



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, NW  
Washington, DC 20240

## Memorandum

To: Regional Commercial Services Chiefs  
From: Chief, Commercial Services Program  
Subject: Updated Commercial Service Provider COVID-19 Guidance under DOI Workplace Safety Plan (Ver. 4)

On August 24, 2022, the Deputy Director, Operations provided updated information on the [DOI COVID-19 Workplace Safety Plan \(Version 4.0\)](#). This memo provides additional information specific to commercial service providers (concessioners, leaseholders, commercial use authorization holders) based upon this updated guidance. This memo supplements the [2022 COVID-19 Operational Posture Guidance for the Commercial Services Program \(03.04.2022\)](#) available on the NPS Commercial Service Internal SharePoint site. Any procedures outlined in this memo that are different than those in this March 2022 guidance supersede that guidance.

### **Commercial Service Provider-Controlled Workplaces**

Concessioner and leaseholders assigned facilities and lands are not considered DOI-controlled workplaces and concessioner and leaseholder employees in those areas are not considered “employees” or “official visitors” under the DOI Workplace Safety Plan. When entering DOI-controlled buildings such as NPS visitor’s centers or administrative buildings for business purposes, or if a commercial service provider is assigned an area in an otherwise NPS-controlled building, the individual is an “official visitor” in that building and is subject to the official visitor requirements outlined in the DOI Workplace Safety Plan. Although concessioners and leaseholders are not required to follow the DOI Workplace Safety Plan in their assigned buildings and lands, following this guidance where applicable, is encouraged to provide a consistent approach to managing COVID-19 risk throughout the park.

### **Vaccinations**

There are currently no federal vaccination requirements for NPS commercial service providers. The NPS will continue to take no action to enforce the clause implementing EO 14042, Ensuring Adequate COVID Safety Protocols for Federal Contractors if it is included in a concession contract, lease, or commercial use authorization.

Under the latest DOI Workplace Safety Plan, as official visitors when entering a DOI-controlled building, commercial service provider employees are not required to attest to their vaccination status or provide proof of a negative test for entry into the DOI workplace.

Vaccination continues to be [recommended by the CDC](#) to protect against COVID-19 disease. Commercial service providers may institute their own vaccination requirements for employees as an independent business decision as part of their own COVID-19 Management Plan. In most cases, commercial service providers should not require proof of vaccination for customers entering their assigned buildings or providing services. They may, after consultation with the park superintendent, institute such requirements in special circumstances such as when providing services involving extended backcountry activities where such preventive measures could be determined as warranted to help protect customers.

### **Masking**

NPS's ongoing masking guidance is based on the CDC's [COVID-19 Community Levels tool](#), which helps communities decide what prevention steps to take. As a result, masking requirements in NPS-controlled areas vary by park based on local conditions. In areas that the CDC identifies as high COVID-19 community level, masks are required for everyone in all NPS-controlled buildings regardless of vaccination status.

Although commercial service providers are not required to follow the NPS mask-wearing guidance in their assigned buildings as they are not NPS-controlled, following this guidance is encouraged to provide a consistent approach to managing COVID-19 risk throughout the park. Commercial service providers and partners may also require employees to wear masks as an independent business decision in consultation with their park superintendent. Customers and employees may also wear a mask if it makes them more comfortable and should not be discouraged from doing so. Commercial service providers should work with their park superintendent to implement requirements including posting signs and updating their web sites based on their masking requirements.

### **Physical Distancing**

Individuals onsite at DOI workplaces are generally not required to physically distance within DOI workplaces, regardless of their vaccination status. Physical distancing limitations also no longer in place for commercial service facilities and operations. For example, distancing limitations in line kitchens or other close quarters workspaces previously advised for are no longer applicable.

Commercial service providers, as an independent business decision, are free to continue enhanced physical distancing in their operations if they determine it is beneficial. When such action could impact the ability to deliver necessary visitor services (e.g., seating in restaurants or on tour buses), the commercial service provide should consult with the park manager on such plans.

### **Quarantine And Isolation**

Quarantine requirements for individuals exposed to someone infected with COVID-19 have been eliminated. Commercial service providers should follow isolation requirements in their commercial services assigned facilities as recommended in the [CDC Isolation Guidance](#). Commercial service provider employees with suspected or confirmed COVID-19 must not be physically present in the commercial service provider workplace or interact in person with others as part of their duties until criteria for discontinuing isolation are met as outlined in the [CDC](#)

[Isolation Guidance](#). This will help prevent COVID-19 spread for the commercial service providers, NPS and other partner employees and park visitors. Commercial service providers must continue to consider needs for adequate isolation facilities in their shared housing plans.

### **Transportation Systems**

CDC [continues to recommend](#) and DOI strongly encourages mask-wearing in enclosed areas of aircraft, boats, and other maritime transportation, and buses operated by commercial service providers while in parks.

### **Shared Housing**

Commercial service provider assigned housing in a park or their own housing outside the park are not DOI-controlled workplaces and so requirements for employee housing in the DOI Workplace Safety Plan do not apply. Prior requirements concerning shared housing for commercial service providers such as limiting the number of individuals in shared bedrooms and physical distancing have been relaxed. While requirements are less, shared housing environments remain one of the areas of highest risk of COVID-19 transmission and potential to impact the commercial service provider workforce. Commercial service providers should continue to coordinate with their park manager on their shared housing plans to ensure they appropriately balance the need for adequate housing to maintain needed staffing levels against the potential for COVID-19 transmission.

### **Covid-19 Reporting**

The [action steps for reporting COVID-19 cases among commercial service providers](#) remain the same which includes reporting cases that are part of a cluster.

### **State And Local Requirements**

Employees and customers of commercial service providers and partners may still be required to meet certain COVID-19 mitigation requirements such as being required to wear masks if a State, local, Tribal, or territorial government where the park is located imposes more protective requirements. Commercial service providers should coordinate with the park manager in such circumstances.

### **Park Coordination**

Park managers and commercial services program staff should work closely with their commercial service providers as these operators revise and implement their COVID-19 management plans. NPS Office of Public Health consultants can assist parks and commercial service providers as questions arise on implementing specific guidance.

### **Distribution**

Please distribute this memo to all parks with commercial service provider operations. Park managers may distribute this memo to their commercial service providers. It will also be posted on the [Concessioner Tools- Public Health](#) web page and internally on the [NPS Commercial Service Concession Specialist Tools](#) SharePoint site.

**For Further Information**

Information on COVID-19 will continue to be updated externally to commercial service providers on the [NPS Public Information for Partners](#) web page and the [Concessioner Tools-Public Health](#) web page as well as for NPS concession specialist internally on the [NPS Commercial Service Concession Specialist Tools](#) SharePoint site. For additional information or questions, contact the WASO Commercial Services Program at 202-513-7156 or [commercial\\_services\\_waso@nps.gov](mailto:commercial_services_waso@nps.gov).

cc: CAPT Sara Newman, Director, Office of Public Health  
Jamie Boyle, WASO Deputy Chief of Staff