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DPHSS Guidance Memo 2022-07

RE: Graduation Ceremony Requirements Relative to Executive Orders 2021-20 and 2021-29

The purpose of this document is to amend the requirements for traditional graduation ceremonies for Schools and Institutions of Higher Education (IHE), in accordance with Executive Orders No. 2021-20 and 2021-29 during the current Pandemic Condition of Readiness 3 (PCOR 3), which was declared by Executive Order No. 2021-16 on July 21, 2021. The requirements set forth by the Department are intended to help prevent the spread of COVID-19 while providing Schools and IHEs an option for a traditional graduation ceremony.

This memorandum supersedes DPHSS Guidance Memorandum 2021-14 (Amendment #1) in its entirety, and does not apply to the "Grad and Go" graduation concept.

This memorandum provides minimum requirements that Schools and IHEs must comply with in order to operate a traditional graduation ceremony. Schools and IHEs may choose to implement stricter policies, including but not limited to vaccination requirements, physical barriers, social distancing, and limited occupancy, subject to local and federal law. This information is not intended to serve as legal advice and should not be construed as legal advice. Schools and IHEs should seek the advice of an attorney with regard to adoption of vaccination policies.

This memorandum is effective immediately.

A. Definitions

1. "Contact Log" shall mean a written record of an individual's name, contact information (phone number/email), date, and time of visit.
2. "Face Mask" shall mean a material that covers the nose and mouth and can be secured to the head with ties or straps or wrapped around the lower face. Face masks with exhalation vent(s), valve(s), or any device that allows unfiltered release of exhaled breath are highly discouraged.
3. "Face Shield" shall mean a personal protective equipment designed and worn to protect the wearer's entire face from hazards or potentially infectious materials. Face shields may be used in addition to a face mask, but not in lieu of a face mask.
4. "Institution of Higher Education" shall mean and any college or university or institution of higher learning.

5. "Outdoor" shall mean an open area that may be covered to protect from the elements but shall not be enclosed by more than two walls.
6. "School" shall mean any establishment, public or private, for the care and education of students from kindergarten through grade twelve.
7. "Single Household Unit" shall mean individuals who may or may not be blood-related, but who reside in the same household.
8. "Spectator Pod" shall mean a group of people that only sit or stay with members of their own group.

B. General Requirements and Restrictions

Traditional in-person graduation ceremonies may be held under the following conditions:

1. If held indoors, the total number of individuals shall be limited to no more than the facility's occupancy load with seating, provided the indoor area can maintain the required physical distance (See C.2. below).
2. If held outdoors, the total number of individuals shall be limited to no more than the outdoor area can maintain with the required physical distance (See C.2. below).
3. The number of individuals (school faculty, staff, graduates, and guests) must stay in compliance with the occupancy load and social distancing requirements.
4. Attendees must pre-register with each school prior to the graduation ceremony in order to be allowed entrance to attend the event.
5. Schools and IHEs must post signs in highly visible locations (e.g., entrances, in restrooms) that describe how to stop the spread of germs, such as the proper wearing of face mask, socially distancing, and hand washing.
6. Graduates may be allowed on stage when called to accept their diploma and/or take a photograph.
7. Schools must communicate in writing to all faculty, staff, graduates, and guests that if they are feeling ill, have symptoms of COVID-19, or have potentially been exposed to someone with confirmed or suspected COVID-19, that they should not attend the graduation event.
8. Graduates, guests, faculty and staff currently in quarantine or isolation by DPHSS are prohibited from attending the graduation rehearsal or graduation event.

C. Social Distancing

1. Spectator pods shall be limited to no more than four (4) individuals per graduate for indoor and outdoor events; however, all Schools and IHEs can impose more stringent measures to the number of individuals for each spectator pod.
2. Total number of attendees are limited based on the following requirements:
 - a. Designated indoor or outdoor area can accommodate the graduation ceremony;
 - b. All School graduates are able to be physically distanced from each other by a minimum of three (3) feet of space;
 - c. All IHE graduates are able to be physically distanced from each other by a minimum of six (6) feet of space; and
 - d. Each spectator pod is to be physically distanced from other spectator pods by a minimum of six (6) feet where the distance between each pod is

measured between the outermost individuals of each pod. Members of separate pods shall remain distanced from members of other pods for the duration of the activity.

3. Have a plan in place for staggered entrances and exits and other common places where people congregate in order to reduce the occurrence of bottlenecks. Social distancing measures shall include:
 - a. School graduates must enter and exit at least three (3) feet apart from one another in a single line when directed to their seats.
 - b. IHE graduates must enter and exit at least six (6) feet apart from one another in a single line when directed to their seats.
 - c. Tape, chalk, or other markings should be laid on the ground outside of the venue to have a one-way aisle or otherwise direct attendees to follow certain pathways for entering and exiting from the graduation ceremony to maintain social distancing.
 - d. If a line forms outside of the graduation event, staff should direct those waiting to maintain social distancing.

D. Face Masks and Other Measures

1. Schools and IHEs shall follow applicable requirements of DPHSS Guidance Memoranda, which does not contradict or conflict with Executive Orders 2021-20 and 2021-29, and this Memorandum for face masks; contact logs; cleaning and disinfection of surfaces; and handwashing and respiratory etiquette.
 - a. Schools and IHEs shall implement and enforce wearing of face masks by all individuals ages 2 years and older, including spectators, guests, graduates, performers, employees, volunteers, and participants at all times while on their indoor and outdoor facility or premises, except when:
 - i. Actively eating or drinking; and
 - ii. A mask would create a risk to an individual's health, safety, or job, such as during live singing performances, playing wind instruments, and similar activities.
 - iii. Speakers may remove face mask during their remarks provided they are at least six (6) feet away from other attendees. It is highly recommended for speakers to keep their comments brief to limit the time they are unmasked.
 - b. Contact Logs shall be required and must include a list of each individual's name, contact information (phone number and/or email), date, and time of visit. This record must be maintained for a period of 30 days from the graduation event and must be submitted to DPHSS upon request.
 - c. Toilet facilities must be properly equipped with required and necessary supplies of sanitary paper towels, soap, and toilet paper.
 - d. High-touch areas and toilet facilities should be properly staffed to service, clean, and disinfect prior to, during, and after the event.
2. Shaking of hands, kissing, or other physical contact between the graduate and any person not from the single household unit is highly discouraged.
3. Staff or attendants must be designated to ensure that only those individuals who pre-registered are allowed entrance to attend the graduation event.

For further questions, please contact the Division of Environmental Health at (671) 300-9579 from 8:00 AM to 5:00 PM, Monday through Friday, excluding weekends and holidays, or email, dphss-deh@dphss.guam.gov.


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