Caesar Rodney School District
COVID-19 Vaccination and Testing Certification Procedure

PURPOSE AND SCOPE

On October 15, 2021, the Secretary of the Delaware Department of Health and Social Services issued an Emergency Regulation (“Order”) effective November 1, 2021 requiring all new and existing school district employees, contractors and volunteers (“staff”) to be either vaccinated against or tested regularly for COVID-19 in accordance with Division of Public Health (“DPH”) Guidance.

These Procedures shall apply to all Caesar Rodney School District (“District”) staff and outlines the process by which staff shall document that they are fully vaccinated or provide weekly documentation of their COVID test results. The Order requires the District to have mechanisms, including disciplinary mechanisms, for addressing staff non-compliance with this Procedure.

The District shall maintain records of staff vaccination status and testing results in the same manner as other confidential personal health information as required by applicable law.

DEFINITIONS AND ACRONYMS

- **Contractors** - Refers only to child-serving contractors and those contractors regularly and frequently in school buildings while students are present.

- **DelVax** – The Department of Health and Social Services, Division of Public Health’s vaccine record management system.

- **Medical Exemption** - A medical condition that may prohibit an employee from receiving the COVID-19 test. To qualify, the employee must have a documented disability under the American with Disabilities Act (ADA), which is defined as a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment.

- **Religious Exemption** – The District may accommodate employees who are not able to be tested for COVID-19 as part of their sincerely held religious beliefs and practices unless doing so imposes an undue hardship, which is "more than de minimis" cost or burden on the operation of the employer's business, or which presents a direct threat to the health, welfare or safety of others. Requests for an exemption for personal or philosophical reasons will not be accepted.

- **Staff** – Individuals working for or providing service to the District including full-time, part-time and temporary, casual seasonal, student teachers, interns, and volunteers.
• **Vaccinated** – Refers to a person who is more than two weeks past receiving their second Pfizer or Moderna dose or their single Johnson and Johnson vaccine, per the CDC’s Public Health Recommendations for Vaccinated Persons.

• **Unvaccinated** - Refers to a person who does not fit the definition of “vaccinated” including people whose vaccination status is not known, for the purposes of this guidance.

**DATA MANAGEMENT**

• Staff, including some contractors, with a District email address will have all documentation concerning vaccination status and weekly testing compliance maintained through the Data Service Center.

• Volunteers, interns, student teachers or other staff who do not have a District email address or access to Data Service Center will provide documentation regarding their vaccination status or weekly testing results through a Google form process, which will be provided separately. All other terms and conditions of this Procedure shall still apply.

• Contractors who do not have a District email address will be provided information on their attestation requirements and process separately.

• The District will defer to the Data Service Center and its internal tracking mechanism to provide DPH with data requests and required reporting pursuant to the Order.

• Data Service Center will provide a link to state testing locations and the ability for employees to search for their vaccination record in DelVax.

• Auditing access for reviewing information within the referenced DSC portal is limited to personnel in the Office of Human Resources.

**PROCEDURE**

**Vaccination Certification Process** - All vaccinated staff shall provide documentation to the Data Service Center that they are vaccinated via the following process:

1. Log into Data Service Center and go to COVID-19 Vaccination and Testing Certification.

2. Employees should choose the “Add Vaccination Data” option and hit “Continue”.

   **Note:** Every employee’s status on this page will show as “Weekly Testing Required” until vaccination information is submitted.

3. Employees should enter information regarding the vaccine received including (a) type of vaccine, (b) date of first dose, and (c) date of second dose, if applicable.
**Note:** Employees are not asked nor required to submit information pertaining to the COVID-19 booster shot.

4. Employees must upload proof of vaccination. Acceptable documentation is a copy or photo of the employee’s vaccine card or immunization record, or a copy of the employee’s COVID-19 vaccine record downloaded from DelVax.

5. Employees must electronically certify the accuracy of their certification and Submit.

   - All new employees who are certifying full vaccination status shall follow the Vaccination Certification process no later than the third full day of employment with the District.

