



Operational Protocols at The University of Alabama in Huntsville (UAH) for Modified Limited Research Operations During COVID-19 Pandemic

May 18, 2020

Purpose:

In accordance with the approved goal and guiding principles for “Resumption of Research Operations at the University of Alabama System,” this document provides the guidelines to conduct research at The University of Alabama in Huntsville (UAH) during the COVID-19 pandemic. The UA System goal and guiding principles are:

Overarching Goal: Protect the health and safety of the University of Alabama system research workforce and study participants, while increasing research activity using an incremental approach.

Guiding Principles: Research conducted at the institutions of the University of Alabama system is diverse, and the resumption of activities cannot follow a “one-size-fits-all” approach. Each institution must develop and follow the approach that fits the unique characteristics of its campus. That said, there are guiding principles that are common across all three universities, and we therefore pledge to:

***Principle 1:** Follow the local, state and national public health authority (PHA) directives for shelter-at-home, physical/social distancing, and use of protective gear.*

***Principle 2:** Protect the health & safety of the research workforce, study participants, and vulnerable populations, considering emotional as well as physical health.*





***Principle 3:** Ensure as rapid a resumption of research activities as possible as public health conditions permit.*

***Principle 4:** Maintain a fair and transparent approach.*

Executive Summary of the UAH Guidelines:

In the development of the approach to achieve the overarching goal, each of the guiding principles are considered with respect to roles and responsibilities at various levels of authority within the University and also addressing the unique research environment at UAH.

With respect to Principle 1, UAH leadership will implement a color code system to coordinate and integrate operational procedures across the institution which will be defined based upon State, Local, or UA System restrictions and conditions.

-  Red - No access
-  Orange – Limited Business Operations (current situation-5/3/2020)
-  Yellow – Modified Business Operations
-  Green - Full access. No restrictions

Changes in the prevailing code will be announced by UAH leadership in response to the changing circumstances. Each level defines a different set of work criteria rules and regulations and operational plans, briefly described as follows:

1. Code Red: The highest level of restricted access is Code Red and access is restricted to specific individuals for periodic safety inspections only. All official travel is prohibited during Code Red. UAH has not declared Code Red as of May 4, 2020.

2. Code Orange: Code Orange is the present situation as of May 4, 2020, research facilities are closed except for “Essential Research” and official travel is prohibited. In code Orange, most researchers are required to telework with a very limited on-site presence. Justification must be provided to and approval from the VPRED or Provost for each researcher conducting on-site research.

3. Code Yellow: Code Yellow represents a shift to a modified business operation in which an incremental approach to on-site research can progress. While Code Orange focuses on individual researchers and approvals at the VP level, Code Yellow will focus on plans for work areas addressing risk mitigation methods and density restrictions with approvals at the unit level. Official travel may commence with approvals, but mandatory screening and quarantine may be required depending on the situation.

4. Code Green: Code Green restores normal access restriction prior to the COVID-19 pandemic.

Principle 2 and Principle 3 will be addressed together because these principles are highly interdependent. Research simply cannot productively resume without a healthy (physical and emotional) workforce. Procedures can be implemented that mitigate risk, but risk can never be eliminated. To minimize the risk, mitigation plans will:

- assume all personnel and study participants are COVID-19 positive until screened or tested negative.
- adhere to all existing safety protocols in addition to COVID-19 related precautions. For example, a required buddy system safety rule in a laboratory cannot be ignored.
- address efforts to fairly safe-guard the vulnerable/higher risk population.

UAH research excels in collaborative environments with partners from federal, state, and commercial entities. Rapid resumption of operation for UAH research will require cooperation of several agencies. UAH is in constant communication with its partners and mitigation plans will adhere to the guidance of all collaborating entities.

All research and creative work at UAH is vital to the well-being of the institution. The OVPRED and OEHS will work with all units to develop a plan to resume activities. UAH's plan will be posted on the OVPRED website.

