March 28, 2021

Michelle Asha Cooper, Ph.D.
Acting Assistant Secretary for
Postsecondary Education
400 Maryland Ave. S.W.
Washington, DC 20202

Dear Dr. Cooper,

Hallmark University is pleased to respond to your March 22nd inquiry for institutional SARS-CoV-2 best practices. As a Hispanic-serving institution located in San Antonio, Texas, Hallmark University serves a unique student body. Approximately 70% of all attendees are minorities, hail from lower socioeconomic levels, are adult commuter students, and a high population are veterans. The Latinx population has been disproportionately affected by the pandemic according to the Center for Disease Control and Prevention (CDC). The university took this situation seriously from the beginning of the pandemic and rapidly developed a comprehensive SARS-CoV-2 response.

To date, Hallmark has no known cases of transmission occurring on campus and will provide comment on establishing a safe and healthy learning environment.

Sincerely,

Joe Fisher
Resident/CEO
JFisher@HallmarkUniversity.edu
Establishing Safe and Healthy Environments: Best Practices

Best Practices to Reduce SARS-CoV-2 Spread

1. Minimize individuals on-campus.
   a. All non-essential employees were moved to a work from home designation.
   b. All classes without a hands-on component were moved online.
   c. All co-curricular events were cancelled or moved on-line.
   d. Most recruitment efforts were moved to virtual meetings and protocols established to allow students to complete the enrollment process virtually.

2. On-campus Protocols:
   a. Mask requirements when in common areas of the building and when in situations where social distancing was not possible.
   b. Social distancing in common areas and in-person classes.
      i. Nursing and the Aviation Technician programs continued to meet on-campus.
   c. Hand sanitizer stations were installed in all classrooms and common areas.
      i. An ample supply of reserve sanitizer was obtained and managed by the facilities division.
   d. Signage at all entrances with information on institutional policies.
   e. All individuals are required to pass through staffed checkpoints where temperatures are taken, and standard screening questions are asked.
      i. All staff required to report on-campus are required to sign in after passing the screening station, and this report is sent to HR daily.
   f. Human Resources established a matrix for how to address direct and indirect exposures.

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<tr>
<td>1* Employee is unable to work because the employee is quarantined and/or experiencing COVID-19 symptoms and seeking a medical diagnosis;</td>
<td>Yes - 10 days</td>
<td>CDC Recommendation - Yes</td>
<td>Yes, if authorized</td>
<td>Yes</td>
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<td>2* Employee is unable to work because the employee is quarantined and/or experiencing COVID-19 symptoms and seeking a medical diagnosis; Employee has received Positive results</td>
<td>Yes - 10 days</td>
<td>CDC Recommendation - Yes (to confirm diagnosis); AND at least 10 days have passed since test (with positive results) must receive two negative test results in a row, at least 24 hours apart.</td>
<td>Yes, if authorized</td>
<td>Yes</td>
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<td>3 Employee is unable to work because of a bona fide need to care for an individual subject to quarantine</td>
<td>No**</td>
<td>Yes, at least 10 days have passed since test positive results of person being cared for.</td>
<td>Yes, if authorized</td>
<td>Yes</td>
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<td>4 Employee is unable to work due to a bona fide need for leave to care for a child whose school or child care provider is closed or unavailable for reasons related to COVID-19.</td>
<td>N/A</td>
<td>N/A</td>
<td>Yes, if authorized</td>
<td>N/A</td>
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<td>5 Employee has temp of 100.4 or higher</td>
<td>Yes, until he/she has not had a temperature over 100.4 without medication for 3 consecutive days.</td>
<td>No</td>
<td>Yes, if authorized</td>
<td>No***</td>
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CDC Guidance

a Employee must inform their direct supervisor they are unable to work (both remote or onsite)
**See CDC guidance on definition of close contact
**To qualify for FFCRA, must seek medical diagnosis

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3. Cleaning and Disinfecting
   a. A night cleaning crew deep cleans the facilities daily, including the use of disinfection products that meet the EPA list N disinfection criteria.
   b. Facility staff wipe down common areas during the day.
   c. Computers and tables are wiped down after use by one class before another will be allowed to use the same room.
   d. Regularly touched surfaces on doors, such as crash bars and handles were covered using NanoStrip technology. This technology creates a self-cleaning surface through nano-crystals that oxidize the surface when exposed to light. **NanoSeptic Continuously Self-Cleaning Surfaces**
   e. Electrostatic spraying of the facility to compliment regular disinfectant efforts. Hallmark University utilizes the Clorox 360 system®. Clorox® Total 360® System — Electrostatic Sprayer I CloroxPro It is portable and allows for cleaning on an as-needed basis as well as regular application. This supplemental effort ensures hard to reach areas are addressed.

4. Air Quality
   a. Ensure adequate ventilation for the facility. The maintenance division ensured all preventive maintenance measures were up to date and adequate airflow to all rooms.
   b. The University is also looking at a specialized purification system located within the ventilation system. Plasma Air: Whole Building Air Purification ([plasma-air.com](http://plasma-air.com))
      - Interactive airborne pollutants such as viruses, bacteria, fungi, and molds.
      - Self-cleaning once a day.
      - Discharges static electricity and electrostatic build-up.
      - Produces positive and negative ions that neutralizes harmful pollutants and orders.
      - Removes dust and dirt build up.

5. Room Layouts and Physical Barriers
   a. Chairs and tables were removed, or disabled with tape, to ensure social distancing occurred for the limited on-campus activities and classes.
   b. Physical barriers were installed at the front reception desk and in common meeting rooms such as those used by the admissions office when meeting with prospective families.

6. Support Services
   a. Education. It was imperative for the university to educate students, faculty, and staff on the seriousness of the virus, how it was spread, how an individual could minimize exposure risk, and identify the symptoms. The university also sought to dispel any inaccurate information regarding the SARS-CoV-2 pandemic.
   b. Emotional and Spiritual Support-
      i. The Department of Student Affairs continuously communicated to all students who reported being impacted by the virus. This includes those who tested positive, whose family members were positive, loss of employment due to related shutdowns, and those who needed additional emotional support. As individual needs presented themselves, students...
received personalized support through counseling and advising, referrals to local resources such as food banks, affordable housing options and, in more serious cases, students were granted a leave of absence (LOA). Students who tested positive for SARS-CoV-2 were given additional support from faculty which includes due date extensions on their course assignments, and additional one on one tutoring.

ii. The Campus Ministry reached out to our employees and student body with emails intended to minister to them and show sincere concern for their emotional and spiritual needs. Several emails also included short videos provided by others which addressed their needs. In addition, a weekly prayer conference was scheduled in which employees and students could request prayer and/or participate in prayer for the needs of others. The Chaplain direct office phone number and cell phone number for calls and text messages were also provided. Individual emotional and spiritual issues were referred to the Campus Ministry department.

7. General Operations
   a. The administration established a SARS-CoV-2 webpage with helpful information for the university family as well as institutional policies and procedures.
   b. The university leveraged in-house experts in the establishment of SARS-CoV-2 protocols. These included faculty with advanced nursing and medical degrees (M.S.N, D.N.P, M.D.).
   c. If an individual attending an in-person class, such as Aviation Technician, was exposed or tested positive, the entire cohort is put on quarantine and moved to virtual learning for 14 days.
   d. The university administration follows the regular briefings of Bexar County officials on the infection rate, hospitalization rate, and other updates.
   e. Employees that were required to quarantine may have been given FFCRA if they qualified.
      i. Employee is unable to work because the employee is quarantined and/or experiencing COVID-19 symptoms and seeking a medical diagnosis; Employee has received Positive results.
      ii. Employee is unable to work because of a bona fide need to care for an individual subject to quarantine.

Summary
The best practices listed above were derived from multiple sources. These included local, state, and federal guidance, protocols, and recommendations. The university also utilized in-house expertise from faculty in the Nursing program, which included those with doctoral degrees in medicine and nursing, as well as leveraging its experienced administrators. For example, the nanostrap technology was previously utilized to help prevent the spread of the influenza virus. Given the sensitivity of the Latinx population to the effects of the virus, the university realized the need to take aggressive action to protect its students, faculty, staff, and other stakeholders. We hope the Department of Education (DOE) finds this information useful as it complies with Executive Order (E.O.) 14000. We are happy to answer any questions or engaged in a more in-depth dialogue as the DOE deems appropriate.