



ATPE Recommendations to the Texas Education Agency and School Districts Regarding District-Level COVID-19 Policies for the 2020-21 Instructional Year

ATPE strongly believes all students and educators have a right to a safe school environment. In a state with more than 1,200 school districts and charter schools ranging dramatically in size, geography, and student/parent demographics, a one-size-fits-all policy rarely provides the flexibility necessary to meet the needs of Texas students or school staff. Certainly, the approach to mitigating the spread of COVID-19 should likely vary between urban and rural settings. However, given the complexity and severity of the COVID-19 pandemic, **ATPE firmly believes all Texas public school students, parents, and employees deserve to have a clear understanding of the minimal protections and protocols their local school districts will put in place to address their health and safety.**

It is equally important for the voices of parents and staff to be systematically included in the development and implementation of a district's COVID-19 policies and protocols. With that in mind, **ATPE urges the Texas Education Agency (TEA) to release COVID-19 reopening guidelines and require that prior to the start of the 2020-21 school year, each school district develop, approve, and disseminate a local policy that prioritizes student and employee safety. The policy must describe the health and safety measures the district will take to mitigate and respond to the threat of COVID-19.**

Recommendation: Require districts to involve non-administrative, campus-level staff and parents in the decision-making process.

ATPE recommends that TEA require each district to assemble a COVID-19 advisory committee comprising non-administrative campus-level staff, as well as parents and appropriate locally identified medical professionals, to assist in the development of a local pandemic policy for the district. This COVID-19 pandemic advisory committee should include at least one parent and campus educator who serves in a non-administrative role from each vertical team within the district. The district may appoint some, or all, of the members of an existing district committee, such as the School Health Advisory Council (SHAC) or the District Advisory Committee (DAC), to serve as its COVID-19 advisory committee, so long as parental and campus educator membership requirements are met.

Upon drafting its local pandemic policy, the school district should be required to share its draft policy with all district employees and allow them a reasonable opportunity to provide feedback

through an online survey. Districts should also be encouraged to make their draft policies available to parents for feedback.

TEA should specify that upon receiving feedback, the district, with the assistance of its local COVID-19 advisory committee, should consider the feedback received and make any appropriate changes to its draft policy prior to submitting the proposed policy to its board of trustees for approval and adoption.

Recommendation: Require employee and parental notification of local policies.

Once a policy is adopted, the district should be required to notify all employees and parents of the policy and post to a link to said policy on the district homepage. Districts should also consider notifying employees and parents of the policy by mail, email, phone, or a combination thereof.

Recommendation: Offer guidance for local policy development and revision.

District policies, such as a local pandemic policy, are intended to provide a measure of consistency and certainty to parents and staff. However, in a rapidly developing situation such as the COVID-19 pandemic, districts should also be prepared to adjust their policies and subsequent practices. TEA should encourage districts to identify the circumstances and processes by which the district may revise its local policy with the assistance of the district's COVID-19 advisory committee, especially as new information becomes available or public health necessitates.

Recommendation: Provide more specific guidelines for district COVID-19 policy provisions.

The district's local pandemic policy should be designed to enable individuals to be safely present in an in-person educational setting and may include such provisions for students and faculty as a mask policy or remote temperature checks, as locally appropriate. Policies and procedures should be designed to provide maximum protection for the physical and mental health and welfare of district staff and students while also being practical, feasible, and appropriate for the developmental stage and needs of each student.

Special considerations and accommodations to account for the diversity of students and staff should be incorporated. Policies and procedures should consider the varying risk factors among district staff, such as but not limited to age, pregnancy, the presence of high-risk individuals in their household, or other health factors. Policies and procedures should also consider impacts

to vulnerable student populations, including those who are medically fragile, live in poverty, have developmental challenges, or have special health care needs or disabilities.

