Federal Law Enforcement Training Centers Training Reconstitution and Resumption Plan May 26, 2020



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BACKGROUND: Since the Secretary of Health and Human Services declared COVID-19 a national health emergency on January 31, 2020, FLETC has been conducting continuous planning on how best to prevent, contain, mitigate, and recover from its potential impacts on FLETC students, staff, and contractors who execute FLETC's mission to prepare the federal law enforcement community to safeguard the American people, our homeland, and our values. FLETC conducted its first formal planning and coordination meeting on February 19, 2020. Between February 19 and March 20, 2020, as the disease became more widespread and more clearly understood, FLETC enacted an incremental response to the COVID-19 threat with actions such as:

- Establishing widespread telework where feasible
- Ordering Personal Protective Equipment (PPE) supplies
- Developing risk surveys and implementing nationally recognized best practices to minimize individual risk
- Reducing transmission risk of possible asymptomatic carriers by restricting gyms, dining facilities, and other on-Center areas to students only and prohibiting Center access for visitors, guests, and tour groups
- Implementing the use of screening tools to proactively identify potential carriers of the contagion (e.g., contactless medical grade thermometers)
- Creating an executive-level planning body to ensure that the COVID response was synchronized across all FLETC lines of business
- Developing response plans and creating isolation areas should a student develop COVIDlike symptoms or test positive for the disease
- Cancelling advanced and international training to protect critical basic law enforcement training
- Moving all off-Center students onto one of FLETC's Training Delivery Points (TDPs) to minimize risk of student infection

By March 20, it became apparent to FLETC leadership that the continuing spread of the contagion across the Nation, and the responses enacted by federal, state, and local agencies, made the hazard risk too great to continue. Facing the reality that a COVID outbreak would render the agency unable to provide essential services for students necessary to sustain inresidence training, the FLETC Director made the decision to cease training effective immediately and to return all students to their home stations no later than March 23, 2020. With that effort underway, on March 23, 2020, the FLETC Director began shifting the planning focus of the organization away from the cessation of training to the parameters under which training would resume. The initial result of that planning effort, dubbed Operation Reconstitution, is summarized in the remainder of this document.

SITUATION: Upon resuming training, FLETC's priority must be to restore the deployment of new law enforcement officers and agents to the field. Thus, FLETC will prioritize fulfilling

agencies' requirements for Level I training, which FLETC defines as training that prepares federal law enforcement personnel to perform the essential tasks for the position into which they were hired, or for the essential tasks associated with new duties to which they have been assigned. FLETC will focus its immediate resources and capacity on fulfilling the urgent training needs of agencies that must deliver new officers and agents to the field. Over the past nine weeks, FLETC has reassessed and reconstituted every aspect of its training operations. In consultation with Department of Homeland Security (DHS) headquarters components, FLETC's 95+ federal Participating Organizations, and numerous federal, State, local, military, academic, and private sector entities, FLETC has adjusted and added new features to its training processes to reduce risks to its people while ensuring its ability to perform its training mission.

EXECUTION: The FLETC Training Reconstitution and Resumption Plan addresses the resumption of FLETC training programs, which FLETC is implementing in three phases. In Phase I (the focus of this document), FLETC plans to restore and begin as much Level 1 training as possible within established procedures for social distancing, venue occupancy, and other parameters outlined later in this document. During this phase, FLETC will complete the training of new officers and agents who were in training on March 20, 2020.

On June 3, 2020, students will return to FLETC's training delivery points (TDP) in Glynco, Georgia, and Artesia, New Mexico. On June 7, 2020, they will return to FLETC's TDP in Charleston, South Carolina. These students will begin a 14 day period of restricted movement at FLETC's residential locations. During the 14 day restricted movement period, students will participate in scheduled activities in small groups or alone, including online refresher and new training, required administrative activities, and physical exercise. Any movement will be in small groups. This is to ensure to the extent possible that students commencing in-residence training are not COVID-positive before they begin interacting with staff, instructors, and contractors. FLETC is currently exploring testing capabilities, which may shorten the restriction of movement period if and when implemented. In-residence students will not be permitted to leave Center for the duration of their training, with limited exceptions.

Following the 14-day restriction of movement period, training will resume in Glynco and Artesia on June 17, 2020, and in Charleston on June 22, 2020. FLETC-Cheltenham is non-residential, and will resume on-site training on June 17, 2020.

