

## COVID-19 SAFETY PROTOCOLS FOR HIGHER EDUCATION INSTITUTIONS

### Are colleges still required to follow the higher education proclamation and DOH guidance for higher education?

Yes, at the time this publication was written, the [higher education proclamation](#) and [DOH higher education guidance](#) were still in effect and had not been amended. The higher education proclamation outlines requirements for all colleges, regardless of whether the colleges require students to be vaccinated. The DOH guidance document is just that – guidance – and it applies only to colleges that require vaccination.

### How does Gov. Inslee’s announcement on lifting the mask mandate affect colleges?

Both the [higher education proclamation](#) and [DOH higher education guidance](#) refer back to the statewide mask order. Given that [Gov. Inslee will remove the mask mandate effective March 12](#), SBCTC’s interpretation is that colleges may lift indoor mask mandates on March 12 as well. [Local public health departments](#) still have the authority to require masks. SBCTC encourages colleges to check local health department rules before making decisions or announcements.

Masks will still be required in health care settings – such as hospitals, dental offices and long-term care facilities – and in correctional facilities. [Federal rules](#) requiring masks on public transit, taxis and rideshare vehicles also remain in effect.

### May colleges still require masks if they choose to do so?

SBCTC’s interpretation is that, like K-12 school districts, community and technical college districts will still be able to require masks indoors despite the lift in the statewide mandate effective March 12.

### Will employees be required to wear masks?

At his Feb. 28 news conference, Gov. Inslee indicated mask mandates for employees will also be lifted on March 12, but that employers may still require masks if they choose to do so. SBCTC is still awaiting formal rules from the Department of Labor & Industries.

## What about vaccine requirements?

Governor Inslee's vaccine requirement for state employees remains in effect. This requirement applies to current and future employees.

## 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.

#### 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.
- 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. (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

According to [a vaccine mandate FAQ](#) by the Governor’s Office, vaccinations are not required of contractors who are at a site for a short period of time and have a fleeting physical presence with others.

## 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.

## What’s the difference between an exemption and an accommodation?

People can seek an exemption from vaccine requirements for medical reasons or sincerely held religious beliefs. If colleges decide to grant an exemption, the colleges then have to determine if they can provide a reasonable accommodation.

## How can I meet the vaccine requirement if I work for a public or private university or college in an ECEAP/Early ECEAP or Head Start/Early Head Start program?

According to the Governor’s Office and the Washington State Department of Children, Youth & Families (DCYF), the university or college will assume the responsibility of verifying documents for their employees that are providing ECEAP/Early ECEAP or Head Start/Early Head Start services. Staff working in ECEAP/Early ECEAP or Head Start/Early Head Start programs also will need to document in DCYF’s MERIT system that they have met the vaccine mandate as verified by their university or college employer.

## What other health and safety protocols must colleges follow?

In addition to the 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 many 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](#) (Note: as of March 1, 2022, DOH had not updated this document. Please see the [DOH website](#) instead.)
  - [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 and routinely sanitize high-touch surfaces. 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](#).

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

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