboarding</b>	Facilities should limit hiring and set dates for on-boarding of seasonal staff, based on projections of visitation levels and other demands for seasonal hiring.
<b>Field work</b>	Field work may resume. Work environments of more than 10 people, where appropriate distancing may not be practical, should be avoided unless precautionary measures are observed such as use of cloth face coverings.

## Phase II Approach

A Phase II operating posture should be informed by State and tribal/local determinations and consistent with IAs mission while prioritizing the safety of its workforce and the public. In a Phase II operational posture a facility, area, or regional office should abide by the initial steps in Phase I, consult its [COVID-19 Station Risk Assessment Tool](#), if applicable, and work with IHS and/or OPH and State/tribal/local public health officials to ensure expansions of public access are considerate of State, tribal and local health guidance.

To ensure the safety of staff and the public, work locations who manage public access and visitor services functions should consider mitigation measures such a sequencing or the use of timed entry to disperse visitors throughout the facility and promote social distancing. It is understood that in some cases, reduced staffing/seasonal capacity, illness in employees, and increased public health protocols may impact the station’s ability to fully move forward into the next operational phase.

For Phase II, offices should use the designated regional POC’s in close consultation and coordination with the Bureau Deputy Director, to inform second phase criteria determinations.

Similar to Phase I, the IA has adapted [White House guidance](#) to address common operational considerations. Table 2: Phase II Guidelines contains the Phase II guidelines. These guidelines should be considered along with the station’s [COVID-19 Risk Assessment Tool](#).

**Table 2: Phase II Guidelines**

Topic	Guidance
<b>Vulnerable/high risk populations</b>	In States, Tribes or regions that remain in the Gating period, Phase 1, or Phase 2, and as appropriate and consistent with Departmental policies, managers and supervisors should maximize telework and leave options for eligible employees who express a need to remain away from the official workplace, including but not limited to 1) employees whom <a href="#">CDC guidance</a> defines as being at higher risk for serious complications from COVID-19; 2) employees who are part of CDC-identified special populations; and 3) employees who request telework or leave flexibilities to protect vulnerable household members who are at higher risk for severe illness from COVID-19. Without soliciting protected information related to age or underlying medical condition(s), managers and supervisors should continue to rely on information voluntarily provided and self-certified as accurate by employees who express a need to remain away from the official workplace.
<b>Social distancing</b>	Follow <i>Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</i>
<b>Travel</b>	Non-essential travel can resume to other jurisdictions in Phase II or Phase III.
<b>Telework</b>	Telework is encouraged, whenever feasible to achieve business operations.
<b>Detention center and corrections staff</b>	<p><b>CONTRACTORS:</b> Contractor access to BIA OJS facilities will continue to be restricted to only those performing essential services or those who perform necessary maintenance on essential systems. Contractors who require access will be screened using the same procedures as staff prior to entry. Delivery of goods to include food and supplies will be receipt by a supervisor outside of the facility. Delivery of services such as laundry will be in receipt by a supervisor outside of the facility. Maintenance contractors who are approved for access, by the BIA Supervisory Correctional Officer/Supervisor will be screened using the same procedures as staff prior to entry. These practices will be re-evaluated in 30-60 days.</p> <p><b>SCREENING OF STAFF:</b> BIA OJS will continue to practice enhanced health screening of staff. Such screening includes self-reporting and temperature checks. These screening practices will be re-evaluated in 30-60 days.</p> <p><b>SCREENING OF INMATES:</b> BIA OJS will continue to screen inmates by using the following practices and will re-evaluate the practices in 30-60 days:</p> <ul style="list-style-type: none"> <li>• All newly-arriving OJS or Tribal inmates are being screened for COVID-19 exposure risk factors and symptoms. All newly-arriving inmates shall be screened in the Sallyport or designated room outside of the booking area.</li> <li>• Asymptomatic inmates with exposure risk factors are quarantined.</li> <li>• Symptomatic inmates with exposure risk factors are isolated and tested for COVID-19 per local health authority protocols.</li> </ul>