Once students begin training, FLETC has outlined procedures and policies associated with training operations, facilities and services, training management, and training scheduling to mitigate the risks associated with introducing COVID-19 to the maximum extent practicable. FLETC has also identified short-term actions necessary in the areas of staffing, communications, and finance in order to successfully reconstitute training in Phase I. FLETC will follow guidelines from the Centers for Disease Control and Prevention (CDC) to the maximum extent possible, such as its current recommendation for people to wear face coverings in public or group settings where maintaining social distancing is difficult.

In Phase 2, FLETC will add as quickly as possible new programs scheduled to occur in FY 2020, which were postponed when training paused. FLETC expects Phase 2 to begin as space becomes available when Phase 1 programs graduate. Phases 1 and 2 will thus overlap until all Phase 1 programs graduate. Phase 3 will begin when FLETC is able to restore its TDPs to full capacity as it existed prior to COVID-19. During Phases 1 and 2, FLETC will operate a six-day work week to maximize training throughput.

Phase 3 will begin when FLETC is able to restore its training delivery points to full capacity as it existed prior to COVID-19. Phases 2 and 3 are condition-dependent, taking into consideration the changing pandemic conditions across the Nation; changes to CDC guidance; COVID-19 testing capabilities and the availability of reliable, effective diagnostic tools, therapeutics, and/or vaccines; and other new medical developments in combatting the contagion.

FLETC OPERATION RECONSTITUTION PLAN: To guide the Operation Reconstitution planning effort, the agency established seven focus area groups (FLETC Operation Reconstitution Groups, or FORGe) under the direction of the FLETC Deputy Director. The FORGe Team Leads met on a regular, frequent basis with agency leadership to receive guidance, to provide information and brief ongoing actions within their respective areas, and to achieve synergy by working collaboratively on each component of the effort. The seven FORGe groups are:

- Screening & Security
- Facilities & Services
- Training Programs
- Training Management
- Staffing
- Communications
- Financial

Each of the FORGe groups have representation from across the FLETC directorates, offices, and TDPs. The teams also incorporated CDC, DHS, and Federal Emergency Management Agency (FEMA) guidance as planning tools, and consulted with DHS human capital and DHS medical authorities, as well as representatives from many organizations that depend on FLETC for training services.

While not exhaustive, the following provides a summary of the Phase 1 actions developed by the FORGe teams:

I. SCREENING AND SECURITY

Enhance Student Screening

Approximately 30 days prior to the start of training:

- Students will receive COVID-19 screening questions recommended by the CDC and consistent with Department-level guidance.
- FLETC will ask students to limit personal travel until they depart for FLETC, and will provide a list of cautionary measures to follow 14-days prior to traveling to a FLETC TDP.
- FLETC will instruct students that face coverings will be required for travel on the bus from the airport to FLETC and throughout training in particular circumstances. FLETC will provide a link to CDC-recommended face coverings.
- FLETC will require students to acknowledge their understanding and receipt of this information.

Approximately 14 days prior to the start of training:

- Students will again answer COVID-19 screening questions, and FLETC will remind them to limit personal travel.
- FLETC will remind students of the 14-day cautionary measures to follow, and will provide students with a link to current CDC guidelines related to domestic travel.
- FLETC will require students to acknowledge their understanding and receipt of this information.

72-Hours prior to the start of training:

- Students will again answer the COVID-19 screening questions, and FLETC will provide a link to the current CDC guidelines related to domestic travel.
- FLETC will caution students to wear a face covering during travel to FLETC, and will remind them of the requirement to wear a face covering for transport from the airport to FLETC.
- FLETC will require students to acknowledge their understanding and receipt of this information.

On arrival and throughout time at FLETC:

- Upon arrival at the Visitor Control Center (VCC) at each FLETC site, each student will undergo additional screening to include answering COVID-19 screening questions and having their body temperature taken by FLETC's security contractor.
- Throughout their training program, students will undergo random body temperature screening at various locations and times at all FLETC TDPs.
- Prior to the start of each training session, instructors will screen students utilizing only the screening questions. Additionally, instructors will direct students to perform Self-checks/Buddy-checks throughout the day.

Staff/Student Interaction

- Prior to ceasing training operations, FLETC enacted numerous controls to limit student/staff interaction. These included suspending staff's usage of indoor fitness facilities and cafeterias, and maximizing telework options, and will continue upon the resumption of training.
- FLETC will implement other changes to further limit staff/student interaction, such as restricting access to FLETC's convenience stores at each TDP.

