1.0 Policy Purpose

The purpose of the Brown University COVID-19 Campus Safety Policy is to manage all teaching, research, learning, work and other activities that are authorized to take place on campus in a safe and orderly manner.

2.0 To Whom the Policy Applies

This policy applies to all faculty, staff, students (graduate, medical and undergraduate) and any other individuals approved to live, work, teach, study and conduct research on campus. Where the policy refers to “faculty and staff,” “employees,” “students,” “individuals” or “community members” it must be read as encompassing all approved on-campus activities and persons. “Campus” means all University-owned, -leased or -occupied facilities and grounds or other locations where University functions, programs and activities are conducted.

3.0 Policy Statement

All departments that have been working remotely and demonstrate a compelling need to return to campus to conduct research or perform administrative operations and duties that cannot be done remotely will be asked to submit for approval specific plans appropriate to their area and function consistent with this policy. All students will follow the directives provided by the respective dean based on the students’ relationship to the University (Dean of the College, Dean of the Graduate School, Dean of the School of Public Health, Dean of the Medical School). No member of the community, and others as determined by the University, will be able to return to campus, or continue to be on campus in the case of already on-site essential personnel, or otherwise be on campus until they have completed training and signed an employee acknowledgement form (for faculty and staff, available via Workday) or a “Student Commitment to COVID-19 Community Health and Safety Requirements” form (for students) that affirms their understanding and acceptance of this policy.

This policy is subject to modification as new regulations, information and guidance become available from the U.S. Centers for Disease Control and Prevention (CDC), the U.S. Occupational Safety and Health Administration (OSHA), Rhode Island Department of Health (RIDOH) and other federal and state agencies.

3.1 Principles Governing COVID-19 Campus Safety

- Provide for the safety and well-being of every Brown community member while following public health guidance and considering individual circumstances.

- Minimize health risks through de-densified work, living, teaching, study and research arrangements, including physical work locations, residence hall room assignments, classrooms...
and scheduling, social distancing and individual health monitoring for COVID-19 symptoms, and by following all current and applicable public health guidance.

- Maximize sustained telecommuting for those able to work remotely to the best extent possible to reduce the density of Brown community members on campus.

- Minimize financial impact on the University.

- Support flexibility for departments to develop plans and approaches specific to their mission and function in a manner consistent with this policy and all State of Rhode Island public health guidance and regulations.

- Maximize simplicity with clear and consistent guidance that all community members can easily and effectively follow.

- Provide easily accessible reporting mechanisms for community members with health and safety concerns and appropriate consequences for lack of compliance.

3.2 Return to Campus Plans

3.2.1 Departmental Requests to Return to Campus (Other Than Research Laboratories)

Department Chairs, Managers or Directors who wish to have their units considered, in whole or in part(s), for return to campus will submit a plan in accordance with the processes established by the Provost and Executive Vice President for Finance and Administration.

3.2.2 Departmental Plan Review

Submitted plans will be reviewed by the Provost and Executive Vice President for Finance and Administration, informed by a small committee of leaders from the Office of the Vice President for Research, Environmental Health and Safety, University Human Resources (UHR), Department of Public Safety, Office of General Counsel and others with expertise and responsibility in health and safety. If a plan is approved, the Department Lead Contact Person will be notified and the department, UHR and others will have additional responsibilities as detailed below.

3.3 COVID-19 Campus Safety Requirements and Expectations

3.3.1 General Policy Requirements

Community members are responsible for periodically reading the information provided by Brown University to remain aware of up-to-date guidance on continued preparedness, action

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1 A separate, but similar, review and approval process for the return to campus of laboratory-based research activities is administered by the Office of the Vice President for Research and principal investigators should contact that office (resuming_research@brown.edu, 401-863-7408) for further information and guidance.
and response to COVID-19, and ways to prevent its spread. Policies provided by the University are based on recommendations from the CDC, OSHA and RIDOH.

To the best extent possible, faculty and staff who can work from home — in full or in part and as determined by their supervisor — must continue to do so. Maintaining reduced density of faculty and staff on campus reduces risk of transmission of COVID-19 and protects vulnerable members of the community.

