



Guidance Regarding Public Health Precautions

The preference of Loudoun County Public Schools (LCPS) is for 100% in-person learning, as long as we can provide learning experiences safely and in accordance with the requirements and recommendations of state and public health officials. The Governor set forth guidance on Tuesday, June 9 for LCPS and other Virginia school divisions for the 2020-2021 school year via the release of the [Phase Guidance for Virginia Schools](#). That document and the accompanying *Recover, Redesign, Restart 2020* report aligns school reopening phases with the Forward Virginia phases, and outlines public health precautions for the new school year.

LCPS plans for the new school year will include different approaches based on which phase Northern Virginia is in at the start of the school year. The information shared by LCPS regarding the new school year primarily relates to the possibility of starting the school year during Phase III. While state education and health officials have not outlined public health precautions for after Phase III, it is likely that more in-person learning, larger group events, and other less-restrictive precautions would be possible when our community moves beyond Phase III. Please recognize that many of these responses to frequently asked questions relate specifically to Phase III, not to the less restrictive period after Phase III.

Please know that LCPS continues to work toward the goal of providing the option to parents of having their students participate in a revised 100% distance learning model if they do not want their students to participate in any in-person learning. The hope is to offer this to as many parents as possible, not just the parents of medically-fragile youth.

Are Virginia K-12 school divisions required to submit a health plan?

Yes. On June 8, the state health commissioner issued an [order](#) “requiring every public school division and preK-12 private school in Virginia, before reopening in accordance with Phase II and III guidelines, to submit to the Virginia Department of Education a plan outlining their strategies for mitigating the spread and public health risk of COVID-19 and consistent with the Centers for Disease Control and Prevention (CDC) and Virginia Department of Health mitigation recommendations. Such plans shall include policies and procedures for the use of face coverings; health screenings of staff and students; physical distancing measures; enhanced hygiene practices for staff and students; isolation of symptomatic cases; and cleaning and disinfecting procedures and other topics as outlined in the Phased Guidance for Virginia Schools.” (pps.1-2)

What is the purpose of the *Phase Guidance for Virginia Schools* set forth by the Governor on June 9, and revised most recently on June 16?

The [Phase Guidance for Virginia Schools](#) states that the “guidance is intended to mitigate risk of COVID-19 transmission in public and private preK-12 school settings, while supporting the resumption of peer-to-peer learning and providing crucial support for parents and guardians returning to work.” (p.1)

How does the *Phase Guidance for Virginia Schools* relate to the existing Forward Virginia phases and the accompanying mitigation strategies?

The [Phase Guidance for Virginia Schools](#) states, “The school reopening phases are aligned with the existing Forward Virginia phases, through which the state will progress by monitoring public health data and key measures on disease transmission, healthcare capacity, testing capacity, public health capacity to trace contacts of cases, and other relevant factors. Community mitigation strategies (e.g. physical distancing, enhanced cleaning, etc.) will be necessary across all phases to decrease the spread of COVID-19.” (p.1)

After considering *CDC Interim Guidance for Schools and Daycamps*, and *CDC Considerations for Schools*, can school divisions deviate from the *Phase Guidance for Virginia Schools*?

Yes. The [Phase Guidance for Virginia Schools](#) states, “This guidance document, which is aligned with the interim CDC guidance for schools, serves as a recommendation for Virginia schools to mitigate risks associated with COVID-19. Divisions should make decisions on implementing such guidance, and assuming additional risk, in consultation with local health departments and school board attorneys. Public health conditions and practical limitations may inform decisions to deviate from the guidance.” (p. 1)

School divisions can deviate from the *Phase Guidance for Virginia Schools* by adopting a **more or less assertive** approach to mitigate public health risks. In order to deviate from the *Phase Guidance for Virginia Schools*, school divisions must submit a [form](#) entitled *Notification of Intent to Vary from Phase Guidance for Virginia Schools*.

The release of the state health commissioner’s [order](#), the [Phase Guidance for Virginia Schools](#) and the *Recover, Redesign, Restart 2020* on June 8 and June 9 was not accompanied by any information regarding the opportunity for school divisions to submit a *Notification of Intent to Vary from Phase Guidance for Virginia Schools*. Information regarding this opportunity was released several days later.

What level of public health risk is associated with the approach to reopening schools that is under consideration by LCPS?

The CDC references three levels of risk: lowest risk, more risk, highest risk. One can describe the approach under consideration by LCPS as between the “more risk” and “highest risk” levels, and closer to the “more risk” level.

The [*Phase Guidance for Virginia Schools*](#) states that:

“Per the Centers for Disease Control and Prevention, the more people a student or staff member interacts with and the longer the interaction, the higher risk of COVID-19 spread. As such, different activities come with different levels of risk:

- lowest risk: Students and teachers engage in virtual-only classes, activities, and events.
- more risk: Small, in-person classes, activities, and events. Groups of students stay together and with the same teacher throughout/across school days and groups do not mix. Students remain at least 6 feet apart and do not share objects (e.g., hybrid virtual and in-person class structures, or staggered/rotated scheduling to accommodate smaller class sizes).
- highest risk: Full sized, in-person classes, activities, and events. Students are not spaced apart, share classroom materials or supplies, and mix between classes and activities. Therefore, schools should include mitigation strategies detailed in CDC guidance to promote behaviors that reduce spread, maintain healthy environments and operations, as well as prepare for when someone gets sick.” (pps.1-2)

As explained in the response to the following question, LCPS is considering a few limited exceptions to the practices recommended by the *Phase Guidance for Virginia Schools*, thereby involving more public health risk.

