

**NMCAA Head Start COVID-19 Vaccine Policy and Procedure**

 **Policy**

All staff, visitors, volunteers, and those contractors whose activities involve contact with, or providing direct services to children and families, must be fully vaccinated for COVID-19 or have an allowable exemption. Proof of vaccination or an allowable exemption with corresponding negative test results must be received prior to staff hire or before visitor/volunteer/contractor contact occurs with children or families.

**Definitions and Policy Applicability**

*Staff* is defined as "paid adults who have responsibilities related to children and their families who are enrolled in programs." Consistent with that definition, "all staff" refers to anyone who works with enrolled Head Start children and families in any capacity regardless of funding source.

This includes all outside service providers, transportation staff, and contractors who are in classrooms or working directly with children and families during times of Head Start service provision or while children are in Head Start care.

Transportation options that are included as a part of Head Start program provision includes NMCAA operated bussing and public transit options for which the Head Start program contracts. Under some circumstances, parents make individual arrangements with public schools to arrange for transportation to a Head Start classroom. As supported by the State of Michigan Child Care Licensing Bureau, transportation taking place as a result of individual arrangements are not subject to this policy, as NMCAA does not contract with those entities and a child who is on the public school bus in not considered to be “in care.”

*Intermittent Staff* is defined as those who do not engage in Head Start service provision on a regular weekly basis and do not receive pay during times of absence (substitute teachers).

The term *Head Start* is inclusive of Head Start, Early Head Start, and Early Head Start-Child Care Partnership programs.

Fully vaccinated means an individual is two weeks out from receiving the requisite number of one of the approved vaccinations (currently Pfizer, Moderna, or Johnson & Johnson).

A separate Policy and Procedure is in place for Collaborative Center staff and can be found at: <http://www.nmcaacc.com/uploads/5/5/0/4/55044167/collaborative_center_covid-19_vaccine_and_masking_plan__without_signature_.pdf>

**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 or monitor a Head Start site, such as licensing consultants, QRIS consultants, fire inspectors, etc.

**Procedure**

**Proof of Vaccination for Staff**

**(see definition above and subsequent guidance below for ISD/1755 service providers)**

Proof of vaccination status for all staff must be submitted to Human Resources or the designated COVID-19 Coordinator via in-person delivery or secure email.

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

NMCAA will maintain records of each employee’s vaccination status and proof of vaccination 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.

**Approval Process for Exemptions**

Employees, visitors/volunteers, and potential new hires may request an exemption from the COVID-19 vaccination requirement by submitting a request to Human Resources.

NMCAA will notify the employee/applicant regarding whether a request for an exemption is granted or denied.

If granted, NMCAA will notify the employee/applicant of any specific alternative protective measures required of the employee, if any. If denied, the reason for such denial will be provided. Such decisions may be reviewed for legal compliance.

Allowable reasons for exemption include:

1. Individuals for whom a vaccine is medically contraindicated;
2. Individuals whom medical necessity requires a delay in vaccination; or
3. Individuals who are legally entitled to an accommodation/exemption with regard to the COVID-19 vaccination requirements based on an applicable Federal law.

**Regular COVID-19 Testing for those with Exemptions**

Those who have been granted an exemption from the mandatory vaccination requirement, will be required to comply with this policy for regular COVID-19 testing so long as they remain unvaccinated.

Testing may be completed during work hours, so long as the time to test does not interfere with necessary program operations. If testing is completed during work hours, mileage to and from testing site, or to pick up an NMCAA purchased test, will be reimbursed. Extra time off, or hours over and above the number allotted weekly, will not be granted for testing purposes.

All employees, contractors, and visitors/volunteers working regular schedules (not intermittent) and subject to the testing requirement must be tested for COVID-19 at least weekly, with results submitted no later than noon on Friday, in accordance with the following:

**Acceptable COVID-19 Tests**

Tests may be conducted at official testing locations or may be completed using an in-home test (see “Testing Results” for in-home testing information).

A COVID-19 test satisfies this requirement if it is:

1. Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the U.S. Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test); and
2. Administered in accordance with the authorized instructions.

**Availability and Cost of Testing**

* In-home test kits will be provided by NMCAA at no charge, whenever possible. Employees should advise their supervisor when running low on test kits (down to 2 tests) and the supervisor will advise the HR Director of the need to replenish.
* Availability of these tests may vary based on numerous factors, including but not limited to, supply chain and demand issues and community need.
* Should employees prefer to use a different acceptable test and/or coordinate their testing with and be tested by health care providers of their own choice, the costs of such tests will be the sole responsibility of the employee. In that event, employees are free to obtain acceptable testing from wherever they find most convenient and affordable.

**Scheduling Tests**

* Employees who seek to utilize the acceptable tests provided by NMCAA should coordinate with their supervisor, or other appointed designee, to set-up a time for a proctored test.
* Employees utilizing other acceptable tests at their own expense are free to coordinate their testing with, and be tested by, health care providers of their choice.
* All testing must be completed at times that will ensure the results will be available within the reporting window identified above (at least weekly- with test results submitted no later than noon on Friday).

