Grenfell Campus COVID-19 Research Exemptions Policy and Procedures (GC-REPP)

Updated Feb. 17, 2021

Background

The original version of this document was created by the COVID-19 Research Working Group (CRWG) at MUN’s St. John’s campus as a campus-wide initiative to respond to the initial onset of the COVID-19 pandemic “new-normal” in March 2020. As we continue to operate outside of “business as usual” for research activities at Grenfell Campus, this document will inform Grenfell Campus researchers on policy and procedures governing this “new-normal” approach to on-campus, in-person, and fieldwork research activities. Research that can be carried out remotely will continue to be done remotely and researchers will only be asked to review this document to carry out on-campus, in-person, or fieldwork research activity when otherwise unavoidable.

Grenfell Campus adopts the St. John’s campus research 3-tiered Alert Level Framework that corresponds to provincial Alert Levels: **RED** (Alert Level 5), **YELLOW** (Alert Levels 4 and 3), and **GREEN** (Alert Levels 2 and 1). Senior administration at Grenfell Campus (including the VP, AVP (Grenfell Campus Graduate and Research Studies and the Deans) determine – in consultation with other MUN campuses – the research alert level as pandemic updates are provided by provincial health authorities.

This framework outlines the goals, principles, activity types and levels for receiving and reviewing requests for research exemptions at each Alert Level. The framework is broadly consistent with activities permitted under the provincial COVID-19 Alert Level System that was announced for the province as of April 30, 2020.

Goals

As the ever-evolving COVID-19 pandemic necessitates that the university roll back to a more restrictive research Alert Level in response to an identified rise of case numbers across the province, the re-phasing in of access to on-campus research spaces, fieldwork and face-to-face interactions with research participants must ensure the health and safety of Memorial’s students, staff, faculty, research participants and collaborators, as well as the broader community in which Memorial exists. This document reflects the specific processes for Grenfell Campus.

Principles

1. Recognize and adhere to all relevant public health directives from the Chief Medical Officer of Health and follow the advice of the minister of health and Community Services and Premier of Newfoundland and Labrador with respect to actions to limit the spread of COVID-19.

2. Protect the physical, mental and emotional health and safety of our students, staff, faculty, research participants and collaborators:
   a. Students must not feel compelled to work on campus or in the field;
   b. Researchers, students and other employees who feel uncomfortable about their work situation, for whatever reason, need to know that they can confidentially report their concerns to the Associate Vice-President Research and Graduate Studies (Grenfell
Campus) and that they do not have to participate in any activity where they are not comfortable;

c. Only approved on-campus research activities, fieldwork, or in-person interactions with research participants can proceed while the provisions of this Framework are in effect;

d. Principal Investigators (PIs) must identify which students, faculty, staff and collaborators are essential personnel for ongoing research activities and the PIs retain responsibility for all individuals engaged in their research projects and for ensuring that members of their research teams are aware of, and abiding by, the activity-specific Health and Safety Plans that are associated with the Framework request process;

e. Health and safety associated with research activities must be rigorously maintained, with adequate access to and use of PPE and other health and safety supplies;

f. Environmental Health and Safety (EHS), Facilities Management and Campus Enforcement and Patrol (CEP) must be in agreement that proposed research activities can be allowed to proceed.

3. Protect the careers of postdoctoral fellows and early career researchers.
   a. COVID-19 presents challenges to researchers at all seniority levels, but they will have the greatest impact on postdoctoral fellows and early career researchers.

4. Maintain a priority focus on students – both graduate and undergraduate – and their progress through their academic programs:
   a. Limitations on research activity have enormous effects on graduate students, which, to the greatest extent possible, need to be mitigated;
   b. While it is important to remember that undergraduates are students first and researchers second, many begin to build their research skills through internships and through other undergraduate research experiences, so this should be considered as circumstances permit their re-engagement.

5. Recognize and support other disproportionally affected researchers in accordance with equity, diversity and inclusion (EDI) principles:
   a. There is already evidence from the international research community that women, people with disabilities, Indigenous peoples and people of colour have greater burdens of care and less access to resources during this time. This is already impacting research activities.

6. Ensure the process for approving the phasing in of on-campus research activity, fieldwork and face-to-face interactions with research participants is informed, fair and transparent.

7. Continually strive to enable as much research activity as possible, while respecting the necessary limits required by the evolving COVID-19 situation in NL and while understanding the potential to re-impose restrictions should the situation require.

Criteria for Approving Research Activity During the COVID-19 Pandemic (see table below for more detailed information on research Alert Levels)

1. Restrictions on research activities will take into account government restrictions or public health advice.

2. Appropriate personal protective equipment (PPE) is available for the research team.

3. The research activity can comply with all provincial and institutional COVID-19 requirements related to health and safety, subject to a review and approval of a project-specific Health and Safety Plan by Memorial’s EHS unit and Grenfell Campus’ Director of Facilities Management and
Ancillary Services.

