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By Electronic mail

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DC Department of Health (DOH)
899 North Capitol Street, N.E., 5th Floor, Room 549
Washington D.C. 20002

Re: School Nurses Recommendations for Safe Reopening of the Schools

Dr. Nesbitt:

The District of Columbia Nurses Association (DCNA), an affiliate of the National Nurses United, AFL-CIO, is a full-service professional organization and labor union solely dedicated to representing health care professionals in the District of Columbia. With approximately 2,000 members, DCNA advances the health care profession by fostering high standards of practice, promoting the economic and general welfare of employees in the workplace and lobbying District officials regarding health care issues. DCNA represents over 100 school nurses who are dedicated to the health and welfare of the students in the District of Columbia Public School System (DCPS).

As we face the current COVID-19 pandemic, DCNA has witnessed healthcare facilities throughout the District fail to provide adequate personal protective equipment (PPE), and prompt testing opportunities, engage in proper contact tracing within their facilities, provide proper isolation rooms, ventilation and more. The school nurses are gravely concerned that similar missteps will be made as the District discusses the reopening of schools. The District has not provided school nurses with a plan that includes policies procedures or even a decision on the proper equipment that will ensure that both students and staff are properly protected in the reopening of the schools.

As the District presents a plan to the District residents on the reopening of schools, the plan provided by Office of the State Superintendent of Education (OSSE) to

the staff does not outline the role of the school nurse. Additionally, the school nurses were not a part of the Mayor's Reopen DC Advisory Group. **This is disappointing.**

As healthcare professionals, school nurses are specialists in public health and are on the front lines of exposure to students who are sick or who are asymptomatic, but infectious. The school nurse leads healthcare in schools and practices in a holistic manner to address the needs of students. **School nurses should be an essential member on pandemic preparedness, re-opening and re-entry planning teams to ensure that the students and staff are properly protected during this pandemic.**

Additionally, the Nurse Practice Act which regulates the practice of nursing in the District, serves to ensure the highest standard of care for all residents of the District and especially our children during these difficult times. The Nurse Practice Act requires that only a licensed Registered Nurse may provide a comprehensive nursing assessment of the health status of an individual. In a school health setting, a Registered Nurse would address anticipated changes in a student's condition and evaluate and plan nursing interventions. The Nurse Practice Act also addresses the roles and responsibilities of other assistive personnel such as Licensed Practical Nurses and others who function under the supervision of a Registered Nurse. These valuable members of the health team are bound to provide care at the direction and guidance of a Registered Nurse. As nurses, it is our responsibility to the residents of the District of Columbia to ensure the care of the children in the District during these unprecedented times is supported by evidence-based care guided by the rules and regulations of the Nurse Practice Act.

Despite our absence on the planning for the reopening of DCPS, DCNA has created a task force charged with developing recommendations that DCPS should implement when reopening the schools. These recommendations are comprised of policies, procedures and required equipment and infrastructure changes that should be in place before and during the reopening of DCPS to ensure safety for both students and staff. These recommendations are supported by the National Association of School Nurses (NASN), Centers for Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA). The recommendations address the following essential topics:

- I) **Personal Protective Equipment;**
- II) **Health Suite Infrastructure Requirements;**
- III) **Screening and Isolation Guidelines.**

1. Personal Protective Equipment (PPE)

According to OSHA, PPE will be worn to minimize exposure to hazards that cause serious illnesses such as COVID 19. CDC states that PPE is used every day by healthcare professionals when providing care to protect themselves, patients and others. In the school settings, a Health Care Professional (HCP) includes but is not

limited to Registered Nurses, Licensed Practical Nurses, Trained Medication Assistants, Nurse Technicians and other school-based personnel.

Adequate PPE for HCP is essential. **Although schools are not identified as a “healthcare setting” during this pandemic, school nurse will be on the frontlines of exposure to students who are sick or asymptomatic, but infectious.** During the performance of those services, there is risk of infection due to contact with students and/or staff or contaminated environmental surfaces. Furthermore, appropriate PPE is essential to protect all persons in the school and to ensure that a healthy nurse can continue to provide services to the school community. Additionally, under the OSHA regulations - 29 Code of Federal Regulation (CFR) 1910.132, 1926.28, DCPS and its contractors and grantees are required to provide appropriate PPE to staff, including N95 respirators, to protect employees from hazardous working conditions, which in this case is possible exposure to COVID-19.

