
UC Hastings Law COVID-19 Prevention Program & Campus Access Policy

Effective July 29, 2021

Revised July 30, 2021 (Sections II and VI)

Revised August 24, 2021 (Sections II, III, V, and VIII)

Revised September 9, 2021 (Section VI)

Revised October 15, 2021 (Sections I, II, III, IV, V, VI, XI)

Revised January 3, 2022 (Sections I, II, VI, VII)

Revised January 19, 2022 (Sections VII, VIII)

Revised March 21, 2022 (Sections II, III, V, VI, XV)

Revised May 18, 2022 (All Sections)

I. Purpose & Background

The purpose of this policy is to align campus access with evolving COVID-19 protocols. This policy and associated protocols are based largely on the [San Francisco Department of Public Health, the Center for Disease Control's \("CDC"\) Interim Public Health Recommendations for Fully Vaccinated People](#), the [CAL/OSHA COVID-19 Prevention Emergency Temporary Standards](#), and limited recommendations from the [State of California Department of Public Health](#). Following completion of spring 2022 finals, on May 16, 2022, the College largely eliminated COVID-19 requirements while retaining the ability to reimplement needed COVID-19 pandemic protections if triggered by a surge or campus outbreak, as discussed more fully below in Sections X and XI.

II. Vaccination

On May 31, 2022, the [UC Hastings Law COVID-19 Vaccination Policy](#) will expire on its own terms. Per the Centers for Disease Control ("CDC"), people who are fully vaccinated are at low risk of symptomatic or severe infection. UC Hastings Law strongly encourages COVID-19 vaccination, including boosters as recommended, for everyone accessing campus buildings. As of May 18, 2022, UC Hastings Law does not require proof of vaccinations to enter campus buildings, however, the College may revise this requirement at any time without notice based upon increasing case levels, Public Health guidance, or other circumstances.

Students: As of June 1, 2022, UC Hastings Law is no longer limiting student access to campus buildings based upon COVID-19 vaccination status. However, UC Hastings Law is adding the COVID-19 vaccine and booster to the vaccines required by the [UC Immunization Policy for Students](#). Students may request a medical exemption or an accommodation based on a sincerely held religious belief, practice or observance.¹ [Student Medical Exemption Request](#)

¹ This includes traditionally recognized religions as well as beliefs, observances, or practices, which an individual sincerely holds and which occupy in their life a place of importance parallel to that of a traditionally recognized

[Forms](#) and [Religious Accommodation Request Forms](#) shall be submitted directly to the student's Carbon Health account portal. Failure to timely comply with the COVID-19 vaccine requirement will result in an academic hold and the student will not be able to register for the following semester's classes. Questions about the COVID-19 vaccine requirements or exception process can be directed to healthserviceshelp@uchastings.edu. Accommodation requests based on disability shall follow the typical process described on the [Disability Resource Program website](#), and questions can be directed to disabilityresourceprogram@uchastings.edu.

Employees: As of June 1, 2022, UC Hastings Law is not mandating COVID-19 vaccinations or boosters for employees. However, reinstatement of this requirement could occur at any time. As such, employees are strongly encouraged to receive the COVID-19 vaccine and all recommended boosters pursuant to the timelines of their healthcare providers.

III. Campus Access

Faculty, staff, students, contract personnel, vendors, and others in our campus community have no constraints on access to campus buildings. There are limited restrictions for visitors remaining as detailed below. Details on specific uses, activities, and locations follow.

- Library: Unscheduled visitors are not permitted in the library. Please consult the library's website for more information on hours and services.
- Fitness Center: The fitness center is operating at normal capacity; however, it is not available to public visitors or guests.

IV. Physical Distancing at UC Hastings Law Campus

At UC Hastings Law, facilities and spaces have returned to normal occupancy, and classes, events, programs, and other campus activities utilize standard capacities based upon existing room capacities. The College retains the right to re-implement physical distancing requirements either when required by public health agencies or when deemed necessary given specific circumstances.