The University has published its “Plan for a Healthy and Safe 2020-21,” providing a roadmap for steps to mitigate the impact of the COVID-19 pandemic as on-campus activity resumes more fully in the fall. Based on expert guidance and the downward trend of COVID-19 in Rhode Island as of July 7, 2020, Brown is pursuing a three-term 2020-21 academic calendar that provides for a “de-densified” approach for the transition of students to campus starting in Fall 2020. The University will reduce the number of students studying in Providence, offer remote learning and instruction options, and implement extensive health and safety protocols and policies. All activities — teaching, research, work, study, social functions, dining, athletics, student activities, etc. — that take place on campus in accordance with the “Plan for a Healthy and Safe 2020-21” must fully comply with this policy.

Brown community members will be provided with training and information regarding how to comply with this policy to ensure a safe working and learning environment for themselves and their colleagues. Reasonable accommodations will be made for community members with disabilities and underlying health conditions as necessary and appropriate.

### 3.3.2 Face Masks and Coverings

All Brown community members, visitors and guests authorized to be on-campus must wear masks or cloth face coverings unless doing so would impact the individual’s health or unless alone in a laboratory, private office, residence hall room or similar area where there is no contact with others. Reasonable accommodations will be made for community members with health conditions preventing them from wearing masks. The University will provide individuals approved to be on campus with three (3) reusable face coverings. Individuals also may use their own, provided they meet applicable state guidelines (refer to the COVID-19 Face Covering Guidance and Rhode Island requirements for more information).

- Wear a face covering at all times when teaching or attending an in-person class or similar academic activity or function.

- Wear a face covering when in all University buildings and while in outdoor public areas where social distancing may be difficult. Face coverings must be worn before entering a University building; while walking inside buildings; in areas such as stairwells, elevators, kitchens and bathrooms, where social distancing may be difficult to maintain; and while working, teaching, studying, conducting research or any other activity in the same area as others.
• The State of Rhode Island requires wearing a face covering in public settings where other social distancing measures are difficult to maintain.

• Laboratory researchers must dispose of reusable face coverings as regulated waste when contaminated with chemical, biological and/or radiological agents.

• Reusable face coverings should be laundered daily.

• If you believe you need a higher level of protection such as an N95 respirator, as is appropriate in health care settings, please discuss concerns with your supervisor and have them contact Environmental Health and Safety (EHS) at safety@brown.edu to conduct a risk assessment.

3.3.3 Personal Responsibility When Sick or Feeling Sick and for Public Health

• All Brown community members must stay home from work, class and/or other University events and functions if they are experiencing symptoms of COVID-19, have tested positive for COVID-19, have been exposed to COVID-19 (identified contact) or otherwise are feeling sick. In the case of employees, they must inform UHR, and employees and students must contact their medical provider (University Health Services for students).
  o Individuals who are diagnosed with COVID-19 must self-isolate. Employees must immediately notify UHR of their diagnosis and continue following the guidance of their health care provider; students must immediately notify University Health Services. The identity of anyone testing positive will be kept confidential by UHR and University Health Services and will only be shared by designated contact tracers who will notify the Rhode Island Department of Health, contact tracers employed or contracted by the University, other employees or contractors of the University on a need-to-know basis, and any other person or entity as required by law.
  o Any individual who has been exposed to COVID-19 must seek medical treatment as soon as possible to determine if they need to be tested for the virus and/or meet the criteria for quarantine.
  o Individuals must not return to work, classes and/or other University events or functions until the criteria established by federal and state agencies to discontinue home isolation are met.

• All Brown community members must monitor their health conditions daily before arriving on campus and be aware of all possible COVID-19 symptoms and complete a

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2 Symptoms may appear 2-14 days after exposure to the virus. People with these symptoms or combinations of symptoms may have COVID-19: Cough, shortness of breath or difficulty breathing (or at least two of these symptoms: fever, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell). Check the CDC website periodically as the symptom list may be updated as more medical information is learned.
daily (daily meaning scheduled workdays for employees) online symptom tracker (see Section 3.3.6 for more information).

- All Brown community members must take responsibility for maintaining logs of their daily contacts, to aid in the event contact tracing is necessary.

