Guidance For Research Operations During COVID-19

Dear Tarleton faculty and research staff,

In order to lower the risk of COVID-19 transmission among our Tarleton research community, we provide the following guidance regarding research activities for the near future (adapted from guidance offered by the Division of Research at Texas A&M University). For individual assistance, please contact the Office of Research and Innovation (ORI) directly. This can be done either via email to a member of our staff or through the Research Query form.

For the most recent University guidance from the President’s office, please visit the Tarleton COVID-19 Update page.

Office of Research and Innovation Staff
www.tarleton.edu/ori
254-968-0526
SUMMARY FOR CONDUCTING RESEARCH AS OF MARCH 25, 2020

● Regarding Executive Order GA-14 issued by Texas Governor Abbot on March 31, 2020, the TAMUS Office of General Counsel has determined that for TAMUS members, including Tarleton, “research is one of our essential functions” and that “our leaders have the authority to evaluate our research activities and determine which of those activities are essential and should continue, and which can be paused or set aside”. See below for OGC’s guidance on making the determination of essential research.

● The Office of Research and Innovation is providing services as usual with communication completed through email, telephone, and video meetings.

● Policies and regulations that apply to research activities still apply.

● Remember all personnel should stay home if they experience any symptoms including fever, cough, or difficulty breathing.

RESEARCH FACILITIES/LABORATORY SAFETY

1. What advice did the TAMUS Office of General Counsel offer to leaders for making the determination of which research activities are essential and which can be paused or set aside?

“In making that determination, it is appropriate to consider the nature of the research activity, the impact of a pause, legal/contractual obligations and deadlines relating to the research activity, and the public health risk associated with continuation of that activity. For example, it may be appropriate to continue a research project if legal/contractual obligations require it to be completed by a date that makes a pause infeasible. Conversely, it is likely necessary to pause a research activity that may create a public health risk, such as research that involves close physical contact or interaction with human research subjects, perhaps a kinesiology project or a behavioral psychology project.

For any research activities that continue, it is crucial that System leaders review their research activities and take the steps necessary to ensure that only essential personnel come to the workplace to perform or support those activities, and that persons work from home to the maximum extent possible. It is also crucial that System leaders take steps to ensure that any research activities that continue will be performed in a way that observes the guidelines issued by the President and CDC (incorporated...
into GA-14) to the fullest extent possible, addressing issues such as appropriate social distancing and enhanced custodial and hygiene practices, among others.”

2. Now that classes are being delivered remotely in alternative formats – and not meeting in person for the time being – are research laboratories and facilities still open and operational? How is research affected by recent shelter-in-place orders?

Yes, research laboratories and facilities are expected to continue operations. While exemptions exist in some shelter-in-place orders for essential activities, we want to cooperate with local authorities to the maximum extent possible. To help maintain social distancing, all activity that does not require physical presence on campus (e.g., writing, data analysis) should be carried out remotely. Please communicate with your research manager/supervisor or your principal investigator for additional information or potential concerns about your individual health.

3. What can I do to prepare my laboratory research area?
- Review and prioritize critical laboratory research activities. Researchers are advised to consider ways to scale back or delay research projects in the event that it becomes necessary to reduce or even halt laboratory research operations.
- Identify procedures and processes that require regular personnel attention (e.g., cell culture maintenance, animal studies, and contact with human subjects). For those conducting these activities, consider measures that encourage the fewest number of staff interacting at one time, but caution against staff working in isolation without some level of communication with other staff.
- Investigators should reduce density in labs and allow students and other lab staff to work remotely as much as possible. There is a lot of variability in different labs needs and how this might be handled, but social distancing should be practiced at all times.
- PIs should carefully consider what research is essential and what research can be paused or prioritized (for example writing, data analysis) to allow for staff and students to work remotely. Staggering work hours/days or shifts within reasonable times to lower density of workers is another option to consider. Be sure that your laboratory is prepared to stop operations now if
access to research laboratories becomes limited to very few people on short notice.

- Ensure that staff and students have established a daily routine for preparedness and are ready in case work must be stopped. For example:
  - Do not initiate beginning new, long-term projects, at least for the next few weeks.
  - Complete as many ongoing experiments as possible.
  - Back up your electronic data each day, and be sure to record all important information in lab notebooks.
  - Leave your work station / lab bench in a clean and orderly state, clean laboratory instruments and glassware, and properly dispose of all waste in case you are unable to return for an extended period of time.
  - Each day, take your laptop or other materials you need to work remotely with you.
  - Take your lab phone tree and/or your lab continuity plan with you so you can communicate with your lab members.
  - Communicate with your PI and other lab members if/when you need help.

