ISSUE BRIEF

JULY 9, 2021

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).

The proclamation makes a distinction between campuses that require vaccination and those that do not.

Campuses that require vaccination as a condition of learning and working on campus are exempt from most of the proclamation's mandates. Instead, they may voluntarily follow <u>guidance published by the state</u>

Department of Health.

Campuses that do not require vaccination must follow a more comprehensive set of directives in the <u>proclamation</u>.

For both types of campuses, students, faculty and staff who are unvaccinated must wear a face mask according to the <u>DOH face covering order</u> and <u>L&I requirements for employers</u> — even if they claim a vaccine exemption.

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 campuses that do not require vaccination?

The <u>June 30 higher education proclamation</u> includes these new directives for colleges that do not require vaccination:





CONTACT INFORMATION

Carli Schiffner
Deputy Executive Director
Education Division
360-704-4353
cschiffner@sbctc.edu

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- Maintain, whenever possible, 3-foot physical distancing (instead of 6 feet). Where physical distancing cannot be maintained, implement administrative or engineering controls to minimize exposure.
- Gather vaccination status information from <u>all students enrolled in in-person classes</u> and from faculty and staff who choose not to wear masks while on campus (see page 4).
- 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.
- 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.

Additionally, 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.)

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

For colleges that do not require vaccination, the <u>June 30 higher education proclamation</u> includes many of the directives found in the October 2020 version of the proclamation.

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>
 of <u>Higher Education</u> (IHEs) and the U.S. Environmental Protection Agency's <u>list of disinfectants for</u>
 COVID-19.
 - 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:
 - o Evaluation and Management of Persons with New Unexplained Symptoms of COVID-19.
 - o What to do if you were potentially exposed to someone with COVID-19.
 - 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 that campuses that do not require vaccination must enforce the DOH masking order. What about campuses that do require vaccination?

The <u>June 30 higher education proclamation</u> requires colleges that do not require vaccination to enforce students' compliance with the <u>DOH face covering order</u>.

Campuses that require vaccination, on the other hand, <u>are advised to enforce mask wearing</u>. The assumption is students at these campuses have already proved their vaccination status in order to learn and work on campus, thus, most students 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?

The <u>CDC</u> and <u>Department of Health</u> recommend physical distancing, masking, handwashing, cleaning, health screening and adherence to isolation and quarantine protocols. Both agencies also recommend colleges:

- 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** <u>Improve building ventilation</u> 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 that do not require vaccination must gather vaccine status information only from students enrolled in face-to-face classes.

At campuses that do not require vaccination, how do students prove whether or not they're vaccinated?

Under the <u>June 30 higher education proclamation</u>, colleges that do not require vaccination must 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.

For faculty and staff, colleges have to gather vaccination information only from personnel who choose not to wear masks while working on campus.

When should colleges expect 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 that do not require vaccination 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 campuses that require vaccination and those that do not.

May colleges still enact college-wide masking requirements?

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

May colleges grant students vaccine exemptions for religious or philosophical reasons?

Yes, colleges that require vaccination may grant students vaccine exemptions for medical, religious or philosophical reasons. Students with vaccine exemptions still have 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, 3-foot physical distancing must still be enforced at campuses that do not require vaccination. The October 2020 version of the 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 campuses that do not require vaccination to maintain, whenever possible, 3-foot physical distancing even if distancing restrictions have been lifted at counterpart services/functions out in the local community. Colleges that are unable to maintain physical distancing should implement administrative or engineering controls to minimize exposure.

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?

- Carli Schiffner, deputy executive director of education, cschiffner@sbctc.edu | 360-704-4353
- Laura McDowell, communications director, lmcdowell@sbctc.edu | 360-280-0670 (cell)
- Julie Huss, human resources director, jhuss@sbctc.edu | 360-704-4350