



DISTRICT OF COLUMBIA  
OFFICE OF THE STATE SUPERINTENDENT OF

# EDUCATION

## COVID-19 Vaccination Mandate for Student Athletes

*(Revised Dec. 1, 2021)*

### Background

Healthy bodies and minds are critical for academic success. Schools play an important role in keeping students safe, healthy and ready to learn. The spread of coronavirus (COVID-19) remains a serious threat, particularly for individuals who are not fully vaccinated. The COVID-19 vaccines are highly effective in protecting persons from COVID-19. Now that vaccines are widely available, schools are in a unique position to promote the vaccine as a key mitigation effort for protecting the health and wellbeing of our students, staff, residents and families. To ensure the safest learning environment, schools should strongly encourage all eligible students to secure the COVID-19 vaccination.

On Sept. 20, 2021, Mayor Muriel Bowser signed [Mayor's Order 2021-109](#) requiring that by Nov. 1, 2021 all adults who are regularly in schools and child care facilities in the District must be vaccinated against COVID-19. 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. A full course of vaccination means individuals must have received the second dose of a two-dose series, or one dose of a single-dose series before they practice or compete at DC school facilities. This Order does not permit a test-out option for individuals unless they have been granted a medical or religious exemption.

*NEW:* In order to ensure schools and local education agencies (LEAs) had a strong implementation process and a window to operationalize Mayor's Order 2021-109, the City Administrator's office previously established an extended implementation window from Nov. 1 – Dec. 1, 2021 before full exclusion of student athletes from school-based extracurricular athletics was required. As of Dec. 1, non-compliant student athletes are not permitted to participate in school-based extracurricular athletics until they have received a full course of vaccination or have received an approved medical or religious exemption.

### Student Athlete Requirements

Pursuant to Mayor's Order 2021-109, no student aged 12 or older shall practice, compete or otherwise participate in school-based extracurricular athletics (including both interscholastic and intramural sports), unless the student has received a full course of vaccination against COVID-19, or unless the student has received an approved medical or religious exemption. Student athletes covered by this Order shall not be permitted to train, compete or otherwise participate with their school-based teams until they have met these requirements.

A student who will turn 12 years of age between the issuance of Mayor's Order 2021-109 and Nov. 1, 2021 must receive a full course of vaccination or receive an exemption by Dec. 13, 2021 to be able to practice or compete in school-based athletics. Students turning 12 after Nov. 1, 2021 have two months from their birthday to receive a full course of vaccination in order to participate in school-based athletics.

Mayor's Order 2021-109 applies to public, public charter, independent, private and parochial schools, including school athletic teams based outside of the District that utilize District school facilities for practices or games. The Order does not apply to athletics at District Department of Parks and Recreation facilities or to private club sports and athletics unless they train or compete at school facilities in the District of Columbia.

Private club teams and independent, private and parochial schools are free to promulgate and enforce more stringent policies regarding COVID-19 vaccination than the Mayor's Order prescribes.

## Collection of Student COVID-19 Vaccination Records

The District of Columbia Public Schools (DCPS), the Public Charter School Board (PCSB) and each independent, private and parochial school must establish systems for ensuring compliance with this rule among their student-athletes, including communication about the requirements imposed by Mayor's Order 2021-109, a process by which persons subject to this Order shall certify their compliance with the requirements of this Order, a process for verifying compliance with this Order and a process for enforcement of the requirements of this Order. School and LEA leaders are encouraged to coordinate with their school health personnel, registrars, athletic directors, coaches and any other personnel who may be positioned to communicate these requirements and collect or store COVID-19 vaccination documentation submitted to the school.

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. School leaders shall verify 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.

## Proof of COVID-19 Vaccination

Student athletes subject to this Mayor's Order shall submit proof of a full course of COVID-19 vaccination to their school of enrollment. Acceptable forms of proof are limited to:

- A scan or image of a Centers for Disease Control and Prevention COVID-19 Vaccination Record Card, or a paper copy of an official vaccination record from a government body (if vaccinated outside of the United States); or
- A screenshot of the COVID-19 vaccination status from the DC Health database ([DC MyIR](#)) or other certification from DC Health or other jurisdiction verifying full and complete 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 two-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 a student athlete is only required to demonstrate full course of vaccination in order to begin participating in school-based extracurricular athletics. Proof of COVID-19 vaccination should be submitted directly to the school or LEA and kept in a student's health record.

## COVID-19 Testing or Proof of Prior Infection

*UPDATE:* Mayor's Order 2021-109 does not permit a student athlete to demonstrate proof of prior COVID-19 infection or to test-out of the COVID-19 vaccination requirement unless the student has received a religious or medical exemption. All persons who have received an approved exemption shall wear a mask for all indoor and outdoor athletic events except for swimming (even if the current indoor masking order is rescinded or superseded), shall be tested weekly for COVID-19 and shall provide the school a negative COVID-19 test result on a weekly basis in order to report to their school-based extracurricular athletic activity. If the student's team is not yet practicing or competing, those with approved exemptions are obliged to submit proof of negative tests beginning the week before they want to begin practicing or competing, or with sufficient time for their exemption and test records to be verified on rosters.

