



# Face-Covering Exemption Policy for Students

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## ***General Description***

### **Policy Summary:**

This policy addresses the issue of disability-related reasons for an exemption to the university's face covering requirements.

### **Purpose:**

Wearing a face mask is one important way to slow the spread of COVID-19. The Centers for Disease Control and Prevention (CDC) recommends wearing a face-covering in public places, including universities, in a variety of different circumstances. However, wearing a face-covering may be difficult for some people with a disability. To ensure equal access for students with disabilities under the appropriate federal, state, and local statutes, this policy addresses the necessary process for reviewing requests for reasonable modifications to the university's face covering requirements.

### **Scope:**

This university policy applies to all Trinity University students.

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## ***Policy Content***

### **Introduction**

In response to the COVID-19 pandemic, in alignment with the local ordinance requiring face coverings, and consistent with guidance from the Centers for Disease Control and Prevention ("CDC"), Trinity University may require certain individuals on the Trinity University campus to wear a face covering while indoors and possibly outdoors if certain conditions cannot be met. This policy serves the university's goal to help reduce the risk and spread of COVID-19. Trinity University has implemented environmental health and safety protocols for students, faculty, staff, and guests while on campus, which include guidance for face covering. In some cases, wearing a face-covering is not possible due to an underlying condition or not being able to

manipulate the mask independently. The university provides reasonable modifications to individuals with a disability who are unable to meet the requirements of wearing a face-covering.

## Student Responsibilities

- Students must provide advance notice of the need for accommodation to help ensure that there is adequate time to review the request and make a decision on a case-by-case basis.
- Students who are not registered with Student Accessibility Services must complete an [application for services](#) and provide documentation.

On the application, students must request the need for a face-covering exemption accommodation. Individuals with questions about what documentation is required should consult the [COVID-19 Student Accommodation FAQ](#).

- Students who are currently registered with Student Accessibility Services must make a formal request for adding accommodations through the [Additional Accommodations Request Form](#) in SAS Link.

On the Additional Accommodations Request Form, students must indicate a need for the face-covering exemption accommodation. **Student Accessibility Services reserves the right to request additional documentation to support the student's request.**

- The student must faithfully engage in the interactive process with Student Accessibility Services in the determination of whether a face-covering exemption accommodation is a reasonable modification.
- If approved for reasonable modifications to the face-covering policy, students must continue to follow all other safety protocol and procedure as outlined by Trinity University.

Students may be required, as a condition of their approval for the face covering exemption, to meet the following parameters:

- Weekly surveillance testing with the COVID Health Team on-campus
  - Students with a Face Covering Exemption may still be subject to the university's contact-tracing process, as the COVID Health Team will continue to use the same criteria for this student as others.
  - If a student with a Face Covering Exemption is identified as a close contact exposure, they will be required to quarantine despite their vaccination status. Vaccinated students who are a close contact exposure are usually allowed to forego quarantine BUT they MUST mask when indoors. If the student is vaccinated but is a close contact exposure, then they are not be permitted to

move about campus, as they are at higher risk for being infectious due to his status of exposure.

- A mandatory 6 feet distance between the student and others in class
- De-densifying other spaces where 6 feet separation is not possible, including separate lab sessions (SAS is happy to work with the department on scheduling and funding for facilitating this) or remote participation accommodations
- Agreeing to avoid large crowds as much as they possibly can

If the university experiences a large outbreak university-wide, as defined by the COVID Health Team, this accommodation and the solutions for providing the accommodation may be altered. The Face Covering Exemption is ALWAYS subject to further review to ensure it is not a direct threat to the health and safety of the campus community. Please note that this may include a move to remote learning facilitated by SAS.

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For more information on Trinity University's COVID-19 safety policies, please click [this link](#).

## Student Accessibility Services Responsibilities

- Student Accessibility Services must engage in the interactive process faithfully to determine if reasonable modifications to the face-covering policy can be made.

**This may include consultations with other personnel at the University, such as General Counsel and/or Health Services.**

- Student Accessibility Services will provide timely notification of a decision on reasonable modifications to the face-covering policy via an emailed letter or other written means.
- Student Accessibility Services reserves the right to determine what type and scope of reasonable modifications to the face-covering policy can be made.

Reasonable modifications may include, but are not limited to:

- a. Approval for virtual engagement and learning in lieu of live, in-person means.
- b. Approval for alternative face-covering (i.e., face shield, other PPE)
- c. Approval for an exemption to face-covering requirement in socially-distanced engagement and learning by live, in-person means
- d. Other solutions in consultation with the appropriate faculty and university leadership

The intent of the reasonable modifications is the student's continued ability to be an active member of the Trinity community in engagement and learning opportunities. These reasonable modifications will allow the student the ability to participate, or benefit from, the programs offered or goods and services that are provided by Trinity University.

- Student Accessibility Services will involve academic departments and faculty, whenever possible, to explore the best options for reasonable modifications to the face-covering exemption policy that provide the best learning environment for the student's health and safety, as well as the health and safety of others in the campus community.

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## Performance Evaluation

### Consequences of Policy Violation:

Students who do not follow the proper protocol for requesting a reasonable modification to the face-covering exemption are subject to the standard [Trinity University COVID-19 Health and Safety Protocol](#) until reasonable modifications have been approved by Student Accessibility Services.

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## Terms & Definitions

### Terms and Definitions:

Term:	Definition:
Face-Covering	For the purposes of this policy, a face covering is an item affixed to the face to help prevent the spread of the COVID-19 virus, including cloth garments that cover the nose and mouth and/or medical-grade masks.
Reasonable Modification	A reasonable modification means changing policies, practices, and procedures, as needed, to provide goods, services, facilities, privileges, advantages, or accommodations to an individual with a disability.

## Related Documents

### Related Documents:

Document Type:	Document Name:	Document Number:
Policy	COVID-19 Policy on Protective Behavior	HMRS-0057

### Related Content:

For more information and resources, please see the following pages:

- [CDC COVID-19 Hub](#)
- [Trinity University COVID-19 Hub](#)
- [Equal Opportunity and COVID-19](#)

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## Revision Management

### Revision History Log:

Revision #:	Date:	Recorded By:
v3.0	9/21/2021 4:55 PM	Sheryl Tynes
v2.1	7/9/2021 3:08 PM	Spencer Scruggs
v2.0	11/17/2020 2:44 PM	Sheryl Tynes
v1.0	10/21/2020 2:49 PM	Spencer Scruggs

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### Vice President Approval:

Name:	Title:
Sheryl Tynes	Vice President for Student Life