

# Brown University

## Resuming Work in Research Facilities Principles and Procedures: Stage 1

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### I. INTRODUCTION

Brown University's first priority is the health and safety of every member of the Brown community, and that priority has guided and will continue to guide all of the University's decisions and response to COVID-19. As the state of Rhode Island progresses through the phases of Governor Gina Raimondo's Reopening Rhode Island plan, the University can begin to consider the resumption of a limited set of academic research programs and activities. Research is a critical component of the academic mission of the University and has beneficial impacts to society at large as well the Providence and Rhode Island economies. Accordingly, resumption of laboratory-based research — in a manner fully consistent with the best and current public health guidance, the guidance and direction of the State of Rhode Island, and the University's [COVID-19 Workplace Safety Policy](#) — is a high priority, for Brown and our local, regional and national community.

Resuming research in accordance with public health guidance and the University's COVID-19 Workplace Safety Policy is a challenging and complex undertaking, which will take time and will be conducted in a staged manner. In order to ensure that research resumption at Brown is both safe and effective, Provost Richard M. Locke charged the Brown Research Continuity Committee with developing Principles and Procedures to guide this work. Members of the Committee (listed below) surveyed their research community, consulted with peer institutions about best practices, coordinated with University planning groups for reopening academic and other university spaces, and reviewed state and federal public health guidance

These Principles and Procedures apply to Stage 1, the initial stage of resuming work in certain research laboratories at Brown University. The goal and scope of Stage 1 is to resume all laboratory-based research that meets government and University guidelines, is consistent with building density constraints and other COVID-19 necessitated precautions and restrictions, and that cannot be conducted remotely. Throughout Stage 1, all faculty research that can be done remotely, will continue to be.

Future stages will include resumption of research beyond laboratory-based research. Plans and anticipated timelines for future stages will be communicated to faculty in the coming weeks.

### **Research Continuity Committee Members**

Jeffrey Bailey - Pathology and Laboratory Medicine; Covid Research Task Force

Laurent Brossay - Molecular Microbiology and Immunology

Amy Carroll - Office of Research Development, OVPR

Edward Hawrot - Division of Biology and Medicine

Greg Hirth - Earth, Environmental, and Planetary Sciences

Lawrence Larson - School of Engineering

Bess Marcus - School of Public Health

Joseph Meisel - University Library

Stephen Morin - Environmental Health and Safety

Nicole Picard - Office of General Counsel

Jill Pipher - Office of the Vice President for Research

Jennifer Tidey - School of Public Health

Leah VanWey - School of Professional Studies, Institute at Brown for Environment and Society, Sociology

Lai-Sheng Wang - Chemistry

Gang Xiao - Physics

## II. GUIDING PRINCIPLES<sup>1</sup>

**Overarching Goal:** To protect the health and safety of the Brown community, while increasing research activity in a staged approach.

Our framework is informed by the following principles.

**Principle #1:** *Follow the relevant local, state, and national public health authority directives.*

- **Background:** On April 27, 2020, the state of Rhode Island released "[Reopening RI: Charting the Course](#)", which outlines a phased approach to reopening businesses and community interactions in Rhode Island. On May 9, 2020, the state entered Phase I of that plan. All of the phases involve significant social distancing, facial covering requirements and limitations on the size of gatherings.
- **Background:** There also is a [White House Plan for Opening up America Again](#).
- **Considerations:** Brown recognizes that reasonable accommodations will need to be made for employees with underlying health conditions as necessary and appropriate.

**Principle #2:** *The resumption of research will be carried out in full compliance with the [Brown University COVID-19 Workplace Safety Policy](#) and any other University policies that govern the return to campus.*

- **Background:** The Policy has been developed to apply to all members of the community — faculty, staff, students and any other individuals approved to return to campus — and all such individuals will complete a form acknowledging that they have read and agree to abide by the policy before access to campus, including access to research laboratories, is allowed.

**Principle #3:** *Protect the health and safety of the research workforce and the health and safety of human research subjects.*

- **Safety Considerations:** Safety within laboratories and libraries must be rigorously maintained, with adequate access to personal protective equipment (PPE) and safety-related supplies. Brown Strategic Purchasing, Contracts and Insurance (SPCI) with input from Environmental Health and Safety (EHS) will make available and provide reusable face coverings for researchers. Community members should report behaviors inconsistent or in violation with the Policy to a supervisor, EHS, 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 [online](#) for matters of concern, or by phone (877-318-9184). However, please note this reporting service does not generate an immediate response.