- All Brown community members must take responsibility for reducing and minimizing their network of contacts and engage in behaviors that reduce and break the spread of COVID-19. Such behaviors include not shaking hands, ensuring the authorized number of passengers at a time on an elevator (take the stairs whenever possible, and prioritize elevator use for community members with mobility needs), prohibiting social gatherings and celebratory events, and restricting unnecessary convening of groups.

- All Brown community members will need to comply with University policies regarding the restriction of off-site work activities, such as international and domestic travel, conference and large meeting attendance, in-person trainings and other similar activities.

- All Brown community members must take responsibility for promoting safe hygiene practices, including vigilant hand washing and cleaning (sanitizing) of classrooms, laboratories, work stations and other office areas, especially including common work areas, surfaces and equipment, such as shared printers and copiers. The University will increase the frequency of cleaning across campus, but individual behavior will be critical to reducing the risk of spread for all community members. The guidance followed should include, but not be limited to, the following:
  o Avoid to the fullest extent possible touching your face to prevent the potential transfer of the virus to or from surfaces.
  o Use hand sanitizer provided at building entrances or wash hands for at least 20 seconds upon arrival to campus, throughout the day, and before you leave at the end of your workday for employees. Other times to wash hands include: after blowing one’s nose, coughing or sneezing; after using the restroom; and before eating or preparing food. Use hand sanitizer that is at least 60% alcohol when soap and water are inaccessible.
  o Wearing gloves in public areas is not a substitute for good hygiene, and can provide a false sense of safety. Hand washing is the best defense against infection, and gloves should be worn only when a task requires it. Wash hands immediately when gloves are removed.
  o Disinfectants such as hand sanitizer and wipes or spray will be provided by the University in order for individuals to enhance cleaning/disinfection of surfaces.
  o Facilities Management and other property managers will clean and disinfect common spaces and high-touch surfaces in these spaces.
  o Shared spaces, high-touch surfaces and equipment must be disinfected before and after use by members of the Brown community. These include but are not limited to doorknobs, light switches, phones, tables, desk surfaces, drawer handles, shared computer keyboards and mice, printers, water faucets and coolers, other office equipment, lab benches and research equipment.
For electronics and sensitive equipment, consider the use of alcohol-based wipes or spray containing at least 70% alcohol to disinfect touch points.

- All faculty and staff must notify UHR if they test positive for COVID-19 or are contacted by RIDOH due to exposure.
  - In consultation with UHR, employees will be informed of immediate next steps to take. UHR will receive and monitor inquiries throughout normal business hours at universityhr@brown.edu.
  - Supervisors must notify their property manager (Facilities Management Service Response or other) and EHS, so appropriate facility cleaning and disinfecting can be coordinated.
  - **The identity of anyone testing positive must be kept confidential.** No personal identifying information can be shared, only that there is a positive case in an office, floor or building so that preparations can be made to clean the facility as recommended by the CDC.
  - If closing of spaces is necessary, critical access will be handled on a case-by-case basis as directed by EHS.
  - For additional information on steps to take when an employee has contracted COVID-19, please visit the UHR website.

- All students must notify University Health Services if they test positive for COVID-19 or are contacted by RIDOH due to exposure.
  - Students will be directed to "isolate" from others. Specific on-campus housing has been designated for on-campus students to stay in while they are considered contagious to prevent spreading the virus. Health Services, Brown EMS, Dining Services, Student Support Services, Facilities and Residential Life have partnered to ensure students are supported while living in this housing. Off-campus students will be advised to isolate as much as possible from roommates and others. Information can be found on the Health Services website with regard to steps students can take when they are sick. Students will be contacted daily during their infectious period to check in on symptoms and respond to questions or concerns. Isolation will last a minimum of 10 days from the onset of symptoms.
  - University Health Services will determine when isolation can conclude.

### 3.3.4 Workplace, Classroom and Other Physical Space Requirements

Physical work locations, including classrooms and laboratories, must limit proximity between individuals to no less than 6 feet. To accomplish this minimum standard the following rules must be strictly adhered to:

- All classrooms, lecture halls, conference rooms, common spaces, huddle rooms and other similar convening spaces must be limited to the authorized user occupancy only and individuals using these spaces must maintain appropriate social distancing at all times. Meetings that cannot be held virtually must be held in a space (indoors or outdoors) large enough to maintain appropriate social distancing, including the use of face
coverings and a minimum distance of 6 feet between individuals.