- Review emergency procedures with researchers and staff:
  - Ensure your door signage is up to date.
  - Ensure personnel have access to current contact information for key lab staff.
  - Ensure that your office unit has current staff contact information.
  - Ensure that high-risk materials (biohazards, chemicals) are secured with current emergency contact information.

- Maintain a sufficient inventory of critical supplies that may be affected by global shipping delays.
- Consider installing remote-control monitoring devices for critical equipment (e.g., -80°C freezers, liquid nitrogen storage dewars, incubators) if not in place. Work with nearby labs to ensure cryogenic storage can be maintained.
- Ensure that all biohazardous agents are properly secured at the end of each workday. Do not allow biohazardous wastes to accumulate. Solid biohazardous wastes should be autoclaved at the end of each day and disposed. Liquid biohazardous wastes should be treated with chemical disinfectants or autoclaved and disposed. Use freshly prepared disinfectant to clean lab equipment and benches where work takes place at the end of each day. Do not neglect disinfecting commonly touched surfaces including...
door handles, sink faucets, telephones, etc., too. Doors to labs should remain locked when no one is present.

- Encourage research staff to communicate any potential health concerns with their principal investigator and the Biosafety Occupational Health Program, as necessary.

4. Are there any restrictions regarding how many individuals can be in a research laboratory space? *Individuals should practice social distancing and disinfection practice if they are required to be in a laboratory space for essential activities.*

5. What types of precautions should researchers use when handling human materials specimens in the research lab?

   *Laboratory research staff should continue to follow universal precautions, wear appropriate personal protective equipment (disposable gloves, laboratory coat/gown, eye protection, etc.) and follow Biological Safety Level 2 containment practices for handling all human materials.*

6. Are research laboratories and facilities that work with biohazardous materials open and operational?

   *Yes. At the present time, laboratory research involving the use of biohazardous materials in BSL-1 and BSL-2 labs may continue operating as usual. That said, now, more than ever, it is important to adhere closely to all standard microbiological practices and to follow universal precautions. Wear your PPE (i.e., gloves, lab coats and eye protection) when working with infectious biohazards in the lab. Keep in mind that shortages of commonly used PPE (e.g., gloves, lab coats, respiratory protection, and eye protection) are already being reported. To the extent possible, the number of personnel entering lab spaces that require donning and doffing of PPE (masks, gowns, face shields, etc.) should be limited to essential personnel and critical functions/experiments only. This is especially important for experiments requiring respiratory protection (i.e., N95 respirators), as these items need to be prioritized for healthcare workers. Researchers may also consider purchasing and using non-disposable PPE in the interim. Please contact the Office of Biosafety to discuss options available if shortages continue or worsen. Before leaving the lab, remove*
your PPE and wash your hands properly with soap and water. Do not eat or drink in the lab, and do not come to work if you are feeling unwell.

7. Will offices of Research Compliance be available if needed?
Yes. All IRB, IACUC, and IBC operations will remain functional. We will be continuously available to answer questions during regular business hours through email, phone, Jabber, and Zoom (by appointment).

8. Will the Institutional Biosafety Committee continue to meet and review submissions?
Yes. The IBC will continue to meet once monthly, as scheduled. Likewise, the submission review process will continue as before, however adjustments may be necessary if staff or IBC committee members must work remotely. Please expect approval turnaround times to increase during this time. Your patience and understanding are appreciated.

RESEARCH TRAVEL

1. Should I cancel travel plans related to research (conferences, site visits, field trips, etc.) amid the COVID-19 outbreak?
Per the Office of the Chancellor, no international travel is permitted and no domestic travel is permitted unless deemed mission critical as of March 13th.

2. What if I was awarded a Student Scholarly Travel Grant (SSTG) to present scholarly work at an upcoming conference?
Due to all travel being cancelled, per the Chancellor, all awarded SSTGs are postponed indefinitely.

