ISSUE BRIEF

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### **COVID-19 SAFETY PROTOCOLS FOR HIGHER EDUCATION INSTITUTIONS**

# Now that Washington state has reopened, do colleges still have to follow COVID-19 safety protocols?

Yes, even though the state has reopened, colleges and universities still have to follow protocols established by the Governor's Office. Those protocols are found in <u>a higher education proclamation</u> published by the Governor's Office on June 30, 2021 (proclamation <u>20-12.3</u>, which is a revision of the October 2020 proclamation).

Fully vaccinated campuses are exempt from most requirements in the <u>June 30 higher education</u> <u>proclamation</u>, including social distancing requirements. Instead, they may voluntarily follow <u>guidance</u> <u>published by the state Department of Health</u>. The proclamation defines the conditions under which a campus is considered a "fully vaccinated campus."

At both fully vaccinated and nonvaccinated campuses, all students, faculty and staff who are unvaccinated – even if they claim a vaccine exemption – must wear a face mask according to the <u>DOH face covering order</u> and <u>L&I requirements for employers</u>.

### What's the definition of a "fully vaccinated" campus?

A fully vaccinated campus requires all students, employees, and faculty to prove — through documentation or a self-attestation — they are fully vaccinated against COVID-19 before returning to campus. Campuses must provide medical exemptions as required by law, and may provide religious and philosophical exemptions as well.

Because vaccinated people are exempt from the <u>DOH face covering order</u>, fully vaccinated campuses are sometimes informally referred to as "mask-free" campuses. In reality, though, people with vaccine exemptions still have to wear face masks.

The June 30 higher education proclamation provides a formal definition of "fully vaccinated campus."





CONTACT INFORMATION

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#### When does the new proclamation take effect?

Although the <u>June 30 higher education proclamation</u> officially took effect July 1, 2021, the Governor's Office recognizes it will take time to implement new requirements. The expectation is for colleges to fully comply with the proclamation by fall quarter.

# What are the new requirements for nonvaccinated campuses?

The <u>June 30 higher education proclamation</u> requires nonvaccinated campuses to follow these new requirements:

- Maintain 3-foot physical distancing (instead of 6 feet).
- Gather vaccination status information from all students enrolled in in-person classes.
  - **For vaccinated students**, colleges must obtain or observe documented proof of vaccination or obtain self-signed attestations from students stating that they are vaccinated.
  - For unvaccinated students, colleges must obtain a signed attestation stating they are unvaccinated.

The proclamation identifies specific language to include in the attestation.

- For faculty and staff, colleges have to gather vaccination information only from personnel who choose not to wear masks while working on campus.
- Inside college facilities, enforce compliance with the <u>DOH face covering order</u> and <u>L&I requirements</u>. Both orders require people to wear face masks unless they're vaccinated.
- A faculty member may require students to wear face masks during in-office meetings with the faculty member. (The proclamation does not make the same requirement for staff, although colleges may choose to implement similar policies.)
- Update the college's COVID-19 plan to address the new requirements listed above, plus current best practices by the <u>CDC</u> and <u>DOH</u>, and <u>L&I</u>. The plan must also address all of the "carry forward" requirements from the October 2020 proclamation, listed below. Copies of the plan must be available at each location on campus.
- Make diligent efforts to monitor and enforce student and staff compliance with the proclamation.

# Which requirements from the October 2020 proclamation were carried forward in the updated proclamation?

Many of the provisions in the October 2020 proclamation were carried forward, with a few edits, into the <u>June 30 higher education proclamation</u> and apply to nonvaccinated campuses:

#### Campus safety

- Have a comprehensive COVID-19 plan in each building (to include both the new requirements listed above and these carry-forward requirements).
- Implement and maintain handwashing policies.

- Sanitize facilities. Colleges need to implement and maintain adequate sanitation protocols consistent with CDC's <u>Cleaning and Disinfecting Your Facility</u> guidance and <u>Guidance for Institutions</u> <u>of Higher Education</u> (IHEs) and the U.S. Environmental Protection Agency's <u>list of disinfectants for</u> <u>COVID-19</u>.
  - Note this comment in the <u>CDC guidance</u>: "When no people with confirmed or suspected COVID-19 are known to have been in a space, cleaning once a day is usually enough to sufficiently remove virus that may be on surfaces and help maintain a healthy facility....If there has been a sick person or someone who tested positive for COVID-19 in your facility within the last 24 hours, you should clean AND disinfect the space."
- Implement and maintain health screening for students and staff according to the <u>DOH's Guidance</u> for <u>Daily COVID-19 System of Screening of Staff and Guests</u>. Although the title of this DOH document refers to "daily" screening, the body of the document appears to recommend screening only when people plan to be on-site.
- Develop response protocols for students, personnel and visitors with symptoms or confirmed to have COVID-19.
- Require students or personnel to follow local health jurisdiction directions if they have symptoms of, have been exposed to, or have, COVID-19. They should also follow any DOH or CDC directions provided those directions don't contradict local guidance:
  - Evaluation and Management of Persons with New Unexplained Symptoms of COVID-19.
  - What to do if you were potentially exposed to someone with COVID-19.
  - o What to do if you have confirmed or suspected COVID-19
  - What to Do If You Are Sick.
- Make a plan with local health jurisdictions to address isolation and quarantining needs of any students or personnel who are unable to do so in their usual place of residence.
- Post COVID-19 safety signs.

