November 18, 2020

Dear Whatcom County School Superintendents:

This letter is an update to my previous ones of October 12 and August 31, 2020 on school operations and planning for COVID-19. Since then there have been updates to Schools – Fall 2020-2021 Guidance (DOH, updated 10/28/20), and Decision Tree for Provision of In Person Learning among K-12 Students at Public and Private Schools during the COVID-19 Pandemic (DOH, updated 10/16/20). The guidelines Return-to-Play Guidelines (Washington Interscholastic Activities Association, 10/6/20) and Employer Health & Safety Requirements for School Scenarios (OSPI/DOH/L&I, 9/30/20) remain in effect and have not been updated.

DOH is considering revisions to its Decision Tree in light of accumulating evidence that schools have been able to successfully operate in-person with the phased reopening. Although cases and outbreaks have occurred, transmission has been limited in the school settings. The implementation of the measures from the Guidance have allowed for safe provision of instruction, services, and support to students by schools, with cautious, phased-in introduction of hybrid and in-person instruction and services, including in-person services for high-needs students.

An update to the Decision Tree is still under review and is likely to include a revision of the community transmission rate category thresholds for COVID-19 Activity Levels and the addition of in-person instruction for younger students to activities to be continued when the COVID-19 Activity Level is HIGH, as is currently the case for in-person services for high-needs students.

The current threshold for categorizing community transmission as high is a 14-day rate of 75 cases/100,000 population. Whatcom County had a relatively flat transmission rate around 50 until November 4, when it began a steep rise. As of 11/6/20, the rate was 64.2, with a rise to at least 134.0 on 11/15/20, likely to be higher as delayed reports are added. This information is from the COVID-19 Disease Activity tab on the WA Risk Assessment Dashboard https://coronavirus.wa.gov/what-you-need-know/covid-19-risk-assessment-dashboard and is usually updated daily. The counties to the south of us (Skagit, Snohomish, King, and Pierce), have 11/6/20 rates from 158 to 213, and preliminary rates as of 11/15/20 of 278 to 309. Although Whatcom rates are lower, we have similarly steep increases in rates and we anticipate that without changes from the recent restrictions announced by the Governor, we may reach similarly high transmission rates within the next couple of weeks.

Given the likely revision of the COVID-19 Activity Level thresholds and responses, and the evidence for limited transmission of COVID-19 within schools and by younger children, I recommend that in response to the increase in community transmission rates within Whatcom County that school districts pause in their plans for expanding in-person instruction for middle and high school students, with the exception of special needs students and struggling students who are unable to engage in remote learning. Returning elementary school students to in-person instruction may continue to be phased in. Transmission of virus by the older students is similar to adults and their class schedules are not conducive to limiting the number of other students and teachers with which they have contact. Elementary school students can be grouped in small cohorts and limit their number of staff and student contacts, and they are less efficient in transmitting infection than older children and adults.
To avoid disruption of school operations and families, those middle and high schools that have already opened in-person instruction or have made plans to do so this week do not have to return to remote instruction at this time. The CDC *Indicators for Dynamic School Decision-Making* has community 14-day infection rates of >200 per 100,000 as one indicator for the highest risk of transmission within schools. Until we receive an updated DOH *Decision Tree*, we will use this as a threshold for HIGH COVID-19 Activity Level. Because of the higher risk for transmission among middle and high school students, we will use a lower threshold of 100/100,000 for instituting restriction on in-person instruction for these older students. If rates are sustained above these levels for two weeks, I recommend restricting usual in-person instructional activity, while continuing in-person services only to high-need students.

As transmission of the virus occurs in the community, we anticipate that COVID-19 infections will occur among students and staff of schools. It is the effectiveness of the measures taken to suppress transmission within schools and our communities that will allow us to sustain safe operations of our schools and businesses and to avoid roll backs and restrictions on educational services. To the extent that community infection rates can be reduced by the newly announced advisories and proclamations by the Governor and through ongoing recommendations for physical distancing, use of face coverings to reduce transmission by those who are infected, minimizing size of gatherings, and hand hygiene, we can avoid further restrictions and maintain and eventually open up operations.

When infections occur it is critical to identify them early, for those who are infected to isolate themselves from others while contagious, and for their close contacts to quarantine during the time they could become infectious after exposure. Therefore, schools need to assure that students and staff who are infected or are close contacts to cases are excluded from school for the duration of their isolation or quarantine periods. This will reduce the risk of transmission at school and prevent outbreaks that could result in closures, health risks to others, and disruption of instruction for many.

School districts or private schools make the final decision about the level of their operations and assure their compliance with the Governor’s Proclamation (most recently 20.09.2), OSPI/DOH/L&I requirements, and the DOH *K12 Guidance and Decision Tree*. Students designated as high need individuals can continue to have in-person instruction in small groups even during the High COVID-19 Activity Level. WCHD will continue to provide technical assistance to schools as they implement the requirements and recommendations for COVID-19 transmission control, and will take the lead and cooperate with schools in response to cases and outbreaks, provide case and contact investigation, support isolation of cases and quarantine of their close contacts, and provide documentation of when affected individuals can return to school. We will also determine whether classrooms or schools must close in response to outbreaks and when they may reopen. We continue to recommend a cautious, slow phased-in approach to resuming in-person learning, and recognize the challenge to providing a safe environment for the critical educational and developmental opportunities and support services that children need and that schools must provide.

Sincerely,

[Signature]

Greg Stern MD, Health Officer

Attachment: Appendix – Requirements and References re: COVID-19 and School Operations/Planning
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REQUIREMENTS (PROCLAMATIONS, REGULATIONS, GUIDELINES)

PROCLAMATION BY THE GOVERNOR AMENDING PROCLAMATIONS 20-05, 20-08, 20-09, and 20-09.1 20-09.2 - Phased Reopening of K-12 Schools

EMPLOYER HEALTH & SAFETY REQUIREMENTS FOR SCHOOL SCENARIOS, September 30, 2020 (OSPI/DOH/L&I)

Decision Tree for Provision of In Person Learning among K-12 Students at Public and Private Schools during the COVID-19 Pandemic (DOH) (updated 10/16/20)

K-12 Schools – Fall 2020-2021 Guidance (DOH, updated 10/28/20)

Return to Play Guidelines (WIAA, 10/6/20)
https://docs.google.com/document/d/e/2PACX-1vQBoiz1UnhXtci0yuLS5ekxblUjZiQyu7eHR2RovekTWHxjGvh71hfhzZW0ghd19bop3KZxipy5Kg2/pub

REFERENCES

Indicators for Dynamic School Decision-Making (CDC, updated 9/15/20)
https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/indicators.html#thresholds

WA COVID-19 Risk Assessment Dashboard