

October 22, 2020

The Hon. Phil Mendelson, Chairman
Council of the District of Columbia
The John A. Wilson Building
1350 Pennsylvania Avenue, N.W.
Washington, DC 20004

Dear Chairman Mendelson and Councilmembers:

I write to share questions you may wish to raise on the important issue of safely reopening the District's public schools for in-person instruction. As you know, the Office of the D.C. Auditor is engaged in several short- and long-range projects assessing the District's efforts to mitigate the effects of the COVID-19 pandemic. While we have not initiated a project specific to schools reopening, our research has put us in contact with work undertaken in other jurisdictions and a wide variety of national and local studies underway or completed. What follows are a set of questions and a list of resources based on that research to date and I share in the hope the information is useful in your oversight on this critical issue.

Questions

Public Health

- What evidence is DCPS using to assume that we can safely bring back roughly 75% of elementary school students when so many other urban districts are starting in-person learning with a lower proportion of students? Why not work gradually toward 75%?¹ And is attendance at 75% of building capacity consistent with D.C. Department of Health (D.C. Health) recommendations?
- While the federal Centers for Disease Control (CDC) has not issued rules on testing in schools they have recommended that schools *consider* testing, including asymptomatic testing, testing

¹ In NYC about half of students are in distance learning and half are in hybrid learning. Importantly, hybrid means that not the entire 50% of in-person students are there at the same time. In DCPS, the 75% would be there all at the same time. <https://www.newsweek.com/nearly-half-students-nyc-nations-largest-public-school-district-signed-all-remote-learning-1532099>.

Boston Public Schools (which just had to close in-person learning) had the majority of students in distance learning and only targeted students in-person: <https://www.boston.com/news/education/2020/10/21/boston-public-schools-suspending-all-in-person-learning>.

In Texas, about 50% of students are in-person, some percentage of these in hybrid settings and some full-time in person: <https://dshs.texas.gov/coronavirus/schools/texas-education-agency/>.

of Tier 2 contacts,² testing in schools in geographic areas that otherwise lack adequate testing, and testing for schools serving higher risk populations. Has the District considered these testing options—either a pilot testing plan, a sample-based testing plan, or a more robust testing plan?

- Given the announcement this week that DCPS will provide rapid tests to symptomatic students (different than the asymptomatic testing discussed above), how will the results be reported, interpreted and used? If and how does DCPS plan to seek testing consent? Which rapid test will DCPS be using and what are its accuracy rates in children?
- Cases are increasing across the country and the widely accepted prediction is that the winter months will bring a rise in cases here and elsewhere. Has D.C. Health provided written guidance for D.C. schools on the timing of increasing in-person instruction?
- Did DCPS collect school-level data this school year on the demand for in-person instruction including in-person seats and CARE classroom seats? If not, why not?
- Do the education agencies—the Deputy Mayor for Education, the Office of the State Superintendent of Education, and DCPS—plan to publicly report on the proportion of students who attend in-person instruction including demographic data on students in attendance?
- Do we have a threshold for a new case rate in the District that would lead to a shutdown of all schools? Are these metrics publicly available?

Facilities

- Do you anticipate that custodial needs will change and if so, how? Do you anticipate additional supplies will be needed and what will that cost be?
- How much personal protective equipment (PPE) and cleaning materials should schools have on site? What is the status of supplying what you believe to be necessary?
- Will any DCPS staff funded with "at-risk" dollars be reassigned to lead CARE classes?
- What is the status of HVAC maintenance? Have all buildings been equipped with HEPA filters that meet CDC guidelines with regard to COVID-19 mitigation?
- Has DCPS purchased additional stand-alone air filters for elementary school buildings? Please describe the planning process on additional air filtration to provide additional protection including the number of buildings with the new equipment and the cost. Which buildings will have additional stand-alone filters and by what date?

² Tier 2 contacts are students, teachers, and staff in the same classroom/cohort/pod as the person with COVID-19 who always kept 6 feet distance between persons. For example, this includes individuals in the following scenarios: Students, teachers, or staff in the same hallway, but not sharing a classroom or bathroom. Students who took the same bus but were farther than 6 feet apart from other riders at the same time as a person with COVID-19.

Guidance Specific to In-Person Instruction

- How is an outbreak of COVID-19 defined in a school and in a childcare center?
- How is the District defining a close contact³ and Tier 2 contacts in a school setting? Will families receive notification if close contacts or Tier 2 contacts within schools have confirmed positive COVID tests? Why, or why not?
- What are the criteria for shutting down a school or a school system? More specifically, what policy has D.C. Health established and what COVID metrics will be used to scale up or scale back in-person school reopening?
- Has D.C. Health provided a definition for “illness” in a school setting? What is the protocol for assessing students and staff for symptoms of COVID-19? For example, will an entire class quarantine if someone has a cough? Will students and staff be sent home for symptoms of illness, and if so, what does that protocol involve? At what point are students with symptoms allowed to come back to school following quarantine?
- Is the District currently collecting data on COVID-19 cases in all schools that have reopened? Is D.C. collecting data on deaths in schools from COVID-19?
- The District is currently reporting on COVID-19 cases and deaths among certain essential workers. Will you collect and publicly report on COVID-19 cases and deaths among school personnel for DCPS? For all schools in the District?
- News reports indicate that independent and parochial schools were given guidance by D.C. Health on student cohort size but the guidance was advisory only. Is this accurate? Please explain the cohort and capacity recommendations and why the guidance was advisory and not required.
- What enrollment and attendance data will be regularly collected and reported to enable the D.C. Council and the public to know which and how many students and staff are in each school building at any given time?
- Should staff working in congregate settings with children including in schools have additional training during the pandemic? What type and when/how will it be provided?
- What guidance is OSSE or D.C. Health providing to schools about having certain classes like music and physical education in person? Speech therapy? Mental health services?
- What happens if students take off masks or refuse to wear masks? Are there different protocols for students with disabilities?

