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30	15	15
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30	15	15
Warsaw	Hermitage	Morgan
Benton	Hickory	Morgan
	Warsaw 30 -	Warsaw 30





Early	Start
Head	44

Prenatal	2	2	I
Home Based	8	8	ı
Full Day/Full Yr Home Based	8	8	ω
Projected Enrollment	18	20	ω
Site Name	Warsaw	Hermitage	Morgan
County	Benton	Hickory	Morgan





Non-Federal Share Requirement

Central Missouri















Darin Preis <darinp@cmca.us>

### **Corrected Date! Expected Requirements for COVID-19 Vaccination and Masking**

Office of Head Start <no-reply@hsicc.org> Reply-To: no-reply@hsicc.org To: "Mr. Darin Preis" <darinp@cmca.us> Mon, Nov 22, 2021 at 3:30 PM

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# Expected Requirements for COVID-19 Vaccination and Masking: A Letter from the Director

Providing comprehensive Head Start services to the children and families who need them most is a driving focus for everyone in the Head Start community – at the federal level, at the agency level, and at the classroom level. To that end, I am sending this letter to share with the Head Start community an early update on the rule that will revise the <u>Head Start</u> <u>Program Performance Standards (HSPPS)</u> to include additional health and safety requirements. While we cannot share all the details until the rule is published, we want you to have as much information as possible now for planning purposes.

The health and well-being of Head Start children, families, and staff continue to drive the decisions we make at the Office of Head Start (OHS), as they have throughout the COVID-19 pandemic. In light of the availability of the COVID-19 vaccine, and the requirement for programs to deliver fully in-person comprehensive services, these new HSPPS are essential to create the safest environment possible for staff, children, and families. At the same time, I know some staff and programs are deeply concerned about the requirement for vaccination. I hope you can <u>talk with staff</u> about these difficult issues and support them in speaking to a health care professional about their vaccination decision.

Soon OHS will release new HSPPS for masking and COVID-19 vaccination of grant recipient staff. These standards will be released through an Interim Final Rule with Comment Period in the Federal Register. The new requirements are critical as we work together to move toward fully in-person comprehensive services by providing healthy and safe environments for everyone.

The new HSPPS will require the use of face masks for individuals 2 years of age and older, with some exceptions. This require  $\frac{1}{90}$  ill be effective immediately upon

publication.

The new standards will also require vaccination against COVID-19 for all staff, contractors working directly with children, and volunteers. The HSPPS will require these individuals to be vaccinated by January 31, 2022. This means staff, certain contractors, and volunteers must have their second dose in a two-dose series or first in a single-dose by January 31, 2022. There will be provisions for exemptions to the vaccination requirement for those who cannot be vaccinated due to medical conditions or sincerely held religious beliefs, practices, or observances. For those granted a vaccine exemption, there will be a weekly testing requirement.

Consistent with other HSPPS, these new standards will focus on outcomes over processes and plans. As the experts most familiar with the unique needs of each Head Start community, it will be the responsibility of local programs to establish a process for implementing these standards, including reviewing and granting the exemptions for medical conditions or sincerely held religious beliefs. These standards will be monitored through the OHS Monitoring System like other health and safety standards.

You may find it helpful to hear from others who have been successful in implementing similar requirements. The <u>Strategies for Staff Vaccination</u> series shares stories of programs across the country that have implemented vaccination requirements for their staff. The <u>MyPeers</u> Health, Safety, and Wellness community is a great place to find out how other Head Start programs are making policies and to share ideas and resources with each other. The OHS technical assistance system will continue to support grant recipients in implementing these new requirements.

When the new HSPPS are released in the Federal Register, OHS will host a webinar to discuss the new requirements. OHS will also provide written responses to the questions that programs and staff have raised in the last few months.

Sleeve up and mask up, Head Start family, as it's the best way we can care for and protect each other.

