

UC Hastings Law Health & Safety Plan

Current as of September 3, 2020

Business Entity Name	UC Hastings Law
COVID-19 Staff Liaison	Rhiannon Bailard Executive Director of Operations
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I. Purpose & Compliance with Health Officer Directive No. 2020-22 and Industry Specific Guidance

This Health & Safety Plan is intended to establish UC Hastings Law compliance with all requirements set forth in Health Order Directive No. 2020-22 (“Health Directive”). Additionally, UC Hastings Law has implemented all industry-specific guidance in the directive as applicable to the campus including transportation, cafeterias, eating establishments, congregate living, and shared laundry facilities.

UC Hastings Law intends to submit three requests for Health Officer Approval of on-campus programming. These requests are (1) an immediate request to provide individual spaces to graduates to take the California Bar Exam on October 5 and 6, (2) a near-term request for current Fall 2020 Semester on-campus indoor programming and related operations, and (3) Spring 2021 on-campus indoor programming and related operations submitted by no later than early November 2020. Relatedly, UC Davis uses the UC Hastings Law campus for their Masters in Business Analytics program and we anticipate their submittal of a Health & Safety Plan request for use of our campus for on-campus programming.

II. Social Distancing Protocol: UC Hastings Law has a Social Distancing Protocol, which was last updated on September 2, 2020 (see Attachment A) per the latest update to the Safer at Home Order issued September 1, 2020. The prior version had been shared with all employees, vendors, and students. It is posted on all campus buildings. And, it is available on our internal intranet site as well as our external website on our COVID-19 landing page, which is accessible from the home page. UC Hastings Law will update all locations with this revised social distancing protocol, which has only minor changes to the most recent version, by September 4, 2020.

Section 1 – General Requirements for All Higher Education Programs

I. Remote Learning and Personnel

UC Hastings Law has provided all classroom instruction online since March 2020. Rarely, client meetings and fieldwork have occurred in person under limited and regulated circumstances. UC Hastings Law made the decision in late June 2020 to provide classroom instruction in the fall semester online, which was prompted by a desire to ensure that students who had not already moved to the Bay Area would not provide notice to current landlords and make other arrangements to relocate when it was unnecessary to do so. Similarly, UC Hastings Law has maximized the number of people working remotely since March 2020, with essential employees permitted to work on campus and other faculty/staff only permitted to come to campus periodically rather than on an ongoing basis, for example, when there is some function that cannot be done virtually or to pick up items that support their working remotely. UC Hastings Law understands that indoor lectures, classes, or courses involving two or more people (including the professor) are not permitted without prior written approval of a Health & Safety Plan by the Health Officer or their designee.

II. COVID-19 Liaison

As listed above, UC Hastings Law has designated Rhiannon Bailard, Executive Director of Operations as the UC Hastings Law COVID-19 Liaison. Ms. Bailard, along with Director of Human Resources, Andrew Scott, has served as the Core Pandemic Response Team Co-Lead since early March 2020. Ms. Bailard is available at (415) 581-8858 or bailardrhiannon@uchastings.edu. UC Hastings Law has also created a COVID-19 site on an internal intranet and a COVID-19 page on the external internet that includes Ms. Bailard's designation as the COVID-19 liaison as well as her contact information.

III. COVID-19 Prevention Plan

UC Hastings Law has a written, campus-specific COVID-19 prevention plan, which tracks the State's Guidance for Institutions of Higher Education (see Attachment B). Additionally, UC Hastings Law has created a set of guidelines for the campus community to determine when they should stay home based upon individual circumstances related to possible exposures and symptoms (see Attachment C).

IV. Written Notice to All Personnel & Students

While UC Hastings Law does not currently have any on-campus programming, the College will provide the written notice provided in the Health Directive Section 1.5 to its personnel and students who may participate in on-campus programming in the future.