Recognizing that school divisions have an option of informing the state of intent to deviate from the guidance, is LCPS considering deviating from the guidance in order to adjust the recommended physical distancing within classrooms?

Yes, but only in order to deviate from the guidance on a limited basis.

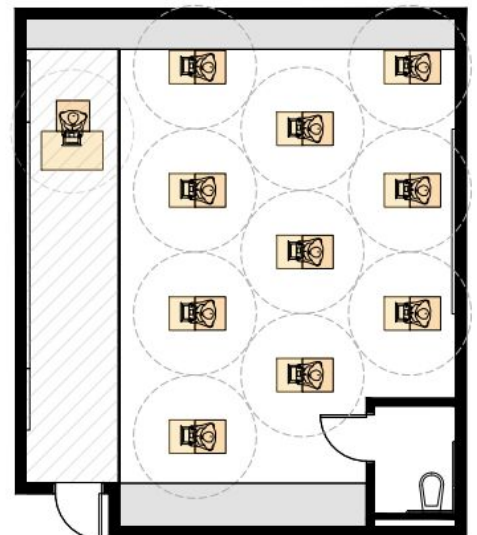
LCPS is tentatively planning to assign classroom space to individual students based on 4-foot circles around students, which would allow students to spend some of the day with 6 feet of separation from others. Teachers and students, as developmentally appropriate, could wear cloth face coverings when the 6-foot physical separation is not possible because of movement within the classroom. It appears that this practice would not constitute deviating from the guidance. Note that the circles are hypothetical circles, not circles delineated by markings on the floor.

LCPS is considering deviating from the guidance by assigning classroom space, when necessary, based on 3-foot circles around students. Recognizing that students use a portion of the circles, 6 feet of separation would not be provided. This approach may be necessary in order to have the classroom capacity to implement a schedule that involves most students attending school in-person twice a week while participating in a revised approach to distance learning three times a week. This is particularly the case because our tentative plans envision some students with disabilities and some English learners attending school more than twice a week.

If one wants additional details, here are several excerpts from the [Phase Guidance for Virginia Schools](#) that have implications for classroom capacity.

- “In-person instruction may be offered for all students, however social distancing measures should be implemented.” (p.5)
- “Mitigation strategies may impact operations and capacity limits. A multi-faceted instructional approach may need to be planned for Phase III.” (p.5)
- “Social distancing and other measures will remain important prevention strategies. Additional operational requirements will include measures such as physical distancing, gathering limits and other mitigation strategies (e.g. face coverings, class size limitations, etc). Schools should follow all guidance from the CDC.” (p.6)
- “Physical distancing of at least 6 feet should be maintained to the greatest extent possible in all buildings. Other social distancing precautions should include, but are not limited to:
 - Consider restricting mixing classes/groups of students.
 - Consider closing or staggering the use of communal spaces.
 - Limit outdoor activities/recess to 50 people, with a priority on social distancing and restricting mixing of classrooms.
 - Large gathering limits to be determined by Executive Order in effect at that time.
 - Athletics and extracurricular activities may continue with some mitigation measures. More guidance will be forthcoming.” (p.6)

The sketch next to this paragraph depicts ten students and one teacher in an 850-square-foot elementary classroom. The sketch includes 4-foot circles (a 1-foot inner circle for the student, and then another 3 feet of space). The adjacent circles result in 6 feet of physical separation between the students. A similar sketch depicts 11 students and one teacher in a 730-square-foot secondary classroom. If LCPS assigned classroom space based on 4-foot circles, rather than 3-foot circles, it would increase classroom capacity. For example, a revised version of the classroom sketch with 3-foot circles would include 17 students (not just ten) and one teacher.



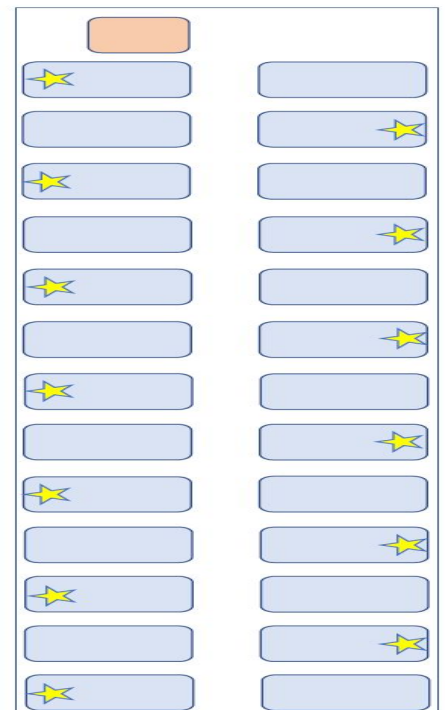
Recognizing that school divisions have an option of informing the state of intent to deviate from the guidance, is LCPS considering deviating from the guidance in order to adjust the recommended practices relating to transporting students on buses?

