

## FACE COVERING (MASK) POLICY

### I. Policy Section

14.0 Risk Management

### II. Policy Subsection

14.18 Face Covering (Mask) Policy

### III. Policy Statement

Grand Rapids Community College, “GRCC”, is committed to providing a safe and healthy workplace and educational environment. Due to health and safety concerns related to the COVID-19 pandemic, and pursuant to CDC and Kent County Health Department recommendations, all employees, students and visitors must comply with this policy. The CDC has established a four-level rating system to indicate the level of COVID-19 transmission within a community and has now determined the level of transmission in Kent and Ottawa County is “substantial”. Effective Tuesday, August 10, 2021 all individuals, regardless of vaccine status, must wear a face covering in the following circumstances:

- in indoor work spaces designated for the individual, when six (6) feet of separation from non-household members cannot be consistently maintained, or in indoor workspaces designated for the individual when 6 feet of separation from non-household members can be consistently maintained but no additional safeguards are present; and
- in any shared spaces, including at service desks, during in-person meetings, classrooms, in restrooms, break rooms and hallways, regardless of whether those spaces are currently occupied by others.

### IV. Reason for Policy

As a result of the COVID-19 pandemic, health organizations, including the Center for Disease Control (CDC) and Kent County Health Department recommend that individuals wear an appropriate, well-fitting face covering (mask) in certain settings. This Policy addresses when face coverings must be worn on campus.

In the event the CDC, Kent County, and/or other health officials change the requirements and/or recommendations for the use of face coverings, this Policy may be modified or rescinded.

## V. Entities Affected by This Policy

All GRCC employees, students, members of the Board of Trustees and visitors to the campus.

## VI. Who Should Read This Policy

All GRCC employees, students, members of the Board of Trustees and visitors to the campus.

## VII. Related Documents

14.13 Communicable Disease Policy

## VIII. Contacts

Executive Director, Operational Planning (Policy Owner)

Vice President for Finance and Administration

Executive Director, Human Resources

Director of Equal Opportunity Compliance

## IX. Definitions

Face covering (mask): A well-fitting tightly woven cloth or other multi-layer absorbent material that closely covers an individual's mouth and nose. Other masks such as N95 medical masks and similar clinical masks are also acceptable face coverings, but GRCC encourages those masks be prioritized for medical settings. Face coverings may be secured to the head or simply wrapped around the lower face. They can be made of a variety of materials and may be factory-made or made by hand. The CDC does not recommend the use of face shields as a substitute for face coverings, and face shields do not meet the definition of face covering for purposes of this Policy.

The CDC defines an “appropriate, well-fitting face mask” as a mask that, at minimum:

1. Closely fits over the nose and mouth to prevent leaks;
2. Has multiple (2+) layers of tightly woven, breathable fabric;
3. Has a nose wire;
4. Does not have any valves; and
5. Is washed daily (if cloth) or changed daily (if disposable).

## X. Procedures

A. Expectation of wearing a face covering: All employees, students, and visitors (including vendors, contactors and other guests) must wear a face covering in the circumstances described below. The examples are meant to help explain the reasoning, but do not include every situation that may arise.

Employees, students and visitors must wear a face covering:

1. In indoor work spaces designated for the individual, unless six (6) feet of separation from non-household members can be consistently maintained AND additional safeguards (partitions, sneeze guards, etc.) are present.
  - a. Two student employees who share a cubicle area are working next to one another at adjacent computers. They must both wear a face covering.
  - b. However, employees working in cubicles more than 6 feet apart may take their face covering off when they arrive in their cubicle only if sneeze guards or partitions are present. In those cases, they may work without it until they need to interact with others or go into a shared space.
2. In any shared spaces, including at service desks, during in-person meetings, classrooms, in restrooms, break rooms and hallways. Face coverings are required in these spaces regardless of whether anyone else is currently also sharing that space.
  - a. For example, a student working at a table in the Cook building hallway should wear a face covering, even if no one else is in the hallway, as other students and employees may pass by.
  - b. However, a student in an enclosed study room in the Business lab may remove their face covering, provided there are no other people within the room.
  - c. For example, a student at the front desk of the Enrollment Center is interacting with an employee; both should be wearing a face covering.