V. Daily COVID-19 Symptoms Verification & Screening Procedure

Starting on March 10, 2020, UC Hastings Law began requiring everyone that came to campus to fill out a form asking about (1) COVID-19 symptoms, (2) exposure, and (3) travel history, before permitting access the campus. Additionally, notices were posted at that

time prohibiting entry unless an individual had no symptoms or exposures of concern. In July 2020, the Pandemic Response Team transitioned from use of passive consent per posted notices upon entry into the building in combination with required completion of a paper form, to an [online symptoms questionnaire](#) made available on the UC Hastings Safe app landing page, the COVID-19 page of uchastings.edu, as well as the internal intranet site. The questionnaire covers symptoms, travel, exposure to other individuals suspected or confirmed to have COVID-19, and diagnoses of COVID-19. If all questions are answered correctly, the individual receives confirmation for entry to campus along with email receipt of the same. If a question is answered incorrectly, meaning they have symptoms or pose another risk to the campus community, they are instructed to stay home and not come to campus along with other directions based upon the particular circumstance.

Every person who comes to campus must fill out the questionnaire in advance of their visit to campus every time they come to campus with the exception of residential students who would be permitted to stay in their personal residence irrespective of answers to the questions (i.e., home isolation). Upon entry to a campus building, security will ask for photo ID and also about completion of the questionnaire. If the individual has not completed the questionnaire, there are paper versions available that they may complete at that time. Additionally, Human Resources periodically checks in with essential employees coming to campus to ensure they are completing the questionnaire.

VI. Face Coverings

Face coverings are required at all times while on campus and upon entering the campus unless there is a medically necessary exemption from requiring the use of a face covering. UC Hastings Law was an early adopter to first suggest the use of face coverings before it was recommended by the CDC and prior to becoming a requirement. UC Hastings Law has made the requirement explicit with notifications going out to the campus community and signage posted at all entrances as well as throughout the campus buildings. They have also committed to provide 5 reusable face coverings to any personnel or student that comes to campus. Additionally, UC Hastings Law has communicated to the campus community that failure to abide by the face covering as well as other COVID-19 requirements (e.g., social distancing) is a violation of student and employee conduct codes and subject to discipline just like any other protocol or policy.

Any individual that arrives to campus without a face covering will not be permitted inside. However, UC Hastings Law does have a limited number of disposable masks available at the guard booths in case there are extenuating circumstances that require someone without a face covering to access campus.

VII. Visitors

UC Hastings Law has prohibited non-essential visitors from accessing campus since March 2020. This includes the use of all campus spaces and facilities, which remain off-limits. The

Operations Department reviewed all vendor requests for access and has permitted access only to those that are required for the ongoing operations and functions of the campus, which cannot be done remotely or delayed indefinitely. Additionally, tours and open houses continue to occur virtually.

VIII. Travel & Quarantine

UC Hastings Law has adopted SFDPH recommendation to require self-quarantine for all individuals that have travelled outside of the Bay Area, as broadly defined and not to apply to those who commute from outside of the Bay Area, for 14 days. The only exception is that employees who have essential business on campus may seek a waiver for campus access within the 14 days based upon a request for risk assessment by Human Resources looking at mode of travel (e.g., driving vs. plan) and interactions (e.g., remained with household or participated in large gatherings, ate indoors at restaurants, etc.).

IX. Promotion of Healthy Hygiene Practices On Campus

UC Hastings Law has sent information to the entirety of the campus community about safe hygiene practices since January of 2020, when the first safety bulletin was circulated about the novel coronavirus. Since that time, the Core Pandemic Response Team has regularly provided updates to the community in the form of safety bulletins, emails, town halls, as well as the creation of an internal intranet and external internet site for COVID-19. Additionally, in July 2020, in anticipation of resumption of on-campus activities, UC Hastings Law implemented a comprehensive signage campaign throughout the campus promoting healthy hygiene practices including the following:

- Washing hands frequently with soap and water for 20 seconds or using a hand sanitizer with at least 60% alcohol when not available
- Wearing a face covering at all times while on campus
- Maintaining social distancing of at least 6 feet, which includes provision not just of signage requesting that people maintain distance of 6 feet, but also specific occupancy limitations in all common area rooms (e.g., bathrooms, elevators, meeting rooms, office suites, etc.) throughout campus
 - i. Where social distancing is difficult to maintain (e.g., security booth and reception areas), UC Hastings Law has erected plexiglass barriers to ensure protection between individuals
- Reminding individuals to cough or sneeze with their face covering on and/or into their elbow, and to wash hands immediately afterwards

Please see Attachment D for images of the signage included in the comprehensive healthy hygiene campaign.

