

Collaborative Centers Vaccine (COVID-19) Plan

Head Start has a long history of prioritizing the health and safety of staff, children, and families. This priority continues to hold true as we move into the third year post the initial COVID-19 outbreaks and pandemic. On November 30, 2021, the Office of Head Start took another step to ensure the health and safety of staff, children, and families with the announcement of a new standard to ensure that all employees, contractors, and volunteers who work on Head Start Programs and who work directly with children will be vaccinated by January 31, 2022, unless an exemption/reasonable accommodation is requested and granted. For those who are granted an exemption, weekly COVID-19 testing will be required.

Early childhood caregivers are essential professionals and prioritize children's health and safety every day. Given that children under age 5 have only recently been eligible for vaccination, the addition of the vaccine standard reduces the spread of COVID-19, especially the more infectious variants to young children in their care.

Evidence shows the vaccine has the following impact on programming:

- Protects the health and safety of children, staff and families by reducing transmission of COVID-19 from staff to children and families.
- Reduces program closures, and prioritizes safe, sustained in-person early care and education for children — with all of its known benefits to children and families.

Definitions

Staff: The definition of staff in § 1305.2 is “paid adults who have responsibilities related to children and their families who are enrolled in programs.” Consistent with that definition, “all staff” refers to all staff who work with enrolled Head Start children and families in any capacity **regardless of funding** source. The term “Head Start” is inclusive of Head Start, Early Head Start, and Early Head Start-Child Care Partnerships.

Volunteers: All volunteers who are in classrooms or working directly with children other than their own.

Fully Vaccinated: Full vaccination requires 14 days after a two-dose series such as Pfizer or Moderna, or 14 days after a single-dose series such as Johnson & Johnson.

Not subject to this policy are:

- those engaging in brief visits, such as an approved individual dropping off or picking up a child, janitorial staff replenishing supplies, etc.
- parents/guardians attending socializations or family engagement events, as they are considered service recipients, unless they are serving as volunteers to participate in activities such as set up or clean up, and non-federal match will be collected.
- parents/guardians meeting on site when children are not present
- professionals who are required to inspect/monitor sites, such as licensing consultants, QRIS consultants, fire inspectors, etc., because they are not staff and are not there to work directly with the children.

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Proof of Vaccination

OHS will monitor this requirement in the same way it monitors other health and safety requirements included in the Head Start Program Performance Standards. Programs must document vaccination status and those records need to be available for monitoring purposes. Accordingly, all staff and volunteers must report their vaccination status in the following ways:

- Designated human resources personnel at each Collaborative Center will maintain proof of vaccination for staff and volunteers. Proof of vaccination generally should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) that administered the vaccine. The following shall constitute acceptable proof of vaccination status:
 1. The record of immunization from a health care provider or pharmacy;
 2. A copy of the COVID-19 Vaccination Record Card;
 3. A copy of medical records documenting the vaccination;
 4. A copy of immunization records from a public health, state, or tribal immunization information system; or
 5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s).
- NMCAA will house **only the dates** of vaccination or approved exemption for the sole purposes of monitoring compliance to the Head Start Program Performance Standards. Staff and volunteers must submit vaccination/exemption date(s) to their Collaborative Center Services Coordinator to be held in their personnel files. This information will be kept confidential and only shared with those who have a legitimate business need to know and as otherwise permitted by law.
- NMCAA Collaborative Center Services Coordinators will monitor documentation stored by Collaborative Centers.

Vaccine Exemptions:

Exemptions may be granted for people who request and receive an exemption from vaccination because of a:

- Medical condition, or medical necessity requires a delay in vaccination, as documented by a licensed medical practitioner (as a reasonable accommodation under the Americans with Disabilities Act)
- Sincerely held religious belief, practice, or observance (established under Title VII of the Civil Rights Act of 1964)

Approval Process for Exemptions

The director (or other designated human resources personnel) employed by the Collaborative Center will engage in an interactive process to determine whether the exemption request meets the following criteria:

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- **Medical/Disability Exemption**

- The staff or volunteer has completed the CC COVID-19 Vaccination Medical-Disability Exemption Request Form (or approved alternative) and submitted it to the center director (or other designated human resources personnel employed by the Collaborative Center).
 - An alternative form produced by the Collaborative Center may be used if approved by the NMCAA Human Resources Director.
- The staff or volunteer's healthcare provider has verified the need for an exemption by completing and signing Section Two of the CC COVID-19 Vaccination Medical-Disability Exemption Request Form.
 - For alternative exemption forms, verification from the healthcare provider is documented, collected, and stored in accordance with the approved, alternative form.
- Any medical information received through this process will be treated as confidential in accordance with applicable law, and kept in the employee's separate and confidential medical file.

