

# **NASA Office of Procurement**

## **Contractor FAQs - Vaccine Attestation**

### **Guidelines**

*(These FAQs will be updated to address new questions or changes in procedures as needed.)*

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# **Attestation Form**

- 1. As a contractor, if I do work for another agency and attested to my vaccination status with that agency, do I need to complete a separate attestation form for NASA?**

Yes, or your parent company can manage the attestations for their employees and attest to NASA that you have one on file and whether you are required to test.

- 2. Proof of attestation cards are not printing from the site. Not all of these contractors have ready access to printers. Can they screen shot the confirmation number or reference it?**

Contractor employees who have a NASA issued badge who complete the certification through the online attestation are not required to print a confirmation of submission of the form. Contractor employees or visitors who do not have a NASA issued badge prior to arrival at the NASA facility who complete the paper version of the attestation certification at the NASA facility badging office will be required to carry the completed certification on their person while on the NASA facility.

- 3. Are people who are not going to a NASA facility required to complete a certification of vaccination status? Or does this apply to all regardless of whether or not they are going to NASA facilities?**

All NASA civil servants and contractor employees, whether working remotely or on site, are required to complete and submit a Certification of Vaccination Status.

- 4. On the certification form, does the contractor identify its contract Program Manager as the supervisor or do they list the CO or COR?**

Contractor employees should identify their company supervisor, or any other person designated by the company, if applicable.

- 5. The tool isn't user friendly - is there a POC who can answer questions on the software tool?**

If you have any questions about the software tool, please contact Azhar Rafiq in the Office of the Chief Health and Medical Officer at [azhar.rafiq@nasa.gov](mailto:azhar.rafiq@nasa.gov).

- 6. On the online certification form should a contractor employee choose "Employee" or "Guest"? Is there any difference for subcontractor employees?**

The online form has been updated to read "Employee/Contractor". All Contractor employees, including subcontractor employees, should choose "Employee/Contractor".

- 7. If subcontractor's employer name is not included in the "Employer" dropdown listing, do subcontractors input the prime contractor's name?**

This is not a required field, so if the employer's name is not found the individual can leave the field blank.

- 8. The "Global Letter for Vaccination and Access to Centers" indicates "Contract employees and visitors that do not complete the certification online will be required to report to the NASA facility badging office to complete and sign..." If a visitor does complete online, how will the badging office be able to confirm this?**

Contractor employees who have a NASA issued badge who complete the certification through the online attestation are not required to print a confirmation of submission of the form. Contractor employees or visitors who do not have a NASA issued badge prior to arrival at the NASA facility must complete the paper version of the attestation certification at the NASA facility badging office and will be required to carry the completed certification on their person while on the NASA facility.

- 9. It was the contractor's understanding that all contractor employees are required to complete the online attestation, however, the "Global Letter for Vaccination and Access to Centers" indicates contract employees who do not complete it online will be required to report to the badging office to complete the form. Only visitors should be completing the paper form.**

Correct, Contractor employees who have a NASA issued badge (other than a temporary badge issued at the NASA badging facility) are required to complete the certification through the online attestation form. For contract employees without computer access, their company will ensure certification is accomplished.

- 10. Is the attestation and associated 72 hour repetitive testing policy only during the Stage 2 surge or is this policy permanent?**

The policy related to attestation and associated testing is a requirement recently received from the Office of Management & Budget (OMB). This OMB requirement is not associated with NASA's Stage 2 or connected to NASA's stage changes. It is likely to continue until OMB changes it. Additional guidance regarding testing requirements is forthcoming.

- 11. Will the contractor receive reports, based on the Vaccination Certification Form, on who needs to be tested prior to coming onsite and on who is fully vaccinated? If not, then why is the government collecting that information directly rather than through the contractor? How will NASA monitor compliance with completing the Vaccination Certification Form?**

No, NASA will not provide reports to contractors. Alternatively, your parent company can manage the attestations for their employees and attest to NASA that you have one on file and whether you are required to test. When completing the NASA attestation form online, contractor employees should identify their company supervisor, or any other person designated by the company, if applicable. Supervisors or designees will receive an automated email notifying them when an employee under their supervision submits a certification form.

