DISTRICT OF COLUMBIA HEALTH BENEFIT EXCHANGE AUTHORITY (DCHBX) COVID-19 VACCINATION POLICY FOR CONTRACTS, PURCHASE ORDERS, AND GRANTS OCTOBER 13, 2021

Frequently Asked Questions

- 1. Who is subject to the DCHBX vaccination requirement?
 - a. Answer: The vaccination requirement applies to all contractors and grantees, including their employees, subcontractor/subgrantee ("subs"), and agents, who are funded in whole or in part by DCHBX, and volunteers who are assigned to perform work for or on behalf of DCHBX.
- 2. Does this requirement apply to all my employees and subs even if they are not paid, in whole or in part, by DCHBX?
 - a. Answer: No. DCHBX's vaccination policy only applies to employees, agents, or subs who are paid, in whole or in part, by DCHBX funds, and volunteers assigned to perform work for or on behalf of DCHBX.
- 3. Do I have to comply with the DCHBX vaccination requirement if my employees and subs operate entirely remotely?
 - a. Answer: Yes, if employees, agents, or subs are paid, in whole or in part, by DCHBX funds.
- 4. Do I have to submit compliance documentation to DCHBX?
 - a. Answer: Yes. Contractors and Grantees are required to provide documentation of their compliance with this Policy to DCHBX when requested in writing, by the DCHBX Contracting Officer or DCHBX Grant Administrator.
- 5. Will a vaccination card suffice for proof of vaccination?
 - a. Answer: DCHBX contractors and grantees are responsible for ensuring compliance with the vaccination policy and developing their own internal procedures, including specifying acceptable proof of vaccination and establishing a process for granting and documenting medical or religious exemptions.
- 6. What qualifies for medical or religious exemptions?
 - a. Answer: DCHBX contractors are responsible for ensuring compliance with the vaccination policy and developing their own operational procedures, including for granting medical or religious exemptions in accordance with applicable guidance

issued by the Centers for Disease Control and Prevention (CDC), U.S. Equal Employment Opportunity Commission (EEOC), US Department of Health & Human Services (DHHS) or other federal, state, or local authority.

- 7. What form of documentation would be required to grant a medical or religious exemption?
 - a. Answer: DCHBX contractors and grantees are responsible for developing their own internal operational procedures, including establishing a process for their employees, subcontractors, and volunteers to request and receive a medical or religious exception.
- 8. May I provide an exemption to an employee, sub, or volunteer who agrees to be tested periodically for COVID-19?
 - a. Answer: No. The only grounds for exemption are medical or religious.
- 9. May I provide an exemption to an employee, sub, or volunteer who agrees to mask?
 - a. Answer: No. The only grounds for exemption are medical or religious.

10. Will HBX assist me in establishing a vaccination policy and process for my company?

- a. Answer: DCHBX may direct the contractor or grantee to available resources and guidance issued by the Centers for Disease Control and Prevention (CDC), U.S. Equal Employment Opportunity Commission (EEOC), US Department of Health & Human Services (DHHS), the District of Columbia, or other federal, state, or local authority. It is otherwise the responsibility of the contractor or grantee to develop its own internal operational procedures, without direct assistance or legal advice from DCHBX.
- 11. Is there any policy on booster shots at present?
 - a. Answer: DCHBX contractors are responsible for ensuring compliance with the vaccination requirement, which may include requiring booster shots in accordance with guidance issued by the Centers for Disease Control and Prevention (CDC), US Department of Health & Human Services (DHHS), or any other federal, state, or local authority.
- 12. Do new hires need to complete the vaccination process prior to doing work on an HBX project?
 - a. Answer: Yes, all new employees, agents, subs, and volunteers must have received a full course of vaccine, or received a religious or health exemption, by the time they start to do work for DCHBX.

- 13. Will noncompliance with DCHBX's vaccination requirement adversely impact my past performance record or prevent me from seeking a past performance reference from DCHBX in the future?
 - a. Answer: No.