



DISTRICT OF COLUMBIA
OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

COVID-19 Vaccination Mandate for Schools Frequently Asked Questions:

(Nov. 9, 2021)

The Office of the State Superintendent of Education (OSSE) issued guidance on Oct. 8, 2021 for District of Columbia public, public charter, private, parochial, and independent schools regarding the implementation of the COVID-19 vaccination mandate in [Mayor’s Order 2021-109](#). This document is intended to update and address frequently asked questions related to local education agencies’ (LEAs’) and schools’ implementation of the *COVID-19 Vaccination Mandate for District School Employees, Contractors, Interns and Volunteers* and the *COVID-19 Vaccination Mandate for Student Athletes*.

For information and resources on the District of Columbia Government’s COVID-19 response and recovery effort, please visit coronavirus.dc.gov. For additional information and resources from OSSE, please visit the OSSE Guidance and Resources for COVID-19-related Closures and Recovery [webpage](#).

If you have questions relating to this guidance, contact the OSSE Division of Health and Wellness at OSSE.HealthandSafety@dc.gov.

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General

1. Which schools are covered by the Mayor’s Order?

The Mayor’s Order and OSSE’s guidance were issued for public, public charter, private, parochial and independent elementary and secondary schools and LEAs, as well as adult education schools, located and operating in the District of Columbia.

2. Who is required to receive the COVID-19 vaccine?

Per Mayor’s Order 2021-109, all adults who are regularly in schools and child care facilities in the District must have received a full course of vaccination against COVID-19 effective Nov. 1, 2021. This includes

adult employees, contractors, interns and volunteers, but does not include adult students enrolled in school. The Order further requires that students aged 12 and older must have received a full course of vaccination against COVID-19 in order to participate in school-based extracurricular athletics.

3. What is a full course of vaccination?

A full course of COVID-19 vaccination means the individual has completed the vaccine series and received the second dose of a 2-dose series, or one dose of a single-dose series. An individual is considered fully vaccinated 14 days after the last dose of a COVID-19 vaccination series, but for purposes of Mayor's Order 2021-109 an individual is only required to demonstrate effective Nov. 1, 2021 that they have received two doses of Pfizer or Moderna or one dose of Johnson & Johnson COVID-19 vaccination.

For purposes of Mayor's Order 2021-109, a full course of vaccination does not include the COVID-19 vaccine booster shot. For more information on who is eligible for booster shots, please refer to the Centers for Disease Control and Prevention (CDC) website available [here](#).

4. How can school staff, educators and eligible students access the COVID-19 vaccine?

All District residents age 5 and older are eligible to receive the COVID-19 vaccine in Washington, DC.

The District offers multiple high-capacity, walk-up, no-appointment-needed vaccination sites. Additional opportunities for vaccination also currently exist in certain DCPS schools, as well as pharmacies and medical provider offices. Additional information, including the list of walk-up site locations, is available on vaccinate.dc.gov and vaccines.gov.

5. How does an individual get approved for a religious exemption?

In order to have an approved religious exemption, the individual must submit in writing to their LEA or school that receiving the COVID-19 vaccination would violate their sincerely held religious beliefs and the granting of the religious exemption would not impose an undue burden consistent with federal and District of Columbia law. Such requests for religious exemptions should be scrutinized by the LEA or school to be sure that the applicants in fact have a sincerely held religious belief that precludes them from taking the vaccine, and that the exemption would not pose an undue burden on the LEA or school. The LEA or school shall review and must explicitly approve requests for religious exemption.

OSSE has provided two template religious exemption forms that schools and LEAs may choose to adopt or amend for student athletes and for employees, contractors, interns, and volunteers. The template forms are available on the OSSE website, found [here](#). In an effort to promote consistency across schools, LEAs are strongly recommended to use this request for religious exemption form for student athletes already engaged in fall and winter sports. LEAs will be required to use this form for student athletes beginning with the spring athletic season.

LEAs and schools must establish a process for reviewing and approving or denying religious exemption requests, such as with a school leader or their designee. LEAs and schools should consult their legal counsel for questions regarding approval or denial of religious exemption requests. Approved religious

exemptions should be kept in an individual's personnel file for staff and an individual's student health record for students.

6. How does an individual get approved for a medical exemption?

In order to have an approved medical exemption, the individual must submit to their LEA or school written certification that is signed, stamped, or otherwise approved from a physician or other licensed health professional who is authorized to order an immunization, stating that being vaccinated for COVID-19 is medically inadvisable due to the person's medical condition, and it is in fact medically inadvisable for the person to receive a COVID-19 vaccine due to the person's medical condition. Medical exemptions may come in the form of a letter or other formal statement from the physician or licensed health professional and must include their contact information. LEAs and schools may contact the physician or licensed health professional if they have questions about the medical exemption.

