

## 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. Fully Vaccinated individuals are exempt from the requirement to wear a Face covering unless they are in a “high risk program” with additional mask requirements. Those who are not Fully Vaccinated for COVID-19 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 work spaces 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 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 a Face covering (mask) in certain settings. In addition, the Michigan Department of Health and Human Services require Face coverings in most public spaces. 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officials change the requirements and/or recommendations for the use of Face coverings, this Policy may be modified or rescinded.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

- A. Face covering (mask): A 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.
- B. Fully Vaccinated: means at least two weeks have passed after receiving the final dose of an FDA-approved or authorized COVID-19 vaccine.

## X. Procedures

- A. Expectation of Wearing a Face covering: All employees, students, and visitors (including vendors, contractors and other guests) who are not Fully Vaccinated must wear a Face covering in the circumstances described below. The examples provided are meant to help explain the reasoning, but do not include every situation that may arise.

Employees, students and visitors who are not Fully Vaccinated 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.
3. High-risk or high-exposure programs may require Face Coverings, even for individuals who are Fully Vaccinated. These may include nursing, dental, and other areas where health concerns or the need for physical proximity between individuals makes wearing a Face covering necessary.

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

- a. Remind individuals that all those who are not Fully vaccinated must wear a Face covering 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 people who are not Fully vaccinated. Per relevant emergency orders and this policy, a person who is Fully Vaccinated does not have to wear a Face covering unless they are in a "high-risk program" that requires it. 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.

XI. Forms

XII. Effective Date

This policy goes into effect August 25, 2020.

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.

XIV. Next Review/Revision Date

August 2021.