TEA should provide additional guidance and resources addressing the following areas for districts to use while drafting a local pandemic policy:

Staff Training and Professional Development

The policy should include specific guidelines for supporting and training staff on implementation of the district's required and recommended health, safety, and educational procedures. To the extent practicable, staff training and professional development should be conducted in a virtual environment to reduce the risk of exposure to COVID-19.

Physical Distancing and Other Policies to Minimize Person-to-Person and Person-to-Communal-Object Contact

The primary known mode of transmission of COVID-19 is through respiratory droplets among persons in close proximity. However, it is also possible to become infected after touching a virus-contaminated surface and then touching the mouth, eyes, or nose. Districts should consider and implement clear and specific guidelines designed to mitigate the potential spread of COVID-19 by reducing close physical proximity to other persons and exposure to communal objects. In developing local policies, the following areas should be considered and addressed:

Grade bands/age-appropriate policies

Students at different grade levels have dramatically different developmental capabilities in addition to different expectations regarding movement and daily interaction with their physical environment. For example, unlike most elementary students, middle and high school students typically move between classrooms, may utilize lockers, and may not stay in the same cohort throughout the day. These and other grade-related differences should be addressed in policies on physical distancing and other associated risk-reduction strategies.

Cohort development

Minimizing the total number of people with whom individuals interact on a daily basis reduces the overall opportunity for viral spread. Districts should consider policies designed to create the smallest feasible cohorts and reduce cross-cohort interaction as much as possible. This could include strategies such as having smaller groups of students on campus at different times of the day or, in upper grades, having teachers as opposed to students move between classes.

Classrooms

TEA should provide districts guidelines, similar to those currently in place during summer school, for calculating the maximum number of students that may be present in each classroom. Districts should also consider, and the agency should help identify, best practices regarding the setup and utilization of classroom space to minimize contact.

Hallways

Districts should consider strategies such as staggered release and creation of one-way corridors to minimize the amount of contact and overall number of bodies present in hallways at one time.

Communal indoor spaces

Communal indoor spaces such as gyms, cafeterias, libraries, special classrooms, and faculty lounges present special concerns and opportunities and should be addressed independently in the district's plan.

Playgrounds and other communal outdoor spaces

Like indoor communal spaces, outdoor spaces present their own obstacles and opportunities as the use of outdoor spaces may provide some additional mitigation against viral spread. Safe utilization of such spaces should be addressed in the district's plan.

Transportation

Transporting students to and from school incorporates yet another educational environment and often a second set of district staff. Policies and training must be in place to address the critical need to safely transport students to and from school while maintaining a safe environment for the students and driver or other staff present.

Meetings

Wherever feasible, districts should have policies in place to minimize in-person staff-to-staff and staff-to-parent meetings. The use of remote or virtual meeting platforms should be the general practice. In-person meetings should be discouraged.

Meals

The continuity of student meal service is essential and should be addressed with care and the utmost safety precautions. District policies should ensure that students being served through the School Lunch Program will continue to receive meals, include special considerations for students who are developmentally unable to feed themselves or who need assistance, and outline the process for students to receive and eat their meals. District policies should also address the role of school employees during mealtimes and should ensure that employees have an adequate lunch break, even if students eat in classrooms rather than a lunchroom.

Organized Activities

The district policy should include considerations for limits to organized activities, such as sports, clubs, and other events, that would cause students, staff, parents, or other community members to gather.

Special Populations

District policies must include considerations for how special populations will be served equitably and address the health and safety of students receiving special education and language services. Additionally, protections for the staff providing these services must be included in these considerations, as many of the health and safety practices adopted for students may not be developmentally appropriate or feasible for students in special education.

Use of PPE

TEA has procured a limited amount of personal protective equipment (PPE). District policies should indicate whether the use of PPE such as masks will be required by students, staff, parents, or any other individuals who may enter the school building. Due to limited numbers of procured PPE, the district should outline what types of PPE will be considered acceptable and should prioritize state-provided PPE for the families and staff who have the greatest need. District policies must include how noncompliance with PPE policies will be handled.

