

COVID-19 SAFETY PROTOCOLS FOR HIGHER EDUCATION INSTITUTIONS

Which COVID-19 safety protocols must colleges follow?

Colleges must follow several proclamations and rules around COVID-19 health and safety. The following chart indicates the key document for each issue, but there may be crossover language in the other documents listed on this chart or elsewhere. We've described most of those crossover effects later in this issue brief.

Issue	Higher education proclamation 20-12.5	Vaccination proclamation 21-14.1 for employees at agencies, K-12 and higher ed, and health care institutions	Statewide mask order 20-03.4 from the state Department of Health	Labor & Industry requirements and guidance for employers	Higher ed guidance from the Department of Health	Health Emergency Labor Standards Act protects high-risk employees from discrimination during public health emergencies
Student vaccinations (a local college decision)	X					
Student vaccinations – in clinical placements		X				
College employee vaccinations	Higher ed proclamation refers to this vaccination proclamation	X				

CONTACT INFORMATION

SAFETY PROTOCOLS FOR HIGHER EDUCATION INSTITUTIONS

Issue	Higher education proclamation 20-12.5	Vaccination proclamation 21-14.1 for employees at agencies, K-12 and higher ed, and health care institutions	Statewide mask order 20-03.4 from the state Department of Health	Labor & Industry requirements and guidance for employers	Higher ed guidance from the Department of Health	Health Emergency Labor Standards Act protects high-risk employees from discrimination during public health emergencies
Student masks			X			
College employee masks			X			
Overall health and safety protocols for colleges requiring vaccination	X				X	
Overall health and safety protocols for colleges that are not requiring vaccination	X					
Health and safety guidance and rules for all employees in Washington state, including private businesses				X		X

Does everyone on campus need to wear a mask indoors?

Yes, according to [a statewide mask order](#), masks are required for everyone who is in an indoor public space, regardless of vaccination status. For employees, there are limited exceptions when face coverings aren't required:

- When the employee is vaccinated and in an office space that is not easily accessible to the public.
- When an employee — vaccinated or unvaccinated — is working alone indoors or in a vehicle with no interactions with others and no expectation of in-person interruptions.

Who is required to be vaccinated on campus, and how do they report their vaccination status?

Students

There is no state mandate for students to be vaccinated; it's a local college decision. The higher education proclamation spells out rules for colleges that choose to require students to be vaccinated, and those that do not.

At colleges requiring vaccination

- Students who come to campus for in-person classes or services (including Running Start students) must be fully vaccinated or have a medical or religious exemption from the college. According to the [higher education proclamation](#), proof of full vaccination can be in the form of:
 - A signed attestation.
 - A CDC Covid-19 vaccination card or photo of the card.
 - Documentation of vaccination from a health care provider or electronic health record.
 - State immunization information record.
- Medical and religious exemptions are granted on a case-by-case basis by the college. Philosophical exemptions are not allowed.
- 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.
- The higher education proclamation took effect immediately, but the Governor's Office recognized that it takes time for colleges to implement all the requirements. Students are expected to be fully vaccinated before coming to campus, starting fall quarter.

At colleges not requiring vaccination

- Students don't have to be vaccinated, or have an exemption, in order to attend in-person classes or services at colleges that do not require vaccination. However, everyone on campus needs to maintain 3 feet of physical distancing, and the college needs to enact comprehensive health and safety protocols that are specified in the [higher education proclamation](#).
- Vaccinated students who attend in-person classes or services still have to supply vaccination-status information to the college. There are two reasons for this requirement, found in the higher education proclamation:

1. It allows the college and the state to see vaccination trends among college students
 2. If the [statewide mask mandate](#) is ever lifted in the future, the attestation form will help colleges identify students who can go without a mask.
- 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.

Employees

- According to [the vaccination proclamation](#), all state employees must be vaccinated, or have a medical or religious exemption, by Oct. 18. (Philosophical exemptions are not allowed.) This requirement applies even if the employee is working entirely online.
- The vaccination requirement applies to all cabinet-level state agencies, as well as employees in K-12 and higher education, and in health care settings. The vaccination requirement also applies to:
 - Student workers.
 - College boards of trustees, who are considered workers under the proclamation.
- Health care students who have clinical rotations must follow the vaccination requirements of the health care institution where they will be working – i.e., they must be fully vaccinated or have an exemption before their clinical experience.
- According to the vaccination proclamation, proof of full vaccination for employees can be in the form of:
 - A CDC Covid-19 vaccination card or photo of the card.
 - Documentation of vaccination from a health care provider or electronic health record.
 - State immunization information record.
 - Employees vaccinated outside the U.S. may show a reasonable equivalent of these documents.
- Attestations alone do not qualify as evidence of vaccination for employees (unlike for students).

