



Student Proof of Vaccination and Testing FAQs

Updated September 17, 2021

1. What are the requirements of the student COVID-19 proof of vaccination and testing guidelines?

Minnesota State students are required to provide proof of COVID-19 vaccination status or participate in weekly testing for COVID-19 if they:

- Live in a residence hall owned by a college or university, or by the college or university's foundation
- Participate in athletic programs
- Are subject to requirements of a clinical or experiential learning site with its own vaccination and/or testing requirements, which may differ from Minnesota State guidance
or
- Participate in other extra-curricular student groups identified for inclusion in these guidelines

2. Are student employees subject to MMB policy #1446 "COVID-19 Proof of Vaccination and Testing"?

Yes, student workers, those on work study assignments, graduate assistants, and other student employees are subject to the same proof of vaccination or testing requirements as employees. Student workers are covered under the MMB policy consistent with [Minn. Stat. 43A.08](#). Also, doing so is consistent with how student workers are included under broad state mandates such as the wage notice law and unemployment insurance. This includes students who are paid stipends for campus leadership roles, serving in student government, etc. Additional information on the MMB policy is available on the [HR Connect site](#).

3. What vaccinations are approved by the U.S. Food and Drug Administration (FDA) or the World Health Organization (WHO)?

This is the current list of WHO approved COVID vaccines, plus the foreign market/trade names (if any):

- Pfizer-BioNTech COVID-19 vaccines (e.g., Comirnaty, Tozinameran)
- Moderna COVID-19 vaccine
- Janssen (Johnson & Johnson) COVID-19 vaccine
- AstraZeneca-Oxford COVID-19 vaccines (e.g., Covishield, Vaxzevria)
- Sinopharm COVID-19 vaccine

The FDA has issued an Emergency Use Authorization (EUA) for the use of the:

- Moderna COVID-19 vaccine
- Janssen (Johnson & Johnson) COVID-19 vaccine

On August 23, 2021, the FDA approved the use of the Pfizer-BioNTech COVID-19 Vaccine, also known as Comirnaty, for the prevention of COVID-19 disease in individuals 16 years of age and older.

4. What is considered “fully vaccinated”?

According to the CDC, in general, people are considered fully vaccinated against COVID-19:

- 2 weeks after their second dose in a 2-dose COVID-19 vaccination series approved by the U.S. Food and Drug Administration (“FDA”) or the World Health Organization (“WHO”):
 - o Pfizer-BioNTech COVID-19 vaccines (e.g., Comirnaty, Tozinameran)
 - o Moderna COVID-10 vaccine
 - o AstraZeneca-Oxford COVID-19 vaccines (e.g., Covishield, Vaxzevria)
 - o Sinopharm COVID-19 vaccine,

OR

- 2 weeks after a single-dose COVID-19 vaccine approved by the FDA or the WHO
 - o Janssen (Johnson & Johnson) COVID-19 vaccine.

Students who do not meet these requirements are considered not fully vaccinated.

5. What documentation can support an attestation of vaccination?

Proof of vaccination will be:

- An original CDC COVID-19 vaccination card;
- A paper or electronic copy of a CDC COVID-19 vaccination card; or
- An original or copy of an alternative official vaccination record, as proof of FDA- or WHO-approved COVID-19 vaccination status, if vaccinated in another country.

Proof of full vaccination against COVID-19 must legibly show, at a minimum:

- Name of the individual vaccinated
- Date of birth of the individual vaccinated
- The manufacturer of the vaccine
- The date(s) on which the vaccine was administered

6. Can colleges and universities expand this requirement to apply to academic programs and academic activities where it is difficult to maintain social distancing (law enforcement skills training, science labs, etc.)?

At this time, the requirement can only be expanded to apply to activities that are extra-curricular. That includes activities such as choral ensembles, instrumental ensembles, and theater productions where there may be a mix of students participating for credit as well as students participating for no credit, as well as intramural sports.

7. Can campus-controlled health clinics require students who receive clinical training at those sites to be vaccinated? Does it need to be the same vaccination and testing framework that applies to other student groups and to student employees?

Health clinics and other clinical training sites controlled by colleges and universities should follow any applicable MDH industry guidance

(<https://www.health.state.mn.us/diseases/coronavirus/guidance.html>).

8. Is there a target or a goal for vaccination rates? At what point can colleges and universities begin to reduce or eliminate the testing requirements? What indicators will inform that decision, such as vaccination rates, community transmission rates, etc.?

While there is no identified goal or target for vaccination rates, MDH has identified a very high vaccination rate (85-90%) as being needed to blunt the effects of the delta variant. Currently, there is no timeline for eliminating the proof of vaccination or testing requirement. Similarly, MMB has not indicated how long the employee policy may be in place. The CDC's county-level transmission rates are one indicator that will inform any possible changes in mitigation strategies, along with campus case rates and vaccination rates.