Staff, PO, and Visitor Screening

- FLETC began implementing screening on April 21, 2020, for all personnel entering a FLETC TDP to include screening questions and body temperature scanning.
- Visitors will continue to be restricted, including graduation guests.

• FLETC will continue to work with POs on delivering videos of graduations or live streaming where possible.

Response Actions for Positive or Suspected COVID-19 Cases

- FLETC has formed the FLETC COVID-19 Joint Operations Command to effectively and efficiently coordinate COVID-19 emergency response operations across the FLETC enterprise.
- FLETC's Chief Security Officer (CSO) leads the COVID-19 Joint Operations Command, which consists of Incident Response Teams (IRT) to rapidly address any potential COVID cases while allowing training to continue uninterrupted. The IRT consists of representatives from the Office of Security and Professional Responsibility (OSPR), the Environmental & Safety Division (ESD), and the Student Services Division (SSD).

Testing Coordination

- FLETC is currently exploring testing capabilities for students and staff who have contact with students.
 - II. FACILITIES AND SERVICES

FLETC has identified required actions to adopt and implement appropriate social distancing and cleaning and disinfecting solutions to ensure preparation for training resumption on June 17, 2020, and the return of students on June 3, 2020. FLETC has categorized these actions across the following key areas:

- ➢ Facilities and training operations
- Dining hall operations
- Shipping and handling operations
- Dormitory operations
- Transportation and program support
- Equipment issue

Facilities and training operations

- FLETC will continue and enhance cleaning and disinfecting of facilities, including training venues and training equipment, in identified areas using technology.
- FLETC will use high-efficiency technology (e.g., foggers) to disinfect facilities and equipment, and will implement enhanced cleaning protocols among contract staff, both in terms of materials and frequency.
- FLETC will establish requirements for cleaning supplies at each training venue to ensure students have the ability to conduct "self-help" in terms of cleaning and disinfecting their workspaces (e.g., computer keyboards).
- FLETC is installing exposure-reduction barriers to provide protection for FLETC staff, contractors, and students at customer-service points (uniform and equipment issue, dining hall, dormitories, etc.).
- FLETC is conducting Job Hazard Analyses/Risk Assessments (JHAs/RA) to identify hazards and control measures required to reduce and/or minimize hazards.

• FLETC will conduct JHAs for all training courses to ensure appropriate engineering controls, administrative controls, and/or PPE are utilized.

Dining Hall Operations

- FLETC food service contractors at all TDPs have implemented their emergency operations plans.
- The food service vendors will implement administrative and engineering controls to provide safe dining services for students, including:
 - Maintaining hot food and grill lines, while eliminating self-service, including dispensing beverages;
 - Temporarily closing salad lines, with packaged salads provided, including all condiments;
 - Reworking ingress and egress routes to include only one way in and one way out to enable social distancing;
 - Building and deploying exposure-reduction barriers at customer service touchpoints;
 - o Incorporating floor markings to ensure social distancing guidelines are provided; and
 - Deploying appropriate PPE to appropriate staff, in accordance with their emergency plans.
- FLETC will implement social distancing measures to the extent possible throughout the dining facilities.
- FLETC will implement "grab and go" options at the Student Centers at all residential locations to provide students an alternative to gathering in the dining facilities.
- FLETC will implement staggered meals times, thereby allowing for a reduction in occupancy during the hours of operation and concomitant appropriate social distancing within the dining facilities to the extent possible.
- FLETC will limit dining facility patronage to students only, thereby limiting student exposure to those who come onto FLETC each day from off-Center.

Shipping and Handling

- The FLETC mail-handling contractors have implemented their emergency operations plans across all TDPs.
- Each FLETC TDP is developing revised procedures for how shipping and receiving personnel interact with customers.

Dormitory Operations

- FLETC has cleaned and disinfected all dormitories at its residential TDPs, and plans to ensure dormitory cleaning and disinfecting remains consistent and recurring.
- The housekeeping contractor will implement changes to dormitory room cleaning that will adhere to social distancing, cleaning and disinfecting, and PPE protocols.
- All housekeeping staff responsible for cleaning dormitories will ensure they maintain and utilize appropriate PPE.
- If for any reason, the housekeeping contractor is unable to procure sufficient PPE for housekeeping staff assigned to the dormitories, FLETC will cease contract housekeeping and implement self-cleaning by the students.
- FLETC will schedule returning students in dormitories in a way that reduces the risk of exposure across classes to the extent practicable.
- Students will be lodged in single rooms with single bathrooms only.