B. Implementation of Requirement: In compliance with this policy, GRCC community members should:

- a. Remind individuals that all individuals, regardless of vaccine status, must wear a face covering indoors as defined in this policy.
- b. Notify individuals where a face covering may be found, if they need one, or any other feasible alternatives (rescheduling, virtual meetings, etc.)
- c. If an employee believes that the person is in violation of this policy or GRCC's Code of Conduct, the employee should contact the Office of Student Life and Conduct (for students) or Human Resources (for

employees).

- d. If the individual is a visitor, or if there are any safety concerns during the conversation about the face covering expectations, Campus Police should be called for follow-up.
- C. Availability of face coverings: If possible, employees, students and visitors should provide their own face coverings to wear in compliance with this Policy. If an employee, student or visitor does not have access to a face covering, they may pick up a face covering by visiting GRCC Campus Police or Student Life & Conduct.
- D. Non-discrimination: Any interactions or enforcement under this Policy are subject to GRCC's prohibition on discrimination, as described in the Equal Opportunity and Non-discrimination policy and other relevant non-discrimination policies. This Policy may not be enforced in a discriminatory fashion based on age, race, color, religion, marital status, sex/gender, pregnancy, sexual orientation, gender identity, gender expression, height, weight, national origin, disability, political affiliation, familial status, veteran status or genetics.
- E. Communication: Notice of the requirements of this Policy will be posted on all building entrances and common areas, as well as online. This Policy will be shared in GRCC Today and included in GRCC's Administrative Policy listings at [www.grcc.edu/generalcounsel/policies](http://www.grcc.edu/generalcounsel/policies).
- F. Exceptions: The following exceptions, as outlined in relevant laws and emergency orders, may exempt someone from the requirement to wear a face covering under this Policy. These exceptions may apply to individuals who:
1. Are swimming;
  2. Are eating or drinking while seated in a designated area;
  3. Are in indoor work spaces designated for the individual where six (6) feet of separation from non-household members can be consistently maintained AND additional safeguards (partitions, sneeze guards, etc.) are present.
  4. Are in specific areas that have approved plans that require face covering use beyond that defined in this Policy, such as in laboratories or clinical settings;
  5. Are visitors to the campus who are younger than two (2) years old;
  6. Are Law enforcement officers acting in the event of an emergency;
  7. Are asked to temporarily remove a face covering for identification purposes;

8. Are giving a speech for broadcast or an audience, as long as the speaker is more than twelve (12) feet from the audience. This exception does not apply to instructors in regular classroom lectures. For purposes of planning for such an event, the designated area should work with the Executive Director of Operational Planning to discuss additional recommended safety measures;
9. Are individuals who have a condition defined as a disability under the ADA that limits the use of a face covering. Notice of the disability will be considered a request for a reasonable accommodation under the ADA, and GRCC will follow an interactive process to discuss with the individual possible accommodations, which may include virtual classes, designated “mask breaks,” etc.
  - a. Requests for accommodation for students should be directed to Disability Support Services, and for employees, should be directed to the Director of Equal Opportunity Compliance. Requests for accommodations for visitors should be directed to the office they are visiting; departments who need assistance in providing accommodations can reach out to the Director of Equal Opportunity Compliance.
  - b. Accommodations of alternate face coverings: Employees or students who require others to use a clear face covering for communication purposes should make the request accordingly. Students should make the request of Disability Support Services, and employees may make the request of the Director of Equal Opportunity Compliance. Campus visitors should request accommodations through the office they are visiting.
10. Athletes and officials actively participating in on-court competitions sanctioned by the Michigan Community College Athletic Association in compliance with vaccine and testing protocols.

XI. Forms

N/A

XII. Effective Date

This policy goes into effect August 10, 2021.

XIII. Policy History

August 2020: New policy was created at the recommendation of the COVID-19 response team.

June 2021: Policy updated to modify definition of face covering consistent with MDHHS orders, clarify exceptions to face covering requirements, including requirements for Fully Vaccinated people.

August 2021: Policy updated to reflect CDC recommendations for indoor mask

use due to the COVID Delta variant.  
January 2022: Policy updated to reflect CDC recommendations regarding appropriate, well-fitting masks; and to include an exception for certain athletic competitions.

XIV. Next Review/Revision Date

Pending CDC Level of Community Transmission status