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Appendix A: Summary Table of Requirements, Approvals, Responsibilities for the Conduct of On-Site Research

	CODE LEVEL			
	Red No Access	Orange Limited Op	Yellow Modified Op.	Green Normal Op
Restrictions				
Buildings	No Badge Access	Badge Access Only	Badge Access Only	No Badge Needed for Working Hours
PPE, Physical Distancing, Sanitation	Required	Required	Required	Normal Requirements
Remote operation of research that can be conducted remotely	Required	Required	Phased Transition	Requires Approval from OSP and OVPRED
Remote operation of research conducted by ¹ higher risk individual	Required	Required	Recommended	Requires Approval from OSP and OVPRED
Allowable On-site Research	None	Only Essential Research	Research in facilities with approved plan	No additional restrictions
Responsibility for On-site Research				
PI	Telework only	Limited Access Plan	Density Management Plan for Research Space	Standard Plan
Supervisor	Telework Only	Limited Access Plan	Density Management Plan for Shared Space	Standard Plan
Approvals				
Individuals on Campus	President	VPRED/Provost	Not Required	Not Required
Workspace	President	Unit Head	Unit Head	Not Required
Travel	President	VP/Provost	Dean/Center Director	PI





¹ As addressed herein, Only individuals who voluntarily self-identify as vulnerable/higher risk will classified as vulnerable/higher risk.

Appendix B: Details of UAH Restrictions for the Conduct of On-Site Research

The template outline below should be adopted by each Unit without significant change unless more strict requirements are enacted by the Unit. It is of utmost importance to provide our visitors, trainees (students & post-docs), faculty and staff with a healthy work environment that maximizes infectious risk control and minimizes anxiety for Research Laboratories and related Administrative Areas.

Step One - Define the Infectious Disease Risk Control (IDRC) Level

The following color code system defines a different set of work criteria rules and regulations:

-  Red - No access
-  Orange – Limited Business Operations (current situation as of 4/28/20)
-  Yellow – Modified Business Operations
-  Green - Full access. No restriction

Code Red Restrictions

- Restricted to specific individuals for periodic safety inspections only.
- No working on site permitted and all other badge access suspended.
- Personnel with any symptoms will not access buildings.
- Personnel entering the buildings shall wear PPE. Universal masking, such as disposable or cloth masks, is required.

Code Orange Restrictions

- All buildings operating on badge access only.
- Access restricted to specific individuals to maintain essential research. Trainees, including graduate students, postdocs and undergrads, only allowed on site after review and permission from VPRED or Provost.
 - All trainees and personnel must maintain cell phone on them at all times.
 - No one should conduct research on site without alerting their supervisor/PI or his/her designee of their presence and plans.
 - Research personnel entering the buildings shall wear appropriate PPE. Universal masking, such as disposable or cloth masks, is required.
 - When several trainees and laboratory personnel need to be present in the laboratory at the same time, best practices for social distancing must be used, including staggering work times, working 6' apart (when possible), and limiting interactions.
- Remote operation of research that can be conducted remotely is required.
- Research-related personnel with any symptoms will not access buildings to conduct research.

- Research personnel must self-assess before coming to campus for, at a minimum, temperature (<100.4°F), and absence of key CDC recognized symptoms (fever, dry cough, shortness of breath/difficulty breathing, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell). Personnel must feel well before coming to campus. Those with symptoms should contact UAH Health Clinic.
- Website for CDC Recognized Symptoms: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>
- All trainees and personnel who are not involved in the most crucial studies should work at home; read, analyze data, and write manuscripts, grants, thesis, and dissertation proposals.
 - CDC recommendations for cloth masks: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>
- Grant and contract submissions, and regulatory and scientific review processes can carry forward in planning for future studies.
- Administrative support staff required to work remotely wherever possible.
- No children allowed in administrative or research areas under any circumstances.

Code Yellow Restrictions

- All buildings on badge access only.
- Operational plan for roles, responsibilities and interactions as outlined below is in place when transition between Code Orange and Yellow Activities.
- Essential research constraints removed.
- Personnel entering the buildings shall wear appropriate PPE. Universal masking such as disposable or cloth masks is required in common areas, such as hallways, bathrooms, break areas and labs with multiple individuals that cannot maintain 6 ft separation. Universal masking is not intended for individual offices, but should be used when meeting with others within a confined space.
- Masks and other PPE must be considered in relation to the task. Machine shops should consider whether wearing of masks or alternative PPE appropriate to the situation and separation present during the conduct of the task would result in the lowest risk to the operator.
- Research-related personnel with any symptoms will not access buildings to conduct research.
 - Research personnel must self-assess before coming to campus for, at a minimum, temperature (<100.4°F), and absence of key CDC recognized symptoms (fever, dry cough, shortness of breath/difficulty breathing, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell). Personnel must feel well before coming to campus. Those with symptoms should contact UAH Health Clinic.
 - Website for CDC Recognized Symptoms: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