If the condition making the vaccine medically inadvisable is temporary, the physician or other licensed health professional should specify in the certification the date on which, or the change in condition upon which, taking the vaccine would no longer be medically inadvisable, and the person must receive their first dose of a COVID-19 vaccine within 30 days after the specified date or event when taking the vaccine would no longer be medically inadvisable and their second dose (if applicable) within the time period established in the dosing schedule for the vaccine.

Medical exemptions should be kept in an individual's personnel file for staff and an individual's student health record for students.

7. Do individuals with an approved religious or medical exemption need to follow enhanced COVID-19 safety protocols?

Yes. All persons who have received an approved exemption shall (1) wear a mask in the workplace or in both indoor and outdoor athletic events (even if the current masking order is rescinded or superseded), (2) be tested weekly for COVID-19 and (3) provide the school or LEA with a negative COVID-19 test result on a weekly basis in order to report to work or to their school-based athletic activity.

8. Can individuals test out of the COVID-19 vaccine requirement?

No. Mayor's Order 2021-109 does not allow a covered individual to provide proof of prior COVID-19 infection or to test out of the COVID-19 vaccination requirement. Only covered individuals with an approved medical or religious exemption are not required to receive a full course of the COVID-19 vaccination. All persons who have received an approved exemption shall (1) wear a mask in the workplace or in both indoor and outdoor athletic events (even if the current masking order is rescinded or superseded), (2) be tested weekly for COVID-19 and (3) provide the school a negative COVID-19 test result on a weekly basis in order to report to work or to their school-based athletic activity.

9. Where can individuals with approved religious or medical exemptions access weekly COVID-19 testing?

Individuals may access COVID-19 testing through their own healthcare provider, certain pharmacies or through one of the District's walk-up or drive-thru testing sites. Individuals may also utilize the [Test Yourself DC](#) testing kits. Additional information on COVID-19 testing options is available at coronavirus.dc.gov/testing. LEAs and schools shall establish a process for collecting and documenting weekly COVID-19 test results from individuals with an approved religious or medical exemption.

10. Can individuals with approved religious or medical exemption participate in school activities while awaiting their weekly COVID-19 test results?

Yes. As long as they do not have symptoms of COVID-19 or otherwise meet criteria for exclusion, individuals with an approved religious or medical exemption may continue to work or participate in school athletics while awaiting their weekly COVID-19 test results. This should be treated the same as surveillance testing, which does not require individuals to self-quarantine while awaiting test results as part of routine testing. However, if the individual is symptomatic or a close contact of a COVID-19 positive person while they are awaiting test results, the individual must not return to school until they meet the criteria for symptomatic individuals or for close contacts detailed in [DC Health's Guidance for Schools](#) and the [OSSE Exclusion and Dismissal Criteria and Protocols for Schools](#) and [Return to School Criteria](#) resources.

11. Are parents and guardians of students required to receive the COVID-19 vaccine?

Generally, no. Parents and guardians who periodically visit their child's school, such as for parent-teacher conferences or special events, and persons who enter schools on a one-time basis are not covered by Mayor's Order 2021-109. However, if a parent or guardian regularly enters the facility, such as to volunteer or work in the school, then they would be subject to Mayor's Order 2021-109.

12. Are adult students required to receive the COVID-19 vaccination?

Mayor's Order 2021-109 does not mandate adult students enrolled in District schools to receive the COVID-19 vaccination. If an adult student participates in school-based extracurricular athletics or volunteers/works in a school or child care facility, then the Order would apply to them. Schools should continue to encourage adult students to receive the COVID-19 vaccination.

Mandate for District School Employees, Contractors, Interns, and Volunteers

13. Is the COVID-19 vaccine required for school staff?

Yes. Effective Nov. 1, 2021, all adult employees, contractors, interns and volunteers working in-person in a public, public charter, independent, private or parochial school in the District of Columbia shall have received a full course of a vaccination against COVID-19 unless they have been granted an exemption from such vaccination pursuant to, and are compliant with, the requirements.

14. Is the COVID-19 vaccine required for school staff who exclusively work remotely?

Mayor's Order 2021-109 applies to all adult employees, contractors, interns, and volunteers who are regularly in schools. It would not apply to those who are not regularly in a school building. It is at the discretion of the school or LEA to determine the schedule of remote staff and whether their schedule has them regularly entering a school building. It is strongly recommended that all school and LEA staff be vaccinated, even those who are not regularly in a school building.

15. How does the Mayor's Order define "regularly" to determine which individuals who enter the school building are subject to the mandate?