V. Face Coverings at UC Hastings Law

As of May 16, 2022, face coverings are generally optional. Any member of the community may continue to wear a mask if desired, and UC Hastings Law strongly encourages unvaccinated individuals to wear face coverings. Individual offices and classrooms may continue to require face coverings, and all members of the community are expected to follow signage and faculty directions with respect to face coverings. The College retains the

religion. Social, political, or economic philosophies, as well as mere personal preferences, are not religious beliefs for the purposes of this policy.

right to re-implement face covering requirements either when required by public health agencies or when deemed necessary given specific circumstances.

VI. COVID-19 Symptoms & Confirmed Cases

Students, faculty, staff, and all members of the campus community must assess themselves for symptoms of infectious illnesses, including COVID-19, prior to coming to campus each day. **If you are experiencing symptoms of illness, you must stay home and should seek medical care if indicated by your symptoms.** If you are on campus and begin to experience symptoms of illness, you must go home if you are able, or seek medical care, dependent upon your symptoms and circumstances.

- Symptoms of COVID-19: Individuals with the following symptoms, may have COVID-19:
 - Fever or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea

- Life Threatening Symptoms of COVID-19: If you have any of the following symptoms, you may need urgent medical care. Please call 911 or go to the nearest emergency department. If you see someone else suffering from these symptoms, please assist the person in obtaining appropriate medical care.
 - Pale, gray, or blue-colored skin, lips, or nail beds depending on skin tone
 - Severe and constant pain or pressure in the chest
 - Difficulty breathing (such as gasping for air, being unable to walk or talk without catching your breath, severe wheezing, nostrils flaring, grunting, or ribs or stomach moving in and out deeply and rapidly)
 - New disorientation (acting confused)
 - Unconscious or very difficult to wake up
 - Slurred speech or difficulty speaking (new or worsening)
 - New or worsening seizures
 - Signs of low blood pressure (too weak to stand, dizziness, lightheaded, feeling cold, pale, clammy skin)

- Determining when to Seek Medical Care or take a COVID-19 Test: The CDC provides a very helpful [COVID-19 self-checker](#) for use in determining when to seek COVID-19

testing or medical care based upon your individual circumstances and symptoms if any.

- If you are confirmed with COVID-19, you are required to alert UC Hastings Law as soon as you are physically able to do so. You should follow instructions of your medical care provider.
- Timeline for Returning to Campus following COVID-19 Illness: Per the CA Department of Public Health, please use the following guide to determine duration of quarantine following a positive COVID-19 diagnosis:
 - **Stay home** for at least 5 days.
 - Isolation can end after day 5 if symptoms are not present or are resolving **and** a diagnostic specimen collected on day 5 or later tests negative.
 - If unable to test, isolation can end after day 10 as long as symptoms are not present or are resolving.
 - If fever is present, isolation should be continued until fever resolves.
- If you are an employee who is confirmed with COVID-19, your return to work timeline follows the timelines set forth above. However, please refer to VIII(10) below for more information on special circumstances for returning to the workplace.

VII. Close Contacts

A close contact is defined by the CDC as someone who was within 6 feet of someone confirmed as infected by a laboratory test for a cumulative total of 15 minutes or more over a 24-hour period (e.g., three individual five-minute exposures within a day would equate to a qualifying exposure).²

- **If you are unvaccinated and you have been in close contact with someone who has COVID-19, you are not permitted to come to campus** and should take the following steps:
 - **Stay home** (PDF) for at least 5 days, after your last contact with a person who has COVID-19.
 - Test on day 5.
 - Quarantine can end after day 5 if symptoms are not present **and** a diagnostic specimen collected on day 5 or later tests negative.
 - If unable to test or choosing not to test, and symptoms are not present, quarantine can end after day 10.
 - Wear a well-fitting mask around others for a total of 10 days, especially in indoor settings.
 - If testing positive, follow isolation recommendations above.
 - If symptoms develop, test and stay home.

² A close contact also includes providing care to someone who has COVID-19; having direct physical contact with someone with COVID-19 (i.e., hugging or kissing them); sharing drinking or eating utensils with someone with COVID-19; or having someone with COVID-19 sneezing, coughing, or otherwise getting respiratory droplets on you.