Yes, but only in order to deviate from the guidance on a limited basis.

The [Phase Guidance for Virginia Schools](#) states, “Physical distance should be created between children on school buses when possible (e.g. seat children one per seat, every other row) limiting capacity as needed to optimize distance between passengers. Children (such as siblings) living together may sit together on the bus.” (p. 3)

The sketch next to this paragraph depicts a 77-passenger bus with 13 students, sitting one per seat, every other row. A similar sketch depicts an 84-passenger bus with 14 students.

LCPS is considering an approach in which we seek to have one student per seat, every other row, when possible. Siblings from the same household would sit together in the same seat. LCPS is considering double runs, which is when one bus brings two different groups of students to the same school each morning and/or afternoon. LCPS may also need to adjust the start and end times for some schools. Even with more double runs and the possibility of changed start/end times, LCPS would likely have a need to have some buses (at least on some days) on which students are seated one per row, every row (not every other row). This would increase bus capacity to 26 students on 77-passenger buses and 28 students on 84-passenger buses. This approach may be necessary to have the bus capacity to implement a schedule that involves most students attending school in-person twice a week while participating in a revised approach to distance learning three times a week.



The risks associated with students sitting in every row could be mitigated by students wearing cloth face coverings.

Is LCPS considering disregarding the [Phase Guidance for Virginia Schools](#) in order to allow students to attend school in-person every day during Phase III?

As noted in the responses to the two previous questions, LCPS is considering limited deviations from the [Phase Guidance for Virginia Schools](#) in order to have the classroom and bus capacity to implement a schedule that involves most students attending school in-person twice a week while participating in a revised approach to distance learning three times a week.

LCPS is not considering the level of deviation from the [Phase Guidance for Virginia Schools](#) that would be necessary to provide daily in-person instruction for all students during Phase III. By implementing only limited deviations to the guidance, LCPS is relying on the expertise of state and national public health officials.

Daily in-person instruction for all students may be possible after Phase III. LCPS will adjust its approach at any given time based on the phase that Northern Virginia is in at the time. If Northern Virginia exits Phase III after the start of the school year, LCPS would adjust its practices in accordance with the new guidance.

What are examples of practices that LCPS is currently considering that are mentioned in the Recover, Redesign, Restart 2020 report but not required by the Phase Guidance for Virginia Schools?

Two examples of additional practices under consideration relate to daily health screenings and cloth face coverings.

The [Phase Guidance for Virginia Schools](#) states that in all phases, “Daily health screenings should be conducted for staff and students upon arrival. These should be done safely and respectfully, in accordance with privacy laws.” (p. 7) In its [guidance](#) regarding preventing and reducing transmission among employees, the CDC recommends considering “conducting daily in-person or virtual health checks (e.g. symptom and/or temperature screening) of employees before they enter the facility.”

In addition to conducting the screening outlined in the [Phase Guidance for Virginia Schools](#), LCPS is also considering conducting no-touch temperature checks for a random sample of students and staff members each day, and/or requiring staff members to check their own temperature each day before reporting to work.

The [Phase Guidance for Virginia Schools](#) addresses cloth face coverings in stating, “Staff and students should use cloth face coverings when physical distancing cannot be maintained, as is medically and developmentally appropriate. Face coverings are most essential in times when physical distancing is difficult. Cloth face coverings should be worn by staff in times when at least 6 feet physical distancing cannot be maintained. For example, a teacher standing in a classroom 7 feet from students could teach without a face covering. During meetings or gatherings or in narrow hallways or other settings where physical distancing may not be easy to maintain, a face covering would be prudent to wear. Other considerations such as speaking loudly, singing, etc should be considered and may require additional distance.” (p.7)

The CDC has [recommended](#) that “everyone wear cloth face coverings when leaving their homes, regardless of whether they have fever or symptoms of COVID-19.” The CDC also notes that “Cloth face coverings should not be placed on young children under age 2, anyone who has

trouble breathing, or is unconscious, incapacitated, or otherwise unable to remove the mask without assistance.”

LCPS tentatively plans to follow the state guidance by requiring **staff** members to wear cloth face coverings when 6 feet of physical separation is not possible. After considering the CDC guidance, LCPS is considering requiring all **students** age 10 and older to wear a cloth face covering when 6 feet of physical separation is not possible. LCPS is also assessing the possibility of encouraging parents of students younger than 10 to ask their children to wear cloth face coverings when 6 feet of physical separation is not possible, as long as parents conclude that it is developmentally appropriate for their particular children.

Conclusion

The preference of Loudoun County Public Schools (LCPS) is for 100% in-person learning, as long as we can provide learning experiences safely and in accordance with the requirements and recommendations of state and public health officials.

We will continue to provide additional information to the entire LCPS community as our planning moves forward. We appreciate the feedback and input we have been receiving and invite you to continue to share your ideas and ask questions as we work to arrive at the best possible plan for returning to school for the 2020-2021 school year.