

Guiding Principles:

We are committed to providing our learners a public health-informed, in-person learning experience that reflects our commitment to their health and safety. With an international reputation for educational and research excellence, learners are an essential and valued component of the research enterprise.

The safety of our learners, the research workforce, and our broader communities is our leading priority. Training and research protocols must be optimized to provide the lowest risk for COVID-19 transmission feasible, while providing the greatest benefit to the learner. This may require innovative approaches and enabling new, more flexible ways of training and learning.

Learners must review and comply with the U-M Research Re-engagement Guidelines and have completed the mandatory training module: [COVID 19: Working Safely in U-M Research Areas](#). Graduate students or postdoctoral researchers may not be compelled to conduct research activities on campus as a condition of assistantship or associate support, while public health orders governing individual activity remain in effect.

Close Proximity for Training Exception:

The most effective way to reduce the risk of spreading COVID-19 is to minimize the amount of time people are within 6 feet of each other. While introducing a learner to some laboratory techniques and/or performing certain complex research procedures, physical distancing may prevent adequate training.

All alternative measures to eliminate the need for close contact should be rigorously explored prior to seeking an exception to physical (social) distancing during research training. Further, even if an exception is granted, measures to minimize the time within 6 feet must be employed. Measures include but are not limited to:

- Using on-line training modules.
- Recording videos of skill demonstration using mounted cameras or using live platforms (e.g., Zoom) with a webcam.
- Remaining more than 6 feet apart and alternating positions near the sample or equipment, with frequent decontamination of surfaces and equipment.
- Working side-by-side at least 6 feet apart performing the same procedure.
- Introducing a temporary plexi-glass barrier(s) or partition(s) as a supplement to distancing
- Rearrangement of laboratory instruments and/or equipment to better accommodate distancing.

Evidence suggests that Personal Protective Equipment (PPE) similar to that used in Biosafety Level 2 research minimizes the potential transmission of SARS-CoV-2, the strain of coronavirus that causes COVID-19.

Therefore, close proximity training procedures may be permissible under the following conditions:

- Enhanced PPE (lab coat, gloves, and a surgical face mask with the addition of a face shield) **must be used** when at least 6 feet of social distancing cannot be achieved. Surgical masks may be re-used but should be replaced if the mask becomes wet or visibly soiled. Face shields should be decontaminated after **each use** and stored in a clean area or discarded if not reusable
- Use of this PPE regimen in lieu of 6-foot distancing is only permissible in situations where distancing is physically impossible; otherwise, social distancing expectations must be maintained. **If, at any time during the procedure social distancing is possible, it must be practiced.**
- Use of separate high-touch tools, where practicable, to avoid sharing.

Process for Close Proximity for Training Safety Plan Approval:

To assess the requirement for a training exception, the [Close Proximity for Training \(will be Qualtrics or Google link\)](#) form must be submitted to your school for review and approval.

Each request will be reviewed as to whether alternatives to close proximity work are feasible, the benefit to the learner, and potential incremental risk for transmission. Justifications based on convenience or solely on room/equipment availability will not be accepted.

If approved, the Close Proximity for Training approval should be uploaded as an addendum to your laboratory Safety & Hygiene Plan. The Safety & Hygiene Plans are accessible to your school leadership as well as EHS and may be reviewed from time to time for compliance with current state and university COVID guidelines and as part of routine inspections.

Principal Investigator Attestation

The Principal Investigator assumes the responsibility to ensure that trainers and learners understand their responsibilities and that they comply with all the safety requirements of the Close Proximity for Training Exception outlined above and in the official approval. The PI should confirm all parties are comfortable with the plan as proposed and describe the escalation process if, at any point, the trainer or learner has concerns about their safety.

As part of the application process, the PI will attest to the follow:

- I will discuss the guiding principles and requirements for proximity research training with all lab members.
- Senior lab personnel who will be undertaking the training role and the trainee(s) will comply with all enhanced PPE requirements to perform close proximity work and follow

all cleaning/disinfection protocols that are appropriate for the procedure(s) and, if required, that have been approved by EHS.

- Laboratory personnel will adhere to existing six-foot social distancing and maximum room density directives in place by the State of Michigan when not performing work approved under this Close Proximity Safety Plan.
- Laboratory personnel have been made aware that lab safety issues, including personnel who are ill or not following safety protocols, may be reported via the [U-M compliance hotline website](#), by calling 866-990-0111, or contacting EHS at 734-647-1143 or emailing [EHS](#). A learner may also escalate concerns to the school Research Associate Dean.