Persons who enter schools on an infrequent or one-time basis are not covered by this Order, but if a person's ordinary duties or practices include regularly entering schools, such as off-site administrators who regularly visit school sites, or contractors who regularly service schools, they must comply with this Order's vaccination requirement. Parents or guardians who periodically visit their child's school, such as for parent-teacher conferences or special school events, are not subject to this Order. It is at the discretion of the school or LEA to determine whether an individual is regularly in a school building and OSSE reserves the right to monitor for compliance with the intent of the Mayor's Order.

16. Can school employees, contractors, interns, and volunteers show up to work while their religious or medical exemption is pending approval by the LEA or school?

The intent of the Mayor's Order is clear, with a goal of protecting students and limiting the spread of COVID-19. There may be situations where schools will need to make individual decisions based on circumstances, particularly in the early days of implementation. The Mayor's Order does provide some flexibility to address these individual needs and account for necessary administrative operations, including the processing of religious and medical exemptions and verifying the full vaccination status of employees. If the medical or religious exemption is denied after Nov. 1, 2021, the school or LEA must work with the individual to immediately come into compliance by securing a timely full course of the COVID-19 vaccination. Each entity, in consult with their legal and human resources teams, should make decisions that protect their students while moving promptly into compliance with the Order.

17. If a school employee, contractor, intern, or volunteer has received one dose of Pfizer or Moderna before Nov. 1, 2021, but is not due to receive the second dose until after Nov. 1, may they continue to work at school while waiting for their second dose?

Mayor's Order 2021-109 states that effective Nov. 1, 2021, all adult employees, contractors, interns and volunteers working in-person in a public, public charter, independent, private or parochial school in the District of Columbia shall have received a full course of a vaccination against COVID-19 unless they have been granted an exemption from such vaccination. The intent of the Mayor's Order is clear; however, there may be individual circumstances, particularly in the early days of implementation, where a school or LEA may need to provide flexibility to address individual needs of employees and to account for critical operations of the school or LEA.

If an individual is awaiting their second dose after Nov. 1, 2021 and their role is critical to the operations of the school or LEA, the school or LEA may determine whether to allow the individual to work in-person while awaiting their second dose. In these limited cases, the individual should complete the same weekly COVID-19 testing requirements as those with approved medical and religious exemptions until they receive the second dose and they must complete the second dose within the appropriate timeframe. Each entity, in consult with their legal and human resources teams, should make decisions that protect their students while moving into compliance with the Order.

Mandate for Student Athletes

18. Will the COVID-19 vaccine be required for all students?

DC Health does not opine at this time on whether the vaccine will or should be required for all students. Mayor's Order 2021-109 only addresses students aged 12 and older who participate in school-based extracurricular athletics.

19. When should schools and LEAs begin excluding non-compliant student athletes from extracurricular school-based athletic activities?

In order to ensure schools and LEAs have a strong process in place and a window to operationalize the Mayor's Order requirements for student athletes, the District of Columbia Office of the City Administrator has established an extended implementation period before full exclusion of non-compliant student athletes from school-based extracurricular athletics is required.

To operationalize the student athlete vaccination requirement, student athlete exclusion from participation in school-based extracurricular athletics will not be required to be implemented before Dec. 1, 2021. This additional period will enable school personnel to establish and execute systems to collect, review, certify, and record proof of COVID-19 vaccination and medical and religious exemptions. This applies only to student athletes, and not adult school employees, contractors, interns, or volunteers, including athletic directors, coaches, trainers, and game officials.

It is the responsibility of the school or LEA to set strong internal deadlines to process all elements of the mandate far ahead of the Dec. 1 exclusion date and take steps to convey the seriousness of this mandate, including sending letters of non-compliance, excusing unvaccinated athletes from practices to provide them with time to receive their COVID-19 vaccination, and supporting athletes and families with information about and access to vaccine clinics. Such LEA efforts will ensure that student athletes are healthy throughout their season and eligible for every opportunity.

Between Nov. 1 and Dec. 1 all student athletes who have not received the full course of vaccination will be required to wear a mask in both indoor and outdoor athletic events (even if the current masking order is rescinded or superseded) and are strongly encouraged to participate in weekly testing for COVID-19. Schools are encouraged to collect proof of a weekly negative test in order to allow these student athletes to continue participating in their school based athletic activity.

20. Are students who receive an exemption required to wear masks during high-intensity sports?

Yes. Pursuant the Mayor's Order 2021-109, all persons who have received any exemption shall wear a mask in athletic events both indoors and outdoors (even if the current masking order is rescinded or superseded).

21. What should our school do when a student athlete submits the COVID-19 vaccination record?

School and LEA leaders should establish a process for accepting and documenting the COVID-19 vaccination documentation. DCPS and public charter schools are encouraged to accept, review and document proof of COVID-19 vaccination and then add it to the student's health record. School and LEA leaders are encouraged to coordinate with their registrars (or front office staff) and the school health suite personnel (e.g., school nurse) for a process of accepting and approving the documents and proper storage of COVID-19 vaccination records in a student's health record. School and LEA leaders should also determine how to involve or inform athletic directors, coaches, and other athletic personnel of the review and approval process.