³ New definition of close contact: <https://www.washingtonpost.com/health/2020/10/21/coronavirus-close-contact-cdc/>

- Does the administration plan to evaluate enrollment and attendance in in-person settings in order to adjust enrollment if current attendance is not found to be prioritizing equity and serving the students most in need?
- Will the D.C. Dept of Health, OSSE, or the DME issue any guidance around ensuring the availability of a full-time school nurse in every public school serving in-person students so that school nurses do not need to travel from site to site which is not recommended during the pandemic?

Resources

Following are resources that may be useful in understanding the issues surrounding reopening schools during the COVID-19 pandemic.

ODCA research

CARES Act funding in the District: <http://dcauditor.org/report/covid-19-federal-funding-streams-available-to-the-district-of-columbia/>.

[October 9, 2020, correspondence to Council on equity of access to in-person, live instruction seat opportunities in DCPS' reopening plan for students considered at-risk.](#)

Other resources

New definition of close contact:

<https://www.washingtonpost.com/health/2020/10/21/coronavirus-close-contact-cdc/>

Sources that cite DCPS investing in PPE/HEPA:

<https://washingtoncitypaper.com/article/408057/unions-representing-dcps-employees-question-mayors-reopening-plan/>.

<https://www.washingtonpost.com/climate-environment/2020/06/26/coronavirus-indoor-air-schools-offices/?arc404=true>.

DCPS reopening HVAC information:

<https://dcpsreopenstrong.com/faqs/are-school-hvac-systems-being-inspected-and-repaired-in-all-school-buildings-to-ensure-proper-air-quality-and-filtration/>

<https://dcpsreopenstrong.com/health/students/>.

Plans to use secondary teachers as CARE class managers:

https://www.washingtonpost.com/local/education/dc-middle-and-high-school-employees-asked-to-staff-elementary-classrooms-in-reopening-plans/2020/10/20/8344dcd0-1303-11eb-ad6f-36c93e6e94fb_story.html.

Source on recommended air filtration in schools including how to check for sufficient filtration by Dr. Shelly Miller:

<https://theconversation.com/how-to-use-ventilation-and-air-filtration-to-prevent-the-spread-of-coronavirus-indoors-143732>

Harvard created calculator for determining how powerful of an additional stand-alone filter you need for classrooms by size:

https://docs.google.com/spreadsheets/d/1NEhk1IEdbEi_b3wa6gl_zNs8uBJjISS-86d4b7bW098/edit#gid=1882881703.

CDC testing in-schools guidance:

<https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-testing.html>.

San Francisco Public Schools asserts need for testing in schools:

<https://www.sfexaminer.com/news/sfusd-city-schools-will-not-reopen-before-the-end-of-the-year/>.

Other instances of states with COVID reporting compliance problems in schools:

<https://www.indystar.com/story/news/education/2020/10/16/indiana-database-school-covid-19-cases-new-state-data-gives-insight/3670390001/>

Texas reporting of school COVID cases, with less than half of students enrolled in in-person, mostly hybrid:

<https://dshs.texas.gov/coronavirus/schools/texas-education-agency/>

Need for regular enrollment and attendance data for all in-person schools; as an example, NYC teachers say their hybrid classes are fairly empty and this matters for understanding spread and scaling reopening:

<https://ny.chalkbeat.org/2020/10/20/21525984/nyc-attendance-data-missing>

Inequity in school enrollment and attendance in NYC:

https://www.nydailynews.com/new-york/education/ny-nyc-school-reopening-inequities-20201019-ye6xozir35bndewfnfgulmkiui-story.html?outputType=amp&_twitter_impression=true.

Multiple districts moving back to virtual settings across the country in response to pre-determined COVID metrics and state and local policies for scaling up or back in-person school reopening:

<https://www.axios.com/covid19-boston-chicago-students-home-online-learning-fedbfbd5-0822-49c8-a70d-203bf0fdf8d8.html>.

Former CDC Director Tom Frieden's organization Resolve to Save Lives recommends defining an outbreak as "Two or more suspected or confirmed cases of COVID-19 that are epidemiologically linked in a common setting."

<https://preventepidemics.org/wp-content/uploads/2020/07/Data-Dictionary.pdf>.

Michigan finds a 25% increase in COVID in-school outbreaks:

https://www.bridgemi.com/talent-education/covid-outbreaks-michigan-schools-rise-25-percent-week?amp&_twitter_impression=true.

Post article on reporting that includes discussion of outbreak definitions and childcare centers and includes DC Dept of Health decision not to disclose outbreaks at childcare centers to the public:

https://www.washingtonpost.com/local/education/will-washington-area-schools-publicly-report-coronavirus-cases-many-say-no/2020/09/30/6275bd6a-031a-11eb-b7ed-141dd88560ea_story.html.

Articles on deaths among teachers:

https://www.washingtonpost.com/health/teacher-deaths-raise-alarms-as-new-school-year-begins/2020/09/09/646fb848-f2dd-11ea-8025-5d3489768ac8_story.html

<https://www.chicagotribune.com/coronavirus/ct-covid-19-chicago-public-schools-cases-20200916-vxduhpox7nemvhf5ubx56w2hae-story.html>.

Please let me know if you have any questions on these issues. Thank you.

Sincerely yours,



Kathleen Patterson
D.C. Auditor

cc: D.C. Councilmembers
Paul Kihn, Deputy Mayor for Education
Lewis Ferebee, Chancellor, D.C. Public Schools
Michelle Davis-Walker, Executive Director, D.C. Public Charter School Board
LaQuandra Nesbitt, M.D., Director, Department of Health