

George Mason University
Research Continuity and Safety Plan
August 18, 2020

Introduction

George Mason University has adopted a phased approach to continuation of research, scholarship and creative work (hereafter ‘research’) in university facilities, including on-campus, leased facilities, and field and clinical settings. This approach will facilitate a controlled ramping-up or ramping-down of research activities in response to changes in public health conditions during the COVID-19 pandemic.

This document provides guidance to assist researchers with the creation of a safe research environment in which sound public health practices are implemented, consistent with the requirements outlined in Mason’s [Safe Return to Campus Plan](#). The following principles guide development and implementation of this plan:

- Our goal is to permit an increase in research activities outside the home while protecting the health and safety of all of our faculty, staff and trainees (e.g. postdocs and students). Research activities that can be conducted at home and via telework will continue in that manner.
- Researchers must comply with the [Safe Return to Campus Plan](#).
- No Principal Investigator (PI) or research team member may begin university research outside the home until they have received proper authorization. Each PI should work closely with their Associate Dean or Director for Research to complete and submit a *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A), and obtain approval from the Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety and Dean.
- Only authorized personnel with a legitimate need to access university facilities, field or clinical sites should do so. Access should be limited to those activities that have approval and cannot be conducted at home or via telework.
- For a faculty member whose return to work in their university office is included in their approved Department Assessment for their unit’s Safe Return to Campus, if they plan to conduct research from their office (e.g. computational analysis) while there for other work, this would not require a request. However if they wish to bring a research team on campus and/or access facilities for the sole purpose of doing research, they should complete the request. Under no circumstances should safety be sacrificed due to the lack of adequate supplies, such as the type and quantity of personal protective equipment. Academic units must plan in advance for supply chain issues when research activities resume outside the home and must communicate any issues to laboratory safety staff at labsafe@gmu.edu and their Associate Dean or Director for Research.

- Failure to follow the requirements described and referenced here will result in revocation of approved research privileges.

On-Site Work Requirements:

- **Resuming Research Operations:**
 - Each PI who wishes to resume research outside the home must complete a *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A) and complete the *Research Reconstitution Checklist* (Appendix B).
 - When preparing the form, the PI should work closely with their Associate Dean or Director for Research and obtain approval from the Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean before resuming research activities outside the home.
- **Training:** Online training is required for all faculty, staff and students approved or applying for approval for continuation of research outside the home. The *Safe Return to Campus* training is available through MasonLEAPS for faculty and staff and through Blackboard for students. Researchers requesting to resume research in university facilities, both on-campus and in leased facilities, as well as in field and clinical settings, must complete training prior to resuming those activities. Upon completion of each training module, researchers will receive an email documenting completion of the training requirement. Supervisors are responsible for ensuring their staff have taken the training. Visit the [Mason Safe Return to Campus Communications and Training](#) website for information about accessing training and verifying employee training.
- **Promoting and Enforcing COVID-19 Public Health & Safety Precautions:** It is expected that the Mason community will work together to create a safe and positive research environment at all times, but particularly during this difficult time when personal actions can have significant consequences for ourselves and others in the research environment.
 - PIs are expected to:
 - Demonstrate safe behavior
 - Encourage all researchers—faculty, staff, and students—to practice safe behaviors and raise any questions or concerns about safety
 - Enforce compliance with safety policies and procedures, including COVID-19 public health and safety precautions
 - Researchers must follow all pre-COVID-19 safety policies and procedures unless they are in conflict with requirements outlined in Mason’s [Safe Return to Campus Plan](#) and the *Research Continuity and Safety Plan*.
 - In addition to following requirements outlined in the plans, researchers are expected to follow written and verbal instructions received through training and from their Dean.
 - A mechanism for reporting work place concerns is outlined in the [Safe Return to Campus Plan](#).

