MEMORANDUM FOR PBS REGIONAL COMMISSIONERS

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SUBJECT: Funding Responsibilities for COVID-19 Cleaning Costs

The Centers for Disease Control and Prevention (CDC) has issued guidance regarding cleaning and disinfection procedures related to the COVID-19 pandemic.¹ Based on this guidance, the Public Buildings Service (PBS) has modified its scope of work for regular custodial services to help reduce the risk and spread of COVID-19, and is incorporating new disinfection requirements into existing custodial contracts. PBS has also developed a scope of work for detailed cleaning and disinfection when a COVID-19 event occurs in space under the jurisdiction, custody or control of the General Services Administration (GSA). A COVID-19 event is defined as an instance when someone who is confirmed or suspected to have COVID-19 enters or occupies a GSA-controlled facility.

This guidance identifies funding responsibilities for both GSA and occupant agencies for COVID-19 cleaning, and applies to the Building Operations (BA-61) and Rental of Space (BA-53) budget activities, as well as amounts deposited into the Federal Buildings Fund from the CARES Act (P.L. 116-136) and Reimbursable Work Authorizations (RWAs) (BA-80).

**Standard Services Provided and Paid By GSA**

- In facilities under the jurisdiction, custody or control of GSA, GSA will provide cleaning services as outlined in the applicable custodial or lease contract, including the routine cleaning and disinfection of hard surfaces.

- Should an employee, contractor or visitor to a facility under the jurisdiction, custody or control of GSA develop a confirmed or suspected case of COVID-19, GSA will provide cleaning of that portion(s) of the facility accessed by the infected individual(s) in accordance with the recommended CDC protocol, which may exceed the applicable custodial or lease contract.

**Above-Standard Services Paid By Occupant Agencies**

- In facilities under the jurisdiction, custody or control of GSA, GSA will provide cleaning services requested by occupant agencies that include, but are not limited to, the following:
  - Additional cleaning services that exceed the recommended CDC protocol;
  - Increased frequency of cleaning services; and
  - The use of special cleaning supplies and materials.

The requesting occupant agency must pay for such enhanced services through an RWA.

- Should an employee, contractor or visitor to a facility under the jurisdiction, custody or control of GSA develop a confirmed or suspected case of COVID-19, and an occupant agency requests GSA to provide enhanced cleaning to other portion(s) of the facility not accessed by the infected individual(s), rather than solely cleaning that portion(s) of the facility accessed by the infected individual(s), the requesting occupant agency must pay for such enhanced cleaning services through an RWA.

**Authority on Determining Standard and Above-Standard Cleaning**

The PBS Regional Commissioner (RC), as the Head of Contracting Activity for the region in which the facility is located, has the authority to make the determination on what areas will be cleaned at GSA’s expense and what areas will require occupant agency funding. In certain instances it may be difficult to ascertain what portions of a facility an infected individual accessed that require enhanced cleaning and disinfection. In these situations, as a safety precaution, it may be prudent to clean and disinfect, at GSA’s expense, portions of a facility not directly accessed by an infected individual to reduce the risk of additional COVID-19 exposure in the facility.

When the RC makes the determination that GSA will pay to clean and disinfect additional portions of a facility that may not have been directly accessed by an infected individual, the Contracting Officer and Ordering Official must record that decision either in the contract file or by some other appropriate means of documentation.

**Delegated Facilities**

This guidance does not apply to facilities under the jurisdiction, custody or control of GSA for which operations and maintenance responsibilities have been delegated to occupant agencies. In such facilities, the occupant agency remains responsible for all cleaning services in accordance with the terms and conditions of the Delegation Agreement, and the occupant agency may provide enhanced cleaning services in its sole discretion at its sole cost.

If you have any questions, please contact Andrew Heller, PBS Assistant Commissioner, Office of Facilities Management, at andrew.heller@gsa.gov.