

USAID Partner Webinar: Implementation of Executive Order (E.O.) 14042, October 21, 2021
Answers to Questions

Below are USAID's responses to the questions received during the October 21, 2021 partner webinar regarding [AAPD 21-04](#) (*Executive Order 14042 on Ensuring Adequate COVID-19 Safety Protocols for Federal Awards*).

Q1: As a landlord leasing to SBA, and I am responsible for the Covid protocols for other tenants in the building that I have a “contractual relationship” / (the lease) with?

A1: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q2: It does not apply to grants and GUC. Does that include sub-grants under Cooperative Agreements?

A2: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q3: What is the reason the rule does not apply to GUCs?

A3: [Executive Order 14042](#) specifies that the order does not apply to grants.

Q4: It is clear the vaccination requirement applies to an otherwise covered employee who (1) works remotely exclusively and (2) works exclusively on a non-USG award. But what about an otherwise covered employee who BOTH works just remotely and on a non-federal award?

A4: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q5: The task force guidance on masking differs from (and exceeds) CDC guidance. Is there a plan to align the task force guidance with CDC guidance?

A5: Questions regarding the Safer Federal Workforce Task Force's guidance may be directed to SaferFederalWorkforce@gsa.gov.

Q6: You mentioned that the physical access to USAid workplaces DOMESTICALLY - does this mean the sites in other countries are not under the EO?

A6: The reference to “domestically” was only in reference to the AAPD instructions regarding existing contracts that provide personnel with routine physical access to domestic USAID

workplaces (e.g., institutional support contracts (ISCs)). The E.O. and AAPD requirements, as outlined in Section II(1)(a) through (c) of the AAPD, apply to other solicitations and contracts regardless of place of performance.

Q7: EO14042 applies to cooperative agreements but not grants: In DOS, I thought a cooperative agreement is a form of grant. Cooperative agreement would include substantial USG participation in implementation, where a standard grant would not. Is that how USAID defines these terms, too?

A7: Cooperative agreements and grants are both types of assistance. The differences between the two types are described in [2 CFR 200](#) and [ADS 303](#).

Q8: How does this translate for a cooperative agreement? We have some contractors but also a lot of persons working as sub-grantees... how does this affect those people?

A8: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q9: Is the designated POC meant to be an employee of DOS or of the contractor?

A9: The “designated individual (or individuals)” described in the [Safer Federal Workforce Task Force guidance](#) is a contractor employee.

Q10: Will this apply to CCN staff on projects under contract or cooperative agreement?

A10: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#) for the definition of covered contractor employee.

Q11: Is the \$250K an exclusion for SAT contracts only or does it stop the flow down of the clause?

A11: Please refer to the FAR 52.223-99 clause itself for the applicability to subcontracts.

Q12: Does the EO apply to international sub-contractors?

A12: Please refer to the FAR 52.223-99 clause itself for the applicability to subcontracts.

Q13: Does this cover consultants?

A13: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual.

Q14: For contract modifications that do not extend or increase value of the contract: while it is not *required* to include the FAR clause, should we expect that USAID may still do so as part of other modifications, such as an obligation increase?

A14: It is mandatory to incorporate FAR 52.223-99 in the specific situations identified in the AAPD; however, COs have the discretion to incorporate this FAR clause in other scenarios as well.

Q15: To confirm, this does not apply to staff working overseas unless they are regularly visiting USAID offices, correct?

A15: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q16: What can you say for employees working remotely?

A16: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q17: How do IPs report/prove vax status?

A17: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q18: Does the requirement apply to consultants (not employees) hired by USAID contractors?

A18: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual.

Q19: Does the rule apply to consultants? What if the consultant is required to access USG facilities?

A19: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual. If the subcontractor requires access to USAID facilities, the subcontractor must follow USAID's specific requirements for visitors to that facility.

Q20: Secondary question, consultants who work with USAID but are not physically in the same space.

A20: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q21: The requirement to be vaccinated is it only applicable if you have the need to come into the USAID workspace?

A21: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q22: Our contract is not expecting a modification to exercise Options for some time, should we be expecting a modification for this? If we don't receive the modification, are we expected to comply with the guidelines prior to receiving the mod?

A22: A contractor is not required to comply with FAR 52.223-99 until it is incorporated via modification into their contract.

Q23: Does the flow down requirement to subcontractors apply to independent consultants? What is our obligation to monitor them?

A23: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual. In terms of monitoring subcontractors, please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q24: Does the requirement apply to staff who are indirect (NICRA) funded and not working directly on USAID awards?

A24: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q25: Noting OMB does not differentiate per 2 CFR 200 between a grant or subaward under a coag - there are only subawards

A25: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions. Subawards that are grants will be exempt from the requirements.

