GUIDELINES FOR SCALING UP RESEARCH: Phase 1a
OFFICE OF THE PROVOST

May 22, 2020

The following guidelines have been built on based on recommendations from the Brandeis Covid-19 Task Force and the Research, Labs, and Studios Working Group. These Guidelines are subject to periodic updates.

On May 11, Governor Charlie Baker announced the **Commonwealth of Massachusetts Four-Phased Approach** to reopening business activities in the state, and on May 18 he announced that laboratory research would be among the activities permitted to ramp up during Phase 1 on May 25. In this document we outline our phased approach to ramping up research and inquiry on campus that follows the Massachusetts guidance and the Brandeis University Campus Scaling Up Stages. Since March, we have been in the “Current State” or “Essential Operations,” where only minimal essential work and labs conducting research on COVID-19 are permitted. To enter Phase 1 and begin to scale up research in our laboratories, we will adopt the principles and practices of the **COVID-19 MA Guidance and Directives** and implement additional measures and precautions to protect the health and wellbeing of the Brandeis community and the residents of the Commonwealth of Massachusetts.

For the purposes of these Interim Guidelines, we have divided Phase 1 into two: Phase 1a, which deals with scaling-up of laboratory research, and Phase 1b, which deals with scaling up of other research activities, resources, and inquiry on campus. This document outlines our detailed guidelines for Phase 1a, and poses a series of questions and items that need further clarification at the University-level for continued guidance to be developed for all phases.

**Current State**: current essential work and labs working on COVID-19 research

**Timing**: now

**Phase 1a**: ramp up of laboratory research that does not involve human subjects, conducted by principal investigators, graduate students, postdoctoral fellows and associates, and other technical staff.

**Timing**: as permitted by State, pending receipt and review of individual lab plans and protocols by the co-chairs of the COVID-19 Research, Labs and Studios working group. Pending Provost, EVP for Finance and Administration, and VP for Human Resources final approval, training for this phase of scale up could begin May 26th.

**Phase 1b**: ramp up of other research and inquiry, including certain library services, creative work, undergraduate research assistants, and services excluding human subjects and teaching with minimal staffing to support the needs of scholars.

**Timing**: at least three weeks after the start of phase 1a, pending experience with phase 1 and receipt and review of plans and protocols; letters requesting these will go out soon. Will require Provost, EVP for Finance and Administration, and VP for Human Resources final approval.

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1 Laboratory research is defined for the purpose of Phase 1a as research activities that occur in a lab that cannot be conducted remotely. At this time, face-to-face human subject research will not be permitted. Additionally, use of campus office spaces is off-limits at this time, unless activities must be conducted on campus that cannot be conducted remotely.
Phase 2: Certain research protocols involving human subjects, as approved by the IRB and the Provost, with space staggering, physical distancing, and PPE.

**Timing**: Face-to-face human subjects research will be assessed by the IRB and the Provost. Some computer-mediated, off-campus research is ongoing; in-person research will be reviewed by the IRB and the Provost to ensure that it meets state guidelines and University standards for safety.

Phase 3: Use of offices, meeting spaces for inquiry that could be conducted remotely

**Timing** for Phases 2-3 not yet determined.

**Guidelines for Phase 1a Research**
We recognize that under Phase 1a, extreme precautions and guidelines must be in place to ensure a safe working environment for personnel. We have broken down our guidelines by topic area.

**Physical Plant/Engineering Controls**

*Laboratory Areas*
The nature of the rooms, buildings, common spaces, air flow, furnishings and equipment, layout, surfaces, and activities performed in the various areas in which laboratory research is conducted requires a case-by-case determination of the number of persons that can safely work in a given area. For this reason, our guidance with regard to safe occupancy is not based on the average density (persons per square foot) in a particular place. Rather, before labs will be permitted to scale up, each PI, in coordination with EH&S/Facilities guidance, must indicate the number of personnel allowed to occupy a space at a given time with signage on the door or entrance. This figure must conform to State requirements for physical distancing: all personnel will be required to keep a minimum distance of 6 ft from one another if more than one person occupies a given space at one time. In addition, for Phase 1a each lab will be limited to no more than 1/3 of its usual capacity (based upon the usual number of personnel who occupied a lab prior to issuance of the stay-at-home order). A spreadsheet with this information will be kept on file by the department chair and the Vice Provost for Research.