   - Employees certifying they are fully vaccinated will only need to certify one time.

   - Employees who become fully vaccinated at any point and wish to certify as such, may do so by following the Vaccination Certification process and will no longer be required to submit to the weekly COVID-19 testing process.

   - If an employee does not certify that they are fully vaccinated, the employee will be required to certify weekly that they have been tested for COVID-19.

**Testing Certification Process** - All staff who do not certify as vaccinated shall be tested weekly for COVID-19 in accordance with DPH Guidance and provide certification of testing via the following process:

1. Log into Data Service Center and go to COVID-19 Vaccination and Testing Certification.

2. Choose the “Add Testing Data” option and hit “Continue”.

3. Employees will need to provide specific information about their test including the test administrator, date of test, and the test result.

   **Note:** Employees with a positive test will follow COVID-19 protocols until cleared by DPH.

4. Employees are not required to upload proof of testing; however, the Office of Human Resources may request proof of testing at any time.

5. Employees must electronically certify the accuracy of their certification and Submit.

   - All unvaccinated new employees must, within a week before their start date, be tested for COVID-19 in accordance with DPH Guidance and must certify to testing by their third full day of employment with the District. Employees with a positive test will have a delayed start date until cleared by DPH.
• Employees completing the testing certification will need to complete this process weekly unless they become fully vaccinated.

• Individuals who have tested positive for COVID-19 within the previous 90-day period are exempt from this requirement, beginning the date of the positive COVID-19 test. The Office of Human Resources will follow up at the end of the 90-day period regarding each person’s status unless otherwise notified through the Data Service Center.

• Data Service Center will send email reminders to employees who have not completed the certification within the designated timeframe and will provide reports the Office of Human Resources of any unvaccinated employee(s) who have not entered their testing certification.

• In the event an unvaccinated employee is out for a week or more continuously, the employee will not be required to test during their absence but will be required to test before or immediately upon returning to work.

• Employees who become fully vaccinated at any point and wish to document as such, may do so by following the Vaccination Certification process and will no longer be required to submit to the weekly COVID-19 testing process.

TESTING

• Onsite testing throughout the District will be available for employees to utilize. More information on testing availability can be found here on the District’s web page.

• Employees who are unable to test at one of the Districts sites should consider utilizing a free community testing site or a DPH-approved at-home testing option. Information on ordering a DPH-approved at-home test kit can be found here: https://coronavirus.delaware.gov/testing/home-test-kit/

• Over-the-counter test kits are not acceptable.

• The District reserves the right to refuse tests from facilities deemed disreputable in the District’s judgment.

COMPLIANCE

• The Office of Human Resources will obtain weekly reports from Data Service Center of employees who are non-compliant with the Order. The Office of Human Resources will also be provided a randomized list of employees who have certified as having been tested in order to validate the information provided by the employee.
• The Office of Human Resources may also develop additional procedures in order to become aware of instances of non-compliance with the Order.

• Employees who do not comply with the requirement to either certify as vaccinated or be tested weekly, or are unable to provide validation of their test will be subject to discipline:

  ➢ First offense will result in a verbal reprimand noted on a confidential spreadsheet maintained in the Office of Human Resources.

  ➢ Subsequent offenses will result in a written reprimand in the employee’s personnel file. The Office of Human Resources will email non-compliant employees a written reprimand to be acknowledged and returned to the Office of Human Resources and placed in the personnel file. If an employee does not acknowledge and return the reprimand within two business days, it will be presumed acknowledged.

  ➢ The District reserves all rights and prerogatives to enhance discipline.

**MISCELLANEOUS**

Exceptions – Requests for exemption to the testing requirements will be considered only for medical or religious reasons. Requests for an exemption for personal or philosophical reasons will not be accepted.

Other - In the event the contract with Data Service Center terminates, or Data Service Center is unable or unwilling to fulfill any of the services identified in these procedures, the administration shall undertake such other procedures so as to comply with the Order as necessary.

This Procedure shall become effective November 1, 2021.