- Assigned work locations or assigned work schedules must be arranged to ensure that the 6-foot minimum social distancing standard is followed. Where possible, work locations must be physically separated from each other, or staggered schedules (including staggered breaks) established to allow for appropriate social distancing. Where staggered schedules and breaks are in place, the same cohorts of individuals to the fullest extent possible should work on the same schedules to further limit each employee’s network of contacts.

- All coffee machines, microwaves, refrigerators and similar amenities will be closed and restricted from use until further notice.
  - Limit to the extent possible eating and drinking to departmental approved areas where there are no groups, and maintain social distancing. Follow a best practice to disinfect surfaces before and after using rooms that will be used at other times by others. Remove non-essential items from these areas.
  - Where possible, assign individuals to use specific bathrooms to limit and identify the number of individuals using each facility.

- Work assignments and locations that require high-volume interaction with customers, students and the public at large will be protected with plexiglass or similar barriers to reduce the risk of transmission. Such locations include dining halls, Mail Services, Brown Bookstore, Campus Center, high-volume departmental reception areas, etc. Facilities Management will assess and install protections, and departments with such locations not already identified should note those needs in their plans and contact Facilities Management Service Response at 3-7800 for assistance.

- Travel routes within buildings and work areas will be adjusted to minimize contact between individuals (e.g., one stairwell for going up, another for going down; one-way travel through narrow corridors or in and out of buildings wherever possible, except in the case of emergency egress). In larger buildings (e.g., Engineering Research Center), buildings shared by multiple departments (e.g., South Street Landing), and general use buildings (e.g., Robert Campus Center) decisions regarding travel routes and necessary signage will be centrally managed by Facilities Management. Departments in smaller buildings will need to include these considerations in their plans and should contact Facilities Management for assistance as needed.
  - When walking in the corridor, stay on the right side of the corridor, especially when passing others. Do not stop and congregate in the corridor.
  - One-way traffic may be necessary for narrow corridors or where high traffic is expected (e.g., classroom buildings, dining facilities, etc.).
  - Designate 6-foot spacing in high traffic areas.
  - Only the authorized number of persons may occupy an elevator at a time. Leave ample room outside elevator doors for others to exit before you approach the elevator.
o Floor markings and arrows will be installed to help support one-way traffic for stairwells, corridors and where people may line up for services or materials such as in dining, stockrooms, shared equipment areas and similar spaces.

o Facilities Management will install approved signs and posters as needed to convey rules and important information. Requests to install additional floor markings, arrows and one-way corridor traffic signs, if needed, should be sent to Facilities Management (or other property management companies where applicable).

3.3.5 Other Policy Expectations

- No social gatherings, formal or informal, in excess of the number of people allowed by the University.

- Intended visitors or guests are encouraged to meet virtually. Business meetings that are essential must be held virtually. In the rare circumstance that a meeting cannot be held virtually, visitors must adhere to social distancing and wear face coverings, from arrival to and departure from University premises (or a University location).

- University dining facilities will be limited and operating on a takeout and pickup basis only.
  o Dining Services’ priority operations will be oriented toward providing food to students.
  o Dining options for faculty and staff on campus will be limited to self-serve vending machines, which will be sanitized multiple times daily, in fixed locations and through pickup/delivery via the Brown Faculty Club or Blue Room.
  o Faculty and staff should anticipate limited food options on campus and plan to bring their own lunch or other meals/snacks (non-refrigerated or in a personal cooler) from home.

- Shuttle transportation capacity will be reduced to abide by State of Rhode Island requirements. Faculty and staff should to the fullest extent possible make use of virtual meeting platforms to reduce the need to take the shuttle between campus locations during their workday.

3.3.6 Mandatory COVID-19 Testing

All faculty, staff and students and others as determined by the University (collectively “testing program participants”) who are working, living or studying on campus or approved to return to campus are required to undergo COVID-19 testing at times and dates established by the University to determine if they have the virus and to allow the University to estimate the incidence of infection in the Brown community.

