

## CLIENT ALERT

### Federal Contractors Now Have Until January 4 for Their Covered Workforce to be Vaccinated

November 4, 2021

On November 4, 2021, the White House released a [Fact Sheet](#) announcing that federal covered contractors now have until January 4, 2022 for their covered employees to receive their final vaccination doses. Under the Executive Order 14042 and the Safer Federal Workforce Task Force guidance, covered contractors previously had until December 8, 2021 to have their covered workforce fully vaccinated or the first date of the period of performance for newly-awarded contracts. The White House announced this change so that the deadline for workers to receive their shots will be the same for the federal contractor requirements, the [Department of Labor's Occupational Safety and Health Administration's \(OSHA\) rule](#) and the [Department of Health and Human Services' Centers for Medicare & Medicaid Services' \(CMS\) rule](#), which were both issued on November 4, 2021. According to the CMS rule, although an individual is not considered fully vaccinated until 14 days (2 weeks) after the final dose, individuals who have received the final dose of a primary vaccination series by January 4, 2022 are considered to have meet the individual vaccination requirements, even if they have not yet completed the 14-day waiting period. According to the Fact Sheet, standardizing the vaccination deadline will allow federal contractors that have workplaces that are subject to both the federal contractor order and the newly-released OSHA and CMS rules to streamline implementation and set one deadline for their workforce. We are expecting the Safer Federal Workforce Task Force to issue FAQs or additional guidance to implement the information contained in the White House Fact Sheet.

Additionally, the White House clarified that the newly-released OSHA rule will not be applied to workplaces subject to the federal contractor requirement or CMS rule, so employers will not have to track multiple vaccination requirements for the same employees.

Crowell & Moring is hosting a webinar on November 10, 2021, which will address this and other key developments. The registration link is available [here](#). Crowell & Moring will also be releasing separate alerts shortly on the newly-released OSHA and CMS rules.

Crowell & Moring is continuing to monitor fast-moving developments in this area and our team is available to help companies navigate the many issues raised by the EO and Task Force guidance.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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