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<sup>1</sup> Adapted for the Brown University community, based on Principles and Framework Guiding a Phased Approach to Restarting University Research Activity developed by University of California, Berkeley in partnership with VCRs/VPRs from the University of California system and the Association of Public and Land-grant Universities, and borrowing liberally from planning documents at many other institutions.

Brown Facilities Management will create and post signage about safety procedures in re-opened buildings.

- **Required Approval:** Principal Investigators will prepare and submit plans for resumption of research. 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), the Department of Public Safety, Office of General Counsel and others with expertise and responsibility in health and safety. The process for submission of plans is described below in Resuming Work Procedures.
- **Flexibility:** During the staged resumption of work in research labs, all reasonable accommodations and flexible work arrangements should be made consistent with University policies, including the Alternative Work Assignment Policy (AWA Policy) and the Americans with Disabilities Act Policy (ADA Policy). To the extent possible, PIs should work with researchers on suggesting alternative work assignments per the AWA Policy given current home situations (lack of childcare or eldercare, a high risk household member). Researchers with underlying medical conditions should contact UHR to request an accommodation under the ADA Policy.

Individuals with concerns about their workplace and/or behaviors inconsistent with or in violation of the [COVID-19 Workplace Safety Policy](#) and/or this guidance should report those concerns to a supervisor, UHR, or other University official. Graduate students should first contact their department Director of Graduate Studies and also Associate Dean of Student Support Services Maria Suarez in the Graduate School, if appropriate. Staff can consult with their department or center Human Resources Partner.

Postdoctoral Research Associates and Fellows should contact:

- Biomed, [Audra Van Wart](#) in the Office of Graduate and Postdoctoral Studies;
  - School of Public Health, [Nancy Barnett](#) in Faculty Affairs; and
  - All others, [Joel Revill](#) in the Dean of the Faculty office.
- **Travel:** Travel restrictions remain in effect until July 1, 2020, and may be extended. Researchers must follow University travel guidance.
  - **Human Subject Research:** Some IRB-approved human subjects research may be approved in Stage 1. Best practices and guidelines information **are** available at the [Human Research Protection Program \(HRPP\) website](#).

#### **Principle #4: Protect the careers of early stage researchers.**

- **Definition:** Early stage researcher includes assistant professors, postdoctoral research fellows, and graduate students.
- **Considerations:** Early stage researchers are at a critical stage in their careers, and Brown recognizes the consequences of reduced access to research spaces on this population. To the extent that it is possible under the public health authority directives, as access restrictions are relaxed, priority to return to research spaces should be given to researchers who cannot work remotely and are under time constraints to complete degrees, term appointments (e.g., postdoctoral researchers), or for tenure and other career reviews.

**Principle #5: Implement a fair and transparent process for resuming lab-based research.**

- **Building Access Priority:** Anyone who can perform their research remotely must continue to do so in Stage 1 of reopening. By minimizing the number of people in Brown buildings, this will allow adequate access with social distancing for those whose research absolutely requires work in Brown facilities.
- **Workspace Density:** The number of people in a workspace must be limited. EHS and Facilities Management will help support two work shifts on each of seven (7) days available (wherever possible) to facilitate separate shifts and staggered work days. While physical distancing and initial low occupancy are critical during the resumption of lab-based research, the safety of lab personnel must be ensured and precautions adhered to when working alone. All lab personnel will additionally be required to be familiar and comply with the [COVID-19 Workplace Safety Policy](#), including, but not limited to, all requirements regarding social distancing, face masks and coverings, and individual responsibility when sick or feeling sick.
- **Resuming Work Procedure Overview:** Please see Resuming Work Procedures for detailed instructions. In brief, individual faculty must create a reopening plan for their labs. These plans will be reviewed by department chairs or research center directors and the appropriate Research Continuity Building Subcommittee. A small committee chaired by the Vice President for Research will then review each department plan for conformity with social distancing and other safety requirements, and make a recommendation to the Provost and Executive Vice President for Finance and Administration who will have final approval of each plan.

**Principle #6: Ensure as rapid a resumption as the public health conditions, applicable public directives, and University policies permit.**

- **Safety Considerations:** Social distancing and reduced density of research personnel in university research spaces is required. Details about these requirements are below in the Resuming Work Procedures section.
- **Worksite Preparedness:** Ensure Core Facilities, Shops, and Fabrication Lines are engaged and ready to support work ramp-up in advance of need.