- Testing will be administered by a third party testing company selected by the University. Testing and/or health monitoring may occur prior to a participant’s return to campus, as a condition of the testing program participant’s continued work or presence on campus, and at any other time at the sole discretion of the University. In addition, the University
may administer routine testing of faculty, staff and students and others, using the least invasive means of reliable and accurate testing available. The routine testing will allow a better understanding of the initial incidence of the 2019 novel coronavirus (COVID-19) in the Brown population and how it changes over the year, as well as identify the proportion of asymptomatic positives and other information that will assist efforts to promote health and safety on campus.

- Participants in the testing program will be required to complete a daily (daily meaning scheduled workdays for employees) online symptom tracker.

- Testing costs and any expenses related to testing of participants through this program will be covered by the University.

- The University and the testing company will maintain the confidentiality of a participant’s COVID-19 test results and will only share a test result with the individual tested, the Rhode Island Department of Health, contact tracers employed or contracted by the University, other employees or contractors of the University or the testing company on a need-to-know basis, and any other person or entity as required by law. The name of an individual who tests positive for COVID-19 will only be disclosed to others if necessary to prevent a direct threat to health and safety in accordance with applicable law.

- The University will ensure that these mandatory testing requirements are applied in a consistent, non-discriminatory manner in accordance with all applicable laws and regulations.

- Test results will be maintained in a secure and confidential medical file that is separate from an employee’s personnel or student’s academic file.

- Non-exempt employees will be compensated for time spent traveling and waiting for the administration of a test. Testing times will be coordinated with work shifts when appropriate.

- Testing program participants should note that nasal swab testing only reveals if the virus is currently present. A negative test does not mean that the individual will not acquire the virus later. Therefore, even if an individual tests negative for the virus, individuals must continue to comply with all requirements in the COVID-19 Campus Safety Policy to help ensure a safe campus environment for themselves and their colleagues/peers.

- Failure to comply with these mandatory testing requirements will disqualify an employee or student from being on campus and may subject an employee or student to discipline, up to and including termination of employment for employees. Students may be subject to non-academic discipline through the Office of Student Conduct and Community Standards (see Section 6.0).

4.0 **Definitions:** N/A
5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University leaders and supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

Faculty, Student and Staff Responsibilities:

- Reading and understanding this policy and the Healthy Brown website before returning to campus and agreeing to periodically review the website to remain aware of up-to-date information on continued preparedness, action and response to COVID-19 and committing to follow the guidance and restrictions contained in the policy and this website at all times.

- Wearing a face covering (University-provided or self-provided) in accordance with this policy, the University’s COVID-19 Face Covering Guidance and the State of Rhode Island Face Covering Rules, as they may be updated from time to time. This guidance requires that everyone wear a face covering when in all University buildings (except while eating in designated areas, while working alone in a private office, laboratory or similar area) and while in outside public areas where social distancing may be difficult. Additionally, face coverings must be worn when teaching or attending an in-person class or similar academic activity, before entering a University building, while walking inside buildings, and in areas such as stairwells, elevators, kitchens and bathrooms where social distancing may be difficult to maintain.

- Following CDC Guidance for preventing the spread of COVID-19 including without limitation, (a) social distancing of at least 6 feet; (b) washing hands often with soap and water for at least 20 seconds, or using an alcohol-based hand sanitizer that contains 60% to 95% alcohol and covering all surfaces of one’s hands and rubbing them together until they feel dry; and (c) covering one’s mouth and nose when coughing or sneezing.

- Committing, as a condition of enrollment at or continued/resumption of employment on campus, to undergoing required testing for COVID-19 at the location, times and dates established by the University to determine if one has contracted the virus and to enable the University to monitor infection rates in the Brown community in order to protect individual health and safety and the health and safety of both the Brown and local community.

- In the case of a student, calling University Health Services immediately at 401-863-3953 and undergoing any COVID-19 testing recommended and following any treatment or mitigation measures, such as isolation or quarantine, if one exhibits any symptoms of COVID-19 as established by the CDC. As symptoms of COVID-19 may be updated from time to time, students are committing to periodically reviewing the CDC website.