## Medical Exemption

Students may be exempted from immunization requirements only if a physician or other licensed health professional who may order an immunization certifies in writing that there is a medical reason not to receive the COVID-19 vaccine. Medical exemptions shall be signed, stamped or approved by a physician or other licensed health professional stating that the COVID-19 vaccine is medically inadvisable for the student due to the person's medical condition. Medical exemptions should be submitted directly to the school or LEA and kept in a student's health record.

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.

*NEW:* As of Dec. 1, 2021, if a student athlete submits a request for medical exemption and it is under review, the student may not participate in school-based extracurricular athletics while it is under review by the school or LEA.

*UPDATE:* All student athletes who have received a medical exemption shall wear a mask for all indoor and outdoor athletic events except for swimming (even if the current masking order is rescinded or superseded), shall be tested weekly for COVID-19 and shall provide the school a negative COVID-19 test result on a weekly basis in order to report to their school-based extracurricular athletic activity. Masks must not be worn by any individual while in a swimming pool.

## **Religious Exemption**

Students may be exempted from immunization requirements for religious reasons. Persons who object in good faith that the COVID-19 vaccination would violate their sincerely held religious beliefs shall submit their objection in writing to the school. Religious exemptions should be submitted directly to the school or LEA and kept in a student's health record. Simply submitting a request, though, does not mean that the request is granted, and effective Dec. 1, 2021, those student athletes seeking religious exemptions are not permitted to practice or play until their exemption has been granted.

*NEW:* As of 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 vaccination 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.

*UPDATE:* All student athletes who have received a religious exemption shall wear a mask for all indoor and outdoor athletic events except for swimming (even if the current masking order is rescinded or superseded), shall be tested weekly for COVID-19, and shall provide the school a negative COVID-19 test result on a weekly basis in order to report to their school-based extracurricular athletic activity. Masks must not be worn by any individual while in a swimming pool.

## **NEW: Mask Requirements for Fully Vaccinated Student Athletes**

Per [DC Health COVID-19 Guidance for Schools](#), fully vaccinated student athletes are not required to wear masks while they are **actively physically engaged** in a school-based extracurricular athletic competition or practice. Masks must be worn by student athletes at all other times while indoors when they are not actively participating (e.g., while resting and in team meetings). Student athletes who are not fully vaccinated and have received an approved medical or religious exemption shall wear a mask for all indoor and outdoor athletic events except for swimming (even if the current masking order is rescinded or superseded).

## **Student Health Record Retention and Protection**

Schools shall collect and retain student COVID-19 vaccination records submitted to the school as required by Mayor's Order 2021-109.

DCPS and public charter schools should document the proof of COVID-19 vaccination and add it to the student's health record. School leaders are encouraged to coordinate with their school health suite personnel (e.g., school nurse) for proper storage of COVID-19 vaccination records in a student's health record.

Completed vaccination records and exemption requests shall be treated as private records exempt from disclosure under section 204(a)(2) of the Freedom of Information Act of 1976, effective March 29, 1977, D.C. Law 1-96; D.C. Official

Code § 2-534(a)(2); however, the information included on those forms and requests may be used internally for verification, staffing, payroll and assignments, and as any other operational needs may require, consistent with local and federal laws and regulations.

### **Coaches, Athletic Directors, Referees, Trainers and Athletic Department Personnel**

Pursuant to Mayor's Order 2021-109, 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. This shall include, but is not limited to, coaches, trainers, athletic directors, referees, meet or game officials, school-based media specialists filming games and training sessions, security personnel, janitorial and maintenance staff, school bus or van drivers transporting athletes and adult volunteers or interns who are regularly at the school. This applies to any person whose ordinary duties or practices include regularly entering schools, including school grounds. Schools and LEAs shall establish a process to certify their compliance with the requirement, a process for verifying compliance and a process for enforcement of the requirements. DCPS central office will establish a system for verifying compliance for DCPS schools and the PCSB will establish a system for verifying compliance for public charter schools. All persons who have received an exemption shall wear a mask in athletic events (even if the current indoor masking order is rescinded or superseded), shall be tested weekly for COVID-19 and shall provide the school a negative COVID-19 test result on a weekly basis in order to report to their school or school-based athletic activity.

Nothing in Mayor's Order 2021-109 shall be deemed to prevent an employer from imposing stronger vaccination requirements on their employees, agents, volunteers or subcontractors, subject to applicable federal and local laws and regulations.