**12. What if my vaccination status changes?**

Any NASA employee or contractor employees who have a NASA issued badge (other than a temporary badge issued at the NASA badging facility) may update their status by submitting a new Certification of Vaccination form using the same link.

# Vaccination

**1. Is NASA requiring employees to be fully vaccinated?**

Not at this time.

**2. If the contractor teammates wish to pursue vaccination, is a single dose sufficient or does the standard duration, post vaccination apply for site access?**

The Centers for Disease Control and Prevention considers an individual fully vaccinated if they are:

- 2 weeks after their second dose in a 2-dose series, such as the Pfizer or Moderna vaccines, or
- 2 weeks after a single-dose vaccine, such as Johnson & Johnson's Janssen vaccine

## **Testing (e.g. Procedures, Cost)**

- 1. How will NASA contractors be reimbursed for the cost of testing employees, including time spent getting tested?**

Costs related to testing and time spent getting tested for contractor employees shall be charged in accordance with company disclosure statement and accounting policies. Additional guidance regarding testing requirements is forthcoming.

- 2. What happens if a civil servant, contractor employee or visitor who is fully vaccinated tests positive for COVID?**

If an individual tests positive for COVID-19 on or after August 16, 2021, the individual is required to notify their supervisor, or company designee, and local NASA facility health clinic in addition to quarantine requirements as established by the CDC.

- 3. Seeking to confirm that non-vaccinated personnel will need to be tested every 72 hours regardless of any known exposure?**

Additional guidance regarding testing requirements is forthcoming.

- 4. The requirement for a negative COVID test will start on or about Monday, August 23, 2021. NASA will not provide testing for contract employees and visitors. Additional guidance regarding test requirements is forthcoming. How does this relate to the 8/16 date above?**

The August 23, 2021 date was the anticipated start date for the requirement for a negative COVID test report to be provided. The timing of this requirement was updated recently by the White House to September 20, 2021. The August 16, 2021 date was the start date for when individuals were required to complete the attestation form prior to entering the NASA facility.

- 5. Should the test be no older than 72 hours old or should the results be no more than 72 hours old?**

Additional guidance regarding testing requirements is forthcoming.

- 6. Memo states "However, anyone working on site who is not fully vaccinated will be required to be tested weekly for COVID-19 before coming onsite." However, memo states "provide proof of having received a negative COVID-19 test result from an FDA-authorized test for COVID, that is less than 72 hours old prior to entering the facility," which would require more frequent than weekly testing. What is the correct testing timeline requirement?**

Additional guidance regarding testing requirements is forthcoming.

**7. Can a TO be issued to cover COVID related costs?**

NASA will not provide testing for contract employees and visitors. Costs related to testing and time spent getting tested for contractor employees shall be charged in accordance with company disclosure statement and accounting policies. Additional guidance regarding testing requirements is forthcoming.

**8. We have the Bimax, FDA approved testing kits. If a person tests negative with this test, how does NASA know it was done within the last 72 hours. Must we test at some place that can date stamp the test? Can we test on-site? Because of HIPA requirements, our crew supervisors do not know who is or is not vaccinated, so there's not a way to only send vaccinated persons to respond to a trouble call.**

Additional guidance regarding testing requirements is forthcoming.

**9. If we are required to be tested, how long will this testing go on for?**

The policy related to attestation and associated testing is a requirement recently received from the Office of Management & Budget (OMB). It is likely to continue until OMB changes it. Additional guidance regarding testing requirements is forthcoming.

**10. If testing is required and performed, what documentation is there for this? I have already been tested and never received any written documentation for my results.**

Additional guidance regarding testing requirements is forthcoming.

**11. Appointments will be required every single time testing is required. What happens if I cannot get an appointment that week?**

Additional guidance regarding testing requirements is forthcoming.

**12. Will my testing be accomplished on my duty day?**

Additional guidance regarding testing requirements is forthcoming.

**13. Why isn't the Occupational Health Facility on the NASA facility providing the necessary testing? They offer the FLU VACCINATION to employees.**

NASA will not provide testing for contract employees and visitors. Additional guidance regarding testing requirements is forthcoming.

**14. Who do I report my testing to if I have to get tested?**

Additional guidance regarding testing requirements is forthcoming.