*Common Spaces*
Signs will be posted at elevators to indicate that they will be single use. Single use of bathrooms is strongly encouraged, with signs to that effect posted. Signage will be posted to remind personnel not to touch elevator buttons with their hands, if possible. Personnel will be encouraged to use stairs whenever possible.

Facilities Services personnel will redirect through signage traffic flow through buildings to being one-way, where practicable.

Signage describing and depicting health and safety policies and procedures will be developed and posted throughout all laboratory buildings along with information for reporting health policy violations.

*Cleaning Protocols*
Research groups will undertake primary custodial service of lab spaces, which will increase custodial capacity to focus on repeated cleaning of shared spaces throughout each weekday. Custodial staff will leave cleaning supplies on a weekly basis so personnel can clean their own spaces and will be available for additional cleaning of lab spaces when needed. Research personnel will be responsible for the
cleanliness of dedicated research spaces. This includes sweeping/swabbing of floors, waste removal to receptacles in common area, and the disinfection of all surfaces and tools prior to and after use. Per state guidelines, each lab will be required to keep a cleaning log with the date, time, and scope of cleaning.

Facilities Services has developed further protocols for cleaning common areas during the scale-up of research activities. Custodial staff will also keep a cleaning log with the date, time, and scope of cleaning.

**Personal Protective Equipment (PPE) Controls**

Requirements for PPE are based upon state, local, and institutional requirements in addition to the requirements of occupational health and safety based upon the activities in which laboratory personnel are engaged.

**Face Coverings**

ALL PERSONNEL MUST WEAR A MASK AT ALL TIMES, whether in the lab or in a common area, whether alone or around others. Exceptions include using the bathroom, eating and drinking in permissible spaces while maintaining physical distance of 6 ft. or more, and conducting research techniques that require removal of the face mask and have been detailed in the individual lab protocol. Laboratory personnel are expected to provide their own mask (reusable masks are permitted) unless there are special circumstances that require disposable masks (i.e. animal research). When disposable masks are required, they will be provided by the laboratory and purchased through Procurement. Personnel will be responsible for ensuring that reusable PPE is washed and cleaned regularly.

**Other PPE**

Laboratory personnel are expected to use other forms of PPE including face shields, gloves, lab coats, gowns, booties, etc. where required and appropriate for the risks in which they are engaging. PPE is for individual use and may not be shared.

**Behavioral Controls**

We recognize that new behaviors must be learned and implemented in order to keep one another healthy and safe. Before labs will be permitted to scale up research activities, all laboratory personnel requesting access to research spaces must undergo a mandatory PPE & COVID-19 Training, which will be provided by EH&S and the Office of Research Administration.

Any member of a lab wishing to come to campus, must sign up on a lab’s designated registry to ensure that 1/3 or fewer lab members (based upon the usual number of personnel who occupied a lab prior to issuance of the stay-at-home order) will be in a lab at any given time. On a daily basis before coming onto campus, the lab member must complete a health Self-Assessment and verify on the registry that they have done so and are safe to come in to lab. Individuals who feel sick, exhibit symptoms associated with COVID-19, or suspect exposure to someone who has a confirmed case of COVID-19 within the past 14 days are not permitted on campus at any time. PIs are responsible for ensuring that density requirements do not exceed guidelines and that all lab personnel are completing the health self-assessment on a daily basis.
All persons must log in on arrival to the lab and log out on departure. This is required in order to keep track of personnel who overlapped in the lab, for tracking exposure should an outbreak occur. PIs will retain logs for at least 30 days.

Additionally, we recommend the following policies:
1. All personnel must maintain a minimum of 6 ft distance from one another at all times.
2. As previously stated, all personnel must wear a mask or face coverings at all times.
3. All personnel must strictly follow standard laboratory safety techniques including the removal of all contaminated PPE prior to leaving the work area, keeping reusable PPE clean, ALWAYS washing hands after removing PPE, and never reusing disposable gloves.