Q26: How far down the supply chain does the EO apply? Eg. HO accountant whose salary is covered out of G&A, DC office lease that is primarily paid out of G&A, but where

some workspaces are charged directly to contracts for US based project staff, cleaning staff hired by DC landlords, etc

A26: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q27: Should I start modifying PSC awards?

A27: USAID Contracting Officers should begin modifying all existing contracts with USPSCs performing in the United States or its outlying areas, in accordance with the AAPD 21-04 instructions.

Q28: Why is there a delay to applicability to CoAgs?

A28: The applicability of E.O. 14042 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM); once a final determination has been made, AAPD 21-04 will be updated.

Q29: I understand existing awards will not get modified until there is an extension, options exercised. What is the expectation for compliance when an existing award does not get modified until after December 8, 2021? Is there a period that is deemed reasonable to flow down to our subs?

A29: Please note the following from [Guidance on COVID-19 Workplace Safety for Federal Contractors](#): *“Covered contractor employees must be fully vaccinated no later than December 8, 2021. After that date, all covered contractor employees must be fully vaccinated by the first day of the period of performance on a newly awarded covered contract, and by the first day of the period of performance on an exercised option or extended or renewed contract when the clause has been incorporated into the covered contract.”*

Q30: For overseas projects - we understand that staff outside the US are not covered. Are there restrictions on access to USAID Mission space for meetings? I.e. would meetings be held outside the Mission or would vaccination be required for IP staff to access meetings held at the Mission?

A30: Requirements may vary from Mission to Mission. Please consult with the individual Mission for further guidance. Contractor staff who do not have routine access to USAID workspaces will be treated as visitors.

Q31: Does this apply to international subagreements under a cooperative agreement if the international subrecipient will not be spending time in any USAID locations overseas.

A31: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q32: Is there a sample mod that the COs will use or the mod language will be developed by the COs initiating the mods?

A32: Contracting officers have the discretion to develop their own modification language. The deviated FAR clause must be used in all modifications.

Q33: This applies to purchase orders and consultancy agreements under cooperative agreements?

A33: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q34: Can you clarify - we have subcontracts we issue under our cooperative agreement and does this apply to those subcontracts?

A34: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q35: Kindly clarify if this means all those who are receiving USAID funding under cooperative agreement employees need to be vaccinated for them to be compliant?

A35: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions. If the requirements of AAPD 21-04 are applied to cooperative agreements, recipients will be expected to adhere to the requirements from the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q36: Who will make the determination if a COVID exemption is approved.

A36: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q37: E.O. 14042 makes it clear that the requirement is applicable only to Contracts. Cooperative Agreements are not contracts. On what regulation does USAID base its assessment that cooperative agreements are contract like instrument?

A37: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q38: Could you please clarify the applicability to CoAgs with complete implementation and operations overseas with limited access to vaccines and no US travel planned for project staff?

A38: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q39: Am I missing something...looking for aapd: PAGE NOT FOUND

A39: All AAPDs can be found from the main AAPD landing page, available here: <https://www.usaid.gov/work-usaid/aapds-cibs>

Q40: The requested page “/work-usaid/aapds-cibs/aapd-21-04” could not be found.

A40: Please note a revision (Revision #1) was issued to the AAPD, so the AAPD itself can be found here: https://www.usaid.gov/sites/default/files/documents/AAPD-21-04_Revision1.pdf
All AAPDs can be found from the main AAPD landing page, available here: <https://www.usaid.gov/work-usaid/aapds-cibs>

Q41: Should we expect universal contract modifications through IPN and do you have a timeline?

A41: All modifications will be bilateral modifications. Timing for modifications varies by individual contract; please see Section II(1) of the AAPD for additional details.

Q42: We have an existing CA overseas... if we receive a letter requiring compliance. If we need our employees to vaccinate - is the type of vaccine mandated by the provision?

A42: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q43: If a grant has been issued instead of a cooperative agreement, but for example Embassy USG personnel would attend events hosted under the grant, would that kind of substantial interaction (even though not funded through a cooperative agreement) mean that 14042 should apply in that case, too?

A43: The requirements in AAPD 21-04 do not apply to grants. USG personnel attending events off-site are expected to follow Safer Federal Workforce Task Force guidance.

Q44: By “Place of Performance” - should we understand that this only refers to what is specified in the agreement?

A44: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q45: So bilateral mods are only being issued to the ISCs?

A45: Bilateral modifications are being issued to all contracts that will be modified in response to the instructions found in the AAPD.

Q46: FAQ says covered workplace doesn't apply to an employee's residence. Does this mean it doesn't apply to an employee who telecommutes?