- Human subject research that involves participant contact (or < 6 feet social distancing) may be re-started or initiated, with careful consideration for safety consistent with publicized PH guidelines. Protocols and considerations must be documented in terms of the following:
 - Screening should be an ongoing process with each subsequent physical encounter (whereby social distancing cannot be maintained), and should include consideration of travel to a COVID-19 hot-spot, known or potential contact with infected individuals, CDC recognized symptoms (fever, dry cough, shortness of breath/difficulty breathing, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell), and temperature. Those participants who screen positive in any way but are asymptomatic should be referred for diagnostic RNA testing. If the potential participant tests positive, he or she must quarantine for at least 14 days, followed by repeat diagnostic testing and be CDC recognized symptom free for 8 days confirming disease resolution prior to participating in non-essential human subject research. For participants who test negative after screening positive, they must be symptom and temperature free for 8 days following a negative test result.
 - Although PPE in addition to cloth masks such as face screens would be ideal even when potential participants screen negative for COVID for non-essential human subject research, it is not required. Face masks and stringent hand washing are required for both participants and research personnel, and gloves are highly encouraged.
 - The UAH IRB does not need to approve the incorporation of mandatory employee health screenings, unless you or the sponsor wishes to incorporate the data collected as part of a new research objective of the clinical study. If so, the protocol will need to be amended and approved by the IRB.
- Non-experimental wet-lab work, including data analysis and writing, laboratory means and administrative support tasks, should be completed remotely initially and could be phased out when possible.
- Personnel and trainees, including researchers at post-doctoral and graduate/pre-doctoral levels, are allowed to continue studies on site and/or perform experiments. Departments, units, schools/college, and Supervisors/PIs can define and communicate additional guidelines and requirements, if desired. Researchers whose work involves off-campus sites (such as industrial, educational or health/medical settings) must comply with public health guidelines as recommended by the federal, state and local authorities as well as the requirements of the off-campus site.
 - Other trainees engaged in research, such as undergraduates and volunteers, can only conduct on-campus research with a specific approval of their program director & the responsible mentor.
- No children allowed in administrative or research areas under any circumstance except children who are research participants.

Code Green Restrictions

- Normal. Pre-COVID19 working operations.
- Personnel must feel well before coming to campus.

Appendix C: Roles and Responsibilities for Yellow Code

Director/Chair Leadership Responsibilities (as defined by the College/Center determined Unit) – Maintaining the safety of all personnel and research workspace is the highest priority. Clearly understand what business activities are back on-line. Track activities of self-identified higher risk employees and students when performing work related and educational activities on campus. Frequently work with your supervisors to understand challenges and help navigate issues. Reinforce the policies and recommendations. Establish standard operating procedures for monitoring and compliance.

Supervisor/PI Responsibilities – Maintaining the safety of all personnel and research workspace is the highest priority. Evaluate your group's circumstance, clearly define what needs to be accomplished in your workspace. Review the Specific Space Phenotype Recommendations [1 person / 100ftsq or 10X10 room] and develop a density management plan in order to provide productive deliverables. Any research that can be conducted remotely should be initially completed remotely whenever possible, including administrative support tasks. A transition can progress incrementally. When in doubt, consult with your Chair or Center Director.

Onsite Individuals – Evaluate work process and verify if your staff must be on-site to accomplish your goals given the previous outlined criteria. This will minimize the amount of supplies needed for effective IDRC.

Remote Workplace Individuals – For individuals working from a remote location, provide the following:

- Review Telecommuting Guidelines and complete the Telecommuting Agreement

Blended Workforce

- Put employees on a rotating schedule to minimize occupancy to approximately 1 individual per 100ft². For example, employees could work remotely 3 days a week and be on site 2 days a week. If a group consisted of 10 individuals, only 5 would be on site at any given time. OR, different employees can work different times of the day/night.