**15. What are the COVID testing requirements for contractor employees located at off-site contractor facilities?**

Testing requirements only apply to contractor employees seeking access to the NASA facility.



## Personnel/Labor Relations

**1. Has this process and certification form been cleared by contractor unions?**

This requirement has been implemented across the US Government with the intent of improving health and safety during the COVID-19 pandemic and this current wave of the Delta variant. Because of the emergency nature of the situation and the expediency of implementing the requirement notification and any bargaining with labor needed to be accomplished after implementation.

**2. What if contractor union employee refuse to comply?**

The contractor is still obligated to perform. NASA doesn't direct how a contractor manages its employees.

**3. Delayed test results may require the individual to be off-site until results are available; would this be considered excused leave (i.e. COVID-19 Advanced Agreement)?**

Additional guidance regarding testing requirements is forthcoming. The timing for the start date for the requirement for a negative COVID test report was updated recently by the White House to September 20, 2021.

**4. Will contractors be responsible for monitoring our employees' compliance?**

Yes, contractors are responsible for monitoring their employees' compliance with this certification requirement.

**5. By contractor, is NASA referring just to the prime contractor, or is NASA referring to the prime and any of their part-time, 1099 independent contractors, or subcontractors?**

All NASA civil servants and contractors, including subcontractors, whether working remotely or on site, are required to complete and submit a Certification of Vaccination Status.

**6. Is the contractor responsible for sending out this information and providing the link?**

Yes, the prime contractor would be responsible for flowing down these guidelines to lower tiered subcontractors.

7. **In paragraph two (2) it also mentions “Contractors are responsible for monitoring their employees’ compliance with this certification requirement”. Is there a specific requirement for Contractors to fill out a Certification of Vaccination on a corporate basis, i.e. for all employees, or is the requirement for Employees of Contractors on an employee by employee basis depending upon whether the employee is intent upon attendance at a NASA facility whether in person or remotely?**

All civil servants and contract employees, whether working remotely or on site, are required to complete a Certification of Vaccination Status. The requirement to complete the attestation certificate is on an employee by employee basis.

8. **I want to verify that there is a distinction in the class of people identified in the memorandum specifically the memorandum is discussing the class of Civil Servants and the class of Contract Employees and it is not discussing the class of Employees of Contractors. Is this a correct interpretation of this memorandum.**

“Contract employees” as used in the memorandum means contractor employees working under a contract supporting NASA facilities, both on and offsite. The distinction between groups of contractor employees is between badged and unbadged individuals. Contractor employees who have a NASA issued badge are required to complete the certification through the online attestation form as soon as possible. Contractor employees or visitors who do not have a NASA issued badge prior to arrival at the NASA facility will be required to complete a paper version of the certification at the facility badging office beginning August 16, 2021. In addition, if the unbadged contractor employee or visitor attests to anything other than “fully vaccinated”, the individual will be required to provide evidence of a negative COVID-19 test result report in accordance with Agency guidelines beginning September 20, 2021.

9. **In paragraph two (2) it mentions “In order to enter a NASA facility, all civil servants and contract employees, whether working remotely or on site, ...” We are trying to understand the application of this requirement as it applies to “working remotely”. Our interpretation of “working remotely” is that the person is not on-site but working through a NASA remote VPN or conferencing tool such as Zoom, so I am not understanding why this policy would apply in this situation. Please explain where our interpretation of this particular sentence is in error.**

All civil servants and contract employees, whether working remotely or on site, are required to complete a Certification of Vaccination Status.

- 10. In the last substantive paragraph of the memorandum it specifically indicates that “Contractors are responsible for ensuring that its employees monitor local radio, television stations, and other communication channels.” We are trying to understand how we can implement this specific element of the memorandum as the personal tastes and news sources for each of our employees varies dramatically between from employee to employee and many of our employees are still working remotely from home.**

NASA is not dictating what communication channels contractor employee monitor. The intent of this statement is to ensure that contractors and their employees continue to remain vigilant of the evolving nature of the COVID-19 pandemic so that they comply with local, state, and federal guidelines and policies that are being implemented to ensure the safety of the NASA workforce, including support contract employees.

