To: HELC Licensed Institutions

From: Angela H. Lee, Executive Director

Re: COVID-19 Phase Two Reopening: Guidance for Institutions of Higher Education

Date: June 26, 2020

This memo provides reopening guidance to institutions of higher education operating in the District of Columbia (District) as we continue ensuring the health and safety of students, faculty and staff during the spread of coronavirus (COVID-19). Please visit https://coronavirus.dc.gov/ for up-to-date information on the District’s response.

On June 17, 2020, Mayor Bowser announced that Phase Two of Reopen DC will begin on Monday, June 22, 2020. During Phase Two, institutions of higher education may reopen. In accordance with Centers for Disease Control and Prevention (CDC) guidance and other best practices guidelines, postsecondary institutions shall prepare and submit plans for offering in-person instruction and reopening. Those plans should be submitted to the Higher Education Licensure Commission (HELC) via email to osse.elcmail@dc.gov, under the signature of the chief executive officer or other authorized official of the respective institution.

The HELC will review the plans to ensure they contain the required components as published by the DC Department of Health (DC Health) Phase Two Guidance for Institutions (Preschool K-12 and Adult Education) and HELC Policy Guidance for Re-opening Post-secondary Schools: COVID-19 Recovery Period. Institutions are strongly encouraged to post their plans on their websites.

As they receive additional health guidance, institutions should update their plans and any updates should also be reflected on the institution’s website. These plans do not supersede any District or federal guidance that is in place, and institutions must remain in compliance with such guidance. At all times, institutions should regularly check with DC Health and the District coronavirus website for the most up-to-date information.

It is likely that outbreaks of COVID-19 will continue. Therefore, school plans should consider various contingencies for continuing operations in the event of such potential outbreaks. Institutions are required to report cases and outbreaks to the DC Health, and to consult with DC Health and the HELC regarding the management of outbreaks, dismissals or similar decisions such as a shutdown of the institution’s activities.
At a minimum, an institution’s plans must address the following:

**A. Important Contacts & Timeframes**
1. Identification of a COVID-19 coordinator/campus team.
2. Contact information and procedures for engaging DC Health and HELC.
3. Provide a timeline for reopening.

**B. Support Safety of Employees and Students**
1. **Daily Health Screening**
   a. Describe a process to screen students/faculty/staff entering the building or when returning to campus.
   b. Describe a process to isolate and/or quarantine students/faculty/staff if they develop symptoms during the course of the day.

2. **Encourage Health Practices**
   a. Describe a policy to ensure adequate supplies of soap, paper towels, hand sanitizer and tissue in support of healthy hygiene practices.
   b. Describe plans to offer COVID-19 prevention education/training of students/faculty/staff on proper hygiene strategies (e.g., handwashing, staying home if ill, etc.).
   c. Describe a process to identify sources of contamination for potential outbreaks of COVID-19 through contact tracing.
   d. Describe a process to communicate with students/faculty/staff of potential outbreaks of COVID-19 and procedures to be deployed in mitigating adverse health impacts.

3. **High-Risk Individuals**
   Describe considerations for high-risk and vulnerable individuals (e.g., 65 years or older, underlying health conditions):
   a. Describe a policy to support those at higher risk for severe illness to mitigate their exposure risk (e.g., telework, modified job duties, virtual learning opportunities).
   b. Describe sick leave and absenteeism policies and practices that enable faculty, staff and students to stay home or self-isolate when they are sick or have been exposed.
   c. Describe policies for return to class/work after COVID-19 illness.
   d. Describe considerations for students returning from domestic or international travel (e.g., COVID-19 travel health risks, CDC returning travelers guidelines, travel registry, etc.)

4. **Social and Mental Health**
   a. Describe plans to promote anti-stigma behavior from person exposed to COVID-19.
b. Describe plans to support students with mental health services.

C. Implement Controls to Limit Contact

1. Non-Medical Face Coverings (Masks)
   a. Describe plans on how the institution intends to teach/reinforce use of face coverings among students, faculty and staff.
   b. Describe a policy for faculty use of cloth face coverings (e.g., face covering should be worn in times when at least 6 feet physical distancing cannot be maintained. During meetings or gatherings or in narrow hallways or other settings where physical distancing may not be easy to maintain, a face covering would be prudent to wear).
   c. Describe other considerations such as speaking loudly, singing, etc., that may require additional distance.
   d. Describe a policy for when students should wear cloth face coverings (e.g., in times when at least 6 feet of physical distance cannot be maintained).
   e. Describe a policy for use of face coverings based on relevant business-sector guidance in facilities operated by the institution (e.g., fitness center, dining/break rooms, lounges, student services, office spaces, laboratories, etc.).
   f. Describe plans to accommodate exceptions for those with medical contraindications to face coverings.
   g. Describe how the institution will respond in the event that a student, faculty or staff member does not have the required face mask/coverings.

For more information about non-medical face coverings or face masks, please refer to the guidance “Guidance about Masks and Other Face Coverings for the General Public” on coronavirus.dc.gov.

2. Social/Physical Distancing
   a. Describe strategies to allow physical distancing in classrooms/learning environments (e.g., occupancy, staggered schedules, classroom layouts, workspace distancing, etc.).
   b. Describe strategies to allow social distancing outside the classroom (e.g., limiting visitors, changes to dining services, extracurricular activities, etc.).
   c. Describe plans to restrict occupancy/stagger use of communal, shared spaces such as lounges, exercise rooms, dining halls/break rooms, hallways, offices, etc. to ensure physical distancing. Occupancy must be consistent with any active DC Health guidance.
   d. Describe a policy to limit size of gatherings and/or strict physical distancing to be in place during gatherings, consistent with DC Health guidance
   e. Describe strategies for food/dining services to optimize physical distancing. Plans regarding dining services should consider requirements for face coverings, policies to encourage people to stay home if ill, ensuring adequate
hand hygiene, routine cleaning/disinfection of physical facilities, and health screenings for staff, limit the number of diners or other methods of crowd control, appropriate spacing between tables, eliminating buffet-style or self-serve food, and implementing take out/delivery options.