Schools are encouraged to adopt similar protocols to those that already exist for other health records (such as Universal Health Certificates and Oral Health Assessments). The protocol may include the school front office documenting the submission and approval of vaccination documents and then transmitting the record to the school nurse for storage in the student's health file. LEAs and schools should establish a protocol for who gives final approval on proof of COVID-19 vaccination and requests for medical or religious exemption, such as a school or LEA leader or their designee. Children's School Services (CSS) health suite personnel should not be asked to approve or deny COVID-19 vaccination records or requests for medical or religious exemption.

For high school sports under the jurisdiction of the District of Columbia State Athletic Association (DCSAA), all students included on a school's athletic eligibility roster(s) must be compliant with Mayor's Order 2021-109. Exclusion of non-compliant student athletes from athletic activities will begin on Dec. 1, 2021. School leaders shall verify that all students included on the eligibility rosters meet the COVID-19 vaccination requirement, similar to how school leaders verify student athletes meet the Universal Health Certificate requirement. DCSAA may take enforcement actions against schools and teams that allow students who are not in compliance with the Order to participate in school-based extracurricular athletics. Schools participating in DCSAA sports must cooperate with DCSAA's reasonable requests for documentation of compliance.

22. How frequently does a school need to collect proof of medical or religious exemption?

Medical exemptions do not expire unless the condition making the vaccine medically inadvisable is temporary. The physician or other licensed health professional should specify in the certification the date on which, or the change in condition upon which, taking the vaccine would no longer be medically inadvisable, and the person must receive their first dose of a COVID-19 vaccine within 30 days after the

specified date or event when taking the vaccine would no longer be medically inadvisable and their second dose (if applicable) within the time period established in the dosing schedule for the vaccine.

Religious exemptions expire annually and must be resubmitted by the parent/guardian for approval each school year in which the exemption is sought. A student athlete may use the same approved religious exemption for all extracurricular sports they participate in within the approved school year (e.g., if a student plays soccer in the fall, basketball in the winter and baseball in the spring).

23. Does the mandate apply to other student groups who are present at athletic events (e.g., band, cheerleaders, dance team)?

The Mayor's Order applies to student athletes, coaches, referees, and trainers. The LEA or school should apply the requirement to any student groups that it classifies as being a part of student athletics (which may include marching band, cheerleaders and dance team members).

LEAs and schools interested in expanding vaccination requirements to other student groups are encouraged to consult with their legal counsel to ensure alignment with all applicable federal and local laws. Generally, private club teams and independent, private, and parochial schools are free to promulgate and enforce more stringent policies regarding vaccination than the Mayor's Order prescribes. Public charter schools are encouraged to work with their legal counsel to determine additional opportunities to encourage vaccination for other student groups.

24. Can student athletes participate in school-based athletics while their request for medical or religious exemption is pending approval by the LEA or school?

Until Dec. 1, 2021, student athletes who file a request for a religious or medical exemption may participate in school-based extracurricular athletics while their request is under review by the LEA or school. Beginning Dec. 1, 2021, any student athlete with a request that is pending approval may not participate in school-based extracurricular athletics until the request is approved or the student athlete submits documentation that they have received a full course of vaccination against COVID-19. Once the LEA or school has approved the medical or religious exemption, the approved exemption should be placed in the athlete's student health record.

If a student athlete submits a request for religious exemption and it is denied by the school or LEA between Nov. 1 and Dec. 1, 2021 then the student must receive their first dose of COVID-19 vaccination within five days of the denial in order to continue participating in school-based extracurricular athletics. Beginning Dec. 1, 2021, if a student athlete submits a request for religious exemption and it is under review by the school or LEA, the student may not participate in school-based extracurricular athletics while it is under review. If the request is denied after Dec. 1, 2021, the student athlete must complete the full course of before participating in school-based extracurricular athletics. Students should be reminded that it is illegal to make false statements on government forms, and that includes filing applications for exemptions in bad faith. It is recommended that an LEA or school maintain denied medical or religious exemptions for reference in the athlete's student health record.

25. Can student athletes participate in school-based athletics while in the process of receiving a COVID-19 vaccination series?

Student athletes who are in the process of receiving a COVID-19 vaccination series may participate in school-based extracurricular athletics until Dec. 1, 2021. Beginning Dec. 1, 2021, any student who has not submitted documentation showing completing of the vaccination series (or received approval for a medical or religious exemption) shall not participate in school-based extracurricular athletics until such documentation is submitted to the LEA or school.