A46: The Safer Federal Workforce Task Force's [guidance for federal contractors and subcontractors](#) (see Question 11) and the [FAQs for federal contractors](#) address employees who are authorized to perform work remotely.

Q47: Is it anticipated that USAID would add the provision into cooperative agreements through USAID's standard provisions (presumably RAA) or some other means?

A47: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q48: Are fixed amount awards considered contract-like?

A48: If the fixed amount award is a grant, the requirements do not apply as grants are not considered contract-like awards. At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q49: Can you provide some clarity around who is required to get the vaccine. We have had several questions around whether this applies to staff located overseas.

A49: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q50: Can you address the phrase working “in connection: with a covered contract in the definition of “covered contractor employee” in the OMB FAQ? What does it mean to be working “in connection:” with a contract?

A50: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) (see Question 17) and the [FAQs for federal contractors](#).

Q51: What is required to show proof of vaccination?

A51: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q52: Can you explain (again) what the AAPD contains?

A52: Please review [AAPD 21-04](#) in its entirety.

Q53: Is the executive order applicable to Field Offices implementing projects overseas under cooperative agreements?

A53: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q54: What about remote workers on a subcontract?

A54: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q55: It appears these apply more to those at USAID work places, does it also apply to offsite USAID events?

A55: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q56: How will implementers be required to show compliance with EO 14042?

A56: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q57: Subcontracts at any tier applies only to services right? (including construction) at SAT or higher

A57: Please refer to the FAR 52.223-99 clause itself for the applicability to subcontracts.

Q58: Are there any requirements for managing subcontractor compliance apart from flowing down the FAR to the subcontracts?

A58: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#)

Q59: When will guidance for cooperative agreements be made available?

A59: We anticipate a determination will be made within the next few weeks.

Q60: Do these requirements cover both direct and indirect employees under covered contracts/CoAgs?

A60: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q61: So if a non-US NGO has Cooperative Agreements but no staff in the US, the EO won't apply, correct?

A61: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q62: For foreign entities does this mean staff who would go to in country USAID/CDC offices are required to be vaccinated?

A62: Requirements may vary from Mission to Mission. Please consult with the individual Mission for further guidance.

Q63: What does this look like with request for proposals for contractors? Do we have to ask that applicants submit their vaccination status?

A63: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q64: I know this doesn't apply to GUCs but just confirming that this doesn't apply to subcontracts under grants correct?

A64: Correct.

Q65: Am I understanding correctly that modifications to cooperative agreements will happen after the clause is approved by OMB and only after that time, will USAID partners modify their subawards under cooperative agreements?

A65: Correct. At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q66: Is this also applied for GUC?

A66: The requirements in AAPD 21-04 do not apply to GUCs.

Q67: Just to clarify, does this apply to sub-awards under cooperative agreements?

A67: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q68: Is employee outside of USA required to be mandated for Vaccine ?

A68: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q69: Is there a threshold for flowing this requirement down to independent consulting agreements?

A69: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual.

Q70: Does USAID have any anticipated deadlines for Contracting Officers to notify contractors of non-US applicability of the AAPD?

Q70: All instructions to the COs have been incorporated into the AAPD.

Q71: Sorry to dumb it down but is all of this essentially to say that if you have USAID funding, your team needs to be vaccinated and a clause will be added to your contract if/when there is an extension or renewal?

A71: If a contract is modified to incorporate FAR 52.223-99, the contractor will be required to comply with all guidance published by the [Safer Federal Workforce Task Force website](#),

including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q72: Should we include this in any mods or new subcontracts for international work?

A72: Please refer to the FAR 52.223-99 clause itself for the applicability to subcontracts.

Q73: Is there a list of who is a “Covered Contractor” and “Covered Employee”? Does the guidance apply to consultants? Those working remotely?

A73: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#). The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual.

Q74: How does this impact independent consultants contracted through a contract or CA by an implementing partner?

A74: The flow-down requirements of FAR 52.223-99 apply to subcontractors regardless of whether they are an organization or an individual.

At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM), as part of USAID’s efforts to ensure consistency across agencies. Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q75: I may have missed it but did you address foreign subcontractors and consultants working living and working outside the US. Are they required to comply?

A75: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#). Please refer to the FAR 52.223-99 clause itself for the applicability to subcontracts.

Q76: Is there a sample mod that the COs will use or the mod language will be developed by the COs initiating the mods?

A76: Contracting officers have the discretion to develop their own modification language. The deviated FAR clause must be used in all modifications.

Q77: You just mentioned remote employees, but please review my question -- it was more than that, and it is an issue not addressed by the currently posted FAQs.

A77: The Safer Federal Workforce Task Force the [guidance for federal contractors and subcontractors](#) (see Question 11 - September 24, 2021 Guidance) and the [FAQs for federal contractors](#) address employees who are authorized to perform work remotely.

