

# Phase 2 Higher Education & Workforce Training COVID-19 Requirements

***Phase 2: All non-lecture based Higher Education and Workforce Training is now allowed.***

***All non-lecture based higher education and workforce training, including those activities for which social distancing may not be maintained, is authorized to resume. Adherence to the health and safety points below will be strictly enforced. Workforce training includes schools licensed by the Workforce Training and Education Coordinating Board (Workforce Board) and the Department of Licensing (DOL).***

Prior to recommencing higher education and workforce training programs, all schools are required to develop and post a comprehensive, Phase 2 COVID-19 exposure control, mitigation, and recovery plan. Higher education institutions and workforce training providers remain strongly encouraged to continue remote learning as much as possible to limit in-person interactions. The plan must include policies regarding the following control measures: PPE utilization; on-site social distancing; hygiene; sanitation; symptom monitoring; incident reporting; site decontamination procedures; COVID-19 safety training; exposure response procedures; and a post-exposure incident project-wide recovery plan. Along with posting the COVID-19 exposure control, mitigation, and recovery plan, schools under the Workforce Board's jurisdiction must also submit a signed attestation.

**A copy of the COVID-19 exposure control, mitigation, and recovery plan must be available at each location during any activities**, and available for inspection by state and local authorities. Employees and students must be trained on the safety protocols listed below before activities begin. Failure to meet posting requirements could result in sanctions, including work and instructional activities being shut down.

**All programs are required to post, at each location, a written notice to employees and government officials the Phase 2 work and instructional programs that will be performed at that location, and signed commitment to adhere to the requirements listed in this document.**

**All programs have a general obligation to keep a safe and healthy location in accordance with state and federal law. Programs must comply with COVID-19 worksite-specific safety practices** including those outlined in Gov. Jay Inslee's "Stay Home, Stay Healthy" Proclamation 20-25, in accordance with the Washington State Department of Labor & Industries (L&I) [General Requirements and Prevention Ideas for Workplaces](#), and the Washington State Department of Health (DOH) Workplace and Employer Resources & Recommendations at <https://www.doh.wa.gov/Coronavirus/workplace>. Failure to follow these requirements is considered a violation of these duties and will be penalized accordingly. Under RCW 49.17.060, "each employer shall furnish to each of their employees a place of employment free from recognized hazards that are causing or likely to cause serious injury or death to his or her employees and shall comply with the rules, regulations, and orders promulgated under this chapter."

All programs must specifically ensure operations follow the main L&I COVID-19 requirements to protect employees and students, including:

- Educate employers and students about coronavirus, how to prevent transmission, and the provider's COVID-19 policies.
- Maintain minimum six-foot separation between all employees (and students) in all interactions at all times. When strict physical distancing is not feasible for a specific activity, other prevention measures

are required, such as use of barriers, minimize employees and students in narrow or enclosed areas, stagger breaks, and deliver programs in shifts or cohorts.

- Provide personal protective equipment (PPE) such as gloves, goggles, face shields, and face masks as appropriate or required to employees and students for the activity being performed. **Facial coverings must be worn by every employee, instructor, and student not working alone (with no chance of human interaction) at the location, and by all patients and clients except for those receiving dental or esthetician services, unless their exposure dictates a higher level of protection under Department of Labor & Industries safety and health rules and guidance.** Refer to [Coronavirus Facial Covering and Mask Requirements](#) for additional details, [https://www.lni.wa.gov/agency/docs/wacoronavirus\\_hazard\\_consideration\\_employers.pdf](https://www.lni.wa.gov/agency/docs/wacoronavirus_hazard_consideration_employers.pdf). A cloth facial covering is described in the Department of Health guidance, <https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf>.
- Ensure frequent and adequate hand washing with adequate maintenance of supplies. Use disposable gloves where safe and applicable to prevent transmission on tools or other shared items.
- Establish a housekeeping schedule that includes frequent cleaning and sanitizing with a particular emphasis on commonly touched surfaces.
- Screen employees/students/patients/clients for signs/symptoms of COVID-19 at start of each class. Make sure sick employees/students stay home or immediately go home if they feel or appear sick. Cordon off any areas where an employee/student with probable or confirmed COVID-19 illness worked, touched surfaces, etc. until the area and equipment is cleaned and sanitized. Follow the [cleaning guidelines set by the CDC](#) to deep clean and sanitize.

