ISSUE BRIEF

JULY 27, 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 July 12, 2021 (proclamation <u>20-12.4</u>, which is a revision of the October 2020 and June 30, 2021 proclamations).

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>July 12 higher education proclamation</u> is already in effect, 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.

How do mandates/guidance differ for campuses that require vaccination and those that do not?

The following chart summarizes key mandates and/or guidance for colleges that require vaccination and those that do not.





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Topic	Colleges that	Colleges that do not	Notes
	require vaccination	require vaccination	
Physical distancing			
Physical distancing required	N	Y_— 3 feet	Colleges that do not require vaccination must maintain, whenever possible, 3-foot physical distancing. Where physical distancing cannot be maintained, colleges must implement administrative or engineering controls to minimize exposure.
Vaccination requiren			
Students coming to campus must be vaccinated, with exemptions allowed	Y — under the July 12 higher ed proclamation's definition of a "fully vaccinated campus"	N	Colleges must offer legally-required medical exemptions and may provide religious or philosophical exemptions.
Employees coming to work on campus must be vaccinated, with exemptions allowed	Y — under the July 12 higher ed proclamation's definition of a "fully vaccinated campus"	N	Colleges must offer legally-required medical exemptions and may provide religious or philosophical exemptions.
Vaccination status v	erification		
Colleges must record the vaccination status of vaccinated students, faculty and staff who are learning and working on campus	Y for all students who are taking in- person classes Y for faculty and staff who do not wear masks; otherwise, colleges don't need to record their vaccination status	Y for all students — The July 12 higher ed proclamation requires colleges that do not require vaccination to nevertheless obtain or observe proof of vaccination from fully vaccinated students who are taking in-person classes. Y for faculty and staff who do not wear masks; otherwise, colleges don't need to record their vaccination status	According to the July 12 higher ed proclamation, proof of full vaccination can be in the form of a signed attestation or documentation such as a CDC vaccination card or information from a health care provider or the state's immunization information system. The proclamation identifies specific language to include in the student attestation. Colleges must verify the vaccination status of all employees who do not wear face coverings, according to L&I requirements for employers. Proof of full vaccination can be in the forms described above.

Topic	Colleges that	Colleges that do not	Notes
Colleges must record the vaccination status of unvaccinated or vaccine-exempt students, faculty	require vaccination N — but unvaccinated or vaccine-exempt students, faculty and staff must wear masks	require vaccination N — but unvaccinated or vaccine-exempt students, faculty and staff must wear masks according to	See question on page 4: "Can colleges just decide to ask all students, faculty and staff to supply vaccination information?"
and staff who are learning and working on campus.	according to the DOH face covering order and L&I requirements for employers	the <u>DOH face</u> covering order and L&I requirements for employers	
Protection of high-ris High-risk employees are protected from discrimination	Y Y	Y	Signed into law in 2021, the Health Emergency Labor Standards Act protects high-risk employees from discrimination during public health emergencies.
Masks Masks required for unvaccinated people inside college facilities, including those with vaccination exemptions	Y	Y	See <u>DOH face covering order</u> , which requires everyone to wear a mask unless they're vaccinated. This is true for students, faculty and staff alike.
Colleges must allow a faculty member to require all students, regardless of their vaccination status, to wear a mask during in-office meetings with the faculty member.	N	Y — The July 12 proclamation does not make the same requirement for staff, however, colleges may choose to implement a similar policy.	

Topic	Colleges that require vaccination	Colleges that do not require vaccination	Notes
Health attestations			
Health attestations required before students, faculty and staff come to campus	N	Υ	Colleges that do not require vaccination must continue health screening attestations according to the DOH's Guidance for Daily COVID-19 System of Screening of Staff and Guests. 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.
Planning			
Comprehensive COVID-19 plans required	N	Y	College plans must incorporate current best practices by the CDC and DOH, and L&I. Copies of the plan must be available at each location on campus.
Dining halls			
Use signs and floor markings for physical distancing	N	Y	SBCTC recommends that floor markings be set 3 feet apart to align with the proclamation.

May colleges just decide to ask all students, faculty and staff to supply vaccination-status information?

Yes for the sake of efficiency, colleges may choose to ask all students, faculty and staff to provide information about their vaccination status. This way, everyone would complete a common form. SBCTC's IT department is working on solutions in ctcLink and the Legacy system so employees and students can self-report vaccination information into their records.

When should colleges expect to collect vaccination status information from students?

The <u>July 12 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.

Which protocols should Running Start students follow?

Running Start students follow requirements of the colleges they are attending while at the college. They follow their home high school requirements when they are at their high school.

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

The <u>July 12 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.

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.

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

For colleges that do not require vaccination, the <u>July 12 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.
- 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>
 <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
 - o 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.
- Protect high-risk employees from discrimination according to the <u>Health Emergency Labor Standards Act</u> and other applicable laws.

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 <u>July 12</u>
proclamation.

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.

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?

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