Individual Responsibilities - Each individual will be responsible for contributing to effective infection control mitigation. Only individuals who voluntarily self-identify as vulnerable/higher risk will be classified as vulnerable. It is incumbent for everyone to assume that anything and anyone is infectious in Codes Red, Orange and Yellow. If you feel there is a situation not addressed, or you feel you are being asked to do something that does not provide adequate infectious risk control, consult your PI, Department Chair, or Center Director. If the PI, Department Chair, or Center Director do not appropriately reach an accommodation, then the situation should be addressed with your HR representative for adjudication. PIs, Department Chairs, and Center Directors should utilize the advice of support departments including Environmental Health and Safety to define a proper SOP (Standard Operating Procedures) for dealing with that particular situation.

Do's (for individual employees)

- Before you get to work complete a self-assessment of your health status:
 - Take your temperature to verify below 100.4°F.
 - Verify you feel well, generally.
 - Verify you do not have CDC COVID recognized symptoms of fever, dry cough, shortness of breath/difficulty breathing, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell.
 - Notify your supervisor of your status. If any of the above conditions exist and do not report to work.
- **Employee / Trainee Health:** If you are an employee or trainee (graduate student, postdoc) and have a COVID-19 exposure or begin experiencing potential symptoms (fever, dry cough, shortness of breath), please follow the instructions below.
 - **Employees** – Contact UAH Health Services (256-824-2100) and Supervisor
 - **Graduate Students** – inform your mentor and contact UAH Student Health
 - **Postdocs** – inform your mentor and contact UAH Health Services
- Wear mask at all times when inside buildings or walking around common walk ways and outside common areas where social distancing cannot be maintained. If you walk in groups, then masks should be worn.. On site mask can be removed only if your workstation is in an enclosed office.
- Absolutely no drinking or eating in laboratory areas, unless part of an experimental protocol or study.
- Each unit should have a disinfection plan developed with the understanding of each individual personnel members' responsibilities in the conduct of their research and common areas (see Appendix).
- Utilize “Zoom” meetings vs. conference room meetings [attach system link to Zoom].
 - If you have to meet in person, wipe down all surfaces, chairs, audio/visual equipment after each use, maintain at least 6 feet separation, and fully utilize PPE.
- Consider taking the stairs, if you are able, to get from floor to floor as elevators should only hold 1-2 people to maintain appropriate distancing. If taking stairs, maintain at least 6 feet separation from others in stairway.
- Wash hands frequently.
- Utilize hand sanitizer when available.

Don'ts

- Do not shake hands, elbow or fist bump.
- Do not touch your face.
- Enter someone's office without warning.
- Share masks.
- Drink from the building / hall water-fountain.
- Eat or Drink in labs or common areas.

Emotions and Accountability

- Most individuals will feel awkward interacting with individuals in PPE and practicing infectious risk control measures. In fact, it will probably be anxiety inducing for some.
- Please encourage each other in following these policies.
- If someone is chronically out of line with these policies, please notify your supervisor.

Appendix D: Job Hazard Analysis for Yellow Code Operation

Isolated Employee Situation

JOB HAZARD ANALYSIS FORM	DEPARTMENT: Centers/Colleges
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JOB TASK: Isolated employee situations	QUALIFIED POSITIONS:
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ACTIVITY / TASK	POTENTIAL HAZARD IDENTIFICATION	RECOMMENDED PRECAUTIONS
Computer work within an office	Someone entering office unknowingly.	Post an "Occupied" sign and close the door when working inside office. Visitors must knock and remain at the door of the office where 6 feet is available between the desk and the door. For offices smaller than 6 feet, a marker must be placed 6 feet from the desk. Disinfection required between workers.
Work at a test stand or lab bench	Worker could injure themselves and require help.	Safety watch should be established 6 feet from perimeter of work area. PPE (mask, gloves, disposable jacket or suit) should be available for use in event of injury for safety watch. Disinfected mask can be checked out from OEHS per shift. One safety watch could monitor several work stations by radio.
Work at a test stand or lab bench	Contamination of surfaces during shift.	Upon end of shift or work cycle, worker dons surgical mask and gloves and disinfects all horizontal surfaces with Renown #6 cleaner. Posts note on door with last date and time of disinfection with initials.
Work at a test stand or lab bench	Potential contamination by previous employee.	Upon beginning of shift or work cycle, worker dons surgical mask and gloves and disinfects all horizontal surfaces with Renown #6 cleaner. Posts note on door with the word "Occupied".