Hygiene

District policies should address effective methods of hygiene for preventing the spread of COVID-19, such as frequent handwashing, the use of hand sanitizer, and encouraging individuals to cough or sneeze into the crook of an arm. Hygiene practices should be differentiated by developmental ability to take into consideration the necessity for younger students to be watched while washing their hands, as well as consideration for special populations who may need assistance.

Use of Testing and Screening

The district policy should include how students will be tested and screened and who will carry out this process, making sure to include consideration for staff training in this area. Staff who are expected to test and screen students should be in a low-risk category.

Regular Cleaning and Disinfecting

The district policy should include a schedule for regular cleaning and disinfecting, including how supplies will be distributed to school employees and required protocol for all categories of school employees.

Post-Exposure Protocol

A district policy should include protocol for persons who test positive, persons who are exhibiting symptoms or who are believed to be an unconfirmed positive, persons who have come in contact with a person who is confirmed positive or is exhibiting symptoms/believed to be an unconfirmed positive, cleaning and disinfection, classroom closure, and campus closure. These policies should be designed to minimize disruptions to learning and the use of personal leave among staff (i.e., allowing staff to work remotely if they must stay home).

Staff Sick and Leave Policies

Staff and sick leave policies are essential to easing the stress and anxiety felt by educators who may become sick or who have a school-age person in their household who could become sick. Leave policies should include the process for educators to work virtually should they be required to stay at home, as well as other leave policies such as pooling personal days so that staff can access days beyond their own accrual.

Staff Child Care

School employees rely on childcare that may have been previously coordinated by the district. Childcare is essential to the continuity of district operations by allowing school employees to work without disruption, which in turn allows students to learn and be supported without disruption. District policies should include a plan for childcare, including health and safety guidelines, that is not limited to the guidelines published by the Texas Department for State Health Services.

Addressing Student Social, Mental, and Emotional Health

Student needs outside of academics are at an all-time high. District policies should include how the district plans to bolster social, mental, and emotional supports for students. This may include training for teachers, who are often on the front lines of addressing these student needs.

Addressing Staff Mental Health

Teachers, administrators, and staff already operate in a high-stress occupation, which has been amplified by the unknowns and uncertainties of the pandemic. The district policy should address how the mental health needs of employees will be supported.

Educational Expectations

The district should have expectations for student learning in remote settings that contemplate the uncertainty of the coming year. Students and teachers will face unprecedented challenges that will impede learning. Therefore, educational expectations should focus on maintaining structure, continued student engagement, safe and healthy spaces, and fulfilling students' basic needs to lay the foundation for as much learning during this time as possible.

Access to Virtual/Distance Educational Settings

The district should outline how students will be placed in virtual/distance educational settings, while ensuring access for students whose parents either choose a virtual or in-person setting. Parental choice regarding placement is essential, but parents must comply with district policies governing the safety of in-person settings if they wish their child to be in the in-person setting. District provision of PPE and necessary resources to comply with the district policy should be prioritized for students with the most need. District policies should also address how and when students can move between virtual and in-person settings, as well as staffing for virtual and distance settings.

Educator Certification Candidates and Student Teachers

ATPE appreciates the flexibility the state has provided to educator certification candidates to help them complete their programs and requirements for student teaching or practicums during the pandemic. We ask that school districts, while continuing to maintain safety protocols, similarly assist these future educators with any reasonable adaptations they may need to find opportunities to engage with students and by facilitating their virtual access to cooperating and mentor teachers for support and guidance.

Other TEA Mandates

The local district policy should include TEA mandates that have been disseminated through guidance and official correspondence, such as mandatory exclusions from school property for students, staff, and parents who have been exposed or who have been infected by COVID-19.

Other Policies

The district policy should include any other areas of concern to district parents, educators, students, or other stakeholders as shown through the district's feedback collection process.