/ Dr. Bernadine Futrell /

Dr. Bernadine Futrell Director Office of Head Start

Office of Head Start (OHS) | **330 C Street**, **SW** | **4th Floor** Mary E. Switzer Building | Washington, DC 20201 | <u>https://eclkc.ohs.acf.hhs.gov</u> | 1-866-763-6481 | <u>Contact Us</u>

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# Central Missouri Community Action Grant Summary Sheet

Date presented to board	Department(s)	Staff person submitting
12-2-21	Early Childhood	Beth Vossler

Title:	HS/EHS Continuation Grant		
Program operation	May 1-April 30		
dates:			
Funding amount:	\$6,686,403		
Staffing levels:	135		
Funding Source:	DHSS-ACF-OHS		
Target Population:	EHS/HS children, families and prenatal		
<b>Counties of Operation:</b>	Audrain, Boone, Callaway, Cole, Cooper, Howard, Moniteau, and Osage		
Expected number of participants/clients:	465		
Summary of Program: Expected Outcomes:	<ul> <li>CMCA Head Start Operated a comprehensive program serving children and their families in the 8-county service area. We offer comprehensive, developmentally appropriate early childhood program, parenting education, prenatal services, access to literacy activities, father and male involvement activities. CMCA Head Start offers full-day/part year; full-day/full-year; part-day; and collaborative Head Start services. Services in local communities are based on the results of the annual self-assessment and annual community assessment updates.</li> <li>Services are provided, wherever possible, in the language of the home.</li> <li>1. Implement interventions that support families' progress toward achieving self-reliance</li> <li>2. Implement interventions that support children's development and school readiness</li> <li>3. Implement interventions that support programmatic use of data for quality improvements</li> <li>4. Recruit and retain high quality staff</li> <li>5. Quality facility environments</li> </ul>		
Collaboration with	All other programs of CMCA are considered to be integrally important to the		
other CMCA programs:	success of the Head Start program and, as such, we partner with each of them		
Community partners	Thirty-five (35) School Districts, 8 county health departments, Missouri		
involved:	Department of Health and Senior Services, Missouri Children's Division,		
	Columbia Public Schools, Community R-6 Schools, Glasgow Public Schools,		
	Centralia Fair Board, Missouri Coalition for Oral Health, Missouri Head Start		
	State Collaboration Office, MHSA, University of Missouri, Medicaid insurers,		
	Parents As Teachers, First Steps, and more.		

Type of Issuance:	Subject:	References:	
		Performance Standard:	1302.47(b)(5)(vi)(A-D), 1302.93(a)(1)(i-iii), 1302.93(2), 1302.94(a)(1)(i-iii), 1302.94(2)
POLICY		Policies/Procedures:	Employee Handbook: Code of Conduct Policy
		Licensure:	N/A
Effective Date:		Parent Handbook:	N/A
	COVID-19 Vaccination Policy	Personnel Manual:	N/A
		Financial Policies:	N/A
OCTOBER 29, 2021		Forms/Formats:	Request for Medical Exemption, Letter of Intent
		Documents:	Letter from OHS Director, Title VII of the Civil Rights Act of 1964, EEOC Section 12: Religious Discrimination, Missouri Executive Order EO 21-10

#### Purpose

Vaccination is a foundational part of the recommended CDC prevention strategies to mitigate risk associated with COVID-19.

#### Policy

The Department of Health and Human Services, Administration for Children and Families, Office of Head Start (OHS) announced that all Head Start teachers and program staff must be fully vaccinated by January 2022. In order to comply with the Administration, CMCA is requiring all employees paid directly from OHS funds to be fully vaccinated by December 10, 2021 for a 2-dose series or November 12, 2021 if receiving the Johnson & Johnson 1 dose vaccine. Fully vaccinated will be defined as receiving the required number of doses outlined by the manufacturer.

### **Operational Procedure**

- A form will be sent to employees requiring their identified choice for compliance.
  - The form will be uploaded to the agency's identified HR record-keeping system by November 5, 2021.
  - CMCA will treat any staff member who does not comply with the Vaccination Policy as having voluntarily resigned from their employment and their position will be vacated.
    - Vacated positions will be opened.
    - If the employee is resigning and in good standing, they may retain employment until their position is filled or January 31, 2022; whichever comes first.
      - CMCA reserves the right to make any resignation effective immediately.
    - Employees not in good standing will be treated as having voluntarily resigned, effective immediately, on December 10, 2021.
- In order to comply with the December 10, 2021 requirement, the employee must obtain their first dose, or Johnson & Johnson 1 dose series, no later than November 12, 2021.