- **If you are fully vaccinated, including with a booster, and have been in close contact with someone who has COVID-19, but you are not experiencing symptoms, you are not required to stay home**, however, you should continue to monitor for symptoms for 14 days after your last contact with the person who had COVID-19. The CDC also recommends getting tested for COVID-19 3-5 days after a known exposure.

VIII. COVID-19 Prevention Plan

In compliance with the CAL-OSHA COVID-19 Prevention Emergency Temporary Standards, UC Hastings Law continues to implement a COVID-19 Prevention Program as outlined below.

1. System for Communicating: UC Hastings Law has methods in place to exchange information with the community regarding COVID-19. This includes via regular email communications, emergency mass notifications if applicable, the UC Hastings website, COVID-19 My Hastings page, campus signage, and via direct communication with COVID-19 pandemic response team members including the Chief Operating Officer, Chief Human Resources Officer, and Dean of Students.
 - a. All community members are required to report confirmed cases of COVID-19 and may do so without fear of reprisal.
 - b. UC Hastings Law communicates COVID-19 policies and procedures and other relevant information to the community, and in some circumstances, to other persons (e.g., contract personnel, vendors, etc.) within the campus.
2. Identification and Evaluation of COVID-19 Hazards: UC Hastings Law is assessing the campus for COVID-19 hazards regularly. UC Hastings Law employees or their representatives are allowed to participate in hazard identification and evaluation.
 - a. *For improving indoor air quality*, CAL-OSHA requires employers to evaluate how to maximize ventilation with outdoor air to the highest level of filtration efficiency compatible with the existing ventilation system and to assess whether or not the use of portable or mounted HEPA filtration units or other air cleaning systems would reduce the risk of COVID-19 transmission.
 - i. Pursuant to San Francisco Department of Public Health ventilation guidance for improving ventilation in indoor spaces, *the College has taken the following actions in 200 McAllister and 333 Golden Gate*, as these buildings have HVAC systems.
 1. Disabled demand controls on HVAC ventilation systems so fans operate continuously, regardless of heating/cooling needs.
 2. Opened outdoor air dampers and closed recirculation dampers to reduce or eliminate air recirculation.
 3. Generated clean-to-less-clean air movement by adjusting the settings of supply and exhaust air diffusers and/or dampers in

higher risk areas, so that potentially contaminated air is moved away from occupants.

4. Improved central air filtration by upgrading to MERV 10 rated filters.
 5. Created a plan for inspecting, and when necessary, cleaning or replacing filters, which includes changing filters at least quarterly, inspecting filter housings and racks to ensure appropriate filter fit, checked for ways to minimize filter bypass, and running fans continuously.
 6. Programmed HVAC cycles to bring in maximum outside air flow for 1-2 hours before the buildings open each day.
- ii. Pursuant to San Francisco Department of Public Health ventilation guidance for improving ventilation in indoor spaces, *the College has taken the following actions in 100 McAllister*, as this building does not have an HVAC system and instead relies upon passive ventilation.
1. Encouraged all occupants, as weather conditions allow, to increase fresh outdoor air by opening windows and doors.
 2. Encouraged all occupants to use fans to increase the effectiveness of open windows, by positioning fans securely and carefully in or near windows and to minimize air blowing from person to person.
 3. Provided Portable Air Filters to office occupants and in spaces potentially utilized by groups of people including the fitness center, Clara Foltz Lounge, and Skyroom.
3. Investigate and Respond to COVID-19 Cases: UC Hastings Law will conduct an investigation every time there is a COVID-19 case on the campus, which includes verifying case status and determining close contacts, receiving symptom and test result information, and identifying and recording cases. Steps of the investigations are documented, and changes are made to improve the health and safety of the campus.
- a. *Within one business day that UC Hastings Law knows of a COVID-19 case present at the campus, UC Hastings Law will give written notice to all employees known to have been present at the worksite, as defined by CAL-OSHA, during the high-risk exposure period.³ If an employee is represented, written notice will also be provided to the employee's authorized representative. And, written notice will be provided to any independent contractors, employers, or contract employees known to have been present. In such a situation, all personal identifying information of COVID-19 cases or*

³ High-risk exposure period for symptomatic individuals is from two days before symptoms first developed until ten days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved. High-risk exposure period for asymptomatic individuals is from two day before until ten days after the collection of their first positive test.

persons with symptoms, will be kept confidential except when reported to public agencies or as otherwise required by law.