An employee may refuse to perform unsafe work, including hazards created by COVID-19. It is unlawful for their employer to take adverse action against a worker who has engaged in safety-protected activities under the law if their work refusal meets certain requirements.

Employees/students who choose to remove themselves from a location because they do not believe it is safe to work due to the risk of COVID-19 exposure may have access to certain leave or unemployment benefits. Employers must provide high-risk individuals covered by Proclamation 20-46 with their choice of access to available employer-granted accrued leave or unemployment benefits if an alternative work arrangement is not feasible. Other employees may have access to expanded family and medical leave included in the Families First Coronavirus Response Act, access to use unemployment benefits, or access to other paid time off depending on the circumstances. Additional information is available at <https://www.lni.wa.gov/agency/outreach/paid-sick-leave-and-coronavirus-covid-19-common-questions>.

#### **COVID-19 exposure control, mitigation, and recovery plans must include at minimum:**

##### **COVID-19 Site Supervisor**

1. A site-specific COVID-19 Supervisor shall be designated by the program at every location to monitor the health of employees/students and enforce the COVID-19 location safety plan. They must keep the plan current with changes to COVID-19 guidelines. A designated COVID-19 Supervisor must be available at all times during work and class activities.

##### **COVID-19 Safety Training**

2. A safety training must be conducted on all locations on the first day of returning to work/class, and weekly thereafter, to explain the protective measures in place for all employees and students. Social distancing must be maintained at all gatherings.

3. Attendance will be communicated verbally and the trainer will sign in each attendee.

### **Social Distancing**

4. Social distancing of at least 6-feet of separation must be maintained by every person at the location at all possible times. In instances where the 6-foot separation cannot be maintained, the COVID-19 exposure control, mitigation, and recovery plan shall be thoroughly reviewed by all employees/students performing those activities prior to commencing.
5. Gatherings of any size must be precluded by taking breaks, performing lab-type activities, and lunch in shifts. Any time two or more persons must meet, ensure minimum 6-feet of separation.
6. Identify “choke points” and “high-risk areas” on job sites where workers typically congregate and control them so social distancing is always maintained. Consider relocating from small classrooms into larger rooms to accommodate more room for social distancing when at all possible.
7. Minimize interactions during class activities; ensure minimum 6-foot separation when at all possible by furniture placement, physical barriers, and/or demarking floors with tape. Limit the number of students based on class size and activities to allow for 6-foot separation.
8. To the extent practical, allow only one group/class at a time at the same location/lab/classroom.

### **Personal Protective Equipment (PPE)**

9. Provide personal protective equipment (PPE) such as gloves, goggles, face shields, and masks as appropriate or required for the activity being performed. **Facial coverings must be worn by every employee, instructor, and student not working alone (with no chance of human interaction) at the location, and by all patients and clients except for those receiving dental or esthetician services, unless their exposure dictates a higher level of protection under Department of Labor & Industries safety and health rules and guidance.** Refer to [Coronavirus Facial Covering and Mask Requirements](#) for additional details, <https://www.lni.wa.gov/agency/docs/wacoronavirushazardconsiderationemployers.pdf>. A cloth facial covering is described in the Department of Health guidance, <https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf>.
10. If appropriate PPE cannot be provided by the school, the activity is not authorized to commence, recommence, or the site must be shut down.

### **Sanitation and Cleanliness**

11. Soap and running water shall be abundantly provided at all locations for frequent handwashing.
12. Employees and students should be encouraged to leave their workstations to wash their hands regularly, before and after going to the bathroom, before and after eating and after coughing, sneezing, or blowing their nose.
13. When running water is not available, portable washing stations, with soap, are required. Alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol can also be used, but are not a replacement for the water requirement.
14. Post, in areas visible to all workers, required hygienic practices, including not to touch face with unwashed hands or with gloves; washing hands often with soap and water for at least 20 seconds; use hand sanitizer with at least 60% alcohol; cleaning and disinfecting frequently

touched objects and surfaces such as workstations, keyboards, telephones, handrails, machines, shared tools, elevator control buttons, and doorknobs; covering the mouth and nose when coughing or sneezing as well as other hygienic recommendations by the U.S. Centers for Disease Control (CDC).

15. Make disinfectants available to workers throughout the worksite and ensure cleaning supplies are frequently replenished.
16. Frequently clean and disinfect high-touch surfaces at locations and in offices, such as shared tools, machines, vehicles and other equipment, handrails, doorknobs, and restrooms. If these areas cannot be cleaned and disinfected frequently, the locations shall be shut down until such measures can be achieved and maintained.
17. Shared tools and other equipment must be sanitized between users.
18. If an employee reports feeling sick and goes home, the area where that person worked should be immediately disinfected.