**Principle #7: Ensure that viral spread is isolated with minimal impact.**

- **Background:** A key goal is the minimization of the spread at work as well as the impact. A positive test for infection in a single individual may result in quarantine of their contacts and possible shutdown of laboratories, shared resources, core facilities, and libraries.
- **Safety Considerations:** All faculty and staff must take personal 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 no hand shaking, required face coverings, disinfecting areas and equipment before and after use, social distancing, one passenger at a time on an elevator, no social gatherings or celebratory events, one person in a conference room at any time, and no convening of groups. Further detail

regarding these measures and the responsibilities of all community members can be found in the [COVID-19 Workplace Safety Policy](#).

### **III. RESUMING WORK PROCEDURES**

These procedures apply only to Stage 1, the initial stage of resuming work in certain research laboratories. Plans for future stages will be communicated in the coming weeks.

The goal of Stage I is to resume all laboratory-based research that meets government and University guidelines and is consistent with building density constraints and other COVID-19 necessitated precautions and restrictions.

#### **Brown-Controlled Laboratories and Libraries**

During Stage I, the University Library will support research activities with enhanced remote services and remain closed to onsite users. A plan for future stages will be issued separately.

In Stage I, research is eligible to be resumed in Brown-controlled laboratories only if

- A. The research cannot be conducted remotely; and
- B. The research is governed by a research resuming work plan that has been approved in accordance with Stage I guidelines and the [COVID-19 Workplace Safety Policy](#).

#### **Research Resumption Prioritization Factors**

Even if research meets the criteria above, building density constraints and other COVID-19 necessitated precautions and restrictions may create situations where multiple research projects cannot resume simultaneously and the resumption of some research may be delayed. In these situations, department chairs/center directors, building subcommittees, the Vice-President for Research, and the Provost and Executive Vice President for Finance and Administration will weigh the following prioritization factors when determining what research can resume and when:

- Research activities designated as essential under the March 15, 2020 Brown OVPR guidelines.
- Research related to COVID-19 underway and approved as of May 15, 2020.
- Research for which award conditions or proposal requirements necessitate that the research be given priority in order to satisfy and comply with award terms (e.g., contracts with strict, nonnegotiable deadlines that would be missed if research does not restart; contracts or grants with inflexible spending requirements that necessitate

resumption to maintain funding or meet award requirements; research required to meet an upcoming proposal deadline).

- Research for which the risk of significant irrevocable loss is high if data collection or experiments are not continued or completed, including animal experiments where delay would result in significant loss.
- Research that impacts timelines, opportunities, and requirements for early-career researchers (*e.g.*, graduate student projects for which the student is near to degree completion or a qualifying exam, or early-career faculty projects that are vital to the tenure process).

### **Non-Brown-Controlled Spaces**

In general, all research occurring in non-Brown-controlled spaces or areas must satisfy and be performed in accordance with the state, local, and other applicable requirements and guidelines in place for the space or area where the research occurs. This includes the public health guidelines of local government(s) and policies of collaborating institutions. This research is subject to all applicable United States, University and local travel restrictions.

Guidance on field work and international research will be issued separately.

### **All Human Subjects Research**

Some IRB-approved human subjects research may be approved in Stage 1. Best practices, guidelines and information are available at the [Human Research Protection Program \(HRPP\) website](#).

### **Requirements for All Research**

Research resuming work plans must document any unique, anticipated instances where social distancing may not be possible and include a mitigation approach that incorporates precautions in line with EHS guidelines and the [COVID-19 Workplace Safety Policy](#). Undergraduate Students will not be allowed to work in research laboratories during Stage 1 resumption of research.

## **Additional Social Distancing Guidelines**

As noted above, the University has issued the [COVID-19 Workplace Safety Policy](#), and all approved research programs and activities must fully comply with that policy. Additional guidelines for resuming work at research labs and other research spaces are as follows:

- Regarding scheduled/work-shift access, allow 2 shifts per day, 7 days a week with a buffer or staggered timing to minimize interaction in common areas, building and lab entrances.
- Use google calendar for scheduling use of individual lab entrance, core facilities and research support space as needed.
- Density guidelines are no more than 2 researchers per bench and 1 researcher per 300 ft<sup>2</sup>. Exceptions can be made depending on size and configuration of research space and the nature of activity therein.
- Set a maximum number of people allowed to enter lab or library spaces.
- Follow appropriate virus-mitigation protocols including appropriate holding times or disinfection for physical research materials such as books and artifacts after use by researchers.
- Consider creating A/B research teams in the event of quarantine restrictions on the contacts of an infected individual.

## **IV. PROCESS TO REQUEST RESUMING WORK IN A LAB**

**Step One:** Individual faculty must submit a written research resuming work plan consisting of two parts. Resources and links to submission materials are on the Office of the Vice President for Research (OVPR) [Resuming Research Web Page](#).