- b. *In a non-outbreak situation*, UC Hastings Law will offer free testing during paid time to employees who had a close contact in the workplace and to any employees that develop COVID-19 symptoms after the close contact occurs⁴ except for the following categories of employees:
 - i. Individuals who were fully vaccinated before the close contact and do not develop symptoms;
 - ii. Symptomatic COVID-19 cases who returned to work and have remained free of symptoms for 90 days after the initial onset of symptoms; and
 - iii. Asymptomatic COVID-19 cases who returned to work and who remained free of symptoms for 90 days after the first positive test.
4. Correction of COVID-19 Hazards: UC Hastings Law will implement policies and procedures to correct unsafe and unhealthy conditions, work practices, and procedures related to COVID-19 in a timely manner based upon the severity of the hazard.
 5. Training and Instructions: UC Hastings Law will provide training and instruction to the community on various topics, including, for example, COVID-19 transmission, symptoms, prevention, access to testing and vaccination, employment related benefits, and use/availability of face coverings.
 6. Use of Face Coverings: See Section V above.
 7. Other Administrative Controls, Administrative Controls, and PPE: UC Hastings Law has implemented control measures to minimize exposure to COVID-19 hazards. These measures include:
 - a. Improving indoor air quality (see IX(2)(a) above).
 - b. Encouraging handwashing and providing hand sanitizer
 - c. Evaluating employee's needs for personal protective equipment such as gloves, goggles, and face shields, and providing that PPE as needed
 8. Reporting, Record-Keeping, & Access: UC Hastings Law reports information about COVID-19 cases and outbreaks at the workplace to local health departments when required by law. UC Hastings Law also maintains records of steps taken to implement the COVID-19 Prevention Plan and keeps a record of all COVID-19 cases at the campus, including specified information about employees and their presence at the worksite.

⁴ If an employee gets tested outside of their working hours, then they will be paid for their reasonable time to get tested, as well as reasonable travel costs to and from the testing site. Testing sites do not need to be on campus so long as employees do not incur costs for testing.

9. Exclusion of COVID-19 Cases & Individuals with a Close Contact: See Section VIII above. Additionally, and specifically for employees who are excluded from work due to COVID-19 or due to a close contact with an individual with COVID-19, UC Hastings Law will maintain the employee's earnings, wages, seniority, and all other employee rights and benefits as if the employee has not been removed from their job. Employees will be required to exhaust accrued leave during absences.

10. Return to Work Criteria: For employees confirmed with COVID-19, the same criteria for determining a return to campus as those outlined in Section VI above. Though the following scenarios are unlikely, they are included here for potential use in the event of exigent circumstances.
 - a. *In the event of critical staffing shortages* based on actual COVID-19 cases or exposures, health care, emergency response, and certain social service workers who do not develop symptoms may return after Day 7 from the date of the last exposure if they received a negative PCR test result from a specimen collected after Day 5. A critical staffing shortage cannot be based upon anticipation of a future outbreak.
 - b. *UC Hastings Law may also request a waiver of the requirement to exclude* from the workplace exposed or COVID-19 positive employees or personnel, when the exclusion would create an undue risk to public health and safety. Such waiver request must be submitted to rs@dir.ca.gov. If granted, the campus must implement measures to prevent workplace transmission.

IX. Surveillance Testing

Surveillance testing is the practice of regularly or intermittently screening individuals for COVID-19 in order to detect an outbreak early. Per San Francisco Department of Public Health guidance, surveillance testing is not currently recommended because of the low rates of transmission in San Francisco and the greater Bay Area. Due to potential for false positives, conducting surveillance testing during rates of low transmission is likely to mandate quarantines, isolation, and other measures that are not warranted given current community spread. UC Hastings Law looks to San Francisco Department of Public Health for guidance on if and when surveillance testing is required or recommended as an appropriate measure given community spread.