9. Can students subject to these requirements request an exemption from the proof of vaccination requirement? Or the testing requirement? Can students request an ADA accommodation for an exemption from the vaccination attestation or testing requirement?

Students subject to these guidelines can choose to not be vaccinated, or choose to not share their vaccination status. In those cases, students subject to these guidelines must undergo regular testing. There is no religious or conscientious objection exemption form associated with the COVID-19 testing process. Colleges and universities may accept religious accommodation requests under existing campus processes (HR for student employees; Student Affairs or another designated campus contact for students), but weekly testing will be the appropriate option under most cases. Campuses may contact Labor Relations or the Office of General Counsel if they have questions about specific situations.

10. How will attestation of vaccination and weekly testing be collected and documented? Will weekly reports be available?

The building out of the Student VaxTraker tool is underway in collaboration with IT and ASA to be deployed by October 4. ISRS will be the tool students will be utilizing for attestation and documentation upload. IT is also working with ASA on security rules to ensure that only the necessary campus officials have access to appropriate data and information to ensure student privacy. Reporting is being developed so that campuses are able to access the data and information they need.

11. Will students need to submit attestation of vaccination or proof of testing to multiple offices if they are a student worker and live in a residence hall, are on an athletic team, etc.?

The system office is working on the technology solution for the student attestations and to track regular testing. We will provide an update once we have additional information.

12. Do students need to use a specific type of COVID-19 test?

Apart from the specifics of NCAA testing, no specific type of test is required.

13. Who is responsible for the costs associated with testing? Will insurance be billed for testing even if college or university pays for it?

Colleges and universities are responsible for covering the cost of testing. Test providers will bill insurance where allowable, but any uncovered cost will be billed to the college or university. In general, insurance will not cover testing that is conducted for surveillance purposes.

14. Are students in compliance with the testing requirement while waiting for test results if one week has lapsed since the previous test?

Yes, students may continue their normal activities while waiting for test results.

15. What are the consequences of students who do not undergo regular testing?

Ahead of the implementation on October 4, campuses should continue their vaccination educational campaigns, and to underscore the importance of testing for those who are not yet vaccinated. If students decline to submit proof of vaccination and do not undergo regular testing, campuses should determine the most appropriate campus conduct process to address specific situations.

16. What on-site testing is not available or not an option? How will students access testing? How can colleges and universities facilitate testing nearby or on campus?

MMB is working on facilitating testing sites to meet the employee requirement, which provide additional options for meeting the student testing requirements. The system office is in regular communication with MDH about testing options and have shared information about existing state contracts and the associated costs per test.

Additionally, more testing information is available here: [Find Testing Locations in Minnesota / COVID 19 Updates and Information - State of Minnesota \(mn.gov\)](#)

17. How long is a negative test good for?

A student's negative test is valid until the next testing date determined by the college or university.

18. If someone has tested positive for COVID-19 within the prior 90 days, are they subject to mandatory COVID-19 testing during that period?

Because individuals can test positive, persistently or intermittently, following a recent COVID-19 infection, the CDC recommends asymptomatic individuals be excluded from routine screening for a period of 90 days after initially testing positive by PCR test. Anyone with proof of a positive PCR test that occurred within the prior 90 days does not need to undergo mandatory weekly COVID-19 testing during the 90-day period beginning with the date of their initial positive PCR test.

19. Can students use community testing sites?

Community testing sites are not for surveillance testing of students or employees. Campuses will need to identify other testing options rather than relying on community testing sites.

20. Does the COVID-19 Proof of Vaccination and Testing approach change Minnesota State’s posture on masking or other COVID-19 mitigation strategies?

Not at this time. If Minnesota State colleges and universities are located in:

- A county that is categorized as having **Substantial** or **High** transmission by the CDC, face coverings are required in indoor public spaces for all faculty, staff, students, and visitors.
- A county that is categorized as **Low** or **Moderate**, face coverings may be required in indoor public spaces, after consulting with Vice Chancellor Maki.

Once masking is required, used MMB HR/LR Policy #1442 Face Coverings for Agency Staff Policy (mn.gov) updated 08/04/2021 for details on definitions, standards, and expectations.

As circumstances dictate, guidances will be adjusted and communicated separately.

21. Can students request the cancellation of their residence hall contracts as a result of these guidelines? How does these guidelines impact any existing refund policies and schedules?

Campuses should identify available flexibilities in instances where students cancel their residence hall contracts as a result of this requirement, especially prior to October 4.