Topic	Guidance
	<u>MODIFIED OPERATIONS</u> : BIA OJS will continue to implement nationwide modified operations to maximize social distancing and limit group gatherings in our facilities. For example, depending on the facility's population and physical layout, the institution may implement staggered meal times, recreation, etc. These modifications will be re-evaluated in 30-60 days.
<b>Common areas</b>	Follow <a href="#">Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior (DOI) and Work Locations</a>
<b>Organized education and kids/youth activities</b>	Activities (e.g., daycare, camps, programs) should generally follow State, tribal and local guidance and OPH recommendations and can reopen where social distance and other mitigations are possible.
<b>Visitor experiences</b>	Experiences should be conducted at outside locations/venues (under shade structures as needed) or with virtual/remote media and techniques and social distancing. Formal exhibits, and tight spaces (such as historic homes or museums) remain closed if social distancing and cleaning protocols cannot be maintained. Offices should work to ensure that visitor orientation, wayfinding, roving and virtual or remote visitor services are reintroduced or continued, as possible.
<b>Housing</b>	Follow <a href="#">CDC guidance</a> for shared or congregate housing. Social distancing requirements in shared housing remains in effect. Housing and operations guidance may change for particular locations as they progress through the recovery phases and improved recommendations are developed.
<b>Field work</b>	Field work may resume.
<b>Communications</b>	Offices should update signage, web content, and communications protocols to ensure the public understands what further options are available during this phase, and how to safely visit. Signage, web content, and communications should also notify the public that access may be limited during phased reopening and direct visitors to adjust their expectations accordingly and practice social distancing, personal hygiene, and other recommended behavior to avoid infection in public areas.

### Phase III Approach

A Phase III operating posture should be informed by State and tribal/local determinations and consistent with IA’s mission while prioritizing the safety of its workforce and the public. In a Phase III operational posture a facility, area, or regional office should abide by the initial steps in Phase I and II, consult its [COVID-19 Station Risk Assessment Tool](#), if applicable, and work with IHS and/or OPH and State/tribal/local public health officials to ensure expansions of public access are considerate of State, tribal and local health guidance.

The emphasis in Phase III should be to ensure public health guidance is fully implemented as operations and recreational experiences are resumed when phased criteria are met. It is understood that there may be operational and staffing impacts of this phased approach, and therefore, it is possible not all stations, particularly those locations heavily impacted by COVID-19, will be able to return immediately and fully to past operational standards. Developing adjusted standards for operations in coordination with IA national programs may be necessary.

Similar to Phase I and Phase II, the IA has adapted [White House guidance](#) for common office considerations. Table 3: Phase III Guidelines contains the Phase III guidelines. These guidelines should be considered along with the office’s [COVID-19 Station Risk Assessment Tool](#).

**Table 3: Phase III Guidelines**

Topic	Guidance
<b>All employees</b>	All employees should be encouraged to continue to follow CDC guidance for taking precautions to protect themselves from COVID-19.
<b>Unrestricted staffing</b>	Offices may resume all worksites.
<b>Large venues</b>	Venues can operate under limited physical distancing protocols.

Phase III represents a return to normal or new locally standardized operations. Facilities should all re-open at this point and visitor opportunities should fully resume, although local managers should be mindful of projected visitation rates and associated seasonal staffing capabilities.

## IA Roles and Responsibilities

### Bureau Director (BIE and BIA)

- ☐ Approves and activates proposed reopening plan for BIA and BIE and works closely with Indian Affairs and DOI leadership.

### IA Emergency Management Team (EMT)

- IA EMT coordinates with the Assistant Secretary, Indian Affairs (and associated offices), BIA and BIE Bureau Directors, their EMTs and the DOI, Office of Emergency Managements to provide daily reports and complete data calls and other required activities addressed in IA’s Pandemic Plan (attached).

### BIA/BIE Deputy Director, Field Operations

- Coordinates with the IA EMT and assists regions/ADD’s/ ERC’s with implementing their reopening plan for the BIA and proposes changes as situations develop.
- ☐ Maintains situational awareness via the [DOI Common Operating Picture \(COP\)](#) to ensure the BIA/BIE is on track.

### Regional Directors/BIE Associate Deputy Directors

- ☐ Maintains ongoing reporting and oversight of the regional COVID response.
- ☐ Responsible for plan execution and decision-making surrounding the Plan at regional locations during each phase.
- Primary source of engagement for the Education Program Administrators’/Field Special Assistants (FSAs) to maintain situational awareness of local conditions as they change.
- Responsible for employing creative and flexible solutions to meet workforce needs while still advancing the BIA’s and the BIE’s mission.

### Agency Superintendents/Education Program Administrators

- Responsible for local plan execution, coordinating with tribes and decision-making surrounding the Plan at their agency and coordinates with tribal governments to implement the Plan’s actions, where feasible, during each phase.
- ☐ Primary source of engagement for the Regional Directors/BIE Associate Deputy Directors to maintain situational awareness of local conditions as they change.