- In the event a student requires isolation from the rest of the class, FLETC will set aside specific rooms for this purpose.
- The following areas in the dormitories will be closed: game rooms, TV rooms, conference rooms, exercise rooms, and study rooms.

Transportation and Program Support

- The FLETC transportation contractors have implemented their emergency operations plans across all TDPs.
- The transportation contractors will implement administrative and engineering controls to provide safe transportation for students, including:
 - Providing the staff with appropriate PPE and disinfectant;
 - Instructing staff to disinfect the buses and assigned vehicles after each airport run, following each two-hour shift, and at the end of each day; wash their hands often; and keep a six-foot social distance from each other when possible, while also wearing their PPE;
 - o Instructing drivers to always wear their PPE when transporting students or staff;

• Installing signage on all buses emphasizing the need to social distance, as well as clean and disinfect spaces;

• Adjusting passenger loads for to allow social distancing.

Equipment Issue

- The FLETC equipment issue contractors have implemented their emergency operations plans across all TDPs.
- The equipment issue contractors will implement administrative and engineering controls to provide safe equipment issue for students, including:
 - Providing staff with appropriate PPE and disinfectant;
 - Requiring staff to wear their PPE and maintain a six-foot social distance when possible when interacting with staff and students;
 - Upon return of equipment and clothing, staff will disinfect, sanitize or wash the items prior to re-issuing;
 - Creating a Scan system so that staff can scan bar codes of issued items and student IDs versus handling pens/IDs/paperwork, etc.
- FLETC will ensure the following:
 - Placing markers on the floor to facilitate social distancing;
 - o Installing exposure-reduction barriers at equipment issue points; and
 - Clearly marking equipment issue points one way in / one way out to promote social distancing guidelines.

Role Player Operations

- The FLETC role player contractors have implemented their emergency operations plans across all TDPs.
- FLETC will assess and analyze role player requirements for training programs to determine where reductions are possible.
- In the days leading up to FLETC's pause of training operations on March 20, 2020, FLETC initiated a limited review of role player requirements in Center Basic training programs.
- FLETC will look at the ways it utilizes role players in Level 1 training programs to determine whether those requirements can be reduced or whether a safer alternative is available (e.g., students play roles, instructors play roles, etc.).

• The Training Directorates will review blocks of instruction in the Level 1 training programs to determine whether and to what extent FLETC can reduce or modify role player requirements.

III. TRAINING MANAGEMENT

Training Program Modifications and Scheduling

- FLETC will make modifications to training programs to optimize throughput to meet law enforcement operational imperatives while mitigating risk to staff and students where possible without sacrificing training quality. This will include potentially changing sequencing of training to maximize capacity, leveraging different instructional methods such as online training delivery, adjusting policies to streamline online instructor certification, and operating a six-day work week.
- FLETC will notify agencies and students of arrival dates for students, new start dates for training, and new departure dates. FLETC will accomplish this approximately 14 days before students are scheduled to arrive.
- FLETC will prepare eFLETC for online training delivery in Phase 1.
- FLETC will convert identified existing on-site training to online format for delivery through eFLETC. These include legal lesson plans and a leadership lesson plan to complement FLETC Center Basic Programs. Additional blocks of instruction will be added during Phase 1 based on eFLETC capabilities.
- Provide eFLETC Adobe Connect rooms or curriculum capability to students for 14-day restriction of movement period.
- FLETC will provide all students with Bring Your Own Device (BYOD) requirements to facilitate access to programs delivered via eFLETC.

IV. TRAINING

Program Changes

- FLETC will pair students with individual partners, and establish permanent student groups. Pairing students within small groups of four will limit student exposure to one another during hands-on activities.
- Students will work training scenarios with pre-assigned partners and groups for the duration of the training. These four students will be permitted to interact and exchange partners within the core group during practical exercises such as "search incident to arrest" when variation in student size and gender will enhance the learning experience and student comprehension.
- Law enforcement training involves frequent hands-on demonstrations and activities requiring close proximity among students, instructors, and role players. To the extent practicable, FLETC will leverage instructional videos, demonstration tables, mannequins, and other tools to reduce overall physical contact.
- FLETC will conduct a comprehensive review of each block of instruction, and will identify and implement necessary mitigating actions for lecture/lab/physical exercise.
- FLETC will reduce the number of role players involved in training to minimize student exposure to individuals commuting on and off Center each day.