X. Provision of Supplies

UC Hastings Law has provided supplies throughout the campus including disinfectant wipes, hand sanitizer stations, soap and water, paper towels, tissues, and foot pulls for doors at restrooms. Supplies are restocked in all common areas and any spaces that are used by campus community with ample supplies kept on hand. All essential employees that are on campus are provided information to contact facilities in the event that supplies run out. In the event of students coming to campus for on-campus programming, UC Hastings Law will ensure supplies are available and will also provide contact information for replenishment of supplies.

XI. Routine Safe Cleaning & Sanitation Practices

UC Hastings Law has provided enhanced cleaning and disinfection of all common areas since early March 2020. Specifically:

- Cleaning occurs when occupants are not present, and ventilation is provided
- UC Hastings Law disinfects all high-touch areas (e.g., door handles, light switches, sink handles, hand railings, tables, elevator buttons, etc.) two times per day, or more often depending on frequency of use
- All cleaning products meet CDC guidance for use against COVID-19 from the EPA approved list “N”
- UC Hastings Law provides disinfectant wipes in work areas and common areas
- UC Hastings Law encourages employees to participate in the cleaning/disinfecting process by regularly wiping down commonly used surfaces such as conference tables, desks, doorknobs, and light switches before and after use. Employees are also requested to disinfect their desks and workstations regularly; and they are reminded this is especially important if other individuals have been in or near their workspace.
- The campus community is informed that if additional cleaning/disinfection materials are needed, they should please contact facilities at facilities@uchastings.edu or, for more urgent matters, they can contact Security at (415) 565-1414 and they will initiate an immediate Facilities response.

XII. Sharing of Objects

UC Hastings Law discourages the use of shared objects particularly those that are difficult or unrealistic to clean or disinfect between uses, such as pens, computers, and staplers. Signage was posted throughout campus in particular in office kitchens and at printers that state: “shared equipment can only be used if disinfected between uses.” Additionally, some items that were typically shared – e.g., computers in the library – have been removed from service. If items do require sharing, individuals should disinfect them between each use.

XIII. Shutdown of Campus Facilities

While no buildings were completely shut down during the shelter-in-place as we have residential students with multi-year leases and there were limited numbers of essential staff (i.e., security and facilities maintenance) in all of the buildings, the campus occupancy was dramatically decreased overnight and occupancy has remained relatively low since early March 2020. As such, UC Hastings Law took steps to ensure the appropriate functioning of ventilation and plumbing systems.

As to ventilation, the College utilized ASHRAE Standards developed for COVID-19 at 200 McAllister and 333 Golden Gate, where the Bar Exam spaces are offered. As simply put, and consistent with CDC guidelines, UC Hastings Law has assessed ventilation systems to ensure they are functioning properly, and we are maximizing air exchange rather than recirculating air in the buildings.

As to plumbing, the College followed CDC guidance to flush all water systems throughout any areas that were unoccupied or had limited occupancy in order to minimize the risk of Legionnaire's Disease and other diseases associated with water systems. Additionally, all water fountains have been shut down though water filling stations remain available for use. Individuals that use the water filling stations should wash hands after use.

- XIV. Closed All Non-Essential Areas:** UC Hastings Law shut down the basketball gym, fitness center, library, and Dining Area in March 2020. These facilities have not reopened to the campus community and are pending further guidance from Public Health about when it is safe to reopen.

Section 2 – Additional Requirements for Higher Education Programs Offering Outdoor, In-Person Instruction

- I. Outdoor Instruction:** UC Hastings Law intends to offer in-person instruction outdoors in groups of no more than 12 people, including any instructors. Such instruction could take the form of formal courses but could also take the form of informal instruction between faculty and students.
- II. The following rules apply to outdoor instruction:**
- This outdoor instruction would be optional and may be declined by students and personnel.
 - Faculty must properly reserve exterior campus spaces to ensure the campus can maintain appropriate social distancing density.
 - All participants must follow social distancing requirements and wear face coverings at all times. Individuals who are exempt from face covering requirements may not participate in outdoor instruction.
 - Members of vulnerable populations (e.g., over 60 or with a preexisting condition) are encouraged to carefully consider the risks of participating in outdoor instruction.

