



**DEPARTMENT OF THE AIR FORCE
UNITED STATES SPACE FORCE
SPACE LAUNCH DELTA 30**

7 Nov 2021

MEMORANDUM FOR ALL VANDENBERG SFB PERSONNEL

FROM: SLD 30/CC

SUBJECT: Mandatory Coronavirus Disease 2019 Vaccination of Department of the Air Force Civilian Employees

References: (a) Executive Order 14043, *Requiring Coronavirus Disease 2019 Vaccination for Federal Employees*, 9 September 2021
(b) Deputy Secretary of Defense, *Mandatory Coronavirus Disease 2019 Vaccination of DoD Civilian Employees*, 1 October 2021
(c) Under Secretary of Defense, *Force Health Protection Guidance (Supplement 23) Revision 2 -- Department of Defense Guidance for Coronavirus Disease 2019 Vaccination Attestation, Screening Testing, and Vaccination Verification*, 29 October 2021
(d) Safer Federal Workforce Task Force, "COVID-19 Workplace Safety: Agency Model Safety Principles," September 13, 2021
(e) DAF Mandatory COVID-19 Vaccination Guide, 22 October 2021

1. In accordance with references (a), (b), (c), (d) and (e), Department of the Air Force (DAF) civilian employees are now required to be fully vaccinated by November 22, 2021, subject to exemptions as required by law. Vaccinations remain the most effective means to control the spread of COVID-19, lessen the severity of the illness, and ensure our overall total force readiness in the face of COVID-19 variants that are more transmissible. Therefore, all credentialed individuals entering DoD facilities on VSFB for purposes of official DoD business are ordered to comply with the following requirements. These measures will continue to protect the health of all DAF personnel and preserve our total force readiness.

2. Applicability:

a. This policy is applicable to all individuals issued a credential by DoD that affords the individual recurring access to VSFB and to non-DoD individuals seeking access in association with the performance of official DoD business (collectively referred hereafter as "credentialed personnel").

b. This policy does not apply to:

- i. Individuals with *ad hoc* access to VSFB (e.g., delivery personnel, taxi services)
- ii. Individuals who have access to VSFB but may not access/enter VSFB buildings (e.g., groundskeepers, fuel delivery personnel, household goods transporters)
- iii. Individuals accessing buildings unrelated to the performance of DoD business (e.g., residential housing)
- iv. Individuals accessing VSFB to receive a public or entitlement benefit (e.g., commissary, base exchange, base chapel, FSS-related services, and MWR resources)

c. Contractors requiring access to VSFB will be provided guidance under a separate memorandum.

3. Vaccination Requirement:

a. Not later than 22 November 2021, all DAF civilian employees must be fully vaccinated against COVID-19 subject to exemptions required by law. Employees are considered fully vaccinated 2 weeks after completing the second dose of a two-dose vaccine series or two weeks after receiving a single-dose vaccine.

b. For specifics on vaccines see reference (c), Appendix 1. DAF civilian employees may choose one of several vaccines to fulfill the requirement. Vaccines must be either fully licensed or authorized for emergency use by the U.S. Food and Drug Administration (e.g., Pfizer-BioNTech/Comirnaty, Moderna, Johnson & Johnson/Janssen); listed for emergency use on the World Health Organization Emergency Use Listing (e.g., AstraZeneca/Oxford); or an approved clinical trial vaccine for which vaccine efficacy has been independently confirmed (e.g., Novavax).

4. Safeguarding of Medical Information:

a. All medical and other confidential information collected from individuals will be treated in accordance with applicable laws and policies on privacy, including the Privacy Act of 1974 and DoD Instruction 5400.11, "DoD Privacy and Civil Liberties Programs," January 29, 2019, the Rehabilitation Act of 1973, as amended ("Rehabilitation Act"), and 5 CFR part 293, subpart E.

i. While such information may be sensitive and is to be safeguarded as described above, it is not covered by the Health Insurance Portability and Accountability Act (HIPAA) and the associated HIPAA Rules.

ii. Supervisors of civilians will not divulge medical information or vaccination status to any person who does not have need to access the information under the Rehabilitation Act. Personnel with such need are the immediate supervisor, authorized human resources officials, and those management officials who must access the information to implement the guidance in this memorandum. Such information is confidential and will not be discussed with other supervisors or management officials or openly in meetings unless such need exists under the Rehabilitation Act.