### **Employee Health/Symptoms**

19. Create policies which encourage workers to stay home or leave the worksite when feeling sick or when they have been in close contact with a confirmed positive case. If they develop symptoms of acute respiratory illness, they must seek medical attention and inform their employer.
20. Have employees/students inform their supervisors if they have sick family member at home with COVID-19. If an employee/student has a family member sick with COVID-19, that employee/student must follow the isolation/quarantine requirements as established by the State Department of Health.
21. Screen all employees/students at the beginning of their day by asking them if they have a fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell.
22. Ask employees/students to take their temperature at home prior to arriving at work or take their temperature when they arrive. Thermometers used at the school must be 'no touch' or 'no contact' to the greatest extent possible. If a 'no touch' or 'no contact' thermometer is not available, the thermometer must be properly sanitized between each use. Any employee/student with a temperature of 100.4°F or higher is considered to have a fever and must be sent home.
23. Instruct employees/students to report to their supervisor if they develop symptoms of COVID-19 (e.g., fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell). If symptoms develop during a shift, the employee/student should be immediately sent home. If symptoms develop while the employee/student is not working, the employee/student should not return to work/class until they have been evaluated by a healthcare provider.
24. Failure of employees/students to comply will result in employees/students being sent home during the emergency actions, for example if an employee/student refuses to wear the appropriate facial covering.
25. Any employee/student coming to work/class on a location in Washington from any state that is not contiguous to Washington must self-quarantine for 14 days to become eligible to work or attend class in Washington.
26. If an employee/student is confirmed to have COVID-19 infection, employers/program providers should inform fellow employees/students of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).

The employer should instruct fellow employees about how to proceed based on the CDC [Public Health Recommendations for Community-Related Exposure](#).

### **Location Visitors**

27. A daily class attendance log of all employees, students, and visitors must be kept and retained for at least four weeks. The log must include the name, phone number, and email address of all employees, students, and visitors. Visitors are strongly discouraged.

**No location or activities may operate until the program can meet and maintain all requirements, including providing materials, schedules, and equipment required to comply.**

### **Special Programmatic Provisions**

#### ***Cosmetology Programs***

Cosmetology schools must also follow the safety and sanitation standards in [WAC 308-20-110](#).

#### ***Motorcycle skills training and testing***

Motorcycles that are provided for use by the school must be disinfected using the appropriate anti-viral cleaning product(s) before conducting training or testing.

#### ***Training and testing inside a vehicle***

Instructors must use the following PPE and supplies, and receive training on their proper use:

- Gloves
- Masks
- Anti-viral cleaning products

Instructors must ensure students have the appropriate face covering for use during testing or training. Training or testing will be rescheduled if necessary.

Only one student may be allowed in a vehicle with an instructor.

The windows of the vehicle will be rolled down enough to create airflow throughout the vehicle.

When in-car training is scheduled, or is about to be conducted, the school will provide expectations for students:

- Students are to check in and then wait in the vehicle until the school employee is prepared to begin.
- Students are not to congregate with each other or staff.
- Students will be told they cannot train if they exhibit symptoms of illness.

The interior of the vehicle must be disinfected using the appropriate anti-viral cleaning product(s) before conducting in-car testing or training.

Social distancing will be observed whenever practical, for example during the pre-trip inspection.

### **Resources**

These Phase 2 COVID-19 location safety practices are required as long as the “Stay Home, Stay Healthy” Gubernatorial Proclamation 20-25 is in effect or if adopted as rules by a federal, state or local regulatory agency. All issues regarding worker safety and health are subject to enforcement action under L&I’s Division of Occupational Safety and Health (DOSH).

- Employers can request COVID-19 [prevention advice and help](#) from L&I’s Division of Occupational Safety and Health (DOSH).
- Employee workplace safety and health complaints may be submitted to the L&I DOSH Safety Call Center: (1-800-423-7233) or via e-mail to [adag235@lni.wa.gov](mailto:adag235@lni.wa.gov).

- General questions about how to comply with the agreement practices can be submitted to the state's Business Response Center at <https://app.smartsheet.com/b/form/2562f1caf5814c46a6bf163762263aa5>.
- All other violations related to Proclamation 20-25 can be submitted at <https://bit.ly/covid-compliance>.

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