

August 13, 2021: Reply to Recommendation Number 2021–01

Introduction

Management received a formal recommendation (Number 2021–01) sent by the Joint Health and Safety Committee (JHSC) on July 23rd, 2021, in relation to a Health and Safety Checklist for University Re-opening developed by faculty at the University of Toronto’s Dalla Lana School of Public Health (“the Dalla Lana Checklist”).

As per the minutes of the July 21, 2021, meeting, Item #4 – New Business – Health & Safety Checklist for University Re-opening, the JHSC recommends that the employer provide a written response, in good faith, on the status of the items outlined on this checklist be provided to the OCAD University community that clearly demonstrates our preparedness for in-person academic activities beginning in September 2021.

OCAD University’s protocols and safety requirements have been developed using Toronto Public Health’s guidelines for the post-secondary education sector, Provincial COVID-19 legislation, guidelines provided by the Public Health Agency of Canada, and through best practice consultations with universities in the GTA, across Ontario, Canada, and North America.

The American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) checklists are also serving as guidelines for reopening in the post-secondary sector. (See attached).

To assist with navigating this well-intentioned landscape of somewhat differing suggestions in these respects, OCAD U is in the process of engaging Pinchin, a leading environmental health and safety consultant, to review both OCAD U’s current EHS actions and the Dalla Lana Checklist and provide recommendations on necessary actions moving forward. As part of their engagement, Pinchin will also be active in assessing and analysing both air and water quality in our facilities.

For ease of reference and the purposes of the response to the JHSC recommendation (Number 2021–01), we have aligned our various actions and plans in this regard within the Dalla Lana document framework.

Health & Safety Checklist

Requirement #1 – Strongly encourage and support everyone in the University community to get vaccinated while recognizing that vaccines alone are insufficient to protect the community from COVID-19 and must be used in conjunction with several other mitigation strategies as set out below.

On August 12th, 2021, the University announced that students, faculty, and staff will be required to self-declare their vaccination status before they gain access to our facilities.

A rapid testing program will be developed for individuals who are not fully vaccinated to gain access to campus facilities. More information can be found on the OCAD U website; [Update on Fall Plans and Vaccination Requirements](#).

The University is communicating its support of vaccination as the most effective way to protect families, communities, and individuals against COVID-19, and strongly encourages all eligible individuals to get vaccinated.

Requirement #2 – Design and prepare re-opening plans for all occupied spaces aimed at addressing the reality of airborne transmission of COVID-19 through respiratory particles (“aerosols”) that can travel significant distances (i.e., farther than two-meters) and remain suspended in the air for long periods of time.

We recognize the reality of airborne transmission of COVID–19 and plans have been developed and shared initially through the Gradual Opening Team, now expanded to the Fall Experience Group (FEX).

These plans have addressed rigorously space capacities and air quality and include extensive provisions for work from home options and online curriculum delivery. More details can be found throughout this document in subsequent requirements.

Requirement #3 – Proactively and transparently share information with Joint Health and Safety Committees, and campus unions, faculty associations, and other employee representatives, so that the sufficiency and efficacy of the safety precautions that are in place can be assessed.

GO Team re-opening plans have been shared to the OCAD U community through website, and regular email updates have been sent to all subscribers. FEX plans with more detail regarding on-campus activity are under development, with many details awaiting confirmation with imminent PSE plans from the Ontario government.

Essential on-campus health and safety measures which address the possibilities of airborne, surface and person-to-person COVID–19 transmission were established by the GO Team and have been available since May 2020. Plans and actions were also shared and discussed widely at the GO Info Fair in April 2021.

Moving forward OCAD U will continue to share details of measures taken online and through email. Pinchin has also been asked to make recommendations regarding communication of plans and actions.

Requirement #4 – For every building that will be occupied, including classrooms, hallways, offices, entry ways, common spaces, stairwells, and washrooms, the University Administration must:

a) Assess the sufficiency of ventilation and filtration.

OCAD U maintenance staff have remained on campus throughout the pandemic and have been assessing air quality on an ongoing basis. Air measurement consultant Pro-Air Services has been retained to measure air exchange values throughout buildings directly managed by OCAD U. This includes Village By the Grange properties. Hullmark, OCAD U’s partner in the Richmond Street properties, has Read Air, a third-party HVAC specialist, to perform measurements of ventilation rates and equivalent air exchange rates. Read Air will provide results and recommendations on how to improve the air exchange rates as their testing is completed and assessed.

b) Significantly improve the filtration and ventilation in each building.

AHSRAE COVID-19 recommendations began to be implemented in the Spring of 2020. All filtration on the OCAD U campus has been upgraded to minimum MERV–13. All fresh air damper intakes on HVAC units have had their minimum levels increased to maximum levels allowable by the system. BAS-controlled and manual dampers have been opened to allow for maximum air flow.

Currently, Read Air has confirmed that they will be adjusting damper controls at 230 Richmond the week of August 16th, 2021, to maximize air exchange rates. OCAD U staff are working with BAS provider to maximize damper control in 113 McCaul. These rates will be tested once those adjustments have been completed. The data is expected to be received by September 2021. Local filtration will be added, if necessary, to achieve the target air exchange value of 6 ACHeq.

Requirement #5 – Monitor the amount of outdoor air on an ongoing basis in order to verify that targets for ventilation and filtration are being reached in recognition of the fact that HVAC systems often fail to achieve designed performance.

CO₂ Monitoring

A testing schedule is being developed for each building on campus for high frequency areas including stairwells and lobbies. Preliminary testing has been completed by the SS&CO department of several locations at 100 McCaul and 113 McCaul. The results were all within the normal ranges. Pinchin will be asked to provide recommendations on an appropriate testing schedule.

Requirement #6 – Adjust HVAC systems in response to results that are received through ongoing monitoring.

HVAC Monitoring

Observing filter performance is part of ongoing maintenance carried out by maintenance staff. We currently have real-time metered measuring of filter performance on several HVAC units that can be monitored through the BAS. Units that do not have these sensors are visually checked periodically. We do not have gauges or sensors on these units.

Many adjustments have been made to building automation as well as repairs and upgrades to system components to improve air flow, as a result of ongoing maintenance staff and outside contractor testing and observation.

Pinchin will be asked to provide further recommendations regarding measuring protocols and frequency.

Requirement #7 – Conduct, document, and publish a building-level assessment of each occupied building, (including an assessment of stairwells, building entries and exits, corridors, bathrooms, elevator lobbies and cabinets, study areas, labs, libraries, staff and student offices) and areas where large numbers of students may congregate (including classrooms and eating areas), to ensure planned occupancy limits are not exceeded and mitigation approaches (e.g., planned physical distancing and masking) are functioning appropriately as planned.

Building Level Assessment

Occupancy limits have been established for individual spaces on campus including academic and administrative spaces. Capacity limits for washrooms and elevators will be re-evaluated for reopening in September and will continue to be re-evaluated as the public health context changes throughout the Fall and Winter. Occupancy limits signage will be posted outside academic and administrative spaces, and a monitoring protocol will be established with the help of monitors and security to ensure planned occupancy limits are not exceeded and mitigation approaches (planned physical distancing and masking) are functioning appropriately as planned. Masks are required to be always worn on campus and dedicated eating areas will be established for students to use on campus. This protocol will be developed and implemented by September 2021.

Requirement #8 – Where issues are identified with the above mitigation approaches, ascertain further ways to mitigate transmission of COVID-19.

Pinchin will be asked to provide recommendations for the necessary use of standalone air purification units. These recommendations will be shared with the OCAD U community once the report has been submitted.

Building Water Systems and Legionella

Requirement #9 – Prevent the growth of Legionella bacteria by implementing (and documenting) a process for regularly flushing domestic water systems.

Requirement #10 – Implement a system of testing for Legionella in the potable water distribution systems as well as non-potable water in HVAC systems, fountains, etc. of university buildings.

Requirement #11 - Implement a system for addressing positive test results.

Requirement #12 – Implement clear protocols (e.g., around use of Personal Protective Equipment, where and to the extent warranted) for workers who will be conducting sampling and maintenance.

Requirement #13 – Implement a prompt, thorough, and transparent communication framework for promptly advising building occupants on Legionella testing, and test results, mitigation plans, and risk prioritization.

For the past 18 months, cleaning and maintenance staff has been flushing toilets, sinks, kitchenettes, and hot water tanks. It is important to note that although access to our buildings has been restricted and limited over the course of the pandemic, our facilities have not been closed.

We are in the process of engaging Pinchin to provide recommendations on testing protocols for Legionella, including the development of a water maintenance process involving regular flushing of domestic water systems, a testing system for Legionella in the portable water distribution systems and non-potable water in HVAC systems. A protocol for addressing positive Legionella results will also be included and a communication framework to advise the appropriate parties of Legionella testing, test results, mitigation plans and risk assessment.

Return to Campus Plan

Requirement #14 – Implement a policy requiring the wearing of multi-layer, well-fitting non-medical masks in all University buildings at all times except while eating or drinking in safe designated areas.

Mask Policy

On June 29, 2021, OCAD U posted the following information on the COVID–19/Return to Campus Plan website, You are required to wear a mask or face covering at all times (note: individuals who are exempt from wearing a mask or face covering include people who are reasonably accommodated, in accordance with the Ontario Human Rights Code). Masks will be provided to employees and students upon request. Compliance with mask requirements:

- Employees are encouraged to remind students and colleagues of mask requirements;

- Unit managers in employee-only areas should clearly establish protocols based on physical set-up and activity within the unit and be prepared to ensure compliance;
- Employees and students should be mindful that there may be individuals who are exempted from the requirement due to a medical condition or disability;
- Persistent compliance issues should be reported to the employee's supervisor and security along with the individual's name and role (staff, faculty, student).

Requirement #15 – Provide transparent information on how physical distancing, occupancy limits, disinfection schedules, and traffic flow will be monitored and upheld. Compliance with these protocols requires the respectful engagement of all members of the University community.

Monitoring of Physical Distancing, Disinfection Schedules, Occupancy Limits

Transparent information on physical distancing, and disinfection schedule has been provided through the GO Info Fair (April 2021, recordings available on OCADs' website) and will continue to be provided on the COVID-19/Return to Campus Plan website. Occupancy limits for classrooms and studios are provided directly to instructors teaching on site and technicians overseeing studio spaces. Occupancy limits will be posted for academic and administrative spaces.

Toronto Public Health has communicated they are going to provide further specifics for physical distancing in areas such as elevators, stairwells, and washrooms by the end of August.

Requirement #16 – Notify all building occupants (including students and staff who are entering a building to eat or study) of outbreaks and positive cases of COVID-19 within buildings containing work or study spaces.

Notification on Positive COVID-19 Cases

On June 29, 2021, the following information was added to the COVID-19/Return to Campus Plan website. Students, faculty, or staff who were in any OCAD University facilities, and subsequently test positive for COVID-19 are asked to advise the University's health and safety office by emailing ehs@ocadu.ca. This information will be kept confidential and will assist OCAD U in working with Toronto Public Health in tracing the risk of transmission within our community. The University has established certain action steps when it is determined that a member of the community, who accessed a facility, either had COVID-19 at the time of access or tested positive shortly thereafter.

Under current Active Screening/Contact Tracing protocols, all individuals who were in proximity to the affected person are notified.

Once the post-Step 3 protocols are implemented, all employees and students will use the OCAD U Safe app to complete a daily self-assessment and indicate what buildings they will be visiting on a daily basis. This information will be used to notify, by email, those who were in proximity to an individual who has tested positive for COVID-19.

Positive cases are published on our Case Tracking website:
<https://www.ocadu.ca/about/covid19/case-tracking>

Summary

OCAD University's protocols and safety requirements have been developed using Toronto Public Health's guidelines for the post-secondary education sector, Provincial COVID-19 legislation, guidelines provided by the Public Health Agency of Canada, and through best practice consultations with universities in the GTA, across Ontario, Canada, and North America. The Fall Experience Group (FEX) has developed a return to campus plan, and we are currently waiting for Toronto Public Health and the Provincial government to provide return to post-secondary guidelines.

- OCAD U encourages all members of its community to carefully consider public health guidance in making decisions regarding vaccination and encourages eligible community members to get vaccinated.
- OCAD U has responded to ASHRAE recommendations and has upgraded all HVAC filters to a minimum MERV-13 and increased all fresh air content to maximum levels allowable for each system. On-site air testing has been conducted by third-party contractor Pro-Air testing, and OCAD U is assessing and responding to the results.
- Hullmark property management has retained Read Air mechanical services to conduct air quality tests and carry out remedial actions such as opening dampers, adjusting BAS, and installing local filtration to meet our target of 6ACH equivalent.
- OCAD U is in the process of engaging with Pinchin Ltd. to assess air quality and to provide recommendations for improvements on air exchange rates, sealing gaps, HVAC monitoring, building level assessment, and CO₂ monitoring.
- OCAD U is in the process of engaging with Pinchin to provide recommendations on a water maintenance process including Legionella testing.
- Safety protocols for returning to campus are currently in place and accessible on the [COVID-19 Updates/Return to Campus Plan](#) website.

Attachments

Hullmark Indoor Air Quality (IAQ) Portfolio Recommendations
ASHREA Epidemic Task Force – Commercial