3. Does the current TSU domestic travel ban for TSU employees apply to local and regional (in-state) fieldwork?
Yes, local and regional field work is included in the current TSU travel ban. Such fieldwork should not be completed unless an exception has been approved by the university and system administration.
PROPOSAL SUBMISSION & AWARD MANAGEMENT

1. My funded study may be impacted by the measures taken as part of the university’s COVID-19 response, which could lead to delays in completing my study by the end of the project period or end of the semester. What should I do?

Many sponsors are considering the impact of COVID-19 on project timelines. Additionally, most federal sponsors automatically allow for a one-time no cost extension for 12 months at the end of the project. Please work with the Office of Research and Innovation to notify the funding agency or sponsor of any significant pause and/or major changes in study activity.

2. Will my grant proposal be submitted to the sponsor by the deadline during the COVID-19 outbreak?

Proposals are being submitted by Sponsored Research Services (SRS) in accordance with the Proposal Submission Guidelines. Please complete the ORI’s Notice of Intent to Seek External Funding form as per our standard practice when applying for external funding.

3. If the agency to which I intend to submit a proposal is closed due to a COVID-19 outbreak, will my proposal be submitted by the deadline?

It is anticipated that all federal agencies will continue to accept proposals even if a particular agency is closed. The proposal will likely remain in an electronic queue until the federal agency staff return to work, similar to what we experience during a federal shutdown.

4. How can I reach my SRS contact?

Sponsored Research Services (SRS) staff will largely be working remotely. They are still responding to emails and phone calls but please allow additional time for responses.

5. Will I be able to get an extension on a proposal deadline in light of the COVID-19 outbreak?

The Office of Budget and Management (OMB) has released M-20-17, “Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations.” which provides similar administrative relief as listed in M-20-11 to an expanded scope of recipients affected by the loss of operational capacity and increased costs due to the COVID-19 crisis. OMB
has released the information regarding what federal agencies MAY do but they are clearly leaving the decisions up to the individual agencies.

6. Where can I find COVID-19 related guidance from the National Institutes of Health in regards to proposal submission and award management?

7. Where can I find COVID-19 related guidance from the National Science Foundation?
   NSF has developed a new website for the research community with detailed guidance on the Coronavirus (COVID-19). This includes guidance for awardee organizations, researchers, and reviewers of NSF proposals.

8. Can a principal investigator working remotely during self-isolation charge salary/effort on a federal grant?
   Yes, as long as the investigator remains engaged in the project. NIH and NSF require prior approval regarding disengagement from a funded project when disengagement will exceed three (3) months, or if effort reduces by 25 percent or more.

9. Will agencies consider longer no-cost time extensions if they are needed to finish a project after disruption?
   *It is unknown if federal agencies will consider longer no-cost extensions. Therefore, researchers should document the impact of COVID-19 on their grants for future no-cost extension requests.*

**RESEARCH INVOLVING ANIMALS**

1. What about the IACUC?
   *The IACUC will continue to meet once monthly, as scheduled. Likewise, the submission review process will continue as before, however adjustments may be necessary if staff or IBC committee members must*
work remotely. Please expect approval turnaround times to increase during this time. Your patience and understanding are appreciated.

2. If I have an IACUC permit and animals under my care, are there additional steps I should be taking?
-If there are multiple individuals responsible for animal care, this responsibility should be rotated so not everyone is present at the same time and the social distancing recommendation can be followed.
-Researchers should carefully evaluate animal experiment plans to consider timing and resources. PIs should be judicious in expanding breeding colonies, beginning new experiments, or other increases in activities. PIs may wish to consider delaying the initiation of new experiments, and establishing new rodent breeding pairs or timed matings, if staffing limitations could affect the ability to perform studies. Additionally, PIs may wish to consider whether current animal studies should be concluded early to gather data.

3. What do I do if I have other questions about research involving animals?
Contact Clayton Gillespie, research compliance coordinator. Currently, he can be reached via phone (254-968-1815), email (cgillespie@tarleton.edu), or Jabber. At your request, a virtual session can be conducted via Zoom, if needed.

RESEARCH INVOLVING HUMAN SUBJECTS

1. Why must some human participant research studies be paused?
Due to the current COVID-19 outbreak, the possible risk of exposure for in-person contact associated with research activities must be weighed against any possible benefits of the research.

2. Which studies must be paused?
Investigators must postpone, suspend, or amend biomedical or social and behavioral studies that involve in-person, face-to-face interactions with participants including faculty, staff, students and community participants.

