TOURO COLLEGE REOPENING PLAN - APPLICABLE TO ALL TOURO COLLEGE SCHOOLS IN NEW YORK STATE

July 16, 2020

Touro College is planning a phased reopening of our facilities in Middletown, Valhalla, New York City and Long Island. Our dental and medical schools submitted a separate plan (based on guidance at the time) and began limited reopening in June. Our dental and medical schools will continue reopening in July, and the remainder of our academic programs, including administrative operations, will reopen in August. While it is our intention to offer some classes and certain laboratory experiences in person, this will be accomplished using methods to reduce building and classroom density in accordance with government recommendations. Informed by public health professionals, this plan was developed over a period of months with input from students, faculty, staff and administration. Touro College plans to open on time in accordance with the published academic calendar that contains various start-dates for our varied programs and schools. Based on conditions at the time of final scheduling including faculty and student status, some courses will be offered in-person in a hybrid manner so that students can participate in-person or remotely. In addition to any in-person instruction, it is the intent of the College that every didactic course (e.g., non-lab) will be offered remotely should a student not be able or willing to attend a course offered in-person, or should density restrictions limit the number of students allowed in a particular area where the in-person course is given. Experiential classes (labs, fieldwork and student teaching) may contain in-person requirements and will proceed as long as conditions and regulations allow.

The guiding principles behind our plan are to:

• Protect the health and safety of the Touro College community by taking actions based on scientific data and government and health department guidelines. To that end, Touro College endeavors to be compliant with all current and future New York State (NYS) mandatory requirements for physical distancing, protective equipment, hygiene and cleaning, communication and screening.
• Continue to deliver high quality academic programs, compliant with all applicable accreditation standards, in an inclusive manner for all students in all divisions of Touro College, in order to enable students to successfully progress in their academic program, earn credits, graduate on time and enter the workforce in their chosen fields and professions.
• Adopt and adapt necessary changes in our plans due to real-time changes in the spread of COVID-19, emerging laws, regulations and executive orders from all levels of government.

Our plan is organized into four main components:

• Opening the campuses for students, faculty and staff with a new culture of shared responsibility for public health and compliance with federal, state and local guidelines
• Strategies for monitoring health and safety of the campus community in accordance with mandated public health best practices at the time
• Containment, should an outbreak of COVID-19 occur at any of our campus locations
• Plans, should any of our campuses be required to temporarily suspend in-person activities

OPENING THE CAMPUSES

Capacity:

• Touro College will reduce the capacity in all classrooms and in all shared office spaces to comply with Center for Disease Control (CDC) guidelines by at least 50% of posted area occupancy and by spacing seating by six feet.
• When employees and faculty begin to return to work, the preparatory planning and conditions will be consistent with NYS reopening guidelines for office operations appropriate for each school and campus. The date for returning to work will vary based upon campus/building location and need.

• Employees and faculty will be invited back to campuses in a phased schedule and in cases where there are shared workspaces that do not allow for six-foot distancing, supervisors will devise a combined in-person and alternate station/remote work schedule for affected employees consistent with Touro College HR policies.

• Students and faculty will begin to return to campuses consistent with Phase IV reopening guidelines for Higher Education published by the State of New York.

• Faculty who share office space will develop a schedule with their department chairs or deans so that only one faculty member is in the office at a time where a six-foot distance cannot be maintained in that office space.

• Physical and social distancing will require a distance of at least six feet between individuals on campus (except in student dorm rooms) and all individuals will be required to wear a face covering while in all public spaces within the campus.

• The activities at some smaller facilities may have operations temporarily reduced due to the inability or inefficiency of the space to adhere to NYS guidelines. Students enrolled at such campuses will be supported academically and given the opportunity to continue their academic program at any opened site offering the same courses toward a degree program, either in-person (taking into account overall space limitations) or remotely.

• Sufficient quarantine and isolation accommodations for residential students will be designated prior to opening student housing (see section on Residential Living below for more information).

• With the exception of the Touro College of Dental Medicine on our Valhalla campus, Touro does not have a health center. Therefore, individuals in need of medical attention should contact their primary health care provider, an urgent care center or the closest hospital for medical treatment.

• Where offered, shuttle transportation will be in accordance with governmental and relevant health guidelines.

**Personal Protective Equipment (PPE):**

• While on campus or in any Touro College building, with the exception of private offices if the individual is alone, all members of the Touro College community must wear a face covering, either cloth or disposable, consistent with CDC criteria:
  - Covers the individual's mouth and nose
  - Fits snugly but comfortably against the side of the face
  - Secured with ties or ear loops
  - Allows for breathing without significant restriction, and
  - For cloth face coverings, able to be laundered and machine-dried without damage or change to shape

• PPE does not have to be worn in private offices if a staff member or faculty member is alone. Should someone else enter the office, PPE must be worn.

• In some cases, with the approval of administration, faculty members may wear face shields instead of masks that cover the mouth and nose while teaching a class only as long as they are at least six feet away from the next closest person.

• The purchasing and procurement department of Touro College will be responsible for sourcing and purchasing an adequate supply of face coverings and other PPE for our faculty and staff.

• To ensure employees comply with protective equipment requirements, Touro will do the following:
  - Provide employees with an acceptable reusable face covering at no cost to the employee and have an adequate supply of coverings in case a replacement is required.
  - Touro will provide a face covering at no cost to all contractors and pre-approved visitors who enter the building if they do not have one.
    • Employee face coverings must be cleaned or replaced after use or when damaged or soiled, may not be shared and should be properly stored or discarded.
    • Touro will require all employees and faculty to watch a video training session prior to reopening to ensure that all personnel are properly educated on appropriate cleaning, storing and discarding methods for PPE.
Screening and Testing:

- Touro College will require all students and employees to respond to a series of screening questions on their personal devices prior to arriving on campus each day; in the event the screening indicates symptoms of COVID-19, the individual will receive a message prohibiting them from entering the campus that day. The Human Resources Department will review daily the results of the screenings for employees and faculty. The Safety and Security Department will review daily the results of all screenings for students.
  - Touro’s mandatory health screening assessments will include questions about:
    • COVID-19 symptoms in the past 14 days
    • Positive COVID-19 tests in the past 14 days, and/or
    • Close contact with confirmed or suspected COVID-19 cases in the past 14 days
  - Assessment responses will be reviewed every day and the review will be documented.
  - Individuals who do not complete the assessment prior to entering the site will be required to complete one prior to entering the building.
  - Touro’s IT department will train HR and Safety and Security Department staff on how to access the data and those departments will train their staff to make phone calls that are sensitive to employee (HR) and student (Safety and Security) safety.
  - If an employee’s health assessment is flagged by HR for potentially indicating COVID-19 infection, HR will reach out to flagged employees to recommend they seek appropriate medical attention and to ensure that they are not coming into work.
  - In the case an individual’s assessment is flagged or identified as a failed assessment, they may not enter the work site without prior written approval, which shall only be provided with a note from a health care provider indicating that the individual is safe to return to work.
  - Touro will use daily screening to monitor for symptoms of influenza-like illness and may, from time to time, use temperature checks in situations determined in the sole and absolute discretion of the College. The data from these screenings and checks will be reviewed daily.
    - Temperatures may be taken as students and employees enter certain buildings each day (e.g., medical and health sciences programs). Anyone with a temperature over 100 will be denied access to the building.
  - Testing and temperature checks may be implemented if Touro has reasonable cause (e.g. symptomatic individuals, close or proximate contacts, international travel) to do so to prevent widespread outbreak, in its sole and absolute discretion.

Touro College Student Residential Living:

- Only a maximum of two students will be allowed in each room.
- Touro will ensure that it adheres to sanitation and disinfecting requirements from the Centers for Disease Control and Prevention (CDC) and Department of Health (DOH) in all common areas including, at a minimum, all heavy transit areas and high-touch surfaces within the residential facilities.
- Acceptable face coverings (as described above) required in common areas.
- No non-essential gatherings and activities will be allowed in the residence halls.
- Restriction of visitors allowed in residential halls, including students who are visiting other students in other residence halls:
  - No outside visitors will be allowed.
- Upon submission of a reasonable accommodation request and approval of said request, special housing considerations will be provided for students who are immunocompromised or who have an underlying health condition.
- Students who fail the requirements of the screening questionnaire or who test positive for COVID-19 will be provided with separate accommodations and will be allowed to isolate or quarantine in the residence hall in accordance with specific rules and requirements necessary to ensure the safety of the other residence hall occupants.
- There will be mandatory PCR COVID-19 testing 4-10 days before arrival and retesting will occur 1-2 weeks after arrival on campus. The type of testing and testing requirements may be modified based on practices and availability at the time of student arrival.
• There may be other modified rules and requirements mandated by each residence hall and will be provided upon a student’s arrival.
  - There will be no cooking or shared food-prep areas in residence halls
  - There will be assigned bathrooms for each student
  - There will be a required food plan with individually portioned meals served three times daily

• Touro College students residing in NYMC dormitories will be governed by the NYMC reopening guidelines.

Restart Operations:

• In order to maintain the health and safety of our community, and in accordance with the reopening guidelines of the State, Touro College will enforce the following policies:
  - Check all mechanical, electrical and plumbing systems, especially ventilation systems.
  - Use high quality air filters in all facilities.
  - Establish frequent disinfecting and cleaning schedules to be enforced via cleaning logs.
  - Create modified entrances and exits where feasible, and alter other building circulation routes to avoid congregating.
  - Post CDC & directional signage abundantly and visibly throughout Touro facilities.
  - Create layouts for classrooms and other student spaces that comply with social distancing standards.

Operational Activities:

• The total number of occupants in an office and classroom setting at any given time will be kept to a minimum by continuing to utilize the College's work-from-home policy and remote learning structure.

• In addition, the total number of staff should not exceed 50% of the maximum occupancy for a particular office/area. Employee schedules will be staggered by each department head at each Touro location to ensure proper social distancing.

• For personnel required to be on-site, physical distancing requirements will be implemented. To that end, Touro will do the following:
  - Ensure six feet distance between personnel, unless safety or core function of the work activity requires a shorter distance.
    • Any time personnel are less than six feet apart from one another, personnel must wear acceptable face coverings.
  - Tightly confined spaces will be occupied by only one individual at a time, unless all occupants are wearing face coverings and their task/job requires being present.
  - Post social distancing markers using tape or signs that denote six feet of spacing in commonly used and other applicable areas on the site (e.g. clock in/out stations, health screening stations).
  - Where possible, employees may have their desk or workstation relocated to promote social distancing, at the discretion of the facilities department.

• Limit in-person gatherings as much as possible and use tele-conferencing or video-conferencing whenever possible. Essential in-person gatherings (e.g. meetings) will be held in open, well-ventilated spaces with appropriate social distancing among participants.
  - Establish designated areas for pick-ups and deliveries, limiting contact to the extent possible.

• To maintain proper six feet social distancing in the following scenarios, Touro will provide and implement the following protocols in buildings it owns and in buildings where it is the sole tenant:
  - Elevators
    • Maximum occupancy signage will be posted.
    • Face covering will be required for all staff, faculty and students.
  - Bathrooms
    • Face covering will be required for all staff, faculty and students.
    • Certain stalls/sinks will be closed off.
    • Maximum occupancy signage will be posted.
- Hallways
  • Directional arrows will be put in place on floors to keep traffic flowing in one
direction, with limited chance for interaction by individuals on either side.
  • Face covering will be required for all staff, faculty and students.

- Dining Halls
  • Touro will limit dining hall access to take-out meals only.

- Libraries
  • Touro will limit library hours and limit the number of students allowed entry at a
given time.
  • Library users will be requested to clean all workspaces before and after use with
disinfectant provided by Touro.
  • Group study rooms are not to be used by more than one person at a time.
  • Eating will not be permitted in the libraries.
  • Face covering will be required for all staff, faculty and students.

- Research Activities
  • Research will be conducted in accordance with the guidance of outside agencies
following the social distancing and face covering guidelines.

- Entrances, Exits, Staff Lounges & Essential Common Spaces
  • Arrival, lunchtime and departure times will be staggered to reduce the potential for
interaction in entrances and exits, as well as to reduce elevator capacity. We will
encourage the use of stairs to cut down on elevator occupancy density.
  • If eating on-site, lunch will be taken at the employee’s desk.
  • Nonessential common spaces, including break areas, will remain closed or repurposed.

In buildings that are not owned by Touro where other tenants are present, Touro will abide by the
requirements mandated by the building management.

Class Scheduling:

• All in-person classes, with the exception of certain labs and experiential educational experiences, will
be simultaneously offered remotely in a synchronous fashion.
• Classes will be scheduled, to the best of our ability, to enable students who are required to be on-
campus to comply with practices and the social distancing rules then in effect.
• To abide by applicable government density reductions, enrollment in specific sites, in-person
sections or days/times may be limited and students may be assigned to full or partial remote
instruction.
• For the Fall 2020 semester, campus academic leadership may designate courses to be delivered
fully remotely at their discretion and in accordance with guidelines established by government
regulators and applicable specialty accreditors.
• The activities at some smaller facilities may have operations temporarily reduced due to the inability
or inefficiency of the space to adhere to NYS guidelines. Students enrolled at such campuses will
be supported academically and given the opportunity to continue their academic program at any
opened site offering the same courses toward a degree program either in-person (taking into
account overall space limitations) or remotely.

Visitor Policy:

• Visitors will not be permitted unless granted prior permission (registered in advance by
departmental representative with approval from Campus leader).
• Visitors will be provided (in advance where possible) Touro’s standard health screening assessment,
which must be completed and submitted by time of entry.
• Visitors without a completed health assessment or exhibiting signs of illness will be denied entry.
• Visitors will sign in and be required to wear face coverings and adhere to all NYS and Touro College
social distancing policies.
  - Visitors who do not have a face covering and cannot be provided one from Touro College
will be denied entry.
Hygiene and Cleaning:

- Touro will establish campus-wide cleaning and disinfection protocols for classrooms, residence halls, restrooms, dining and other facilities.
- Touro will ensure that it adheres to hygiene and sanitation requirements from the CDC and DOH and maintain cleaning logs on site that document date, time and scope of cleaning.
- Touro will limit the sharing of objects and discourage touching of shared surfaces; or, when in contact with shared objects or frequently touched areas, wear gloves (trade-appropriate or medical); or sanitize or wash hands before and after contact.
- Touro will regularly clean and disinfect common equipment and other shared and high-touch surfaces using DEC products identified by the EPA as effective against COVID-19.
- Touro will provide and maintain hand hygiene stations in the facilities including: handwashing soap, running warm water, disposable paper towels, lined garbage cans, as well as an alcohol-based hand sanitizer containing 60% or more alcohol for areas where handwashing is not feasible.
  - Appropriate hand hygiene and/or products will be available at every entrance to every building, in every corridor, every bathroom and near high-touch common objects, where appropriate.
  - Touro will promote good hand hygiene by posting signage near hand hygiene stations.
- Touro will conduct regular cleaning and disinfection at least after every shift daily or more frequently as needed, and frequent cleaning and disinfection of shared objects (e.g. tools, machinery) and surfaces, as well as high transit areas, such as restrooms and common areas, will be completed.
- The facilities department will increase the frequency of previously established cleaning schedules and abide by EPA and DOH guidelines to ensure products are environmentally safe and effective against COVID-19.
- To ensure employees comply with hygiene and cleaning requirements, Touro will do the following:
  - The maintenance department will be responsible for maintaining cleaning logs.
  - The cleaning logs will consist of checklists for all office areas and will ensure that all common objects are disinfected frequently throughout the day.
  - Logs will be kept on a clipboard on each maintenance employee’s housekeeping cart during work hours.
  - After work hours, logs will be kept in the building manager’s office to be reviewed daily.

Extracurricular Activities:

- To ensure access to participation in all student campus clubs and organizations, meetings and activities shall be held remotely. The president or designated representative of each organization may apply for a Touro-licensed Zoom account to conduct appropriate club/organization activities.
- Touro’s Temporary Travel Policy adopted in March 2020 remains in effect for the Fall 2020 academic semester.
- As a general rule there will be no on-campus presentations, club meetings or events during the Fall 2020 semester. All activities are encouraged to be planned for and offered in a remote fashion so as to ensure full participation by all interested students. Any exceptions to this rule must be approved in writing by senior management and must occur in accordance with the Guidance on Higher Education from NYS.
- All competitive sports activities will be cancelled for the 2020-21 academic year.
- Residential campuses may have alternative guidelines for extracurricular activities, as approved by the dean and senior management.

Vulnerable Populations:

- In the case of a student, employee or faculty member who has a disability, is unable to attend classes or come to the office in person and/or requires other assistance and/or access, a request for reasonable accommodation shall be made in accordance with existing College policy to the disabilities coordinator at the program where the student is enrolled or the Human Resources department. All reasonable accommodations will be made in accordance with the College’s policy.
• In the case of an employee who has a disability (as defined in the ADA and under state and local laws), which prevents that employee from performing one or more of the essential functions of the job, Touro College will attempt, through a flexible, interactive process with the employee, to identify a reasonable accommodation that will enable the employee to perform such functions. After the interactive process, Touro College will provide the employee with a written final determination, identifying any accommodation which has been granted or denied. Requests for accommodations or questions regarding the accommodation process must be directed to the Human Resources Department.

STRATEGIES FOR MONITORING HEALTH AND SAFETY OF THE TOURO COMMUNITY

Incidents of COVID-19:

• Touro College requests all members of our community to notify their dean or Human Resources should they test positive for COVID-19.
• The dean or HR Department must immediately notify the Touro College executive vice president, who will be the point of contact with the local health departments.
• Touro College will work with the applicable county and city local health departments to notify them of positive cases and to cooperate and partner on tracing and notification efforts.
• Touro College will abide by the recommendations of the local health department, including temporarily suspending activities at a particular location, if so warranted.
• All required notifications to employees and students about COVID-19 on campus will be made by the executive vice president or the chief human resources officer. In principle, campus broadcast announcements will not be made unless instructed to do so by health officials - rather, individuals identified through contact tracing will be alerted individually to the best of our ability.

Tracing:

• Touro will provide the information below to the appropriate public agency responsible for the New York State Contact Tracing Program.
  - In the event Touro is notified that a member of the Touro community tested positive for Coronavirus, Touro will cooperate with and follow the guidelines of local health authorities in compliance with the New York State Contact Tracing Program:
    • Touro will access swipe card logs or manual logs from the employee’s worksites where these exist and provide to the relevant contact tracing personnel.
    • Touro will speak to the employee to gain more information, if instructed to do so by the New York State Contact Tracing Program.
• If instructed by the New York State Contact Tracing Program, close contacts, as defined by the local health department, will be informed of potential exposure and that they shall not return to work or school until they satisfy a 14-day quarantine period with no symptoms.

CONTAINMENT

• Any member of the Touro College community who tests positive for COVID-19 or who exhibits symptoms of COVID-19 is required to self-quarantine for a minimum of 14-days.
  - Touro will isolate residential students who are symptomatic or require quarantine in accordance with the procedures stated above.
  - Touro will create a support system that will be provided including food, medicine, psychosocial, academic and/or other support, as needed to residence hall occupants.
• In addition, anyone who is suspected of having been exposed to a person suspected of, or confirmed with, a COVID-19 case must also self-quarantine for 14-days unless the person suspected of having COVID-19 has a negative test at least five days after the exposure and before the end of the 14 days.
• In consultation with the local health department, Touro will identify where students who are exposed to, or infected with, COVID-19 will be residing throughout the duration of their isolation and how their daily needs will be met (e.g. food, medicine, psychosocial support).
• Students who test positive for COVID-19 and are well enough, or students in a mandatory quarantine situation who are well, will be able to participate in classes (except certain labs and experientials) remotely. To the extent that the illness prevents students from participating even remotely, during the COVID-related absence from class, and after requesting accommodations through the existing accommodation process, students may be permitted to make up all work in accordance with applicable school and course policies.