**Testing Results**

* If testing is completed at a facility, outside of NMCAA, documentation should be sent to Kristin Ruckle at kruckle@nmcaa.net indicating the employee’s name, date of the test and the outcome of the test.
* Testing may be completed using an in-home test that is monitored by a proctor, that has been approved by the staff member’s supervisor. The proctor must be in-person or view the employee through Zoom, Facetime, etc. The proctor must watch the employee prepare the test and wait with the employee for the test results. The proctor will then complete the following COVID-19 Test Verification Form for each employee: <https://forms.office.com/r/3a9dM9EW1F> (QR code at bottom of policy)
* Those with positive test results must be immediately excluded from the facility, so they are away from children and staff until they are determined to no longer be infectious. These staff will follow the most up to date NMCAA quarantine guidelines.
* NMCAA will maintain records of such COVID-19 testing results 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.
* Employees who fail to complete the testing at least weekly will be terminated.
* Continued failure to comply with this policy may result in disciplinary action, up to and including termination of employment.
* Employees with a religious waiver, or medical waiver that is not the result of a recent COVID illness, will need to secure a new waiver or statement from their medical provider, should they test positive for COVID-19. The waiver or statement should designate the amount of time testing should be deferred for.

Those staff members off for a week or more, as a result of paid or unpaid leave, will not be subject to testing during that time, but must submit a negative COVID-19 test prior to returning to work.

**Proof of Vaccination for Visitors/Volunteers**

* Visitors/volunteers who have received the vaccination, will be required to show an acceptable proof of vaccination, as outlined above, as a part of the Annual Preservice and Orientation Training (APOT) process. Proof of vaccination will be submitted to Kristin Ruckle (ruckle@nmcaa.net).

**Vaccination Exemption and Testing for Visitors/Volunteers/Intermittent Staff**

* Visitors/volunteers/intermittent staff requesting an exemption will also do so at the time of APOT, following the same process as staff. The staff member conducting APOT with the visitor/volunteer/intermittent staff will request an appropriate exemption form from HR. The visitor/volunteer/intermittent staff will complete the exemption request and will return the form directly to HR. HR will share the exemption decision with the visitor/volunteer/intermittent staff and, if an exemption is granted, will provide the visitor/volunteer with proof of exemption.
* Visitors/volunteers/intermittent staff with approved exemptions will provide test results from an acceptable COVID-19 test (as outlined above) completed within one week of arriving on site, or will self-test with an acceptable over the counter COVID-19 test under staff supervision, within 7 days of entrance to the Head Start service provision space. If testing will take place on site, this must be arranged ahead of time to ensure staff availability to oversee the test.
* For those needing to be tested, results of the test will be sent to Kristin Ruckle (kruckle@nmcaa.net).

**Visitors/volunteers may be asked to show proof of vaccine and ID, or proof of exemption along with a negative COVID-19 test result, at the time of each site visit.**

**QR Code for COVID-19 Test Verification Form**



**7/22 P:/HS/Admin/Pro Manual/Licensing/HS Covid-19 Vaccine Policy and Procedure**

**References: HSPPS 1302.93, 1302.94,** [***CDC Test for Current Infection Guidance***](https://www.cdc.gov/coronavirus/2019-ncov/testing/diagnostic-testing.html)**,** [**https://eclkc.ohs.acf.hhs.gov/exploring-head-start-program-performance-standards/article/universal-masking-covid-19-vaccine-requirement-faqs**](https://eclkc.ohs.acf.hhs.gov/exploring-head-start-program-performance-standards/article/universal-masking-covid-19-vaccine-requirement-faqs)

**Alternate Procedure for Approved Regular Contractors**

**NMCAA recognizes that regular contractors may have processes in place that meet the requirements of Head Start Program Performance Standard 1302.93. In order to avoid duplication of processes, for individuals not employed by NMCAA, employers of special education service providers and regular contractors, as approved by the Early Childhood Programs Director, may choose to follow the process listed above, for visitors/volunteers, or the process below:**

Designated human resources personnel where each special services provider or other regular contractor is employed will maintain proof of vaccination.

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).

**Vaccine Exemptions**

Exemptions may be granted for individuals 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**

Designated human resources personnel employed by the service provider’s place of employment, will engage in an interactive process to determine whether the exemption request meets the following criteria:

* **Medical/Disability Exemption**
	+ The staff member’s healthcare provider has verified the need for an exemption by completing and signing a 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 a 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 Exemptions**
	+ For those who are granted an exemption, COVID-19 testing will be required at least weekly.
	+ The first test results must occur no later than January 31st, 2022.
	+ Designated human resources personnel will 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.
	+ Over-the-counter tests must be observed by designated personnel for both the administration and for the waiting of results. This can be done via zoom (or some other connection) or in-person.