

University of Dayton

Guide for Activities Involving Close Interaction with Human Participants under COVID-19



WORKING DRAFT

08/04/2020

Overview

The novel coronavirus (SARS-CoV-2) that causes coronavirus disease 2019 or COVID-19 is a respiratory virus that spreads from person to person when in close contact. Transmission occurs primarily through respiratory droplets passed from person to person but may be spread through surface contamination. Maintaining physical distance and disinfecting surfaces represents the best means for reducing the spread of the virus in community settings.

Due to the COVID-19 pandemic, new protocols are needed for protecting instructors, researchers, participants and the community from risk of infection when performing activities that involve close proximity to human participants. These activities include any research project and/or teaching activity, such as research involving human subjects (“participants”), human casting techniques and physical therapy or health related activities, that involves close¹ or direct interaction between participants.

¹ The [Public Health Department](#) defines close contact as any individual who is within 6 feet of an infected person for more than 15 minutes and is calculated as a cumulative amount of time over a 24 hour period. Although face coverings and barriers help reduce the risk of transmission between individuals, these measures do not change the close contact definition. Physical distancing is the only way to prevent close contact as it deals with contact tracing.

The following guide will help ensure that the health and safety of faculty, staff, students, participants and the community remains a top priority by providing expectations and considerations for performing these interactions. The information provided in this guide is meant to supplement, not replace, the University's expectations and protocols outlined in the University's [Return to Campus](#) document. Since protocols may change and evolve over time based on the status and understanding of the pandemic, all campus community members are expected to monitor for and comply with changes in University guidance.

Expectations and Considerations

The following information contains considerations when putting together a pandemic related safety plan in situations where activities require close or direct contact between individuals based on the best advice from health care professionals and other experts. Plans must contain appropriate measures for protecting participants and minimizing the spread of the virus.

Any activity that incorporates the use of human subjects must consider measures to prevent bringing infected participants onto campus, to protect the health of researchers and participants, minimize human contact and exposure (includes time, number of people and frequency of interactions), document sessions to facilitate contact tracing and follow campus protocols.

Feel free to reach out to Environmental Health and Safety (EHS) if you need to discuss a specific situation or require additional supplies or resources in order to maintain a safe environment. The following minimum expectations will be required as part of a written protocol:

- Determination of whether the activity or parts of the activity can be performed remotely through telephone contact, remote monitoring, remote data collection, video conferencing, etc.
- Provision of information to participants regarding the current COVID-19 epidemic and how best to reduce their risk of infection. This information can be provided through oral discussion or written documentation. Accounting for high risk participants is required.² Determination of the need for liability waivers is necessary.
- Development and implementation of a two-tier screening process consisting of an off-site or self-monitored prescreening and an on-site ambulatory screening component. Screening should consist of a symptom check, travel and exposure history based on Centers for Disease Control and Prevention

² <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html>

(CDC)³ and Ohio Department of Health (ODH)⁴ guidelines. Scripts and checklists are encouraged to maintain consistency and speed. All screening personnel (faculty and staff) should receive appropriate training and know what to look for when determining participants who may be at risk for COVID-19 infection. Screenings should include both researchers/instructors/staff as well as participants.

- All individuals (includes researchers, instructors and participants) are required to wear a face covering at all times. Face coverings are used to prevent the spread of infection to others and are to be worn along with other required personal protective equipment (PPE) based on the task being performed. Although there is some evidence that a face covering protects the wearer from being infected, a face covering is not considered PPE as it is primarily incorporated to inhibit the virus from spreading to others (source protection)⁵. Wearing a face covering is one tool for reducing the spread of the virus and is not a substitute for social distancing and frequent hand washing. Face coverings can be substituted if the work being performed requires more stringent PPE (surgical mask, N95 mask, respirator) or if wearing the face covering puts the person at additional risk based on the situation.
- Procedures for physical distancing that includes both temporal and spatial measures to minimize contact time and increase separation as much as possible. Keep the number of participants as low as possible at any given time. Maintain at least 6 foot clearance on all sides from others as much as possible and separate stations by at least 6 feet. Distancing methods consist of controlling access to spaces, rotating participants, adjusting or staggering schedules, dividing tasks into smaller groups or teams, assigning individual spaces or areas, rearranging or removing furniture, mapping out areas and incorporating markings.
- When physical distancing measures cannot be maintained, inclusion of additional safety measures for activities that involve close and direct contact must be identified. Incorporate additional PPE, such as face shields, goggles, gloves and gowns, or install barriers as possible.
- Protocols for handling individuals who become symptomatic during a project or session. Considerations should include reporting infections, methods for identifying potentially exposed individuals and contact tracing and temporary

³ <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

⁴ https://coronavirus.ohio.gov/wps/wcm/connect/gov/6fa237c5-c697-4907-8277-9689b8ba2bc8/Guidance+for+Screening+Employees+05.19.20.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=ROOTWORKSPACE.Z18_M1HGGIK0N0JO00QO9DDDDM3000-6fa237c5-c697-4907-8277-9689b8ba2bc8-n8TJXY3

⁵ <https://www.osha.gov/SLTC/covid-19/covid-19-faq.html>

isolation of affected areas.⁶ Methods for identifying potentially exposed individuals should include a record of individuals involved in the activity and the dates and times of contact. Such records should also include the person's name and contact information. The University is working on a form where individuals can report positive cases and exposures. For now, refer to information in the "*Reporting Requirements for Confirmed Exposure During an Activity*" section at the end of the document.