Visitors and volunteers

For visitors and volunteers, the vaccination requirements depend on whether a college has decided to become a “fully vaccinated” campus.

At colleges requiring vaccination

- Volunteers must be vaccinated or have an exemption, but only if they are coming to campus (per the [vaccination proclamation](#)).
- Visitors don't have to be vaccinated (per the higher education proclamation and the [vaccination proclamation](#)).

At colleges not requiring vaccination

Visitors and volunteers do not need to be vaccinated, but the college must enforce 3-foot social distancing and follow additional comprehensive health and safety protocols.

Contractors

The [vaccination proclamation](#) requires contractors to be vaccinated under certain circumstances, as shown on the chart to the right.

The proclamation gives agencies/colleges the option of having the contractor verify vaccination or doing it themselves. If the contractor does the verification, it must do so in a method similar to how the colleges would do it for their own employees. The contractor can't allow self-attestation, and they must have some process in place for medical/religious exemptions.

		Contractor
Type of Facility	State Facility	Vaccinated
	Other Facility	Follow Employer Policy

Do campus vaccination requirements apply to all students, even those learning 100% online?

The higher education proclamation requires “fully vaccinated” campuses to require vaccinations or exemptions from students who are coming to campus for in-person classes or student services. This includes online students who come to campus for in-person services.

The Governor’s Office and the state Department of Health advised SBCTC that the best practice is for fully vaccinated campuses to require all students — even those learning entirely online — to be vaccinated or have a medical or religious exemption because there is a chance they could come to campus. Even students taking 100% online classes may come to campus, whether to visit a library or pick up financial aid.

When do employees have to get their vaccine doses in order to comply with the Oct. 18 deadline?

All employees must be fully vaccinated or have an exemption by Oct. 18, 2021. However, colleges may set an earlier date to allow enough time to verify employees’ vaccination status and process exemptions by Oct. 18. The following chart by the state Department of Health shows when employees have to get their vaccine doses to meet the Oct. 18 deadline.

Vaccine	Series Dose Requirement	First Dose No Later Than	Second Dose	Completed Series	Fully Vaccinated
Pfizer	2 doses, 21 days apart	09/13/21	10/04/21	10/04/21	10/18/21
Moderna	2 doses, 28 days apart	09/06/21	10/04/21	10/04/21	10/18/21
Johnson & Johnson	Single dose	10/04/21	N/A	10/04/21	10/18/21

What other health and safety protocols must colleges follow, beyond masking and vaccinations?

In addition to the masking, vaccination and documentation requirements listed above, colleges must follow other health and safety protocols found in the [higher ed 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 [guidance published by the state Department of Health](#).

Campuses that **do not** require vaccination must follow a more comprehensive set of directives in [the proclamation](#). These include:

Campus safety

- Enforce 3-foot physical distancing. Where physical distancing cannot be maintained, colleges must implement administrative or engineering controls to minimize exposure.
- Require health attestations from students, faculty and staff coming to campus, according to [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 campus.
- Have a comprehensive COVID-19 plan in each building. 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
- Implement and maintain handwashing policies.
- Sanitize facilities. Colleges need to implement and maintain adequate sanitation protocols consistent with CDC's [Cleaning and Disinfecting Your Facility](#) guidance and [Guidance for Institutions of Higher Education](#) and the U.S. Environmental Protection Agency's [list of disinfectants for COVID-19](#).
 - Note this comment in the [CDC guidance](#): "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."
- 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](#)
 - [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 [L&I requirements for employers](#).
- Educate students and personnel on COVID-19.
- Protect high-risk employees from discrimination according to the [Health Emergency Labor Standards Act](#) 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 [DOH face covering order](#) and [L&I requirements 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 [higher education proclamation](#).

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

The [CDC](#) and [Department of Health](#) 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** — [Improve building ventilation](#) by, for example, introducing and circulating outdoor air, ensuring ventilation systems are operating properly, and increasing filtration.

Note from SBCTC: King County Public Health shared a useful [Covid isolation and quarantine calculator](#).

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 – [personal services](#), [fitness centers](#), [libraries](#), [performing arts](#), [venues](#) and [culinary-program restaurants](#), 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.

Whom should I call at SBCTC if I have questions?

- Carli Schiffner, deputy executive director of education, cschiffner@sbctc.edu | 360-704-4353
- Choi Halladay, deputy executive director of business operations, cholladay@sbctc.edu | 360-704-4303
- Julie Huss, human resources director, jhuss@sbctc.edu | 360-704-4350
- Laura McDowell, communications director, lmcdowell@sbctc.edu | 360-280-0670 (cell)