X. Requirements for a Minor COVID-19 Outbreak

A minor COVID outbreak is defined by CAL-OSHA as three or more employee COVID-19 cases within an exposed group⁵ within a 14-day period as measured by the testing date of

⁵ Exposed group means all employees at a work location, working area, or a common area at work where a COVID-19 case was present, at any time during the high-risk period, including in bathrooms, walkways, hallways, and

each case. These requirements apply until there are no new COVID-19 cases in the exposed group for 14 days. UC Hastings Law will work with San Francisco Department of Public Health to ensure appropriate requirements are followed.

1. COVID-19 Testing: Provided to unvaccinated individuals, free of charge, until there have been no cases in the affected group for 14 days. Additional testing may be recommended or required by Public Health.
2. Respirators: Employees have a right to request a respirator if they are unvaccinated.
3. Physical Distancing or Partitions: UC Hastings Law will determine whether to implement physical distancing of at least six feet, or if not feasible, the use of physical partitions.
4. Outbreak Investigation and Hazard Corrections: UC Hastings Law will immediately investigate and determine potential factors that contributed to the outbreak, make any necessary changes to reduce potential for transmission, and document all of these efforts.
5. Ventilation: UC Hastings Law will use the highest compatible filtering efficiency for mechanically ventilated buildings and determine whether portable or mounted HEPA filtration units or other air cleaning systems would further reduce transmission and implement to the degree feasible.

XI. Requirements for Major COVID-19 Outbreaks

A major COVID-19 outbreak is defined by CAL-OSHA as 20 or more employee COVID-19 cases in an exposed group within a 30-day period. The 30-day period is measured based on the testing date of each case. These requirements continue to apply until there are no new COVID-19 cases in the exposed group for 14 days. UC Hastings Law will work with San Francisco Department of Public Health to ensure appropriate requirements are followed including consideration of returning to a campus virtualization based upon the circumstances. The requirements of Minor COVID-19 Outbreaks in Section X above, apply with the following additions:

1. COVID-19 Testing: Provided to everyone in the exposed group weekly, free of charge, regardless of vaccine status, or more frequently if recommended by Public Health.
2. Respirators: Provided to everyone for voluntary use for everyone in the exposed group. If an individual in the exposed group opts not to wear the voluntary respirator, they are required to wear a face covering during the time period these requirements are applicable.

waiting areas. An exposed group does not include (1) places where individuals momentarily pass through while everyone is wearing face coverings and not congregating, (2) the COVID-19 case was not present at the site at the same time as other individuals, or (3) the COVID-19 case was wearing a face covering during the entire visit, which was less than 15 minutes during the high risk exposure period.

3. Physical Distancing or Solid Partitions: Any exposed group individual not wearing a respirator must be separated by at least six feet unless that separation is not feasible, except for momentary instances while individuals are in movement. If physical distancing cannot be maintained, UC locations must install cleanable solid partitions to reduce transmission.

XII. Ventilation and Indoor Air Quality

Refer to Section IX above for measures undertaken by the College to improve indoor air quality. If you have concerns about ventilation in your area that are not addressed by the College's compliance with recommended measures from the San Francisco Department of Public Health and CAL-OSHA, we recommend that, as a mitigating factor, you continue to wear a face covering while on campus.

XIII. Catering & Food Service

Individuals preparing or serving food must abide by the following requirements:

- Ensure proper hand hygiene including regularly washing hands and using hand sanitizer when hand washing is not immediately available
- Use face coverings and gloves, irrespective of vaccination status, while preparing or serving food

XIV. Travel Restrictions

The College does not have any health-related constraints on travel at this time, though this is subject to federal, state, and local requirements including any future travel notices from the CDC or Public Health.

XV. Questions and Comments

For questions and comments, please contact the following individuals about this policy and protocols.

1. Chief Operating Officer, Rhiannon Bailard
2. Chief Human Resources Officer, Andrew Scott
3. Dean of Students, Grace Hum