



Gary Morton
President

Natasha Greaves
Executive Vice President

Administrator Wheeler:

As we face the coronavirus public health crisis, EPA's limited and inflexible telework policy for AFGE employees seriously endangers our employees, their families, coworkers and EPA's ability to accomplish its mission to protect human health and the environment. This policy is in direct opposition to the guidance provided by the Centers for Disease Control (CDC), which recommends that employers "explore whether you can establish policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees and others if state and local health authorities recommend the use of social distancing strategies."¹ Major U.S. companies, including Apple, IBM and Coca-Cola, are following this guidance and asking workers in coronavirus-affected areas to work from home.^{2,3} EPA must prepare to do the same by providing a reasonable and flexible telework policy to AFGE employees **now**. As provided in the CDC guidance, a Continuation of Operations Plan (COOP) should be instituted that allows for the fullest flexibility for telework.

Unfortunately, it's probably only a matter of weeks or even days before each of the Regional offices are identified as "coronavirus-affected." In the Pacific-Northwest and California, States of Emergency have been declared and it is likely there are Regional employees already affected. It is very possible that many of the other areas not yet confirmed will soon become coronavirus-affected.

On February 25, the CDC announced that Americans should prepare for the spread of the coronavirus across the U.S., stating, "It's not so much a question of if this will happen anymore but rather more a question of exactly when this will happen and how many people in this country will have severe illness."⁴

Since February 25, we have seen this prediction come true. New U.S. cases are arising daily, most of which don't have any links to known risk factors, such as travel to hard-hit countries or contact with people who have traveled to hard-hit countries. On March 1, health experts concluded that the virus has probably been spreading undetected for about six weeks in Washington state, where the first U.S. death was reported on February 29. One of these experts noted, "Under current circumstances, a boom of cases should be expected, especially given the possibility of asymptomatic spread and mildness of the disease."⁵

These frightening circumstances have already caused churches, grocery stores and civic groups to change their practices to protect vulnerable people. While the virus has only mild symptoms for some, it can be deadly for others. This makes it imperative that EPA not only allow, but encourage the use of telework for employees who are experiencing any respiratory symptoms, who are in a high-risk group themselves, or who live with others (like older parents) who are in a high-risk group. We can all remember times when sick coworkers have come into the office when they clearly ought to have stayed home, for example because they were low on sick leave.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/guidance-business-response.html>

² <https://www.washingtonpost.com/business/2020/02/28/workplace-coronavirus-work-from-home/>

³ <https://www.usnews.com/news/national-news/articles/2020-03-06/apple-employees-join-twitter-facebook-amazon-in-remote-work-as-coronavirus-spreads>

⁴ <https://www.cdc.gov/media/releases/2020/t0225-cdc-telebriefing-covid-19.html>

⁵ <https://www.usatoday.com/story/news/nation/2020/03/01/coronavirus-hundreds-may-be-infected-washington-state/4923129002/>





Gary Morton
President

Natasha Greaves
Executive Vice President

In this case, coworkers may have only a sniffle, but they could be transmitting a disease that will result in grave illness, and even death, in a fellow employee or member of an employee's family. Allowing mildly ill employees to work from home is therefore essential. It is not enough, however. Even if they're not exposed to coronavirus at work, employees who are in high-risk groups or who live with people in high-risk groups often rely on public transportation to commute to work, where they are exposed to germs from thousands of people every day. They must be provided the opportunity to remain productive by working safely from home.

We are asking you to immediately end the arbitrary limits on regular and episodic (situational) telework for AFGE employees. Restore the option to take two days a week of regular telework and allow employees to take episodic (situational) telework multiple days per week up to full-time, as required under extraordinary circumstances like these. To do anything less is a dereliction of the Agency's responsibilities to its employees and its mission.

Sincerely,

Gary Morton
President, AFGE Council 238

Natasha Greaves
Executive Vice President, AFGE Council 238

Undine Kipka
1st Vice President, AFGE Council 238

Nate James
President, AFGE Local 3331

Dan Stout
President, AFGE Local 3347

Steve Calder
President, AFGE Local 3428

Antony Tseng
President, AFGE Local 3911

Marie Powell Owens
President, AFGE Local 3631

Dianna Myers
President, AFGE Local 534

Nicole Cantello
President, AFGE Local 704

Crystal McIntyre
President, AFGE Local 907

Britta Copt
President, AFGE Local 3607

Bethany Dreyfus
President, AFGE Local 1236