- 11. Is the following assumption valid? As the August 13 email stated that form completion notification to the supervisor was “intended only to enable supervisors to ensure all employees under their supervision have completed the form,” we assume that actual compliance with the attestation, meaning action by the employee to comply as if they are vaccinated or not vaccinated, will remain on the ‘honor system’ as the contractor will not have access to information concerning if the employee is vaccinated or not, unless that information is volunteered by the employee to the company by some other means. Consequently, as a contractor, we can only be responsible for form completion, not overall compliance with NASA facility access direction.**

Contractors are responsible for monitoring their employees’ compliance with the completion of the attestation certification requirement. Contract employees that are not fully vaccinated may be denied access if they cannot provide a negative COVID test report. NASA expects that individuals will complete the attestation certification truthfully and will comply with the guidelines set forth by the agency with integrity.

- 12. Is this a “Condition of Employment” now?**

NASA does not manage the conditions of employment for contractor employees.

## **Facility Access**

- 1. Are there any exceptions to the Vaccination Attestation and Testing requirements for certain contractor employees that are “transient”, such as contractor employees making deliveries, or other contractor employees who would not enter a Federal Building for an extended period of time or those primarily working outdoors?**

In order to both comply with guidance from the Safer Federal Workforce Task Force on the COVID Model Safety Principles, while also minimizing impacts to operations the following adjustments to the NASA COVID-19 Vaccination Attestation and Testing requirements can be made for access to NASA facilities and sites by certain contractor employees as follows:

- “Transient” contractor employees who are making deliveries to a NASA facility or site (e.g. package delivery services; propellant supplier) but will not enter a Federal Building for an extended period of time, are not required to complete and submit a Certification of Vaccination Status or show proof of a negative COVID-19 test result report;
- Construction contractor employees, who principally work outside, can be exempt from the attestation and testing requirements. Consideration should be given to limiting indoor activities for these employees, such as limiting them to only food pickup at a dining facility.

Center/Installation Leadership has discretion to approve additional exemptions, for other infrequent situations where access of individuals does not represent increased risk of exposure or spreading of COVID-19 in the facility/installation. These exemptions may be most efficient when applied to a contract company when all of their employees represent the same low risk.

- 2. Once completed and signed, the contract employee or visitor must present the signed certification form to enter the facility. This is at the main gate? Does this include folks that completed the questionnaire on-line?**

Contractor employees who have a NASA issued badge are required to complete the certification through the online attestation form. Contractor employees or visitors who do not have a NASA issued badge prior to arrival at the NASA facility will be required to complete a paper version of the certification at the facility badging office and provide evidence of a negative COVID-19 test result report, if necessary. Once a NASA contract employee or visitor is issued a badge they will not be required to present the signed certification or negative COVID-19 test result, if necessary, prior to actually entering the NASA facility. Additional guidance regarding testing requirements is forthcoming. The timing of this requirement was updated recently by the White House to September 20, 2021.

**3. Who on Center can ask to see a visitor's completed form? Should it be assumed that if the person has a valid badge they have complied?**

Prior to visitors being issued a badge, security officials at entry points to facilities or sites are authorized to ask visitors to complete the attestation form, and if appropriate, to require proof of a negative test report prior to allowing access to the NASA facility. The timing of the requirement for a negative COVID test report was updated recently by the White House to September 20, 2021. Additional guidance regarding testing requirements is forthcoming. Once a NASA contract employee or visitor is issued a badge they will not be required to present the signed certification or negative COVID-19 test result, if necessary, prior to actually entering the NASA facility

**4. Any individual who fails to complete and sign the Certification of Vaccination Status form or fails to provide any required negative COVID-19 test results (if/when required) may be denied entry to the facility. How will this be enforced and who is checking? Again, including subcontractors?**

Yes, these guidelines apply to all individuals entering a NASA facility, including subcontractors. Contractors are responsible for monitoring their employees' compliance with the completion of the attestation certification requirement and testing if required. NASA expects that individuals will complete the attestation certification truthfully and will comply with the guidelines set forth by the agency with integrity. If the attestation certificate has not been completed or proof of the negative COVID-19 test report provided (if necessary), it could result in an administrative action including an adverse personnel action.