- All participants in outdoor instruction must complete the symptoms self-monitoring questionnaire and confirm its completion to guards upon entry or they will have to complete a paper version.
- All participants must provide photo ID to gain access to campus and the exterior areas where the outdoor instruction will occur.
- Each outdoor instruction session will last no more than 2 hours
- Participants may not attend more than 1 outdoor instruction session per day or more than 2 outdoor sessions per week
- Participants may not eat or drink during the session
- Participants must not gather or mingle before or after the instruction
- Participants are only permitted inside buildings to gain access to the outdoor spaces and to use the restrooms while participating in the outdoor instruction; participation in outdoor instruction does not provide access to use of campus facilities for other uses unless indoor on-campus programming has otherwise resumed

Section 3 – Additional Requirements for Housing Under the Control of a Higher Education Program

- I. **Student Housing:** UC Hastings Law does not have communal dorm-style housing. Instead, the College has approximately 250 apartments available for long-term leases. The default is that students are housed in single rooms without a roommate. The majority of the units are studios and one bedroom and there are a limited number of two bedrooms. Each apartment has its own kitchen and bathroom. Currently, there are 137 students residing in the residential building. Approximately 50% of those residents have resided in their current unit since before March 2020.

Both in March 2020 and in July 2020, when the Core Pandemic Response Team made the decisions to go virtual in the spring semester and for the fall semester, it provided a window to current and future tenants to break leases in order to permit students to move home given the remote learning environment. However, UC Hastings Law continued to provide residential options to students who opted to stay with the understanding that there would be students that did not have alternative housing options and who might have difficulty with remote learning from other locations. To support that latter need, WIFI is provided to all campus residents.

- II. **Quarantine:** While quarantine and isolation rooms are not required as all units are apartments without shared bedrooms, UC Hastings Law does have an adequate supply of units for such a contingency due to unforeseen unusual circumstances. However, as stated, the expectation is that any resident that needs to do so can quarantine and self-isolate in their own unit or bedroom.
- III. **Non-Essential Visitors & Gatherings:** UC Hastings Law has communicated the Safer at Home guidelines to all student residents including the prohibition on indoor gatherings by

members outside of the household. In the first instance, UC Hastings Law defers to the graduate student residents, each of whom has a contained, private apartment unit rather than in communal dorm units, as to the determination of whether a visitor is essential. Additionally, any visitor to the campus is required to show photo identification and to complete the symptoms self-monitoring questionnaire as well as being subject to screening by the security officers. Security officers are on notice to report unusual numbers of visitors.

- IV. Non-Essential Shared Spaces:** UC Hastings Law has closed the basketball gym and fitness center.

Section 4 – Additional Requirements for Transportation Under the Authority of a Higher Education Program

In order to reduce risk of transmission, UC Hastings Law discontinued the campus shuttle program in March 2020 and does not have current plans to resume shuttle operations. However, the College will follow Health Directive Section 4 if it does.

Section 5 – Testing, Contact Tracing, & Vaccinations

I. Testing

UC Hastings Law has a recommended protocol for personnel and students to determine specific actions to take relative to individual circumstances of exposure or symptoms, which include suggestions to get tested (e.g., in the event of symptoms following exposure as a close contact). UC Hastings Law refers students to Carbon Health, the UC Hastings Law healthcare provider for students, and has a specific process to refer students to them for testing. For employees, UC Hastings Law refers employees in need of testing to their healthcare provider. Given that there is no on-campus indoor instruction and limited on-site personnel, UC Hastings Law has not implemented a surveillance testing program.

II. Contact Tracing

UC Hastings Law has supported contact tracing efforts related to individuals who have been confirmed with COVID-19 within 48 hours of becoming symptomatic or taking a test in the event of an asymptomatic individual. UC Hastings Law has worked to pull all relevant information including timelines related to symptoms and diagnosis as well as interactions on-site to determine close contacts, and then followed up with individuals deemed as close contacts as defined by SFDPH to provide notice and give instructions about whether to return to campus. UC Hastings Law will continue to support the efforts

of SFPDH as well as any other Public Health agency conducting contact tracing related to an individual that has been on campus.

III. Influenza & Future COVID-19 Vaccine

Any UC Hastings Law personnel or student who comes to campus after November 1, must have gotten an influenza vaccine prior to November 1 unless they have a medical exemption. The anticipation is that UC Hastings Law will have a similar requirement for the COVID-19 vaccine as soon as it is FDA approved and commercially available.