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 Department of Health higher education guidance were still in effect.

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, for the most part, it applies only to colleges that require vaccination. However, the Department of Health in August amended its guidance to remove a 3-foot distancing requirement for colleges that do not require vaccination. Please see page 6 for details.

Will the higher education proclamation be revoked?

The proclamation remains in effect. The Governor’s Office and Department of Health continue to periodically meet with higher education leaders to discuss COVID-related issues. SBCTC will update this fact sheet if announcements are made.

Are any mask mandates still in effect?

Statewide mask mandates were lifted for most places on March 12. Masks are still required in health care settings — such as hospitals, dental offices and long-term care facilities — and in correctional facilities.

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

Like K-12 school districts, community and technical college districts may still require masks indoors.

Are employees required to wear masks?

Statewide mask mandates for employees were lifted on March 12, but individual employers may still require masks if they choose to do so.
What rules must colleges follow to help protect employees from COVID?

As employers, colleges must comply with COVID-related requirements established by the Washington State Department of Labor and Industries.

Are vaccination requirements for employees still in effect?

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

The Governor’s latest revision to the state employee vaccine requirement does not require boosters, but it does direct the Office of Financial Management to develop incentive programs to promote boosters for employees. At this time, higher education institutions are not required to participate in the booster incentive program.

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 makes 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, the college must 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.

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. State employees are not required to have booster shots as a condition of employment, but OFM is developing incentive programs to promote boosters for state employees. Higher Education Institutions are not required to participate in the booster incentive program.

- 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 – e.g., 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.
Contractors

The vaccination proclamation requires indoor 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.

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

Boosters, and booster incentives, are not required for contractors. Contractors are not included in Governor’s Directive 22-13.1, which directs the Office of Financial Management to establish booster incentive programs for certain state employees.

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**

- Require health attestations from students, faculty and staff coming to campus, consistent with 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, 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: “If no one with confirmed or suspected COVID-19 has been in a space cleaning once a day is usually enough to remove virus that may be on surfaces. This also helps maintain a healthy facility.”

- 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
  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**

• 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.

### Is 3-foot physical distancing still required at colleges that do not require vaccination?

Technically, the higher ed proclamation still requires 3-foot physical distancing. However, on Aug. 11 the CDC issued new guidelines that deemphasize physical distancing at this stage of the pandemic. In response, the state Department of Health issued new guidance for higher education institutions. The new guidance states:

“All non-fully vaccinated campuses must continue to follow the requirements of proclamation 20-12.5. Physical distancing requirements for non-fully vaccinated campuses, however, may align with current CDC guidance.”

Although the proclamation still contains language about 3-foot distancing, it is clear that — through the Department of Health’s new guidance — the intent of the Governor’s Office is to remove this mandate and align with the CDC instead.

Given this change in guidance, it is SBCTC’s interpretation that colleges that do not require vaccination are no longer mandated to maintain 3-foot social distancing or to mark dining hall floors for distancing.
Whom should I call at SBCTC if I have questions?

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