Q78: Would the vaccine requirement have to be for all staff? Or just those on the contract/cooperative agreement (anyone whose time is billed)?

A78: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q79: I am curious to understand if the Federal agencies are working together to determine applicability for consistency? For example, at the moment I believe only NASA and USAID are applying to cooperative agreements? DOD, DED, DOJ, GSA, HHS, NSF, VA are not?

A79: There has been extensive coordination across federal agencies to ensure consistency, including regular and continued dialogue through the Office of Management and Budget, Office of Federal Procurement Policy, the Office of Federal Financial Management and other interagency stakeholders.

At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM), as part of USAID's efforts to ensure consistency across agencies. Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q80: And is this just for US citizens?

A80: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q81: Does these requirements apply to contractors under a cooperative agreement overseas?

Q81: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q82: Just to clarify - the EO requirement would not apply until included in the mod or in the new award, correct?

Q82: Correct.

Q83: What is the proper protocol/process of connecting with our overseas USAID partners, and is there a contact list available for approved countries?

A83: Please contact your COR for additional information.

Q84: Why is natural immunity and people who had COVID not excluded like in the EO. We now know that their antibodies are generally higher than after vaccination.

A84: Questions regarding the Safer Federal Workforce Task Force's guidance may be directed to SaferFederalWorkforce@gsa.gov.

Q85: What if a contractor has conferences in the United States? Does this clause need to be added?

A85: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q86: I understand contractors are required to review, sign, and return modifications by 11/14. Is that the date USAID requires certification that all of our staff and contractors fulfill vaccination requirements? What about exemptions for health and religion?

A86: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q87: As we continue to learn more about the virus, will this guidance change e.g. antibody status in lieu of vaccination?

A87: Questions regarding the Safer Federal Workforce Task Force's guidance may be directed to SaferFederalWorkforce@gsa.gov.

Q88: It sounds like all contractor employees are subject to these guidelines. Does that include field staff? It could be difficult to enforce vaccination requirements in countries where vaccinations are not as readily available as the US.

A88: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q89: It would be very helpful to hear USAID's compliance best practices related to this EO. How do we verify subs' compliance with this requirement? Some practical tips would be very appreciated.

A89: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q90: Given that the clause hasn't been rolled out for cooperative agreements yet, when it is, will the vaccination deadline still be December 8?

A90: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q91: Isn't the requirement considered retroactive since it says you have to comply by Dec. 8 (even if you receive mod or award after that date)

A91: Please note the following from [Guidance on COVID-19 Workplace Safety for Federal Contractors](#): *"Covered contractor employees must be fully vaccinated no later than December 8, 2021. After that date, all covered contractor employees must be fully vaccinated by the first day of the period of performance on a newly awarded covered contract, and by the first day of the period of performance on an exercised option or extended or renewed contract when the clause has been incorporated into the covered contract."*

Q92: Is there any indication of how reasonable accommodations are being interpreted for covered employees - is the expectation that those employees cannot come into the workplace or can with masking/ distancing etc.

A92: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q93: Does it apply to vendors, cleaners etc., that come into our space?

A93: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q94: Once we receive the newest modification to our agreement, do we need to initiate modifications immediately to our subrecipients or are we able to do the same and await the next modification to their subagreement?

A94: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q95: The Guidance for Federal Contractor's Q&A extends the vaccine requirement to remote workers, does it include employees who are stationed overseas?

A95: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q96: What is the link to the OMB FAQ?

A96: The main Safer Federal Workforce Task Force page is available at: <https://www.saferfederalworkforce.gov/>. Additional Safer Federal Workforce Task Force guidance and FAQs for federal contractors and subcontractors can be found at: https://www.saferfederalworkforce.gov/downloads/Draft%20contractor%20guidance%20doc_20210922.pdf

Q97: As the vaccine becomes more available overseas, is there consideration for implementing similar guidance for field based (overseas) offices?

A97: COs may modify existing contracts that provide employees routine physical access to overseas USAID workplaces, depending on local conditions.

Q98: Will USAID hold a similar meeting when this becomes applicable to CoAgs?

A98: At this time, the applicability of the requirements in AAPD 21-04 to cooperative agreements is still being discussed with the Office of Federal Financial Management (OFFM). Once a final determination of the applicability to cooperative agreements is made, AAPD 21-04 will be updated with further instructions.

Q99: No routine and regular interaction at USAID facilities?

A99: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).

Q100: Can a subcontractor choose to comply before the mod is executed?

A100: Yes.

Q101: Do the safety protocols apply to non-US based covered contactors?

A101: Please refer to the [Safer Federal Workforce Task Force website](#), including the [guidance for federal contractors and subcontractors](#) and the [FAQs for federal contractors](#).