

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

I. Introduction and Statement of Purpose

The District of Columbia Health Benefit Exchange Authority (DCHBX) adopts this COVID-19 Vaccination Policy for Contracts and Grants to promote COVID-19 vaccination. This policy shows DCHBX's commitment to promoting COVID-19 vaccination for its current and future vendors/grantees. DCHBX, the District's Affordable Care Act on-line health insurance marketplace, is committed to using its purchasing power to encourage vendors/grantees to be fully vaccinated to help stop the economic and human toll of the COVID-19 pandemic.

II. Vaccination Requirement

- A. Contractors and Grantees must ensure their employees, agents, or subcontractors/ subgrantees ("subs") who are funded in whole or in part by DCHBX, and volunteers assigned to perform work for or on behalf of DCHBX, are fully vaccinated against COVID-19 or have been granted a medical or religious exemption by the Contractor or Grantee.
- B. Contractors and Grantees must ensure all new employees, agents, or subs who are funded in whole or in part by DCHBX, and new volunteers assigned to perform work for or on behalf of DCHBX, have received a full course of vaccine or have been granted a valid medical or religious exemption by the Contractor or Grantee prior to commencing services or activities under the contract or grant.
- C. Contractors and Grantees may exempt their employees, agents, or subs only for a medical or religious reason. No other exemptions are allowed including but not limited to the option to undergo weekly COVID-19 testing in lieu of being vaccinated.

III. Applicability

A. This Policy applies to:

- 1. Contractors and their employees, agents, and subcontractors who are funded in whole or in part by DCHBX regardless of whether these vendors provide services in-person or remotely.
- 2. Grantees and their employees, agents, and subgrantees who are funded in whole or in part by DCHBX regardless of whether these vendors provide services in-person or remotely.
- 3. Contractor or grantee volunteers who are assigned to perform work for or on behalf of DCHBX regardless of whether these grantees provide services in-person or remotely.

IV. New Agreement Terms and Provisions

- A. DCHBX will implement this policy by modifying Appendix 1 of existing contracts, purchase orders, vendor agreements, grant instruments, and other applicable agreements to incorporate the COVID-19 Vaccination Clause.
- B. All DCHBX solicitations, request for applications, contracts, purchase orders, vendor agreements, grant instruments, funding or volunteer opportunities, or any other applicable procurement and agreement will incorporate, at Appendix 1, a COVID-19 Vaccination Clause implementing this policy.

V. Compliance

- A. Contractors and Grantees are responsible for managing, tracking, and documenting their compliance with this Policy at their own expense, including properly collecting and retaining adequate proof of vaccination status and documentation of valid medical or religious exemptions administered by the contractor or grantee or its agents.
- B. 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. Such requests will be made by DCHBX periodically to ensure compliance by vendors/grantees.

VI. Effective Date

- A. This policy is effective on November 1, 2021.
- B. Contractors and Grantees shall have a grace period until December 31, 2021 to come into compliance with this policy. Contractors and Grantees may contact the DCHBX Contracting Officer, no earlier than December 15, 2021, to request an extension of this grace period. Extensions may be granted, and their length will vary, based on the Contractor's or Grantee's good faith efforts to come into compliance.
- C. If the Contractor or Grantee is not in compliance by December 31, 2021, or such extended date granted by the DCHBX Contracting Officer:
 - i. DCHBX will begin the process of securing other Contractors or Grantees that are able to comply with the vaccination policy.
 - ii. For services performed under contracts ending in FY22, DCHBX will include the requirement for the COVID-19 vaccination policy in its RFPs and other solicitations. Contract terms will include the requirement for COVID-19 vaccinations.
 - iii. For contractors with existing purchase orders for FY22, DCHBX intends not to add additional funding to these purchase orders.