- **Buddy System:** Fewer people engaged in research means fewer people to respond in the event of an incident or emergency.
 - Each PI should conduct a risk assessment for procedures to determine which require more than one person to be present and determine whether or not these procedures can be done safely in accordance with required public health and safety precautions. It may be prudent to delay highly hazardous research if possible until normal staffing levels resume. If [highly hazardous](#) research cannot be delayed, PIs must make provisions for teams to work safely and maintain physical distancing.
 - Each PI should also implement a “text-in/text-out” system or similar system to track the safety of personnel who are working individually.
- **Animal Research:** Animal Care Resources is following its continuity of operations plan to ensure that essential animal husbandry services are maintained. Researchers wishing to conduct animal research during Stages 2-5 must contact the Assistant Vice President for Research Integrity and Assurance, Mason’s Institutional Official (IO), to verify that reasonable quantities of existing supplies and resources are available to support the proposed work, and that the research they are proposing to carry out will be possible using physical distancing procedures given the other activities in the animal care facility. The PI must provide proof of approval from the IO when submitting a *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A).

Human Subjects Research:

As usual, all new human subjects research must be approved by Mason’s Institutional Review Board (IRB). Amendments to ongoing approved protocols are not required for the additional health and safety precautions described in this section (physical distancing, use of face coverings, pre-screening, contact tracing).

Stage 2-3 Permissible Activities:

Human subjects research that has been approved by Mason’s Institutional Review Board (IRB) to be carried out remotely may continue during Stage 2-3.

Stage 4 Permissible Activities:

Human subjects research that has been approved by Mason’s Institutional Review Board (IRB) to be carried out remotely may continue during Stage 4 without seeking additional approval through the [Request to Resume Research Form](#).

Face-to-face interactions with human subjects in which there is no physical contact between the subject and researcher will be permitted to resume in Stage 4 with prior written approval from the researcher’s the Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean. Researchers must review [Mason’s Research Continuity and Safety Plan](#) and submit the [Request to Resume Research Form](#). Certain types of human subjects research are still generally prohibited in Stage 4.

Research Activities Prohibited During Stage 4 Without Authorization:

The following types of face-to-face research with human subjects are not permitted during Stage 4 unless authorized in advance, in writing, by EH&S and the Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean with additional precautions implemented:

- Close-proximity or physical contact between researchers and research subjects (less than 6 feet distancing),
- Research subjects who self-identify as or are known to the researchers as being at high risk of severe illness from COVID-19 (see, <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>),
- Minors (less than 18 years of age),
- Prisoners,
- Pregnant women, or
- Mason's MRI facility.

Stage 5 Permissible Activities:

Human subjects research that has been approved by Mason's Institutional Review Board (IRB) to be carried out remotely may continue during Stage 5 without seeking additional approval through the [Request to Resume Research Form](#).

In person interactions with human subjects may proceed with the precautions outlined below and in Mason's [Safe Return to Campus Plan](#) with prior written approval from the researcher's Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean. Researchers must review [Mason's Research Continuity and Safety Plan](#) and submit the [Request to Resume Research Form](#).

The following conditions must be met for research involving face-to-face interactions with human subjects.

Required Safeguards for Stage 4-5 In Person Human Subjects Research:

Whenever research activities are conducted in person, unless an exception has been granted in writing, in advance, by the researcher's department and college, the following additional precautions to protect both research team members and subjects are required during Stage 4-5.

- **Daily Screening for Researchers:** Research Team Members must follow George Mason daily health screening procedures outlined in Mason's [Safe Return to Campus Plan](#).
- **Screening for Research Subjects:** Research subjects must be informed that they must complete COVID-19 screening before interacting with research team members. All research subjects must be pre-screened before interacting with research team members. This screening may be carried out online using the Mason COVID Health Check™ and/or a research team member may complete a verbal pre-screen using the approved screening tool for each subject within 24 hours prior to beginning research in university facilities or in field or clinical settings to verify the subject has not received a diagnosis of COVID-19 within the previous 14 days, does not exhibit any COVID-19 symptoms, and has not had close contact with a person who is confirmed to have had COVID-19 within the previous 14 days. This pre-screen must occur before each visit to university facilities, field, or clinical settings and be maintained confidentially by the research team. Note, screening results cannot be used for research purposes, unless an IRB amendment is submitted and approved, and must be securely stored separately from research data that is collected.
- **Information Concerning Contact Tracing:** Research subjects must be informed at the beginning of the first screening session that 1) Mason follows contact tracing

requirements from the Commonwealth of Virginia and local health departments and 2) their contact information and screening responses, will be provided by Mason to health authorities if required by applicable laws, regulations, or other public health order. For contact tracing purposes, researchers must maintain a list of all subjects who interact with each research team member and the location and time of the appointment. This information must be securely stored separately from research data that is collected.