- In the case of a student, immediately notifying University Health Services at 401-863-3953 if they test positive for COVID-19 so that they can receive appropriate care and support; complying with all instructions given by the University, including without limitation isolating or quarantining in a residence hall room assigned by the University or an off-campus residence until they have been cleared by a health care provider; cooperating with University Health Services and the RIDOH
regarding any contact tracing that they may perform; and, if they have tested positive for the virus prior to travel to campus, working with their health care provider to be cleared prior to return to campus.

- In the case of an employee, following the direction and requirements of this policy (Section 3.3.3) if they are experiencing symptoms of COVID-19, have tested positive for COVID-19, have been exposed to COVID-19 (identified contact) or otherwise are feeling sick.

- Taking personal responsibility for the health and well-being of the community by maintaining a log of daily contacts to aid in the event contact tracing is necessary. If a contact tracer from University Health Services or UHR communicates and informs a community member that they have had contact with an individual who tested positive for the virus, they are committing to cooperating with all University directives for isolating or quarantining. If a community member is contacted by any other contact tracer, including without limitation RIDOH, they are committing to notifying University Health Services (students) or UHR (faculty and staff) immediately.

- Following the policies established by the University and laws of the State of Rhode Island regarding restrictions of attending or hosting social gatherings, especially in terms of the number of people allowed, and acknowledging that social gatherings held in violation of policy have contributed to large outbreaks of COVID-19 in other higher education communities and in Rhode Island.

- Complying with all University travel restrictions and visitor policies, which are included on the Healthy Brown website, because travel to and from the University can unnecessarily increase the risk of exposure to and infection of COVID-19.

- Following new and modified information and health and safety requirements set forth by the University as they become available because public health and medical experts continue to learn more about COVID-19 over time.

### 6.0 Consequences for Violating this Policy

All members of the community must take seriously and follow the Brown University COVID-19 Campus Safety Policy. Corrective action will be taken if community members do not comply with the policy, up to and including suspension without pay or termination of employment, enrollment in or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures, or, for other non-employees the suspension or revocation of the user's relationship with Brown University.

### 7.0 Related Information

This policy is subject to modification as new regulations, information and guidance becomes available from the CDC, OSHA, RIDOH and other federal and state agencies.

Report behaviors inconsistent with or in violation of this policy to a supervisor, UHR or other University official. For emergency situations, call the Brown Department of Public Safety at 401-863-4111. Additionally, Brown's Anonymous Reporting Hotline allows anonymous and confidential reporting on
matters of concern online or by phone (877-318-9184); however, please note this service does not generate an immediate response.

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies: N/A
7.2 Related Procedures: N/A
7.3 Related Forms:
   - COVID-19 Workplace Safety Policy Employee Acknowledgment Form
   - Student Commitment to COVID-19 Community Health and Safety Requirements Form
7.4 Frequently Asked Questions (FAQs): N/A
7.5 Other Related Information: N/A

8.0 Policy Owner and Contacts

8.1 Policy Owners: Provost and Executive Vice President for Finance and Administration
8.2 Policy Approved by: President
8.3 Subject Matter Contacts:
   - Overall Policy Questions and Concerns
     University Human Resources, Vice President Amanda Bailey
     Email: universityhr@brown.edu; Telephone: 401-863-3175
   - Health and Safety Workplace Guidance
     Environmental Health and Safety, Director Stephen Morin
     Email: stephen_morin@brown.edu; Telephone: 401-863-3353
   - Facilities and Cleaning Questions and Concerns
     Facilities Management, Vice President Michael Guglielmo
     Email: michael_guglielmo@brown.edu; Telephone: 401-863-7800
   - Campus Life, Student Health and Student Conduct Questions and Concerns
     Campus Life, Vice President Eric Estes
     Email: eric_estes@brown.edu; Telephone: 401-863-1800

9.0 Policy History

9.1 Policy Effective Date: August 21, 2020
9.2 Policy Last Reviewed: August 21, 2020
9.3 Policy Update/Review Summary: Title changed to COVID-19 Campus Safety Policy due to expanded scope. Mask requirements updated in section 3.3.2 on August 21, 2020. Previous policy versions superseded by this policy:
   - COVID-19 Campus Safety Policy, Effective Date: August 7, 2020
   - COVID-19 Workplace Safety Policy, Effective Date: June 13, 2020
   - COVID-19 Workplace Safety Policy, Effective Date: May 16, 2020