Multi-Employee Situation

JOB HAZARD ANALYSIS FORM	DEPARTMENT: Centers/Colleges
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JOB TASK: Multi-employee situations (less than 5 employees)	QUALIFIED POSITIONS:
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ACTIVITY / TASK	POTENTIAL HAZARD IDENTIFICATION	REQUIRED / RECOMMENDED PRECAUTIONS
Work station that can be designated for one person.	Someone entering office unknowingly.	Establish a 6 foot buffer around the work station using tape or plastic to isolate. Allow only one employee within the areas. If another employee must enter for a separate work cycle, disinfect all horizontal surfaces and controls with Renown #6 between employees. Surgical Mask and gloves acceptable.
Work station that is routinely shared during shift. Example: People performing various tasks must enter data in a common computer.	Contamination of air and surfaces.	Disinfect work station between each use by cleaning horizontal surfaces with Renown #6 or an equivalent cleaner. Surgical Mask and gloves required at all times.
Work that requires multiple individuals to perform a safe lift or align/evaluate a process or item.	Contamination of air and surfaces.	Surgical mask with face shield, gloves and disposable tyvek or coat required for all individuals. Gloves should be disposed between tasks. Employees should monitor each other and remind not to touch face. Disinfect horizontal surfaces between shifts.
Person reports Covid-19 positive test	Potential contamination of co-workers	Self-isolate for 14 days for positive person. Self-monitor/self-isolate for those in contact with person. Contact OEHS to determine if risk level requires swab testing of surfaces.

Appendix E: Approval Process for Resumption of On-Campus Research during Code Yellow Operations

Individual Office Space:

1. All personnel shall adopted the guidance in Appendix B and Appendix C without significant change unless more strict requirements are enacted by the Unit.
2. All personnel must receive some COVID-19 training prior to returning to campus.
 - a. COVID-19 training available on UAH OEHS website:
<https://www.uah.edu/oehs/available-safety-training>
 - b. Additional information available at <https://www.cdc.gov/coronavirus/2019-ncov/communication/index.html>
3. Supervisors at the Unit Level shall approve all employees to work in their individual offices and shall maintain a list of approved employees.

Shared Workspace:

All workspace except for individual offices that can be locked will be considered shared workspace.

1. A units shall adopted the guidance in Appendix B and Appendix C without significant change unless more strict requirements are enacted by the Unit.
2. All personnel must receive some COVID-19 training prior to returning to campus.
 - a. COVID-19 training available on UAH OEHS website:
<https://www.uah.edu/oehs/available-safety-training>
 - b. Additional information available at <https://www.cdc.gov/coronavirus/2019-ncov/communication/index.html>
3. Complete the form, “Code Yellow : Shared Workspace Resumption Approval Form for On-Campus Research.”
 - a. The form can be found on the following webpage:
<https://www.uah.edu/oehs/new-lab-start-up-procedures>
 - b. Job hazard analysis provided by the Office of Environmental, Health and Safety (OEHS) in Appendix D should be referred to in developing plans.
 - c. OEHS is available for consultation, but plans must be develop at the Unit level.
4. Approved forms should be held at the department level.

Appendix F: Research Travel

All personnel must adhere to the existing travel policy from the UA System and UAH. Individual Units may require additional restriction. Depending on the designated code level, additional approval may be need for official travel.

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|--------------|---|
| Code Red: | Official travel is prohibited: Waiver will require the approval of the President. |
| Code Orange: | Official travel is prohibited: Waiver will require the approval of the VPRED or Provost. |
| Code Yellow: | Research travel is allowed, but approval will be required from the Center Director or Dean. A self-isolation requirement on return from travel may be required depending on destination. This should be included in comments on travel authorization. |
| Code Green: | No additional restrictions on travel. |