- **Appointments and Scheduling:** Appointments should be scheduled in a manner that prevents research subject appointment overlap. The break between the end of one appointment and beginning of another should be a minimum of 15 minutes. Research subjects should receive instructions on where to wait for their appointment, and how they will be called and escorted to their appointment. Signage with instructions should be provided as well when appropriate.
- **Persons Accompanying Subjects:** If the participant will be driven to and from the study visit by someone who will wait for them, a research team member must have a discussion with the participant as to whether or not the driver will be allowed to wait in the building, required to wait in their car, or someplace else that is considered safe. Individuals under the age of 18, pregnant women and those at high risk of severe illness from COVID-19 may not accompany study participants.
- **Physical Distancing:** Physical distancing of 6 feet must be maintained unless approved by the researcher's Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean with additional precautions.
- **Face Coverings:** All subjects and research team members must wear face coverings in accordance with the [Safe Return to Campus Plan](#). The research team must provide face coverings to subjects when needed. Studies in which face coverings are removed for any length of time must be approved by the researcher's Department Chair/Center Director, Associate Dean or Director for Research, Environmental Health & Safety, and Dean with additional precautions.
- **Off-Site Research Precautions:** Research team members who are approved to travel off site to work with subjects at other locations (e.g. external clinics, field work locations, etc.) must comply with applicable institutional policies at the site they are visiting when at that location in addition to Mason policies. The most restrictive requirement must be followed. Additionally, researchers must follow travel requirements outlined in Mason's [Safe Return to Campus Plan](#).

The above safeguards are standard for all human subjects research at Mason and therefore do not require an amendment to approved IRB protocols.

- **Research Conducted at Field Locations:**
 - Research teams conducting research at sites that are not George Mason University sites must have written permission to proceed with their research from those who control access to the site.
 - A log of each day's activities should be recorded. This log will include locations, public or private venues accessed or visited, personnel in attendance and any operational anomalies that may have occurred requiring assistance from persons

- outside the research team.
 - Use of vehicles should follow guidance outlined in Mason’s [Safe Return to Campus Plan](#). This includes only one occupant per vehicle and limited stops for fuel and restroom use.
 - The *Request to Resume Research in University Facilities or in Field or Clinical Settings* must include a plan for maintaining hand hygiene while in the field, provisions for physical distancing during field operations (including time spent on vessels and water craft) and a description of disinfecting and cleaning protocols for high touch surfaces and equipment.
 - Please note that research conducted outside the United States (including that performed by students or colleagues who are currently residing outside of the United States for COVID-related reasons) may require principal investigators to disclose “foreign components” or “foreign support” to their sponsors, even if the research in question is fundamental research. It may also trigger international tax consequences. Contact Elena Cirmizi (ecirmizi@gmu.edu) for more information and assistance with tax issues.
 - Research generally cannot be conducted in countries subject to comprehensive economic sanctions without a license from the U.S. government. (Cuba, Iran, North Korea, Crimea Region of Ukraine, and Syria) Contact export@gmu.edu for more information and assistance.
 - Face coverings must be worn in accordance with physical distancing requirements outlined in Mason’s [Safe Return to Campus Plan](#).
 - All research team members should bring ample water/liquids and food for themselves in clearly labelled bottles and containers. No sharing of drinks or food will be permitted.
 - Upon completion of the research all equipment must be disinfected.
- **Shared Equipment Locations and Open Research Spaces Shared by Multiple PIs and Teams:**
 - Use of shared equipment spaces must be included in the *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A), and have the approval of the relevant Department Chairs/Center Directors, Associate Deans or Directors for Research, Environmental Health & Safety and Deans before reopening. Scheduling, workflow and designated work areas for specific instruments will be critical factors to consider with regard to physical distancing in these spaces.
 - Open research spaces shared by multiple PIs and their teams will require significant scheduling and coordination to maintain physical distancing requirements. The *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A) should indicate that the space is shared by multiple PIs and their teams.
- **Limiting Access to the Research Space:**
 - Only authorized individuals may enter a university facility or research space.