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- Proof of vaccination must include the employee's full name, record of the vaccination, and date administered.
  - Proof must be uploaded into the agency's identified HR record-keeping system.
- Any staff hired after October 31, 2021 must present proof of vaccination progress prior to beginning employment.
  - If an employee is hired after October 31, 2021, they must show proof of 1<sup>st</sup> vaccination and be compliant with the December 10, 2021 requirement. If an employee received the Johnson & Johnson vaccination, only 1 dose is required.
  - All new staff vaccination records must be uploaded to the agency's HR record-keeping system.
- Volunteers and Visitors will not be allowed in the Head Start locations without showing proof of vaccination or exemption outlined in this policy-and the individual must be masked.
  - Notwithstanding the above, parent/guardian will be required to wear a mask at pick-up and drop-off.
- Medical or Disability Exemptions will be considered.
  - Any request for medical or disability exemption will be considered with the following documentation:
    - Medical or disability Exemption for Vaccination Form
      - Signed by both the Staff member and Licensed Medical Physician.
      - Documentation must clearly outline the reason for the exemption such as, but not limited to:
        - The applicable CDC contradiction for the COVID-19 vaccine.
        - The applicable contradiction found in the manufacturer's package insert for the COVID-19 vaccine.

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- A statement that the physical condition of the person or medical circumstances relating to the person are such that immunizations is not considered safe, indicating the specific nature and probable duration of the medical condition or circumstance that contradicts immunization with the COVID-19 vaccine.
- Exemption is only good for one (1) year or for the period of time outlined in the exemption documentation. The Staff member will be required to resubmit new exemption documentation after one (1) year.
- Exemptions must be turned in to HR for verification and approval.
- Staff member will be notified by HR if the medical or disability exemption is approved or denied.
  - Any approved medical or disability exempt staff member must wear a mask at all times.
  - The agency may deny an exemption if granting the exemption would result in an undue hardship on the agency as that term is defined under federal and state law and regulations.
- Religious Exemption will be considered.
  - The Staff member's request for a religious exemption must be supported by the Staff members sincerely held religious belief.
  - According to the U.S. Equal Employment Opportunity Commission (EEOC), an employer is not required to automatically accept the legitimacy of an employee's claimed religious objection and the employer may request supporting information.
    - Supporting information such as, but not limited to:
      - How COVID-19 vaccination conflicts with your sincerely held religious beliefs.
      - How your religious beliefs include objections to other vaccines or medicines.
      - Your history of past vaccinations.

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- Possible in-person interview.
- Religious Exemption requests will be considered by a committee comprised of the Executive Director, Deputy Director, and Head Start Director.
- Approved Medical/Disability or Religious exempt employees are required to test weekly and wear a mask at all times.
  - The EEOC has determined that during the COVID-19 pandemic, because an individual with the virus will pose a direct threat to the health of others, employers may require testing.
  - $\circ$   $\,$  The Staff member is responsible for any costs associated with the weekly testing.
    - Weekly testing causes "more than a de minimus cost or burden on the employer" under Title VII of the Civil Rights Act of 1964. The American with Disability Act (ADA) also has an undue hardship definition for employers of "significant difficulty or expense". Weekly testing will cause "significant difficulty or expense", meaning CMCA will not pay for any portion of the weekly testing as it causes undue hardship.
      - Free testing sites by State can be found at: <u>https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html</u>
  - Weekly testing must come from a medical provider or health clinic. At this time, no at-home testing will be accepted.
  - Weekly results must be uploaded to the agency's identified HR recordkeeping system.
    - A supervisor must verify the weekly test has been uploaded.
  - Employees are still expected to work assigned hour and not cause undue hardship for absences.
  - Weekly testing will begin the week of January 31, 2022
- COVID-19 exposure:
  - Fully vaccinated staff may continue to work unless they are showing one or more symptom associated with Covid-19, such as fever or chills, cough,

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shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea.

- Unvaccinated staff, including those who are not fully vaccinated, will be subject to quarantine.
  - The work from home option will be unavailable as the building is open for on-site work.
- After December 10, 2021, unless a directive is issued for a mask mandate, the staff that are fully vaccinated will no longer be required to wear a mask as per the COVID-19 Policy in the Employee Handbook.
- Universal masking is required for all individuals 2 years of age and older when:
  - Indoors in a setting where Head Start services are provided
  - Two or more individuals are in a vehicle owned, leased, or arranged by the Head Start Program
  - Outdoors if the activities involve sustained close contact with other people
- Any Staff member who is found to have submitted fraudulent documentation or otherwise engaged in dishonest conduct with respect to this Covid-19 Vaccination Policy will be subject to disciplinary action up to and including termination of employment.
- If further guidance is released from the Administration that is more stringent, the guidance will take effect immediately and this policy will be updated.