3. Which studies may continue?
Research studies that limit participant interactions to online or remote communication, telephone contact, remote monitoring, remote data
collection or secondary data analysis may continue. Investigators are encouraged to modify their procedures to replace in-person study visits with remote options for questionnaires, survey, screening and consenting, if possible. See question 8 below for information about substantive changes.

4. What if my study doesn't clearly fall into any of these categories? Contact the IRB office to discuss the details of your study at cgillespie@tarleton.edu.

5. May we continue to collect data and follow up with subjects by telephone when in-person data collection has been paused? Yes.

6. May we continue conducting telephone screening of potential subjects? Yes.

7. May we conduct off campus activities to collect data from participants? No, if any of the research interactions involve in-person or face-to-face contact.

8. Must the IRB approve amendments to the study protocol before implementing changes? Yes. If any change to a study is needed during the pause, an amendment must be approved by the IRB prior to implementing the change. There is no need to submit an amendment to pause the study. This includes all levels of studies (exempt, expedited, full board). If you have time sensitive changes to your study due to COVID-19 conditions, please put the following information at the beginning of your amendment: COVID-19 TIME SENSITIVE.

9. Do we need approval from the IRB for communications to study subjects explaining any pause in activities? No. It is not necessary to submit a modification to contact subjects by phone or email to let them know of any pause in the study.

10. If I am pausing study procedures on a project reviewed by an external IRB of Record, must I notify that IRB?
YES, as soon as feasible, for their awareness. The IRB of Record may require review/approval prior to resumption of study procedures.

11. Will a pause or change to the method of data collection in a study approved by the IRB be considered a protocol violation?  
If a change is made to the study, an amendment may be required. There is no need to submit an amendment to pause your study.

12. Will the IRB Office operate as usual?  
Yes. Staff may work remotely but will be available via email and videoconferencing as needed. Staff will continue to process submissions and respond to email communications. Please bear in mind that there could be periods of disruption due to transitioning to remote operations. IRB meetings will be held via zoom.

13. How will the COVID-19 situation affect studies that are pending review by the IRB?  
The IRB will continue to review and approve submissions as usual.

UNDERGRADUATE STUDENT RESEARCH

1. Under COVID-19 precautions, should undergraduates conducting research be allowed to continue working in the lab?  
Undergraduate researchers conducting research for credit should not return to the lab and should work with their faculty adviser to ensure an appropriate plan as it relates to academic credit. Paid undergraduate student workers may continue to carry out important support functions necessary for continuing laboratory operation. Unpaid volunteers should not continue working in laboratories.

GRADUATE STUDENT RESEARCH

1. I am a graduate student and am uncertain as to what is happening in my research lab. Will it still be operational?  
Investigators have been instructed to carefully evaluate how to reduce density and allow students and other lab staff to work remotely as much as
possible, or to stagger working hours to minimize the number of workers in the lab at any given time. The latest federal guidelines limit gatherings to no more than 10 people, under social distancing constraints. Investigators have also been advised to consider ways to scale back or delay research projects in the event that it becomes necessary to reduce or even halt laboratory research operations. Please communicate with your faculty advisor for additional information or potential concerns about your individual health or research, while minimizing in-person meetings and practicing good hygiene and social distancing. Remember also that you should follow proper laboratory procedures at all times, including not working alone in the lab and not removing material (e.g., specimens, animals or sensitive equipment) from the lab without prior approval from the cognizant authority.

2. Will the COVID-19 situation affect my ability to conduct fieldwork and attend meetings/conferences?
Please follow university guidelines for all domestic and international travel. Unless an essential activity, travel is not allowed at this time, including for fieldwork.

FACULTY-STUDENT RESEARCH AND CREATIVE ACTIVITY INTERNAL GRANTS

1. I am a faculty member and received a Faculty-Student Research and Creative Activity Internal Grant (FSIG) for FY 2020. What happens if I cannot complete the project as proposed?
We are extending all FSIG grants awarded in FY 2020 to conclude on December 31, 2020. We will continue to monitor and push the deadline further if the current situation extends for longer than anticipated.

According to the terms and conditions of the internal grant, PIs also have the flexibility to reallocate up to 10% of the budget without formal approval. For budget reallocations exceeding 10%, PIs should contact the Office of Research and Innovation for approval. But given the circumstances, the requests for changes in travel funds, for example, would require little to no explanation.
Submit any questions not answered here to the Research Query form. This page will be updated at least weekly to reflect any new information or questions received.