**D. Potential Exposures and Positive COVID-19 Cases**

All institutions should have a plan for when a student/faculty/staff member becomes sick or exposed to COVID-19.

1. Describe the institution’s exclusion criteria for:
   a. A student, faculty or staff member that has a temperature of 100.4 degrees or higher or any other symptoms;
   b. A student, faculty or staff member, or any close contact, is confirmed to have COVID-19; or
   c. A student, faculty or staff member awaiting COVID-19 test results.

2. Describe the institution’s dismissal criteria in the event students/faculty/staff develops a fever or other signs of illness.

**E. Cleaning and Disinfecting**

All institutions should regularly clean, disinfect and sanitize surfaces, and materials per [CDC guidance on cleaning and disinfecting](#).

a. Describe cleaning and disinfection protocols to include frequently-touched surfaces; transport vehicles; schedules for increased cleaning, routine cleaning, and disinfection; ensuring adequate cleaning supplies and correct use/storage.

b. Describe provisions for hand sanitizer/handwashing stations.

c. Describe plans to ensure adequate supplies to minimize sharing to the extent possible (e.g. dedicated student supplies, lab equipment, computers, etc.) and plans to sanitize shared objects and equipment.

d. Describe plans to ensure that custodial staff has adequate Personal Protective Equipment also ensuring that appropriate EPA approved cleaning products are used. List is available [here](#).

**F. Building Considerations**

Institutions that are reopening after a prolonged shutdown should ensure all ventilation and water systems and features (e.g., sink faucets, drinking fountains, decorative fountains) are safe to use as follows:

1. **Instructional and other Facilities**
a. Describe plans to ensure ventilation systems operate properly and increase the circulation of outdoor air as much as possible, (e.g., by opening windows and doors) if doing so does not pose a safety or health risk (such as risk of falling, triggering asthma symptoms) to students using the facility

b. Describe plans to flush water systems to clear out stagnant water and replace it with fresh water. This will remove any metals (e.g., lead) that may have leached into the water and minimize the risk of **Legionnaires’ disease** and other diseases associated with water. **Steps** for this process can be found on the CDC website.

2. Housing
Describe requirements for face coverings in shared spaces, reminders of proper hand hygiene, enhanced cleaning, training for residential advisors/live-in staff, restrictions on events/social activities in housing facilities, establishment of occupancy limits, restrictions on building access, etc. Institutions may want to consider requiring training and document such training of certain staff.

G. Shutdown Considerations If Necessitated by Severe Conditions and/or Public Health Guidance
The institution should have a plan to manage a school/campus outbreak or a resurgence of COVID-19 outbreak.

1. Describe the criteria and process for campus dismissals or shutdowns. Decisions regarding dismissals and shutdowns should be made in consultation with local and state public health officials.

2. Describe the plans to reduce campus/facility activity in the event of a return to significant community transmissions of COVID-19 or in alignment with public health guidance.

3. Describe a policy for notifying relevant parties about plans for dismissals/shutdowns.

H. Communication Strategy
Institutions are to have communication protocols in place.

1. Describe the institution’s plan for communicate with DC Health for reporting of positive cases. Institutions should be able to quickly provide lists of people at any in-person activities.

2. Describe the institution’s plans to protect the privacy of individuals and alert their students and staff to a COVID-19 case.

3. Describe the institution’s process to comply with DC Health directives to ensure that at a minimum:
a. Notification is provided to those students/faculty/staff in close contact with the individual and the requirement to quarantine for a minimum of 14 days; and
b. Notification is provided to the entire program that there was a COVID-19 positive case, those impacted have been told to quarantine, and steps that will be taken (e.g., cleaning and disinfection)

I. **Academic Affairs**
   1. Describe the institution’s plans to offer internships, clinical, field placements and hands-on experiences.
   2. Describe the institution’s process to ensure safe student access to academic services (e.g. library, career services, academic advising, etc.)

**EXCEPTIONS**
Institutions that operate in the District under the provisions of a Congressional charter should follow the guidance issue by the DC Department of Health titled *Coronavirus 2019 (COVID-19): Guidance for Colleges and Universities*

Institutions that are not domiciled in the District that participate in State Authorization Reciprocity Agreement (SARA) do not need to submit a response to the areas identified above in this memo and should be guided by their respective jurisdiction’s public health guidance.

**GENERAL CONSIDERATIONS**
The HELC is continuing to monitor the COVID-19 developments and reserves all rights to further amend this guidance as deemed necessary and appropriate in furtherance of the HELC’s regulatory oversight authority. All reopen plans should be email to osse.elcmail@dc.gov. If you have specific questions or concerns, please contact HELC at osse.elcmail@dc.gov.

HELC encourages you to review and monitor reliable sources of information related to COVID-19. Here are some links you may find helpful:


- United States Department of Education Federal Student Aid, *Guidance for interruptions of study related to Coronavirus (COVID-19)*

- Readiness and Emergency Management for Institutions Technical Assistance Center- [https://rems.ed.gov/Resources_Hazards_Threats_Biological_Hazards.aspx](https://rems.ed.gov/Resources_Hazards_Threats_Biological_Hazards.aspx)
• United States Department of Veterans Affairs - https://www.publichealth.va.gov/n-coronavirus/

• US Immigration and Customs Enforcement Student Exchange Visitor Program - https://www.ice.gov/sevis