### **Athletic Spectators and Visitors**

Parents or guardians who periodically visit their child's school, such as for parent-teacher conferences or special school events, and persons who enter schools on a one-time basis are not covered by Mayor's Order 2021-109. This includes school athletic fields and grounds. Schools may choose to enforce proof of COVID-19 vaccination for attendance at athletic events, but it is not required.

Per [DC Health COVID-19 Guidance for Schools](#), non-essential visitors should be minimized if the District is at moderate to high community transmission levels. All visitors must wear a face mask while indoors regardless of vaccination status and should be required to follow school policy on health screenings, physical distancing, and other preventative measures.

### **Private Club Sports Utilizing School Athletic Facilities**

Mayor's Order 2021-109 does not apply to athletics at District Department of Parks and Recreation facilities or to private club sports and athletics unless they train or compete at school facilities in the District of Columbia. Schools must ensure private club sports and athletics that utilize school facilities meet this requirement. This includes both adult- and student-based school and private club sports that are based within and outside of the District and utilize a District school's facilities. Schools are not expected to collect individual proof of COVID-19 vaccination, exemption, or negative COVID-19 tests for these individuals, but may meet this requirement by modifying building use agreements or securing a formal assurance from the private club sport league(s) that attests they will ensure all of their athletes, coaches, referees, and other individuals covered under the Mayor's Order will meet the mandate of receiving a full course of immunization by Nov. 1, 2021 or by the time they seek to use the facilities unless exempted.

## COVID-19 Exposure

[DC Health COVID-19 Guidance for Schools](#) requires students and staff who have tested positive or are identified as a close contact of an individual testing positive for COVID-19 to refrain from participating in in-person school instruction and activities, including athletics. Close contacts who are fully vaccinated do not need to quarantine unless they display symptoms of COVID-19. This COVID-19 vaccination requirement will help reduce the number of students and staff removed from in-person activities and limit the disruption to educational instruction and athletic events caused by COVID-19.

## Enforcement

Employees, contractors, interns, grantees, LEAs, child care facilities, school athletic directors and independent, private and parochial schools may be required to demonstrate further proof of vaccination, exemption documentation and/or COVID-19 test results upon request of the Office of the City Administrator (OCA), DC Department of Human Resources (DCHR), OSSE, the relevant agency's human resources office, DC Office of Contracting and Procurement (OCP), the relevant agency's contracting office or other investigative authorities designated by OCA, DCHR, OSSE, or OCP. The Department of General Services (DGS), in issuing permits for the use of school facilities, may also request documentation to support any certification provided.

For high school sports under the jurisdiction of the District of Columbia State Athletic Association (DCSAA), 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.

For questions regarding imposing stronger vaccination requirements on students not stipulated in Mayor's Order 2021-109, schools and LEAs are encouraged to consult their legal counsel.

Though vaccines play a critical role in reducing the spread of COVID-19, receiving a vaccine does not alleviate the need to exercise such other mitigation practices as may be required by another Mayor's Order, DC Health regulations or guidance, OSSE, the DCSAA or any employer or entity covered by Mayor's Order 2021-109. Schools may refer to [coronavirus.dc.gov](#), the [DC Health COVID-19 Guidance for Schools](#), and [OSSE COVID-19 Guidance and Resources](#) for more information.

## Complaints

Any individual who believes a public school, public charter school, independent school, private school or parochial school is not complying with the vaccination and record-keeping requirements may submit a complaint to OSSE via the [online portal](#) beginning Nov. 1, 2021 and OSSE may investigate and take enforcement action if a violation is found.

## Resources

- COVID-19 Vaccination
  - [Get Vaccinated: Locations for COVID-19 Vaccination](#)
  - [COVID-19 Vaccination Information](#)
  - [COVID-19 Vaccination Frequently Asked Questions](#)
  - [COVID-19 Vaccination Student Incentives](#)
  - [Getting Your Child Ready for the COVID-19 Vaccine](#)
  - [The Science Behind COVID-19 Vaccines: Parent FAQs](#)
- COVID-19
  - [Coronavirus.dc.gov](#)
  - [DC Health COVID-19 Health Guidance](#)
  - [OSSE Guidance and Resources](#)
  - [Centers for Disease Control and Prevention COVID-19 Resources](#)

- District of Columbia State Athletic Association (DCSAA)
  - [DCSAA Homepage](#)
  - [DCSAA Policies, Rules, and Regulations Governing Athletics Handbook](#)
- Routine Pediatric Immunizations:
  - [OSSE Immunization Attendance Policy](#)
  - [DC Health Immunization Requirements for Students](#)
  - [OSSE resources, training, template letters, and 1-pagers](#)
- Sports and Medical Organizations
  - [Sports and Medical Organizations Encourage COVID-19 Vaccine Conversations be Part of all Sports Physicals](#)