

CLINTONDALE COMMUNITY SCHOOLS

35100 Little Mack – Clinton Township, Michigan 48035 - 586-791-6300 – www.clintondaleschools.net

BOARD POLICY

Series 3000: Operations, Finance, and Property

3100 General Operations

3120 Temporary Head Start Vaccination and Mask Requirements

On November 30, 2021, the U.S. Department of Health and Human Services issued an interim final rule with comment on Head Start program vaccination and mask requirements (“IFR”).

A. Policy Duration

This Policy is effective immediately and will remain in effect for the duration of the IFR. Notwithstanding anything to the contrary in this Policy, the Superintendent may suspend or revise this Policy (in whole or in part) if, following consultation with the District’s legal counsel, the Superintendent determines that legal authority requires or permits the suspension or revision. The Superintendent must report such suspension or revision to the Board at the next scheduled Board meeting.

B. Definitions

The definitions in this Section apply only to this Policy.

1. “Acceptable Proof of Vaccination Status” means any of the following:
 - a. CDC COVID-19 vaccination record card (or a legible photo of the card),
 - b. Documentation of vaccination from a health care provider or electronic health record,
 - c. State immunization information system record, or
 - d. If vaccinated outside the U.S., a reasonable equivalent of a document listed in (a)-(c) immediately above.
2. “Administrator” means the Superintendent or designee.
3. “Facility” means a structure, such as a building or modular unit, appropriate for use in operating a Head Start program and used primarily to provide Head Start services, including services to children and their families, or for administrative purposes or other activities necessary to operate a Head Start program.
4. “Fully Vaccinated.” A person is “fully vaccinated” 2 weeks after receiving:

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- a. an approved COVID-19 vaccine that requires only 1 dose (e.g., Johnson & Johnson), or
 - b. the second dose of an approved COVID-19 vaccine that requires 2 doses with at least the minimum recommended interval between doses (e.g., Pfizer or Moderna).
5. “Head Start Program” means a program funded under the Head Start Act, 42 USC 9831, et seq., including a Head Start, Early Head Start, migrant, seasonal, and tribal program. This Policy shall only apply to Head Start programs operated by the District or by an entity to which the District delegated responsibility for such a program, in whole or in part.
6. “Mask Recommended by the CDC” means a mask that (i) covers one’s mouth, nose, and chin, (ii) stays in place when a person talks and moves, (iii) does not contain vents or exhalation valves, and (iv) is consistent with the CDC’s “Your Guide to Masks” (<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/about-face-coverings.html>).
7. “Staff” means paid adults who have responsibilities related to children and their families who are enrolled in Head Start programs.

C. Vaccination

1. Requirement

The following Head Start program participants shall be fully vaccinated for COVID-19 by January 31, 2022:

- a. Staff,
- b. Contractors whose activities involve contact with or providing direct services to children and families, and
- c. Volunteers in classrooms or working directly with children other than their own.

2. Exemptions

This Policy’s vaccination requirement does not apply to those:

- a. For whom a vaccine is medically contraindicated,
- b. For whom medical necessity requires a delay in vaccination, or
- c. Who are legally entitled to an accommodation with regard to the COVID-19 vaccination requirements based on an applicable federal law.

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3. Exemption Requests

A person requesting an exemption under Section C(2)(a) or (b) shall complete and provide to the Administrator a signed and dated statement explaining the basis for the requested exemption, along with documentation confirming a recognized clinical contraindication to COVID-19 vaccines or medical need for delay. The documentation shall be signed and dated by a licensed practitioner, who is not the person requesting the exemption, and who is acting within the practitioner's respective scope of practice as defined by, and in accordance with, all applicable state and local laws. The documentation must contain all information specifying which of the authorized or approved COVID-19 vaccines are clinically contraindicated for the person to receive and the recognized clinical reasons for the contraindications or the recognized clinical reasons necessitating a delay in vaccination; and a statement by the authenticating practitioner recommending that the person be exempted from this Policy's vaccination requirement based on the recognized clinical contraindications or allowed to delay vaccination.

The Administrator will consider, in consultation with the District's legal counsel, an accommodation request pursuant to Section C(2)(c) under applicable federal or state law based on a person's disability or sincerely held religious belief, practice, or observance that conflicts with this Policy's vaccination requirement.

4. Proof of Vaccination Status

A person subject to this Policy's vaccination requirement shall provide acceptable proof of vaccination status to the Administrator by January 31, 2022 or before participating in the Head Start program, whichever is later.

5. Testing

A person exempt from this Policy's vaccination requirement shall undergo COVID-19 testing on at least a weekly basis. That person shall promptly provide documentation of each COVID-19 test result to the Administrator.

6. Exclusion from Facility

A person with a positive COVID-19 test result shall immediately leave the facility. The person shall not return to the facility without the prior written approval of the Administrator, which approval will not be granted until the person establishes – to the satisfaction of the Administrator – that the person is no longer infectious.

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D. Masks

1. Requirement

A person must wear a mask recommended by the CDC if the person is:

- a. Two years of age or older when there are two or more people on a vehicle owned, leased, or arranged by the Head Start program,
- b. Indoors in a setting when Head Start services are provided, and
- c. For those not fully vaccinated, outdoors in crowded settings or during activities that involve sustained close contact with other people.

2. Exceptions

This Policy's mask requirement does not apply to the following:

- a. Children or adults when they are either eating or drinking,
- b. Children when they are napping,
- c. When a person cannot wear a mask, or cannot safely wear a mask, because of a disability as defined by the Americans with Disabilities Act, or
- d. When a child's health care provider advises an alternate face covering to accommodate the child's special health care needs.

The Administrator will consider, in consultation with the District's legal counsel, an accommodation request under applicable federal or state law based on a person's disability that conflicts with this Policy's mask requirement.

E. Retention of Exemption Requests and Outcomes

The Administrator will retain copies of exemption requests, outcomes, and supporting documentation completed or obtained pursuant to this Policy.

F. Document Confidentiality

The District will maintain as confidential all medical information, including COVID-19 vaccination and test documentation, in accordance with applicable laws and policies.

G. Discipline

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An employee or student who fails to comply with this Policy may be subject to discipline. A contractor or volunteer who fails to comply with this Policy may be removed from the facility.

Legal authority: 45 CFR Part 1302; MCL 380.11a

Date adopted: 10/23/23

Date revised: