

## PERELMAN SCHOOL OF MEDICINE | HELPFUL TIPS FOR LABORATORY COMPLIANCE OFFICERS

Each laboratory at the Perelman School of Medicine (PSOM) must designate a Compliance Officer (CO), someone who is regularly in the lab (both wet and computational/office-based) and who can [monitor and enforce safety measures](#), including proper mask wearing, additional, proper personal protective equipment, proper laboratory attire, and no eating in the labs, etc. PIs should let everyone in their research group know the identity of the Compliance Officer.

Using tools developed by [Penn Medicine Academy](#) and the PSOM's Research Resumption Committee, please reference the following helpful tips and suggested language to support your role as CO.

Please remember: you are providing a valuable, voluntary educational service to your lab, to PSOM, and to our community. This role represents additional support to the lab, in particular to those who are adhering to policy and who will appreciate knowing that guidelines are being monitored and enforced. If at any time, you feel that your position as CO is too stressful or compromises your ability to work productively with your lab members, please speak to your Principal Investigator or Department Chair immediately.

### Support for this role

Your Principal Investigator, Business Administrator, Human Resources Representative, Department Vice Chair for Research, and Department Chair and/or Center/Institute Director will support you in this role and work with you on any issues that may arise.

If additional support outside of the department is necessary, you can also report compliance concerns through the University's [Confidential Reporting and Help Line](#). Confidential reports of non-compliance are shared with the Office of the Executive Vice Dean and Chief Scientific Officer, and every concern will be addressed in partnership with the University's Office of Audit, Compliance, and Privacy.

Furthermore, in partnership with Environmental Health and Radiation Safety, PSOM will conduct regular, unannounced walkthroughs of our labs. Instances of non-compliance will be shared directly with departmental leadership. Feel free to remind your community about these walkthroughs as necessary.

## INFORMATION TO HELP YOU IN THIS ROLE

### Stay safe during COVID-19

To create and maintain a safe environment during COVID-19, all faculty, students, post-docs, trainees, and staff are required to wear face masks and to maintain a distance of six feet (except in the case of an approved exemption), in compliance with CDC and other guidelines. These precautions, in addition to good hand hygiene, can prevent the spread of most infections. According to guidance from Penn Medicine Academy, when we make people aware of their actions in a supportive, educational (i.e., not punitive) manner, they are more likely to self-correct.

### Visually communicate safe practices

Make sure the signage in your lab, common spaces, and the floor are clear and visible, providing quick and easy reference points when you speak to colleagues. Please feel free to [download and print any of these materials](#) for your labs/departments.

### Give real-time feedback with empathy

Communicate with your lab members in a way that shows the person you care about their health and well-being – lead with kindness. A gentle nudge, like "*Wearing a mask protects you and others,*" can go a long way.<sup>1</sup>

Based on guidance from Penn Medicine Academy, follow the model of giving feedback below. In the second step, when you describe the impact, focus on the well-being of the other person.



### Suggested feedback for possible scenarios of non-compliance

#### A colleague is not wearing a mask properly

1. Hi John. I noticed that you're taking your mask off while sitting at the tech desks.
2. I know masks can be uncomfortable at times, but they have reduced the spread of COVID and are required on campus.
3. Please keep your mask on at all times in the lab. We don't want to take the chance of having you not able to do research or for our operations to be halted. Thank you for taking the time to speak to me.

#### A colleague refuses to wear a mask

1. Hi Debbie. I noticed that you're not wearing your mask.
2. I know masks can be uncomfortable at times, but they have reduced the spread of COVID and are required on campus.
3. In order to be on campus and work in the labs, you must wear a mask at all times in the lab. If you are not willing to comply, you won't be able to conduct your research. We can't afford to have the entire lab operation shutdown, which is a consequence of not adhering to policy. Thanks so much for your cooperation.

#### Colleagues are sitting too close to each other in the lab

1. Hi everyone. It looks like we're not adhering to the 6-foot social distancing directive.

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<sup>1</sup>

<https://www.npr.org/sections/goatsandsoda/2020/06/26/884003848/coronavirus-faqs-is-there-a-polite-way-to-re-mind-someone-to-follow-pandemic-rule>

2. We are practicing social distancing to reduce the potential spread of COVID-19 by sitting 6-feet apart. It is important that we remain vigilant to prevent COVID and to also follow the School guidelines so that our lab can remain open.
3. Let's rearrange where you're sitting based on the marked social-distancing guidelines. We'll check back in a few minutes to ensure you all still have enough space.

#### Colleagues are not maintaining adequate distance in a common area

1. We seem to be a little too close to each other in here.
2. I understand wanting to take breaks together, but we have to be smart about social distancing.
3. Let's mark space where we can have chairs so that we can all share the common area and be safe.

#### Reminding colleagues of the potential consequences to the lab of an individual's non-compliance

If an individual is found to be in non-compliance on several occasions, one potential repercussion is the complete shutdown of the laboratory. It is helpful to emphasize that such behavior poses a risk to the entire research operation. If multiple labs are found in violation, we risk a return to restrictions as implemented in Phase I. We need everyone's cooperation to keep our community safe.

#### **How to react when you receive resistance to real-time feedback**

You may be faced with pushbacks or denials. Thinking on your feet, you may respond by saying and doing these things:

- Acknowledge what you hear: *"It sounds like you don't feel like this feedback is fair. I can imagine that can be frustrating"*
- Ask clarifying questions: *"What are you thinking right now (about this topic)?"* or *"Was the social-distance guideline unclear?"*
- If the conversation gets too confrontational, say *"Thank you for taking the time to consider my feedback,"* and simply disengage. Call your PI, departmental administrator, or Security for assistance.

For individuals that have repeated incidents, the issue can be raised to your direct manager. If there is any professional misconduct while you are giving feedback let your manager and/or HR representative know.

#### **Positive Reinforcement**

In addition to providing real-time feedback, look for opportunities to reinforce appropriate behavior. Thank colleagues for wearing masks properly and maintaining a distance of at least six feet apart. Consider sending out lab reminders acknowledging positive behaviors. Take the time to encourage and recognize, which can go a long way in reinforcement.

### **Support health and well-being**

Remember, one of the best ways to communicate corrective action is by showing care for the person's health and well-being. You will find resources focusing on these areas through [PennMedicineTogether](#). As the name emphasizes, *no one is in this alone*.