Factors to consider when selecting adequate PPE for use in the school setting:

- **Appropriate Fit Testing for N95 Respirator:** OSHA Regulation 29 CFR 1910.132(d)(1)(iii), requires DCPS and its grantees and contractors to create a Respiratory Fit Test Program for all HCP in the school setting.
- **Exposure in the Health Suite:** Students with runny noses, congestion, loose teeth, and/or sneezing and coughing will typically remove their masks to blow noses, take medications or for assessment in the health suite. The risk of the spread for a school nurse is increased without adequate PPE. Furthermore, the school nurses encompass a diverse range of ages and pre-existing conditions which places them at a greater risk for infection and severe illness from COVID-19

The appropriate PPE for school nurses on the front lines are the following:

- **Fit-tested N95 Respirators:** The N95 Respirators provides the best protection for the school nurses especially with aerosol generating procedures such as suctioning and nebulization Each HCP should be provided at least one N95 Respirator per day. HCP should not be required to reuse N95 respirators.
- **Surgical Masks:** The school nurses require surgical masks for care of injured students and routine medication administration. The school nurses should be provided multiple surgical masks per day due to the high probability of contamination while caring for multiple students per day.
- **Face Shield:** The school nurses should be provided with one face shield per day to be used with a mask when performing treatments.

- **Gown:** The school nurses should be provided fluid-resistant and impermeable protective clothing such as a disposable gown to protect from infectious bodily fluids that may permeate the clothing.
- **Gloves:** The school nurses should be provided gloves approved by the Food and Drug Administration to protect nurses from spread of COVID-19.
- **Shoe covers:** Shoe covers to protect the school, the staff, and the students from spreading infectious matter that may have landed on the ground.
- **Hair covers:** Hair covers to protect the school, the staff and the students from spreading infectious matter.

II.) Health Suite Infrastructure Requirements

The school nurses have expressed concerns regarding the health suites infrastructure and their compatibility for adequate ventilation. Many of the health suites are small without proper ventilation and the ability to social distance, especially when a school nurse has a high number of students coming into the health suite and a shared bathroom. These concerns increase the possibility of the transmission of COVID-19 according to the CDC.

An inspection team should be created including CSS manager, school nurse and a representative of DCPS facilities engineer department to inspect and assess each health suite to ensure that the health suites meet the requirements of the CDC guidelines for proper spacing and ventilation. The health suite should be measured by size and dimension to determine the number of students permitted in the health suite at a time to implement social distancing requirements according to CDC guidelines. The Inspection Team will assess the ventilation of the health suite by inspecting the air conditioning units for proper maintenance, changing air filters if needed and adding HEPA filtration units or other CDC recommended air filtration system units for health suites with poor air quality. The Inspection Team should determine if plexiglass separation will be beneficial.

DCPS will create policies and procedures which determine the number of students permitted in the health suite at a time in each suite based on the size or provide an alternative Health Suite that meets the requirements for social distancing and ventilation. DCPS should implement policies and procedures for the use of the health suite that would require all students to arrive with a CSS Nurse Pass. There should also be policies implemented to prohibit any non-student procedures in the health suites. There should be spaces created in each health suite for each of the following situations:

1. **Waiting or Triage Area:** An area where the school nurse can quickly assess the child which can be chairs in the hallway.

2. **Well Student Area:** This will be an area for standard school health procedures including student injuries and medication administration.
3. **Isolation Area:** The area will be for any student who is suspected of a COVID-19 infection. This area should have good ventilation and adequate space.

These spaces will streamline the work of the school nurse which will assist in reducing the transmission of COVID-19.

III.) Screening and Isolation Guidelines

The activities in schools are often interactive which can increase the probability of the spread of COVID-19. The more people a student or staff member interacts with, and the longer that interaction, the higher the risk of COVID-19 spread. The risk of COVID-19 spread increases in school settings as follows:

1. **Lowest Risk:** Students and teachers engage in virtual-only classes, activities, and events.
2. **Medium Risk:** Small, in-person classes, activities, and events. Groups of students stay together 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).
3. **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.