- FLETC will identify training it can effectively deliver in four-hour blocks. This reduces frequency of movement and allows students participating in afternoon physical training to utilize private dormitory showers.
- FLETC will issue training equipment to students for duration of programs where applicable. In some areas, equipment will have to be issued and returned for cleaning.

V. STAFFING

Determine telework and on-site work requirements for Phase 1

- FLETC staff and PO detailees required for on-site execution of Phase 1 reconstitution will return to on-site work for resumption of duties in a COVID-19 environment that has employed mitigation strategies and procedures to minimize risk for staff and students. FLETC has taken into consideration staff who may be high risk or members of vulnerable communities in planning for mission execution in this environment.
- To minimize as many transmission vectors as possible, any function that can continue to be conducted from a telework posture will continue to be delivered in this manner, until otherwise determined based on changes to mission requirements.
- Assistant Directors, managers, and supervisors will advise the Human Capital Office, Workforce Relations Branch (WRB), of any proposed change to working conditions and terms and conditions of employment (e.g., the process and procedures for bringing employees back to onsite work, any new training protocols, any new training certification requirements, and/or any changes to position descriptions, etc.). Sufficient advance notice is necessary to fulfill FLETC's bargaining obligations, including any required "Impact and Implementation" (I&I) bargaining with the Union.
- Assistant Directors, managers, and supervisors will communicate with required FLETC staff and PO detailees regarding their requirement for return to on-site execution of duties.

VI. COMMUNICATIONS

- In coordination with the DHS Office of Public Affairs, FLETC will execute an internal and external messaging campaign to key stakeholders. FLETC will provide strategic information via multi-media (i.e., video, written messages, signage, streaming, etc.) that details relevant and up-to- date information from the CDC and details regarding FLETC's proactive risk mitigation measures.
- FLETC's intent is for internal and external audiences to recognize FLETC's comprehensive efforts to reconstitute its mission while reducing risk to students, staff, and others who enter FLETC's gates. Specific intended results include:
 - Increase in staff awareness of the contemporary and dynamic issues FLETC is proactively addressing during the reconstitution of training.
 - Provide clear guidance for staff and student regarding guidance and expectations for the onsite training environment.
 - Ensuring stakeholders from multiple disciplines such as law enforcement, mental health, public health, education, law, and academia, are aware of the process and work done during this time.
 - Ensuring DHS Headquarters and DHS Office of Public Affairs are aware of FLETC's efforts.

- Educating legislative and other governmental stakeholders regarding FLETC's capabilities and its plan to reconstitute training.
- Sharing FLETC's efforts and strategies with the media to educate, inform, and reduce concerns of the public.

VII. FINANCE

Recalculation of Course Costs

- FLETC has a high rate of fixed costs in its contracts that support training. When FLETC is not conducting training, FLETC must continue to pay all of those fixed costs.
- FLETC will need to recalculate its costs per student based on how many students FLETC projects training the rest of the year. The key change will be that because FLETC must spread the costs across a smaller student population, the costs per individual student will increase.

DISCLAIMER: The information contained in this plan is made available by the U.S. Department of Homeland Security (DHS), Federal Law Enforcement Training Centers (FLETC), for general informational purposes, as the FLETC Training Reconstitution and Resumption Plan. This plan should not be construed as a guarantee that training activities will restart at the stated time and/or under the conditions specified herein. The Phase 1 Action Plan is the first step toward restart of FLETC training in a COVID 19 environment, in furtherance of FLETC's critical law enforcement training mission. As stated above, FLETC anticipates multiple phases to its reconstitution efforts. While FLETC leadership makes every effort to ensure the accuracy of information in this Plan, due to rapidly changing environmental, medical, and geographic conditions the content of the Phase 1 Action Plan, as well as and subsequent action plans, may not reflect the most current legal and/or policy developments.

The policies and procedures outlined in the action plan address FLETC's mutual goal to protect the individuals who work at FLETC and those who receive its training, while FLETC continues its critical mission to deliver newly trained law enforcement personnel to the field throughout the United States. All activities requiring resources outlined in the plan are subject to the availability of funds.