b. In accordance with reference (e) Unit commanders, or their civilian equivalents, will establish a dedicated, unit-level file solely for the purpose of maintaining any submitted hard-copy DD Forms 3175 and accompanying proof documents. If the form is completed electronically in milConnect by the employee, it is not necessary to maintain a hard copy of the form. Any hard copy DD Forms 3175 will be maintained in the unit file established for this purpose, and no other personnel or medical-related documentation of any kind (including test results, medical exemptions, etc.) will be kept in this file. DD Forms 3175 and associated vaccination proof documents are not to be maintained in individual supervisory files, including the Supervisor's Employee Work Folder. The completed DD Form 3175 will be treated as a medical record for confidentiality purposes. Maintenance of and access to completed DD Forms 3175 will be in accordance with applicable law and policy, including appropriate privacy protection measures. The completed DD Form 3175, or any similar vaccination record, constitutes confidential medical information under Federal law and thus must be kept confidential in a file separate from the personnel files maintained by the employee's supervisor and the civilian personnel office.

c. For more information on the storage and maintenance of such information contact Employee Management Relations/Labor Relations (EMR/LRO) at 805-606-5847 or 606-3641.

5. Vaccination Attestation for DAF Civilian Employees:

a. DAF civilian employees who have received a dose of a one-dose vaccine, or both doses of a two-dose vaccine, must provide proof of vaccination to their supervisors. For purposes of the attestation requirement, "supervisor" includes authorized human resources officials. Proof of vaccination may be submitted in hard copy or in an electronic format, and the proof may be a photocopy or photograph of the vaccination record, if it legibly displays the data points to be verified by supervisors. DAF civilian employees who are not fully vaccinated must provide proof of vaccination to their supervisors upon receipt of each required dose. Acceptable proof includes:

- i. A copy of the record of immunization from a health care provider or pharmacy;
- ii. A copy of the COVID-19 Vaccination Record Card (CDC Form MLS-319813_r, published on September 3, 2020);
- iii. A copy of medical records documenting the vaccination;
- iv. A copy of immunization records from a public health or State immunization Information system; or
- v. A copy of any other official documentation containing the data points required to be verified by the supervisor.

b. DAF civilian employees will complete Section A of DD Form 3175 no later than 29 October 2021. DAF civilian employees with access to milConnect (<https://milconnect.dmdc.osd.mil/>) will complete the DD Form 3175 via milConnect; otherwise for those unable to use milConnect, use of a hard copy is authorized. The form is downloadable at <https://www.esd.whs.mil/Portals/54/Documents/DD/forms/dd/dd3175.pdf> or contact EMR/LRO.

c. Civilian employees who are currently in an approved leave status or on an alternate work schedule to which they are not on duty prior to 29 October 2021 suspense date (e.g. firefighter personnel) will complete Section A of DD Form 3175 no later than close of business on the first duty day returning from leave or scheduled day off.

d. DAF civilian supervisors will verify that the information provided by the employee contains the following:

- i. Type of Vaccine Administered
- ii. Number of doses received
- iii. Dates of administration; and
- iv. Name of health care professional(s) or clinic site(s) administering the vaccine(s).

e. No later than 19 November 2021 supervisors will complete Section B of DD Form 3175 using the DoD civilian employee's Employee Identification Number; for those unable to use milConnect, use of a hard copy is authorized. The form is downloadable at <https://www.esd.whs.mil/Portals/54/Documents/DD/forms/dd/dd3175.pdf> or contact EMR/LRO.

6. Vaccination Attestation for Official Visitors:

a. Beginning 22 November 2021, official visitors must complete DD Form 3150 and present to their supporting DAF personnel upon request. Official visitors who fail to complete the DD Form 3150 may be denied access to DoD facilities.

b. Official visitors who are not fully vaccinated or who refuse to complete the DD Form 3150 may access DoD facilities under one of the following circumstances:

- i. Upon submission to their VSFB sponsor of a negative test result from an FDA approved COVID-19 test administered no earlier than 72 hours prior to their visit, or
- ii. Submit to day-of-entry testing, onsite subject to test kit availability or self-provisioned, and receive a negative test result that is presented to the VSFB sponsor within 24 hours of entry.