- No family members, friends, pets or other unauthorized individuals are permitted in any university facility or research space.
 - Municipal trash (not biohazardous waste) should be placed in the corridor outside the research space to reduce the number of spaces custodial staff must enter.
 - Visits from contractors, vendors and delivery personnel should be limited to essential activities such as supply delivery, equipment certifications, maintenance and repairs. These individuals must follow work requirements described in Mason's [Safe Return to Campus Plan](#). The host is responsible for ensuring that Mason's work requirements are followed.
- **Ordering Supplies and Receiving Packages:** In an effort to streamline essential purchases of safety supplies and equipment, all academic units and other departments are prohibited from ordering community health equipment such as plastic barriers, disposable or reusable face coverings, hand sanitizer, hand sanitizer dispensers, disinfectant wipes and non-latex disposable gloves. A full description of this policy is outline in the [Safe Return to Campus Plan](#).

This restriction does not apply to personal protective equipment (PPE) and supplies that support existing research activities and generally were used prior to the COVID-19 pandemic (e.g. safety glasses, laboratory coats, gloves used in wet labs, etc.).

- Due to difficulty in procuring supplies, each PI must provide ample time for orders to be filled and shipped. Many supplies are back ordered for weeks or more. To prevent running out of supplies, orders should be placed two to three months in advance.
 - Procedures for receiving packages are outlined in the [Safe Return to Campus Plan](#).
- **Cleaning and Disinfection:** High-touch surfaces are a particular concern for COVID-19 transmission. The university has increased the cleaning frequency of high-touch surfaces in common areas (e.g. elevator buttons) but cleaning and disinfecting surfaces within a PI's research space and office are **the PI's responsibility**.
 - Before leaving the laboratory, disinfect any surfaces researchers may have touched including door and drawer handles, light switches, faucets, phones and equipment.
 - Disinfect with an EPA-registered household disinfectant suggested for use against SARS-CoV-2. A list can be found at: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>. Follow the manufacturer's instructions for use including concentration and contact time.
 - Consider the use of alcohol-based wipes or spray for electronics in order to reduce risk of damage to sensitive machine components. Whenever possible, consider the use of wipeable covers for electronics.
 - When a PI is notified of a positive COVID-19 case among research personnel, all research spaces associated with that individual should be immediately closed and

the PI should contact EHS for further guidance. Additional information for managing positive COVID-19 cases is available in the [Safe Return to Campus Plan](#).

- **Ramping-down or Cessation of Work:** The COVID-19 pandemic is a rapidly evolving situation. Researchers must be prepared to either ramp-down research activities in response to public health recommendations, or to immediately cease work should a lab member become infected with the virus.
 - Each PI must develop a plan for ramping down research activities. The plan must be documented in the *Request to Resume Research in University Facilities or in Field or Clinical Settings* (Appendix A).
 - To the extent possible, research spaces should be shut down at the end of the day in a manner that will be safe for seven days, in the event that access to the research space is suddenly restricted.
 - Routinely back up critical research data. Whenever possible, store this data in a location that is accessible through remote access.
 - Consider installing remote monitoring devices for critical equipment (-80°C freezers, liquid nitrogen dewars, incubators, etc.).
 - Make sure large pieces of equipment (-80 °C freezers, incubators, liquid nitrogen tanks, etc.) are labeled with emergency contact information.
 - If possible, make sure critical equipment is on backup power. Do not connect nonessential equipment to back up power.
 - Keep heat generating equipment such as hot plates and water baths unplugged when not in use.
 - Unhook and cap gas cylinders if they are not essential.
 - Ensure gas and vacuum lines are turned off when not in use.
 - Routinely dispose of odor causing waste.
 - Routinely disinfect and empty aspiration flasks containing biological waste.
 - Ensure all hazardous waste containers are tightly closed and properly stored. Contact EHS (labsafe@gmu.edu) to request a waste pickup.
 - Personnel should take personal belongings home at the end of each day.

Appendix A : Request to Resume Research in University Facilities or in Field or Clinical settings

An electronic version of this form is available on the [Research Continuity Guidelines Website](#).

Appendix B: Research Reconstitution Checklist

An electronic version of this form is available on the [Research Continuity Guidelines Website](#).