• Touro will implement the following practices to clean applicable contaminated areas in the event of a positive test:
  - Touro will use Lemon-E disinfectant sprayer, a product listed by name on the American Chemical Council/Center for Biocide Chemistries Tier 2 List of Novel Coronavirus (COVID-19) fighting products.
  - The coordinator will contact occupants of any contaminated spaces by email/text message to inform them of contamination and to advise them on next steps.

PLANS

Shutdown Procedures:

• Should the government mandate a shelter-in-place or shutdown of a region where one or more Touro College campuses is located, Touro will comply as it did in March 2020 or in accordance with the then current laws, executive orders or guidance.
  - Any in-person classes will automatically switch to remote instruction.
  - Faculty and staff will be instructed to work remotely from home.
• Residential students who may not be able to depart campus quickly may be able to shelter-in-place for a temporary timeframe and will be required to leave campus housing to shelter-in-place at their permanent residence or other premises in accordance with the State Guidance in effect at the time.

Communication:

• The campus community will be updated on a regular basis through communications from the president, the executive vice president, the provost, the deans and/or the chief human resources officer with respect to all aspects of the campus operation as impacted by COVID-19.
• Touro College will establish a communication plan for employees, visitors and customers with a consistent means to provide updated information, including but not limited to, conspicuously posting and updating safety plans on-site.
• To ensure the institution and its employees comply with communication requirements, Touro will do the following:
  - Post signage throughout the site to remind personnel to adhere to proper hygiene, social distancing rules, appropriate use of PPE and cleaning and disinfecting protocols.
• If a worker or a student informs Touro that they test positive for COVID-19, Touro will immediately notify state and local health department and cooperate with contact tracing efforts, including notification of potential contacts such as workers, students or visitors who had close contact with the individual, while maintaining confidentiality required by state and federal law and regulations.
  - The information will be provided by HR to the executive vice president who will notify state and local health department.
• evptouro@touro.edu will be responsible for answering employee and student questions regarding tracking and other COVID-related questions that may arise.
• In the case of a shutdown of physical operations due to a government mandate of a shelter-in-place or shutdown of a region where one or more Touro College campuses is located, Touro will communicate via email and on its websites the current plans.
  - Updates will be posted to the COVID-19 updates page on the Touro website
    www.touro.edu/updates/coronavirus

OTHER

Touro will stay up-to-date on guidance issued by New York State by reviewing the NY Forward website (forward.ny.gov) and applicable executive orders at governor.ny.gov/executiveorders on a periodic basis or whenever notified of the availability of new guidance.
Touro College is an equal opportunity employer. Touro College treats all employees, job applicants and students without unlawful consideration of race, religious creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical condition), age, disability, medical condition, marital status, genetic information, sexual orientation, gender identity, military service or veteran status, citizenship status or any other classification protected by applicable federal, state or local laws.

While this Plan was created to provide enhanced health and safety measures for our campus community, with the intention of mitigating the risk of COVID-19 on Touro campuses and any potential spread within our campus community, Touro acknowledges that elimination of all risk on campus while still operating with on-campus classes, residential housing and campus events, is impossible.

Touro College is committed to ensuring the fulfillment of this Plan in all decisions including, but not limited to, recruitment, the administration of educational programs and activities, hiring, compensation, training and apprenticeship, placement, promotion, upgrading, demotion, downgrading, transfer, layoff, suspension, expulsion and termination and all other terms and conditions of admission, matriculation and employment.

For Tracing and Tracking, confidentiality must be maintained as required by federal and state law and regulations.

RELATED DOCUMENTS:

- NY Forward Safety Plan Template
- New York State Office-Based Work Guidelines for Employers and Employees
- New York State Metrics to Guide Reopening New York
- New York State Interim Guide for Office-Based Work During the COVID-19 Public Health Emergency
- CDC Links:
- Faculty Essential Workers

If you have any questions or concerns, please feel free to email evptouro@touro.edu