For RED Alert Level, the criteria for research exemptions shall include:
- critical COVID-19 research;
- essential clinical studies;
- critical continuity activities related to research and scholarly activities that cannot be paused for a number of months (based on the above mentioned principles); and
- research activity by disproportionally affected researchers in accordance with equity, diversity and inclusion (EDI) principles.

For YELLOW and GREEN Alert Levels, expanded criteria for research exemptions shall include:
- research activity involving all graduate students and postdoctoral fellows, prioritizing postdoctoral fellows or thesis-based graduate students close to completing their term of appointment or degree who are unable to adapt their research projects or carry out research remotely.
- research activity that cannot be adapted or carried out remotely, which involves external partners or funding bodies that have not indicated flexibility under the COVID-19 circumstances, and which have end dates that are within 12 months of the request being made; and
- time-sensitive and deadline-driven research that cannot be adapted or carried out remotely.

Submission and Review of Research Exemption Requests

At RED Alert Level, researchers should contact their Dean with exemption requests which will be considered by Grenfell Campus VP, AVP (Grenfell Campus) Research and Graduate Studies, and Deans.

For exemption requests at YELLOW and GREEN Alert Level, the following steps must be taken for researchers and graduate studies to apply for an exemption to continue on-campus, in-person, or fieldwork research activities.

1. Each research request must be prepared using the appropriate request form (see the Face-to-Face Interactions with Research Participants Request Form here; the Fieldwork Request Form here; and On-Campus Research Request Form here), which includes an activity-specific COVID-19 Health and Safety Plan. The activity-specific Health and Safety Plan details the measures to be put in place within research spaces under the control of the principal investigator. A density calculator is available through my.mun.ca here.

2. Faculty members and graduate students should communicate with their Dean regarding their requests and copy their Dean and the Associate Vice-President (Grenfell) Research when submitting exemption requests. Requests at Grenfell Campus are being coordinated by the Grenfell Campus Return to Campus Committee.

3. Researchers should forward their requests, including activity-specific Health and Safety Plans, to dpike@grenfell.mun.ca for review by the Grenfell Campus Return to Campus Committee, with a copy to their Dean, the AVP Research (Grenfell Campus) (research@grenfell.mun.ca). Graduate students should also copy their supervisors.

4. The Grenfell Campus Return to Campus Committee will consider the requests from and make recommendations to the Vice-President regarding whether the requests meet Yellow Green criteria.
5. The Committee will advise the researcher (and supervisor in the case of graduate students) and the Dean of the recommendations and any conditions associated with proceeding with recommended research activities.

6. Recommended research activities must not commence before confirmation of approval of the activity-specific Health and Safety Plan by EHS. Prior to undertaking recommended research activities, the activity-specific Health and Safety Plans must be reviewed and approved by Memorial's EHS unit. The Director of Facilities Management and Ancillary Services will work with the EHS unit on activity-specific Health and Safety Plans and approvals for the Grenfell Campus.

After Approval

1. The PI, and the supervisor in the case of graduate students, will ensure that all researchers involved in the research comply with any conditions and with the activity-specific and building-specific Health and Safety Plans.

2. Researchers must register with Campus Enforcement and Patrol upon arrival to campus, who will have a list of approved researchers.

3. A lab supervisor must be present when students are accessing laboratory space to ensure health and safety and equipment/touch surface cleaning measures are being followed.
Memorial University Research Activity Levels (see table below)

There are three levels (RED, YELLOW, GREEN) of access to on-campus research spaces, fieldwork, and face-to-face interactions with research participants. External conditions (e.g. public health advice, existence of community spread, vaccination levels) and campus-specific internal conditions (e.g. building access and controls, cleaning capacity, feasibility for physical distancing, education and screening protocols, limitations on the operations of key research support units) impact on the extent to which on-campus research activities, fieldwork and face-to-face interactions with research participants can be undertaken. Moving between levels will be in response to advice from public health authorities and the ever-evolving COVID-19 pandemic situation in Newfoundland and Labrador.

At all times researchers must be prepared to modify, scale back or suspend access to on-campus research spaces, fieldwork, or face-to-face interactions with research participants as external or internal conditions (outlined below) indicate.