[Close Proximity for Training – to be built in preferred school/college tool](#)

Request for Approval to Perform Close Proximity Procedures for Training

Some training procedures may not be effectively performed while maintaining 6-foot social distancing. Evidence suggests that enhanced Personal Protective Equipment (PPE) minimizes the potential transmission of SARS-CoV-2, the strain of coronavirus that causes COVID-19.

Therefore, such procedures may be permissible under the following conditions:

- Enhanced PPE (lab coat, gloves, and a cloth or surgical face mask with the addition of a face shield) **must be used** when at least 6 feet of social distancing cannot be achieved. Surgical masks may be re-used but should be replaced if the mask becomes wet or visibly soiled. Face shields should be discarded or decontaminated after **each use** and stored in a clean area.
- Use of this PPE regimen in lieu of 6-foot distancing is only permissible in situations where distancing is physically impossible; otherwise, social distancing expectations must be maintained. If, at any time during the procedure, social distancing is possible it must be practiced.
- Use of separate high-touch tools, where practicable, to avoid sharing.
- In exceptionally rare circumstances, maximum room density expectations may not be possible. Mitigating practices should be developed in conjunction with the Department of Environment, Health & Safety ([EHS](#)).

This form will be used to review procedures that, when done properly, may violate the existing 6-foot social distancing directives in place by the State of Michigan Executive Orders. Your procedures described here will be reviewed by your Research Associate Dean.

Approval, or request for additional information needed to secure approval, will be returned to the individual completing this form and the Principal Investigator.

Submitter Name: _____

Submitter Email: _____

PI Name: _____

PI email: _____

Type of learner: (drop down)

- Undergraduate student

- MS/PhD/MSTP student
- Postdoctoral fellows
- Other

Training will occur in:

Building: _____

Room Number: _____

Training Procedure(s)

Description of Close Proximity Procedure(s) to be Performed with Trainee:

Briefly describe the procedure(s), highlighting the **specific aspects** of the procedure(s) that are **not possible** within the directives (i.e., 6-foot distancing and/or within rooms with less than 144 square feet/person). **Please note: you are expected to exhaust any and all means of modifying the conduct of procedures to permit practicing the directives; justifications based only on convenience or room/equipment availability will not be accepted.**

For the procedure(s) that cannot be performed adhering to the social distancing directives, provide the **number of individuals** involved, the **duration** (i.e., length of time) that will be needed to complete the procedure, and the **frequency** (i.e., how often) the procedure will need to be performed without maintaining social distancing:

Can the procedure be done with the trainer(s) and learner(s) wearing all of the following?

- Surgical mask
 - Face shield
 - Gloves
 - Lab Coat
- Yes
 - No – Request will be sent to EHS and RAD for review and consideration

Does the procedure(s) involve high touch of shared tools or equipment?

- Yes
 - If Yes, will you be able to wash hands/change gloves routinely to reduce the likelihood of potential transmission of SARS-CoV-2? (Y/N)

- If No, can you add in procedures to discard soiled gloves routinely through the procedure? (Y/N)
 - If still No – safety plan will need to be reviewed by EHS and RAD
- No

Can you follow the guidance on disinfecting surfaces, shields, and equipment as provided in [Cleaning and Disinfection Protocol for the Prevention of COVID-19 In U-M Laboratory Facilities?](#)

- Yes
- No – Request will be sent to EHS and RAD for review and consideration

PI Attestation:

I attest that

- I will discuss the guiding principles and requirements for proximity research training with all lab members.
- Senior lab personnel who will be undertaking the training role and the trainee(s) will comply with all enhanced PPE requirements to perform close proximity work and follow all cleaning/disinfection protocols that are appropriate for the procedure(s) and, if required, that have been approved by EHS.
- Laboratory personnel will adhere to existing six-foot social distancing and maximum room density directives in place by the State of Michigan when not performing work approved under this Close Proximity Safety Plan.
- Laboratory personnel have been made aware that lab safety issues, including personnel who are ill or not following safety protocols, may be reported via the [U-M compliance hotline website](#), by calling 866-990-0111, or contacting EHS at 734-647-1143 or emailing [EHS\(link sends e-mail\)](#). A learner may also escalate concerns to the school Research Associate Dean.