- **Religious Exemption**

- Staff or volunteer has completed the CC COVID-19 Vaccination Religious Exemption Request Form
- The individual must articulate their religious belief and how it conflicts with the COVID-19 vaccine.
 - Requests must substantiate a connection to or be in alignment with religious doctrine and strongly held beliefs to be approved.
 - A religious exemption will not be granted based on a personal or political objection.
- All such requests must be handled and evaluated in accordance with applicable laws and regulations.

- **Weekly Testing for Exempt Staff and Volunteers**

- For those who are granted an exemption, a minimum of weekly COVID-19 testing will be required.
 - In alignment with the CDCs recommendations, found at the following link: https://www.cdc.gov/coronavirus/2019-ncov/travelers/testing-international-air-travelers.html#anchor_163512708 , *"People who have recovered from COVID-19 can continue to test positive for up to 3 months after their infection. CDC does not recommend retesting within 3 months after a person with COVID-19 first developed symptoms of COVID-19 (or the date their sample was taken for their first positive viral diagnostic test if their infection was asymptomatic)."*
 - Those who have recently recovered from COVID-19 and have a medical or religious exemption, will document the date symptoms first developed or the date the sample was taken if asymptomatic, and the 90 day expiration of when testing would resume. This documentation must be maintained where you are recording weekly testing so that it is readily available for monitoring.

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- Once an exemption has been approved, the designated human resources personnel at the Collaborative Center will work together with staff and volunteers to identify in writing their plan for testing.
- The first test results must occur before working with enrolled Head Start children and families in any capacity and continue on a weekly basis thereafter. Time between tests should be no longer than 7 days. Exception: center closures, holidays and absences on the 7th day.
- Over-the-counter tests must be observed by designated personnel employed by the center for both the administration and for the waiting of results. This can be done via zoom (or some other connection) or in-person at a location agreed upon by the Collaborative Center director.
- Each center will be responsible to maintain records showing proof of weekly testing and have evidence available for monitoring purposes.
- Action must be taken with regard to a positive test result in accordance with all applicable regulations and guidance from the local Health Department.
- **Availability and Cost of Testing**
 - It is the responsibility of the Collaborative Center to determine a plan as to who will be responsible for accessing/purchasing/providing testing kits; the individual with the exemption or the Collaborative Center.
 - Whenever possible, NMCAA will reimburse the center or individual for the cost of in-home test kits up to \$20 per test kit. Reimbursement is based on case by case requests, and pending available funding. Centers are encouraged to plan ahead and access all and any available resources for free testing kits.

Truthful and Accurate information

Employees must provide truthful and accurate information about their COVID-19 vaccination status or exemption request. False or inaccurate statements may be considered a violation of the Agreement between NMCAA and the Collaborative Center and may be cause to terminate the partnership.

Justification

(See the following linking for a complete summary:

<https://eclkc.ohs.acf.hhs.gov/about-us/article/summary-vaccine-mask-requirements-mitigate-spread-covid-19-head-start-programs>)

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Confirmation of Vaccination (or approved exemption)

I, _____, have read and understand the Collaborative Center Covid-19 Vaccine Plan. In compliance with this plan, I have submitted acceptable proof of vaccination as listed in the plan, or received an approved medical/religious exemption pursuant to applicable law. I give permission for the following dates to be shared with designated NMCAA staff for purposes of monitoring compliance to the Head Start Program Performance Standards [1302.93 (a)(1-2) & 1302.94 (a)(1-2)]. I am aware that this information will be kept confidential and only shared with those who have a legitimate business need to know and as otherwise permitted by law.

Final Date of Receipt of COVID-19 Vaccine: _____ **OR** Exemption Approval Date: _____

Signature _____ Date _____

I, _____, confirm that proof of vaccination, as listed in the plan, or (pursuant to applicable law) an approved medical or religious exemption is stored at the center for the above named staff/volunteer, and the record will be maintained in a separate and confidential medical file as required by law. All such medical information will be treated as confidential to the extent required by law, and will only be shared with those who have a legitimate business need to know and as otherwise permitted by law.

Authorized Center Personnel Signature: _____ Date _____