In addition, Indigenous communities across the province may follow a different scheduling for research opening and this framework will follow recommendations from the Miawpukek (Conne River) First Nation, Qalipu First Nation, Nunatsiavut Government, Innu Nation, NunatuKavut Community Council, and any other Indigenous governing body or community regarding specific phasing-in of research implicating Indigenous groups.
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<tr>
<th>Level</th>
<th>Internal and External Conditions</th>
<th>Research Activity Status</th>
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<tbody>
<tr>
<td>RED (High to Very High Risk) Provincial Alert Level 5</td>
<td><strong>External</strong>&lt;br&gt;The Province of NL is operating with measures from Level 5 of the COVID-19 Alert Level System (<a href="https://www.gov.nl.ca/covid-19/alert-system/">https://www.gov.nl.ca/covid-19/alert-system/</a>).&lt;br&gt;&lt;br&gt;Public health directives are stringent.&lt;br&gt;&lt;br&gt;Travel restrictions on incoming and outgoing personnel including requirement for 14-day self-isolation on arrival.</td>
<td>General suspension of on-campus research and scholarly activities in research spaces across Grenfell Campus including non-essential work in laboratories and other spaces on campus. &lt;br&gt;&lt;br&gt;Additionally, all fieldwork and all activities that would involve face-to-face (in-person) interactions are suspended.</td>
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<td><strong>Internal</strong>&lt;br&gt;On-campus activities are limited to work by “critical” employees and researchers who have been given approval through the Research Exemption process.</td>
<td><strong>Internal</strong>&lt;br&gt;Building access is under restricted or controlled access. High compliance with COVID-19 education and screening protocols. &lt;br&gt;&lt;br&gt;Capacity for cleaning is directed toward spaces used for critical activities. &lt;br&gt;&lt;br&gt;Support available through centralized research support units, such as the library and laboratories vary depending on demand for services and the capacity of the units to provide support while operating under COVID-19 constraints.</td>
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<td><strong>EXTERNAL</strong></td>
<td>The Province of NL is operating with measures from Levels 4 and 3 of the COVID-19 Alert Level System (<a href="https://www.gov.nl.ca/covid-19/alert-system/">https://www.gov.nl.ca/covid-19/alert-system/</a>). Public health directives remain stringent but provide for limited on-campus research activity and low-risk fieldwork. Limited childcare options available for parents. Travel restrictions on incoming and outgoing personnel including requirement for 14-day self-isolation on arrival. Internal On-campus activities are limited to work by “critical” employees and researchers who have been given approval through this framework Building access is under restricted or controlled access. High compliance with COVID-19 education and screening protocols. Capacity for enhanced cleaning is directed toward spaces used for critical activities and an increased level of on-campus research activity. Teaching is mostly remote so that the number of people on campus and travelling to and from campus can be largely kept to researchers, other critical faculty and staff, and students in any programs that require on-campus participation.</td>
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<td><strong>RESEARCH ACTIVITY STATUS</strong></td>
<td>The restrictions on on-campus research activity are relaxed to allow more time-sensitive and deadline-driven on-campus research to proceed. Low-risk fieldwork (except in Labrador) that respects the NL public health directives and complies with Memorial travel restrictions may be allowed to proceed with restrictions. Priority will be given to thesis-based graduate students and postdoctoral fellows, particularly those close to completing their degree or term of appointment. Research activities by second-year Master’s students and third- and fourth-year Doctoral students will be considered a priority where density considerations are a factor. Graduate students may be approved to work unsupervised subject to appropriate remote supervision. Priority will be given to projects involving external partners or funding bodies, particularly those that have not indicated flexibility under COVID-19 and where contract end dates are within the next 12 months. Grenfell Campus library will provide information on the current services offered at this Alert Level. Strict expectations for health and safety plans, including the number of people in shared space, physical distancing requirements, and enhanced cleaning activities, for any approved research exemptions. Plans must be included in requests and must be reviewed, amended and approved by Environmental Health and Safety prior to the commencement of approved activities. Researchers must comply with all COVID-19 related education and screening protocols. Priority will be given to disproportionally affected researchers in accordance with EDI principles.</td>
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<td><strong>GREEN (Low to Moderate Risk)</strong></td>
<td><strong>External</strong></td>
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<td><strong>Provincial Alert Levels 2 and 1</strong></td>
<td>The Province of NL is operating with measures from Levels 2 or 1 of the COVID-19 Alert Level System (<a href="https://www.gov.nl.ca/covid-19/alert-system/">https://www.gov.nl.ca/covid-19/alert-system/</a>).</td>
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<td>Public health directives are relaxed to enable more activity in the community, though precautionary measures remain in effect.</td>
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<td>Increased childcare options available for parents and some easing of travel restrictions.</td>
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<td>On-campus activities are limited to work by “critical” employees and researchers.</td>
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<td>University resources are not supporting NL Health Authorities.</td>
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<td>High compliance with COVID-19 education and screening protocols.</td>
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<td>On-campus buildings are open under limited or normal hours.</td>
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<td>Building-specific Health and Safety Plans have been approved by EHS for overall ramp up of operations within a building in which research activity is to take place. This will include defining measures to control and monitor space use and people flow in corridors, common areas and shared graduate student offices.</td>
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<td>Capacity for enhanced cleaning is directed toward spaces used for critical activities.</td>
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<td>More on-campus teaching is underway so building densities need to be carefully managed.</td>
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The restrictions on on-campus research activity are further relaxed to allow more on-campus research plus fieldwork that respects NL public health directives and complies with Memorial travel restrictions may proceed.

In addition, low-risk face-to-face interaction with participants may be allowed to resume subject to approval and implementation of health and safety plans.

Strict expectations for health and safety plans, including minimum personnel, physical distancing, and enhanced cleaning activities, for any approved research exemptions. Plans must be included in requests and must be reviewed, amended, and approved by Environmental Health and Safety prior to the commencement of approved activities.

Researchers must comply with all COVID-19 related education and screening protocols that are put in place by Environment Health and Safety.

Priority will be given to disproportionately affected researchers in accordance with EDI principles.