

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Executive Office of Mayor Muriel Bowser**



Office of the City Administrator

**Additional FAQs for Grantees/Contractors**

**Q1: Should grantees and contractors pay for employee testing? Can DC government grants or contracts be used to pay for employee testing?**

**A1:** The District has a robust public testing program and grantees and contractors are encouraged to take advantage of these sites. In the District, insurers are required to fully cover COVID testing.

**Q2. What is an example of proper documentation for an exemption to the vaccine and what process should grantees or contractors follow when assessing whether to grant an exemption?**

**A2.** EEOC guidance may be helpful when determining adequate documentation and the process to be followed when assessing exemptions.

**Q3. What record keeping or tracking system does the District government recommend to retain documents about vaccinations or exemptions?**

**A3.** As noted in previous FAQs, contractors and grantees are free to use whichever record keeping or tracking system that is compatible with their existing processes. The District does not recommend any particular system.

**Q4. Will booster shots be mandatory?**

**A4.** Section VI. 2 of Mayor's Order 2021-147 (December 20, 2021) states that District government contractors and grantees shall obtain a booster shot against COVID-19 and shall submit evidence of a booster shot.

**Q5. What is the expectation of the District contractor to obtain verification from subcontractors to evidence that their staff is vaccinated?**

**A5.** Contractors should collect whatever information and records that they feel necessary to be able to certify to the District that their covered subcontractors are in compliance with the Mayor's Orders.

**Q6. Does order 2021-109 refer to government contractors only?**

A6. It refers to anyone regularly in schools in the District or child care facilities regulated by the Office of the State Superintendent of Education, whether they are government contractors or contractors working for private entities.

**Q7. What is the process for club teachers who are also DCPS employees that have submitted exemption requests but do not have formal approval documentation?**

A7. Until exemptions are processed, these employees should continue to test weekly and only report in person if they receive a negative test.

**Q8. Are volunteers and interns that work remotely and have no contact with staff are required to be vaccinated?**

A8. No, vaccination is encouraged but not required for volunteers and interns that work remotely.

**Q9. What if the contractor is out of state (i.e. not located in the District or performing services within the District)? All services are performed outside of the District and we have no personnel that come into the district for any reason. Is this Order still applicable? If we need to come into the District for a one-time meeting, does a negative test suffice?**

A9. The Mayor's Orders applies to all contractors and grantees performing in-person work for the District at a District work site or a District facility.

**Q10. Who are exceptions submitted to for review and approval?**

A10. The approval process depends on the type of employee, such as whether they are licensed by DC Health. Individuals should submit documentation to their organizational designee or refer to their organization's internal policy.

**Q11. Does this apply to contractors/schools that are located outside the District of Columbia and are licensed by another agency outside of DC?**

A11. If employees conduct work at District facilities or work sites, the requirements apply.

**Q12. Mayor's Order 2021-099 Section IV indicates that contractors and grantees shall ensure their employees, agents, and subcontractors who provide goods or services in person in DC facilities or who have in-person contact to complete their work under the contract or grant have been fully vaccinated or granted an exemptions identified, are undergoing weekly testing. Does this mean that those who are not granted an exemption must engage in weekly testing?**

A12. Those who are fully vaccinated do not need to test weekly. Contractors and grantees with pending or approved exemption requests should test weekly, and those with denied exemption requests should be removed from any in-person work under the contract or grant unless/until they come into compliance with the vaccination requirement. Mayor's Order 2021-147 requires all contractors and grantees to be vaccinated and only those who have been granted an exemption are eligible to test weekly.

**Q13. Does testing have to be done during working hours?**

A13. No.

**Q14. If you only work on site periodically, do you have to provide proof of a negative test only when work is performed?**

A14. Yes. Mayor's Order 2021-147 requires all contractors and grantees to be vaccinated and only those who have been granted an exemption are eligible to test weekly.

**Q15. What can be done if a person considers proof of vaccination a medical record and opts not to share proof?**

A15. Then they cannot work on a District government site and if they are an employee, the contractor or grantee may subject this employee to discipline.

**Q16. How many years does a grantee/contractor of the District government have to retain records?**

A16. See your contract or grant agreement for record retention requirements, and consult your grant monitor or contracting officer if you have specific questions about your contract/grant.

**Q17. As a District contractor, what if I have a subcontract in place with a company that does not require their employees or subcontractors to be vaccinated?**

A17. All contractors and grantees are required to ensure that subcontractors and subgrantees are in compliance with the requirements. Employees doing on site work on District projects must be vaccinated unless they are exempt.

**Q18. When will the District government begin monitoring grantees and contractors for proof of compliance with these aforementioned Mayors Orders?**

A18. The District has already begun monitoring compliance with the relevant Mayor's Orders, such as for FY2022 grantees. Contractors and grantees should be prepared at any time to promptly provide their proof of compliance in response to a District request.

**Q19. If volunteers facilitate virtual support groups, do they need to be fully vaccinated?**

A19. No. Any employee or volunteer working in an exclusively virtual capacity does not need to be fully vaccinated.

**Q20. If the HR department of a District grantee or contractor verifies proof of vaccination and maintains that information in a spreadsheet without maintaining physical copies of the documents, is that sufficient?**

A20. Yes – see the answer to question #4. Contractors and grantees are free to use whatever process they wish to collect and maintain evidence of compliance with the Mayor's Orders. This may mean maintaining physical and/or electronic records of vaccination statuses and exemptions.

**Q21. How do the vaccination requirements work for telework employees who attend sites once a month?**

A21. Once a month is regular for purposes of the Mayor's Orders and those employees must be vaccinated, unless exempted.

**Q22. If I am a District contractor working in a residential facility that serves District youth, does my company have to comply with the Order?**

A22. Yes.

**Q23. What if someone applies for religious exemption but does not have a religious leader to substantiate an exemption? How does a District grantee or contractor handle that?**

A23. Contractors and grantees have discretion to determine exemptions.

**Q24. If my organization is a District grantee and my organization operates in only one DC government facility, do the vaccination and testing requirements apply to the other sites where my organization works even though they are not DC government facilities?**

A25. No.

**Q26. Does this apply to grantees of the DC Commission on the Arts and Humanities?**

A25. Yes. But it only applies to grantees whose work is performed or conducted in DC government facilities (or the persons performing under the grant there) or who have in-person contact with other persons in order to complete their work.

**Q26. If a contractor is working in a school for only two weeks, does the contractor have to comply with the Mayors Orders?**

A26. Yes.

**Q27. What if an employee refuses to disclose or provide documentation or vaccination or testing?**

A27. They cannot work on site if they are an employee and the contractor or grantee may subject this employee to discipline.

**Q28. Do fully vaccinated individuals need to test weekly as well?**

A28. No.

**Q29. Should seniors – who are recipients of services by a District government grantee or contractor – provide vaccination cards when attending Senior Wellness Centers?**

A29. Vaccination is crucially important but we do not want the vaccination requirement to stand in the way of critical services for vulnerable people who cannot obtain them in any other way. If a person is coming for an essential meal, they could be provided the meal to go. Or if the

senior is homeless and needs to come in to stay warm, then the vaccination requirement does not apply. But seniors coming to Wellness Centers for social reasons, to use the exercise equipment, to use the computer lab or participate in daily classes or activities should be vaccinated to come in.