- **Part one** is a 1-2 page narrative description of the research work to be performed and justification for resuming work. For already approved essential or COVID-19 related work with no changes to your work plan, you can resubmit your previous narrative. For already approved essential or COVID-19 related work with additions or changes, please submit an updated description and justification. These materials will be shared with your chair, the building subcommittees, OVPR and EHS. The description and justification must include the following sections. The file must be named DEPARTMENT/CENTER\_PI LAST NAME\_JUSTIFICATION:
  - Description of the research to be done.
  - Justification for resuming work in the research space
  - List of personnel who will work in the research space
  - Lab Safety Plan
    - Description of the social distancing plan for your research space consistent with the [COVID-19 Workplace Safety Policy](#). You can find a [checklist](#) to help you consider what to include in your lab safety plan on the EHS website.
    - Safety plan for any personnel who will work alone
    - Contact Tracing plan (log, shared google sheet, etc.)

- All plans submitted to OVPR requesting to resume in-person, on-campus human subjects research activities during Stage 1 must include [these minimum requirements](#)
  - Any additional information related to safety for the research space
- **Part Two** is completion of a [Lab Density Google sheet](#). Chairs and Research Continuity subcommittees will use these lab density plans to ensure that safe building population densities are not exceeded. Approved lab density plans will be shared with all the building occupants.
- These two documents (Justification and Lab Density Google Sheet) will be submitted via [Google Form](#).

**Step Two:** Department Chairs and Center Directors will review the plans in their areas to ensure coordination among labs in their department and to adjudicate conflicts among access requests. Chairs and Center Directors will notify OVPR via [resuming\\_research@brown.edu](mailto:resuming_research@brown.edu) when their department/center aggregate lab plan is ready for review.

**Step Three:** The Research Continuity Building Subcommittees (see Appendix A for membership) will review the plans for all labs in their assigned buildings to ensure proper floor by floor and overall building density for work shifts. Research Continuity Building Subcommittee leads will notify OVPR via [resuming\\_research@brown.edu](mailto:resuming_research@brown.edu) when their building plan is ready for review.

**Step Four:** A small committee chaired by the Vice President for Research, and including representatives from the Office of the Vice President for Research, Environmental Health and Safety, Facilities Management, University Human Resources, the Department of Public Safety, Office of General Counsel and others with expertise and responsibility in health and safety will review each department and building plan for conformity with social distancing and other safety requirements. The Vice President for Research will present recommendations to the Provost and Executive Vice President for Finance and Administration, who will have final approval of each plan.

If a plan is approved, OVPR will notify the appropriate chair or center director. Researchers approved to work in labs will be required to sign the [COVID-19 Workplace Safety Policy Acknowledgement Form](#) and complete any required training associated with the Policy. Access to campus will not be permitted prior to official notification from the Office of the Vice-President for Research and signing by each individual researcher of the Acknowledgment Form.

EHS and OVPR will maintain copies of all approved research resuming work plans.

## V. DEADLINES

- Principal Investigators (other than in the School of Public Health) who wish their plans to be reviewed in the first wave of plan reviews must submit their plan via the [Google Form](#) by 12:00 p.m. (noon) on Friday, May 22, 2020. All plans received by that deadline

will be reviewed first, with the goal of an initial set of approved labs being able to resume operations the week of June 1, 2020.

- School of Public Health PIs who wish their plans to be reviewed in the first wave of Public Health plan reviews must submit their plan via the Google Form by 5 p.m. on Tuesday, May 26. All School of Public Health plans received by that deadline will be reviewed first, with the goal of an initial set of approved Public Health labs being able to resume operations the week of June 8, 2020.
- Subsequently, **all plans** will be reviewed on a rolling basis in the order they are received.

## Appendix A

### Research Continuity Building Subcommittees

Subcommittee	Buildings	Members (*lead)
Physical Sciences and Engineering	Barus and Holley ERC Prince Lab GeoChem MacMillan Medical Research Lab	Larry Larson* Gang Xiao Lai Sheng Wang Greg Hirth
School of Public Health	1 Davol 121 South Main	Bess Marcus Jennifer Tidey*
Biomed	Arnold Lab Biomed Center Sidney Frank 70 Ship	Ed Hawrot* Laurent Brossay Rebecca Burwell
IBES	85 Waterman	Amanda Lynch* Leah VanWey
164 Angell	164 Angell	Diane Lipscombe* Sohini Ramachandran Bjorn Sandstede
CLPS	Metcalf	Rebecca Burwell* David Badre