7. Accommodations Based on Medical Condition or Religion:

a. Guidance from DOD regarding religious and medical accommodations is currently under review by HHQ. DAF civilian employees may begin the process and submit accommodation requests to their supervisors using request forms posted on the FSS website (<https://www.vandenbergfss.com/document-manager/civilian-personnel-office/covid-vaccination-requirement-for-federal-employees/latest-af-guidance-as-of-25-october>), with the caveat that the form and information may change when DoD releases guidance.

b. Absent extenuating circumstances, employees must submit accommodation requests by November 12, 2021. Employees who have submitted an accommodation request will be granted a temporary delay in compliance with the vaccination mandate. For such employees, no enforcement action will be taken during this period.

c. Commanders and supervisors should take no action on any received accommodation request until further DAF guidance is received.

d. Any approved exemption from the vaccination requirement is not an exemption from the attestation requirement, screening testing requirements, or other health protection and workplace health and safety mitigation measures. DAF civilian employees who are not fully vaccinated and who have a pending vaccine exemption request must comply with any mitigation measures that are applicable to all not-fully-vaccinated employees at the worksite. Requests for accommodations related to such mitigation measures may be evaluated separately from vaccination exemption requests.

8. Screening Testing Requirements:

a. Beginning 22 November 2021, credentialed personnel, including those with religious or medical accommodation, who are not fully vaccinated and who decline to attest to their COVID-19 vaccination status, are subject to mandatory COVID-19 screening testing on at least a weekly basis.

b. DoD civilian employees teleworking or working remotely on a full-time basis are not subject to weekly testing, but must provide a negative COVID-19 screening test result from a test performed within the 72 hours prior to entry into a DoD facility.

c. A religious or medical exemption from the COVID-19 vaccine is not an exemption from the COVID-19 screening testing. If a civilian employee requires a religious or medical exemption from the screening testing, then follow existing reasonable accommodation processes by informing their supervisor their request for Reasonable Accommodation. For questions on the Reasonable Accommodation process contact the EMR/LRO Office at 805-606-5847 or 606-3641.

d. Civilian employees who are required to submit to COVID-19 screening testing under this policy who refuse COVID-19 screening testing are subject to adverse action, up to and including removal.

Commanders and supervisors may bar such employees from their worksites, including while adverse action is pending. Such employees may be required to telework as appropriate. Any official visitor or other credentialed personnel who are unvaccinated and refuse screening testing will be denied access to VSFB and may be subject to debarment.

9. Enforcement:

a. DAF employees who fail to complete Section A of DD Form 3175 by 29 October 2021 or fail to become fully vaccinated and/or provide proof of vaccination by 22 November 2021 are subject to disciplinary action up to and including removal from federal service.

b. For DAF civilian employees who indicate in Section A of DD Form 3175 they are not yet fully vaccinated or decline to respond, supervisors will provide the employee with a written order to become fully vaccinated. The order will be issued, even for DAF employees that indicate they have an exemption pending. The pending exemption holds all action until a decision is final.

i. The order will give five work days to attend mandatory counseling and to comply with the mandate. Guidance on counseling is forthcoming from HAF.

ii. Failure to attend counseling as ordered could result in discipline up to and including removal from federal civil service.

iii. Proof of first dose of a two dose vaccination series and subsequent update of DD Form 3175 will be seen as a good faith effort to comply with this order. Any proposed discipline or decision to discipline will be held in abeyance for the wait period between vaccination doses plus one work week. Failure to obtain the second dose within the provided time period may result in termination of the abeyance and resumption of the disciplinary process.

iv. For the order memorandum template for supervisors and/or information on counseling contact EMR/LRO at 805-606-5847 or 606-3641.

c. It is my intent that DAF civilian employee discipline for noncompliance be case-specific, consistent across VSFB, and progressive. To this end for SLD 30 DAF employees, I withhold disciplinary authority pertaining to this policy as follows:

i. For disciplinary action occurring at a level not appealable to the Merit System Protection Board (Oral Admonishment, Reprimand, Suspension less than 14 days):

Decision authority is withheld to the Squadron Commander or Deputy Director.

ii. For disciplinary action appealable to the MSPB (Suspensions of 14 days or more, or Removal):

1. Proposal authority is withheld to the Squadron Commander or Deputy Director

2. Decision authority is withheld to SLD 30/CC

iii. Tenant and partner units will follow their respective higher headquarters guidance regarding discipline authority.

d. Discipline for noncompliance with this memorandum will be carried out deliberately, carefully, and with respect and dignity for fellow DAF employees' right to privacy.

10. For questions about topics not covered in this memorandum I encourage all concerned personnel to read reference (e) DAF Mandatory COVID-19 Vaccination Guide, 22 October 2021 available for download at: <https://www.vandenbergfss.com/document-manager/civilian-personnel-office/covid-vaccination-requirement-for-federal-employees/latest-af-guidance-as-of-25-october>.

11. This order will remain in effect until, if, and when the Executive Order and/or implementing guidance is rescinded or modified by the President or higher headquarters, respectively.

ROBERT A. LONG, Colonel, USSF
Commander