DCPS will implement learning procedures that minimize the risk of the spread of COVID-19 by engaging in low or medium risks activities.

Additionally, DCPS will implement the following processes and procedures to control the interaction of the school nurse and traffic in the health suite.

1. When staff or students come to the health office, they must wear a face mask and proceed to the restroom to wash their hands after identifying themselves.
2. All students must come with a CSS Nurse Pass and the contact person's name and current telephone numbers.
3. A contactless digital infrared thermometer will be in every health suite to determine all temperatures in the waiting or triage area near the health suite.
4. Individuals will be assessed for COVID-19 symptoms and treatments and possible exposure prior to coming to school.
5. As recommended by the CDC, social distancing will be strictly implemented in the health suite, by allowing only one student in the office at a time due to the limitations of the health suite design and cubic feet measurements.
6. The school nurse will not be required to leave the office to screen incoming students and personnel at the school entrance.

a. Screening for COVID-19 symptoms

DCPS will train all staff on all of the possible COVID-19 symptoms and create processes on when to send a student to the school nurse. Any student or staff who has COVID-19 symptoms will be immediately sent home. The symptoms of COVID-19 include the new loss of taste or smell, runny nose, tiredness, conjunctivitis, congestion, sore throat, cough, headache, nausea, swelling hands and feet, abdominal pain, diarrhea, vomiting, shortness of breath, chest tightness, fever above 100.4 and more.

b. Care and Isolation Procedures for Students Suspected of a COVID-19 Infection

Upon entering the health suite, the school nurse will assess the student by taking vital signs. If the student is showing respiratory distress, the nurse will follow CSS emergency protocol and call 911. The school nurse will inform the student that a hands-on assessment may be performed if needed, including assessing for abdominal pain. The school nurse will ask for a household history to see if anyone else in the home is sick or having any of the above symptoms and ask student if they have been near anyone who has been diagnosis with COVID-19. If the school nurse confirms that the student has COVID-19 symptoms, the student will be placed in the isolation room with a mask. The student will remain with a licensed nurse in the isolation room with a mask until they are picked up from school.

School nurse or designee will contact family for student to be picked up for possible COVID-19 symptoms. The school nurse will review with student and family contact the preventions measures of COVID-19 to include but not limited to: mask wearing, handwashing and or use of hand sanitizer, social distancing requirements, covering mouth for cough and sneeze, cleaning and disinfecting frequently touched objects and surfaces.

DCPS will ensure there is adequately trained AOM staff to cover the health suite while the nurse is observing the student in the in the isolation room. DCPS will have a procedure in place for a deep disinfectant cleaning for the places within the school building that the student was in prior to being isolated. DCPS will also implement procedures to inform all of the family members of the students and staff that interacted with someone who has COVID-19 symptoms and advise them that they must quarantine and be tested for COVID-19.

In order to return to school after being sent home with COVID-19 symptoms, the student should be retested for COVID-19 with documentation of a negative and a medical clearance from the student's health care provider clearing the student to return to school.

DCPS will implement the following practices and procedures to assist the school nurse in curtailing the spread of COVID-19:

1. All positive COVID-19 test results should be reported to the school nurse immediately to track COVID-19 infections within the school health program and the school nurse can follow up with the student for further care.
2. The removal of waste products will be performed twice a day and as needed.
3. Disinfection of the health suite, classrooms, floors and restrooms will be mandatory daily and as needed after an individual who is suspected of a COVID-19 infection uses the facilities.
4. Staff and parents will not be permitted to use the health suite restroom, the school nurse's desk computer and telephone during, before and after school hours.

IV. Conclusion

Overall, this task force has set forth the recommendations to ensure that safety is first and the lives of the students we care for are not at risk. These recommendations require obtaining the appropriate protective gear, implementing adequate policies and procedures that will protect both staff and students and infrastructure changes that will reduce the transmission of COVID-19 in our school system. As stated above, the school nurses are an essential member of the team to ensure that students and staff are properly protected during this pandemic. We are specialists in public health and we are the frontline of healthcare in the school system.

We are in solidarity with Washington Teachers Union and other advocates that schools must remain virtual until the proper standards as we have outlined in this letter have been implemented. We look forward to the full implementation of our recommendations and to hear from you on partnering to implement our recommendations. Thank you.

Sincerely,

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