- Encourage enhanced personal hygiene practices.⁷ Do not participate and stay home if sick. Wash hands regularly with soap and water or hand sanitizer that contains at least 60 percent alcohol. Cover your mouth when coughing or sneezing. Avoid touching your eyes, nose and mouth. Have the necessary supplies, such as hand sanitizer, tissues and trash baskets, available.
- Procedures for cleaning and disinfecting surfaces, equipment and high touch areas.⁸ It is possible for viral transmissions to occur through virus deposition on surfaces; to protect yourself and others from respiratory virus transmission spaces should be regularly cleaned and disinfected. If the activity takes place on campus, the University's custodial staff will clean and disinfect communal areas and high touch-points. Faculty and staff are responsible for disinfecting surfaces, equipment and electronics in personal spaces, laboratories and shared spaces. Plans should include procedures for routinely disinfecting high touch surfaces (door handles, switches, phones, freezer / refrigerator doors, cabinet handles, desks, tables, railings, fume hoods, etc.) and sanitizing commonly used items, such as equipment, electronics, tools, instruments and PPE (glasses, goggles, face shields, etc.), especially items that are shared between individuals prior to and/or after use.

Availability of adequate cleaners and disinfectant products. Only disinfectants recommended by the CDC or approved by the EPA to effectively kill COVID-19 should be used. Keep in mind that disinfectants have different active ingredients and required contact times, so make sure to follow all safety guidelines and product recommendations. Keep in mind that some disinfectants can damage materials or equipment. If in doubt about the compatibility of a specific piece of equipment, please refer to the manufacturer's recommendations.

- Communication plan which must include methods for communicating and posting safety guidelines and requirements. Health and safety guidelines

⁶ <https://www.phdmc.org/program-documents/healthy-lifestyles/gumc/emergency/covid-19/1724-covid-19-responsible-protocols/file>

⁷ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>

⁸ <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

and procedures must be sufficiently communicated and posted in visible areas throughout the area. Postings should consist of schedules, hygiene and cleaning practices and social distancing requirements as needed.

Process

A COVID-19 safety plan is intended to reduce the risk of infection of COVID-19 during activities requiring close interaction between participants. Plans should include specific protective measures for meeting University and departmental COVID-19 policies in relation to participant involvement, symptom monitoring, PPE, distancing, hygiene, disinfecting, contact tracing and posting requirements. Aside from meeting all University and departmental safety requirements (see below), the plan should describe the specific measures required for the activity and take into account the safety of all participants (employees, clients, students, volunteers, etc.).

The University is currently evaluating COVID-19 related activities involving close human interaction on a case-by-case basis. Written safety plans for activities requiring close interaction between participants for academic courses or other teaching related activities should be submitted to Environmental Health and Safety using this [google form](#) or emailed to Mark Fuchs at mfuchs1@udayton.edu, whereas, written plans for University research involving human subjects should be submitted to the [Institutional Review Board \(IRB\)](#) using the IRB@udayton.edu email account.

University General Safety Requirements

- A face covering is required at all times unless otherwise noted for safety concerns.
- Individuals must maintain a minimum of 6 feet clearance from others at all times when not engaged in close or direct contact activities.
- Hands should be washed upon entry, before leaving the space and at regular intervals.
- Surfaces, equipment and high touch points must be routinely disinfected.
- Safety guidelines and requirements must be posted.

University Additional Requirements for Close Contact Activities

- Participant involvement understanding.
- Two-tier symptom screening process.
- Safety measures for close proximity work when physical distancing measures cannot be maintained.
- Procedures for handling participants who show or develop symptoms.
- Procedures for documenting participants for aiding contact tracing.

Reporting Requirements for Confirmed Exposure During an Activity

- Immediately report symptomatic individuals to the University of Dayton's Division of Audit, Risk and Compliance (ARC) and the Health Center. An incident reporting form is available at the end of this guide.
- Identify potentially exposed individuals to help facilitate appropriate communication and contact tracing. This information should also be communicated to ARC and the Health Center.
- Shut the space down for deep disinfection.
- Reopen in consultation with the University and local health department.

COVID-19 Exposure Incident Report

In the event of an exposure to a COVID positive patient while participating in a clinical or educational setting, the highest priority is prompt notification to the student, others potentially exposed, the Program and any other persons identified by site protocol. Students should comply with all COVID exposure protocols in place at the clinical or educational site as well as those put in place by local and state public health.

Student Name: _____ Date: _____

Experience/Clinical Rotation: _____

Preceptor (if applicable): _____

Site Supervisor at time of incident (if different from preceptor listed above):

Nature of COVID exposure

Date of exposure: _____ Approximate time of incident: _____

Date Notified of Positive results: _____

Incident Description: (please do not report any patient identifying information)

PPE: Please mark the PPE, which was in place at the time of the exposure:

PPE on patient: surgical mask: _____ Other: _____

PPE on student: surgical mask: _____ N95 mask: _____ Gown: _____

Gloves: _____ Face shield: _____ Other: _____

No PPE on student: _____ If No PPE, please describe below why no PPE was in place:

Student exhibiting COVID symptoms: Yes: _____ No: _____

If yes, please list date symptoms started: _____

14 day Quarantine Initiated: Yes: _____ No: _____

If yes, please list date quarantine began: _____

Notifications	Date and Time Notified
Clinical Preceptor (if applicable)	
Onsite Health Services / Employee Health / Occupational Health or Emergency Department/ODH (if applicable)	
Program Director or Department Chair	

Student Signature

Date

Additional Follow Up / For Program Use

Note: Unknown Exposure is defined as a student who participates in the care of a patient for non COVID related symptoms. This patient does not have a definitive COVID positive diagnosis at the time of exam, but it determined to be positive within 14 days after student exposure. This does not cover known COVID positive patients, who are being seen with COVID related symptoms.

Please submit this form to the Program Supervisor or Principal Investigator who should report it to the University of Dayton's Division of Audit, Risk and Compliance (ARC) and the Health Center.