- Responsible for employing creative and flexible solutions to meet workforce needs while still advancing the BIA's mission.

#### Public Information Officer – IA Emergency Management Team

- ☐ Develops communications plans and serves as the focal point for obtaining approvals from Indian Affairs, Office of Public Affairs and DOI Office of Communications (OCO) for bureau-wide messaging.
- ☐ Publishes all-employee messaging and updates public-facing website with current operating status.

## **Employee Health and Wellness**

This pandemic has put atypical emotional and mental stress on DOI employees. Supervisors should continue to take employees' mental health into consideration as plans are formulated and enacted to resume on site operations. Many insurance companies cover telehealth, which allows patients to seek medical care, including therapy and some prescriptions, over the phone. Several resources for IA employees are as follows:

- ☐ DOI Employee Assistance Program: <https://www.doi.gov/pmb/hr/eap>
- ☐ CDC COVID-19 Stress and Coping Resource: <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/managing-stress-anxiety.html>
- ☐ Substance Abuse and Mental Health Services Administration (SAMHSA) Disaster Distress Helpline: 1-800-985-5990, or text TalkWithUs to 66746 (<https://www.samhsa.gov/find-help/disaster-distress-helpline>)
- Indian Health Services (IHS) – Division of Behavioral Health - <https://www.ihs.gov/dbh/>

## **Internal Communications**

When DOI employees begin to return to their duty stations, regular and transparent communications are imperative. This should include a two-way dialogue (feedback loop). Leadership messages to prepare for reintegration should be clear, empathetic, and recurring. This responsibility rests primarily with first line supervisors and should address the following topics:

- ☐ The appropriate status for each employee (i.e., on-site, telework, remote work). It may be helpful to discuss what has worked well for individuals who have been teleworking, what has not worked well, and how to improve collaboration and employee engagement and productivity.
- ☐ Applicable personnel policies and directives on items such as timekeeping, use of approved leave, and hiring flexibilities in accordance with PMB guidance.

In instances where different DOI agencies or offices are in a building shared with other government agencies or even in the same local area, it is suggested supervisors from these offices

communicate with one another to better stagger schedules in early stages to minimize the amount of people in the building as well as ensure that all offices follow similar protocols.

IA should communicate expectations for health screening, social distancing and employee safety, consistent with DOI wide guidance protocols through multiple ways including email, targeted messaging, virtual small group meetings and larger town halls as examples. For General Services Administration (GSA) owned and leased facilities, and office buildings shared with non-Federal government employees, the DOI Designated Official is responsible for determining appropriate screening protocols, or in case of multi-tenant facilities, the Facility Security Committee; deviations from DOI guidance should be communicated with employees.

Regional Directors and FSAs should communicate regularly on activities occurring within their respective DOI regions. Where appropriate, they should coordinate and collaborate with FSAs on opening and transitioning through the phases and to ensure coordination with other DOI bureaus operating in the same region and with States, Tribes and local governments.

IA should create space for two-way dialogue and feedback with employees maximizing existing technologies. Offices may consider using tools like Send Word Now or another centralized tool to communicate with employees. This is a useful tool for communicating with employees who may not have access to their government email address.

## **Collective Bargaining Obligations**

Frequent communications with Union leadership may become an important aspect when reopening offices. The union should be kept informed of the Bureau or Office's plans to reopen. Once the reopening plans are finalized, the Union should be provided with notice of those plans to resume normal operations.

Managers and supervisors should work with their labor relations staff to ensure any applicable labor-management obligations related to plans to return to normal operations are fulfilled, in accordance with the Collective Bargaining Agreement and the Statute.

## **Resources and References**

- ❓ [White House Opening Up America Again Guidance](#)
- ❓ [OMB/OPM Memorandum for Heads of Executive Department and Agencies](#)
- ❓ [OPM Guidance for Resumption of Work](#)
- ❓ [DOI Guidance and Policy](#)



## Attachments

- ☐ [Pandemic Social Distancing and Daily Health Monitoring Implementation Guidelines for Department of the Interior \(DOI\) and Work Locations](#)
- ☐ [DOI COVID-19 Station Risk Assessment Tool & Decision Form](#)
- Indian Affairs Pandemic Plan – 2020
- ☐ Bureau of Indian Education [April 16 - BIE-Funded School Resumption of Activities Guidance Memorandum](#)