



NATIONAL ASSOCIATION OF POSTAL SUPERVISORS

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December 21, 2020

Board Memo 093-2020: USPS Face Covering-Guidance for all Managers and Supervisors

Executive Board:

Attached is a *Face Covering-Guidance* for all USPS managers and supervisors reinforcing the Postal Service's policy for face coverings and social distancing. The attached also includes instructions to assist in addressing situations where a postal employee indicates that he/she cannot wear a face covering, including a mask.

Please share the attached with your membership.

Thank you and be safe.

NAPS Headquarters



December 19, 2020

ALL MANAGERS AND SUPERVISORS

SUBJECT: Face Covering Guidance

As we are now in peak season, our mission is even more critical, and the safety and wellness of our employees is of the utmost importance. The Postal Service provides an essential service to our nation. Taking steps to stay healthy and well means we can continue to be a stable, calming presence across the country.

The Postal Service requires all employees, including supervisors and managers, to wear face coverings when social distancing of six (6) feet cannot be maintained in public, or in public-facing settings when required by state or local orders and directives, and when an employee who does not deal directly with the public cannot achieve or maintain social distancing in the workplace.

You, and your employees, must also adhere to social distancing guidelines (6 feet) whenever possible while on delivery routes, at retail counters, and within the postal workplace: in plants, on docks and in lunch and break rooms.

We are urging you to remind employees to have a face covering readily available when working and to wear a face covering whenever possible to ensure that they continue to protect themselves and their co-workers.

If you have questions concerning an employee who cannot wear a face covering for health reasons, you should confer with the local Occupational Health Nurse Administrator (OHNA) regarding a reasonable accommodation. One example of a reasonable accommodation being requested is the use of a plastic face shield. Requests for face shields can be addressed by the OHNA and approved as appropriate. Employees seeking accommodations other than a face shield will need to be referred to the District Reasonable Accommodation Committee (DRAC).

If the employee's medical information supports that he or she cannot wear any face covering, including a face shield, then the DRAC must assess whether the employee can effectively socially distance at all times. Even if there is a state or local order in place requiring use of face coverings regardless of social distancing capabilities, constant social distancing would be an acceptable accommodation, if possible. However, in most situations, an employee cannot always achieve constant socially distancing, especially on the workroom floor or in bathrooms, break rooms, locker rooms, etc.

For those employees who cannot wear face coverings or face shields due to medical reasons, DRACs should consider reassignment to a position that can allow for constant social distancing, if appropriate for the employee. Not all employees are entitled to a search for reassignment.

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If social distancing and reassignment fail, or are not possible, unless the interactive process with the employee identifies another accommodation that will not impose an undue hardship on the Postal Service, the employee must remain out of work. Consistent with guidance issued by the Equal Employment Opportunity Commission, this is because it would be an undue hardship on Postal Service operations to permit a potential direct threat to other employees in the form of someone not able to observe mask-wearing and infection-control practices to remain in the workplace.

You should consult with your Area Law Department if you, the OHNA, or the DRAC have any questions or concerns related to the Postal Service's face covering policy and any requests for accommodation related to the policy.

Separately, if you have an employee who is unwilling to wear a face covering due to religious reasons, you should contact district Labor Relations, Human Resources or your Area Law Department.

Finally, if you have an employee who simply refuses to wear a face covering consistent with Postal Service policy (no accommodation requested), you should immediately contact your district Labor Relations or Human Resources manager for assistance.

Thank you for everything you are doing for our customers, and for your professionalism every day.