Prior to being issued a badge, security officials at entry points to facilities or sites are authorized to ask visitors to complete the attestation form, and if appropriate to require proof of a negative test report prior to allowing access to the NASA facility. The requirement for a negative COVID test report will start on September 20, 2021. NASA will not provide testing for contract employees and visitors. Additional guidance regarding test requirements is forthcoming.

**5. If a non-NASA contractor employee or visitor has business with a non-NASA tenant entity (e.g. DOD, commercial business) on a NASA facility, will the contractor employee or visitor be required to attest to their vaccination status or provide evidence of a negative COVID-19 test report?**

No, if the contractor employee or visitor is on the NASA facility to conduct non-NASA business, they will not be required to attest to their vaccination status or provide evidence of a negative COVID-19 test report.

- 6. Memo describes requirements for non-vaccinated personnel to carry proof of COVID testing – does not require vaccinated personnel to carry proof of vaccination. Is this an “honor system” best effort requirement?**

Once a NASA contract employee or visitor is issued a badge they will not be required to present the signed certification or negative COVID-19 test result, if necessary, prior to actually entering the NASA facility. NASA expects that individuals will complete the attestation certification truthfully and will comply with the guidelines set forth by the agency with integrity.

- 7. If an employee does not have a valid COVID-19 test, and is therefore denied entry onto the facility, is this considered denied entry per 1852.242-72 Denied Access to NASA Facilities (Oct 2015) in the contract.**

No. If a contract employee cannot provide evidence of a negative COVID-19 test report in accordance with Agency guidelines, and is denied entry onto the facility, the contractor is still obligated to perform.

- 8. The guidance makes no reference to visitors showing proof of vaccination. Do the badging clerks just take the person’s word they are vaccinated? If the visitor keeps their form, how can anyone verify the info was correct? Will the badging clerks be liable if someone has a fake/forged negative test result?**

Prior to visitors being issued a badge, security officials at entry points to facilities or sites are authorized to ask visitors to complete the attestation form, and if appropriate, to require proof of a negative test report prior to allowing access to the NASA facility. NASA expects that individuals will complete the attestation certification truthfully and will comply with the guidelines set forth by the agency with integrity. The badging clerks will not be liable if someone has a fake/forged negative test result.

- 9. For permanently badged employees (federal and contractor) how will the security officer at the gate know that person’s status? If the employee is not fully vaccinated, unvaccinated or chose not to provide their status and is subjected to the testing requirement, who monitors this and who does the employee show the negative test to?**

Once a NASA contract employee or visitor is issued a badge they will not be required to present the signed certification or negative COVID-19 test result, if necessary, prior to actually entering the NASA facility. NASA expects that individuals will complete the attestation certification truthfully and will comply with the guidelines set forth by the agency with integrity. If the attestation certificate has not been completed or proof of the negative COVID-19 test report provided (if necessary), it could result in an administrative action including an adverse personnel action.

**10. On weekends and after hours when the badging office is closed, visitors receive their temp/local badge at the gate. How will this attestation form be handled in those situations?**

During non-business hours, visitors will be provided with the attestation form at the gate where they are receiving their visitor badge.

## **Other**

**1. How do I know that the link I am providing my information on is legitimate?**

The link is a NASA.gov link. This link will open a medgate.com site managed by NASA's Office of the Chief Health and Medical Officer through a third-party vendor, Cority. In addition, the link was included in an email from NASA Deputy Associate Administrator and the letter from the Office of Procurement to the NASA Contractor Community both of which outlined the revised procedures for entering NASA facilities during the coronavirus (COVID-19) pandemic.

**2. I received a letter from the Office of Procurement regarding procedures for entering a NASA facility and the completion of a Certification of Vaccination Status and an email related to the same topic. Are these different processes?**

No, they are not different processes. The Office of Procurement letter to the contractor community was to ensure the widest possible distribution of this new procedure.

**3. If a contractor cannot be compliant, would it be considered an excusable delay under the contract, FAR 52.212-4, such as due to an epidemic?**

No, the completion of the Certification of Vaccination Status and testing procedures, if necessary, are not beyond the reasonable control of the Contractor.

**4. Is this considered a unilateral change to the contract?**

No, this is a stipulation of accessing the facility to ensure the safety of the NASA workforce including support contract employees.