Laboratory Requirements
Each PI is required to submit a Scaling-Up protocol to their department chair and the Vice Provost for Research that describes the safety measures s/he will put into place prior to scaling-up. This protocol will summarize the activities that will be conducted in the lab during Phase 1a and will describe in detail how each lab will implement the safety procedures and guidelines that are outlined in this document, along with any specific or particular guidelines that are necessary based upon the activities or space of each lab (such as procedures that require removal of masks). Prior to scaling-up, the PI must train all personnel on the lab scaling-up protocol, including safety procedures, signup procedures, logging procedures, and additional cleaning and sanitizing procedures. Additionally, the protocol and supporting information must describe the following:
   a. A listing of all authorized lab personnel and how many individuals can be in each area of the lab space at any given time.
   b. A clear process to ensure work shifts do not overlap.
   c. Procedures for maintaining supplies needed to maintain safety and for communicating their storage location to lab members. These supplies include face coverings, gloves, soap, hand sanitizers, cleaning materials, first aid kits.
   d. Procedures to clean/wipe down shared items, equipment, and work surfaces prior to usage by others and document in accordance with state guidelines.
   e. A process to maintain access and activity logs for at least 30 days in order to trace contact should someone become sick with coronavirus.

It is understood that in Phase 1a, personnel will only be permitted to come to the lab to conduct activities that they cannot conduct remotely. Personnel should not come to campus if the work that they intend to do can be conducted off campus. They should only stay on campus for the time required to conduct their work and then leave. Time on-campus should be minimized. We realize that many research personnel will want to spend long hours in the lab. Lab members must adhere to scheduled and approved time so that staggering and social distancing are honored.

Each PI must think carefully about which lab members will be allowed to return to work initially. Criteria they might include in their thinking include:

● Trainees (PhD students and postdocs) may be given priority due to the need to complete their research projects in a timely fashion.
● Priority may be given to lab staff who volunteer willingly to return to the lab.
Shared Equipment
Protocols are required for shared equipment and shared facilities in the same way that protocols are required for each lab. Each piece of shared equipment or a shared facility shall designate a person to be responsible for the oversight, training, safety, and implementation of safety protocols. This individual will also be responsible for maintaining records of sign-up and use. All issues regarding such protocols shall be directed to the responsible person in addition to the chair of the responsible department.

General Policies
Allowable Personnel – only current, trained members of each lab may be permitted to conduct work in Phase 1a. Undergraduates will not be able to work in research labs as employees or on summer fellowships until after a three-week review on the initial re-opening of research labs under Phase 1a is completed and a discussion of how lab protocols would be modified to include undergraduate employees/paid fellows is approved by the Provost, EVP for Finance and Administration and VP for Human Resources.

Any personnel returning from out-of-state\(^2\) must follow current guidance on 14-day self-quarantine prior to reporting to campus – these individuals should work from their place of quarantine to the greatest extent possible if they are asymptomatic. International graduate students or postdocs that can’t return to campus, but are able to engage in NIH-sponsored research activities are, by definition, foreign components. Consult with SPA when planning for the restart of research that necessarily involves personnel in this situation.

Food & Beverages – Food and beverages are not allowed in laboratory spaces. Food and beverages, when consumed in shared spaces, may not be shared with others. Personnel are encouraged to bring food that does not require refrigeration and does not require heating to minimize exposure.

Pets – Pets are not permitted on campus at any time.

Visitors – No visitors are allowed into laboratories; only trained personnel are permitted entrance.

Monitoring & Enforcement – Brandeis University maintains a zero-tolerance policy for violations of the safety guidelines detailed in this document. Enforcement will be by periodic inspection of authorized spaces by EH&S personnel, the auditing of card key swipes, and the engagement of PIs, Chairs, Deans,

\(^2\) Commuters from neighboring states are not subject to self-quarantine, as they will be considered “designated essential workers”, per Massachusetts state guidance: “Health care workers, public health workers, public safety workers, transportation workers and designated essential workers are exempt from this requirement.”
and the Vice Provost for Research to ensure compliance. Individuals and labs that depart from the policies outlined in these guidelines will lose privileges or close until the threat of COVID-19 has passed. University policy governing the reporting of violations of the safety policies and procedures will also be followed. Additionally, the Department of Public Health may conduct random inspections of laboratory spaces.

**Recommended policies for Type 1b research:**
These recommendations are still being developed. Many policy suggestions will overlap those outlined above. Special considerations will be needed for some services provided by the Library (e.g. shared spaces and terminals) and for some shared facilities outside of the sciences (e.g. shared equipment use in the Arts, or the Bloomberg terminals in IBS).