#### Student workers and personnel

- Provide PPE as appropriate or required for those who are not working alone or who can't maintain physical distancing requirements.
- Comply and require compliance with <u>L&I requirements for employers</u>.
- Educate students and personnel on COVID-19.
- Identify available alternative arrangements for student workers and personnel upon requests or refusals to work due to concerns related to campus safety.

#### Visitors

• Post visible COVID-19 entry signs for students, staff and visitors.

#### Dining halls

For dining halls, mark floors for physical distancing, post COVID-19 safety signs, routinely sanitize
high-touch surfaces, and enforce compliance with the <u>DOH face covering order</u> and <u>L&I requirements</u>
for employers. The proclamation does not identify the required distance between markers. SBCTC
recommends setting that distance at 3 feet to align with the distancing requirements in the
proclamation.

### I see nonvaccinated campuses must enforce masking requirements for people who are unvaccinated. Do fully vaccinated campuses have the same requirement?

The <u>June 30 higher education proclamation</u> requires nonvaccinated campuses to enforce mask-wearing for people who are unvaccinated.

Fully vaccinated campuses, on the other hand, <u>are advised to enforce mask wearing</u>. The assumption is students and staff at fully vaccinated campuses have already been required to prove their vaccination status in order to learn and work on campus, thus, virtually everyone should be able to go without a mask unless they have a vaccine exemption.

# What are some of the best practices recommended by the CDC and state Department of Health — as referenced in the June 30 higher education proclamation?

For nonvaccinated campuses, both the <u>CDC</u> and <u>Department of Health</u> recommend the same requirements as the <u>June 30 higher education proclamation</u>: physical distancing, masking, handwashing, cleaning, health screening and adherence to isolation and quarantine protocols. Here are other recommendations shared across both agencies:

- **Promote vaccinations** Offer and promote COVID-19 vaccination by providing on-site clinics, using trusted messengers (including students, faculty and staff), and facilitating off-site vaccination services in the community.
- **Conduct contact tracing** When a confirmed or probable case of COVID-19 is identified, notify your local health department and everyone who has been in close contact with the individual. Close contact is defined as someone who has been within 6 feet of the infected person for 15 minutes or more over a 24-hour period.
- Improve ventilation Improve building ventilation by, for example, introducing and circulating outdoor air, ensuring ventilation systems are operating properly, and increasing filtration.

# Must colleges gather vaccination status information for all students, or only students enrolled in face-to-face classes?

Colleges are required to gather vaccine status information only from students enrolled in face-to-face classes.

## How do students at nonvaccinated campuses show evidence of their vaccination status?

The <u>June 30 higher education proclamation</u> requires nonvaccinated campuses to keep track of the vaccination status of every student who takes in-person classes. This requirement applies to vaccinated and unvaccinated students alike.

Vaccinated students may prove their vaccination status by showing, or providing, documents such as:

- CDC vaccination card.
- Documentation of vaccination from a health care provider.
- A state immunization information system record.
- Or by supplying the college with a hard copy or electronically signed self-attestation.

Unvaccinated students must supply a hard copy or electronically signed self-attestation. <u>The proclamation</u> identifies specific language to include in the attestation.

# When are unvaccinated colleges expected to collect vaccination status information from students?

The <u>June 30 higher education proclamation</u> does not provide this level of detail. SBCTC assumes colleges would gather this information before students attend in-person classes fall quarter.

# How often must unvaccinated students attest to their vaccination status? Chances are, many will get vaccinated sometime in the school year.

The <u>June 30 higher education proclamation</u> does not provide this level of detail. SBCTC anticipates that vaccination status will be part of a student's record like other demographic characteristics and should not have to be collected each quarter. The information could be updated when an unvaccinated student becomes vaccinated.

#### Who will get to see students' vaccination status?

Each college will make its own decision on who can see a student's vaccination status. The fewer people who see the student's information, the better.

#### Are college personnel required to wear masks?

Yes, the <u>Department of Labor and Industries requires all employees to wear masks</u> while working at the college, unless they prove they are vaccinated. This is true for fully vaccinated campuses and nonvaccinated campuses alike.

# May colleges still enact college-wide masking requirements?

Yes. Like businesses, colleges may require everyone on campus to wear masks.

#### Do colleges have to enforce social gathering-size limits?

No. Social gathering size limits went away when the state reopened on June 30. However, nonvaccinated campuses have to enforce 3-foot distancing between people. The old October 2020 proclamation required 6-foot distancing.

# What rules should we follow for college activities that have parallel functions out in the community?

For activities that have parallel functions out in the general community – <u>personal services</u>, <u>fitness centers</u>, <u>libraries</u>, <u>performing arts</u>, <u>venues</u> and <u>culinary-program restaurants</u>, for example – our colleges have always followed the Healthy Washington protocols rather than the higher education proclamation. The Healthy Washington requirements went away on June 30, along with many restrictive protocols. That said, SBCTC believes the intent of the Governor's Office is for nonvaccinated campuses to maintain 3-foot physical distancing even if distancing restrictions have been lifted at counterpart services/functions out in the local community. Colleges should ensure visitors comply with the <u>DOH face covering order</u> requiring unvaccinated people to wear masks.

### Whom should I call at SBCTC if I have questions?

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