



Reopening 101: Tactical Considerations for Independent Schools

June 2020

In these uncertain times, many schools are grappling with what back-to-school should look like. Because many of the tactical decisions can feel overwhelming, NAIS synthesized research and advice from the Centers for Disease Control and Prevention, Fisher Phillips, *Education Week*, The World Health Organization, and the American Academy of Pediatrics to compile the following list.

This document is intended to summarize many different ideas, but it shouldn't be construed as legal advice. Many federal, state, and local laws may govern a school's obligations, so schools should check with their own legal counsel before implementing back-to-campus plans.

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Spaces, Scheduling, and Activities



School Spacing

1. Space seating/desks at least six feet apart when feasible.¹
2. Turn desks to face in the same direction (rather than facing each other) or have students sit on only one side of tables, spaced apart.²
3. Create distance between children on school buses (e.g., seat children one child per row, skip rows) when possible. There should be no more than one student per row.³
4. Close communal-use spaces such as dining halls and playgrounds with shared playground equipment if possible; otherwise, stagger use and clean and disinfect between use.⁴
5. Try to avoid having employees share small office spaces by converting other spaces to workspaces (libraries, gyms, etc.), rotating hours for workspaces, or requiring employees to sign up to use workspaces.⁵
6. Consider using non-permeable, temporary dividers if other options are not available. Depending on state and local orders, some schools may need to consider staggered schedules for employees and students.⁶
7. Provide employees with instruction on social distancing in spaces like copy or supply rooms, teachers' lounges and communal workspaces. Post signage stating the maximum number of employees at a time in a given space and reminders to keep six feet apart.⁷
8. Eliminate high risk areas such as coffee and water stations. Encourage employees to instead bring their own beverages and discourage employees from bringing food to the office to share.⁸
9. Increase lunch spaces and allow employees to bring lunch back to their workspace, an outdoor space, or even off campus.⁹
10. Where possible, make halls and walkways one way, putting floor and wall reminders in such areas.¹⁰
11. If one-direction walkways are not possible due to the building configuration, everyone in these areas should wear face coverings.¹¹
12. If the school has a surplus of unoccupied lockers, it may consider reassigning lockers six feet apart. If this is not possible, the school should schedule staggered, designated times for students to access lockers.¹²
13. Schools should consider limiting the maximum number of persons in the restroom at the same time. Schools can also open additional restrooms (i.e., those located in locker rooms) for general use.¹³

Spaces, Scheduling, and Activities



Scheduling

1. Consider staggering class schedules so that only 50 to 60% of the student body is on campus at any given time. This involves having students in school for “shifts” throughout the day.¹⁴
2. Consider staggering daily work schedules in the same manner for faculty and staff. This can be done in accordance with student schedules where possible.¹⁵
3. Another option could be to have students rotate schedules. For instance, one half of a class attends in-person on Monday, Wednesday, and Friday, while the other students attend by video conference those days and in-person on Tuesday and Thursday.¹⁶
4. Rotating schedules can also be offered on a weekly basis. For example, one half of a grade level attends school in person for one week while the other half attends online. These groups would then rotate during the next week.¹⁷
5. Staggering student and employee schedules can help minimize the number of students in the school at a time in order to maintain social distancing.¹⁸
6. Stagger arrival and pick-up times or locations by cohort or put in place other protocols to limit contact between cohorts and direct contact with parents as much as possible.¹⁹
7. When possible, use flexible worksites (e.g., telework) and flexible work hours (e.g., staggered shifts) to help maintain social distancing between employees and others.²⁰



Physical Barriers and Guides

1. Install physical barriers, such as sneeze guards and partitions, particularly in areas where it is difficult for individuals to remain at least six feet apart (e.g., reception desks).²¹
2. Provide physical guides, such as tape on floors or sidewalks and signs on walls, to ensure that staff and children remain at least six feet apart in lines and avoid facing one another (e.g., arrows for one-way routes in hallways).²²
3. Add physical barriers, such as plastic flexible screens, between bathroom sinks, especially when they cannot be at least six feet apart.²³

Spaces, Scheduling, and Activities



School Events & Extracurriculars

1. Pursue virtual group events, gatherings, or meetings, if possible, and promote social distancing of at least six feet between people if events are held. Limit group size to the extent possible.²⁴
2. Limit any nonessential visitors, volunteers, and activities involving external groups or organizations as possible—especially with individuals who are not from the local geographic area (e.g., community, town, city, county).²⁵
3. Pursue virtual activities and events in lieu of field trips, student assemblies, special performances, school-wide parent meetings, and spirit nights, as possible.²⁶
4. Pursue options to convene sporting events and participation in sports activities in ways that minimizes the risk of transmission of COVID-19 to players, families, coaches, and communities.²⁷
5. To a great extent, athletics are going to be determined by state or local orders and/or athletic conferences. Pay particular attention to indoor sports and those that require student-to-student contact, such as wrestling and football.²⁸
6. Schools also need to think through social distancing for spectators. It may be that for some sports, the number of spectators will be limited or the school may live stream the activity for all to watch from a distance.²⁹
7. Performing arts will require preplanning for students and audiences alike. Teachers must plan to maintain social distancing of students for rehearsals. This might require more rehearsals with fewer students.³⁰
8. For performances, schools may have the performance run multiple times to allow seating to be every third seat rather than every seat being occupied in the theater or music hall.³¹
9. It is too early to say whether field trips will be feasible for the upcoming school year. The school will need to continue to monitor the situation locally as well as the location of the intended trip.³²
10. To the extent that plans need to be made and travel and overnight accommodations purchased, all documentation with providers should have appropriate cancellation and force majeure clauses, permitting the school to cancel or modify the trip with minimal or no consequences.³³
11. All documentation with parents should also be clear that the trip may need to be cancelled or modified and that the school is unable

Spaces, Scheduling, and Activities



Cohorts

1. Ensure that student and staff groupings are as static as possible by having the same group of children stay with the same staff (all day for young children, and as much as possible for older children).³⁵
2. Limit mixing between groups if possible.³⁶



Food Service

1. Have children bring their own meals as feasible, or serve individually boxed or plated meals in classrooms instead of in a communal dining hall or cafeteria, while ensuring the safety of children with food allergies.³⁷
2. Use disposable food service items (e.g., utensils, dishes). If disposable items are not feasible or desirable, ensure that all non-disposable food service items are handled with gloves and washed with dish soap and hot water or in a dishwasher. Individuals should wash their hands after removing their gloves or after directly handling used food service items.³⁸
3. Because of the higher risk of actual or presumed transmission of COVID-19 through buffet lines and open food areas, many schools are eliminating such processes.³⁹
4. All food should be served in pre-prepared containers or displayed for selection in such a way that students and employees cannot breathe on or touch food without proper protection. Ensure that there are glass partitions such that students/employees can see and select the food but not breathe on or touch or self-serve.⁴⁰
5. Those serving the food should be properly checked daily for COVID-19 symptoms and should wear facial covering and gloves when serving and preparing food. Consider individually packed and disposable eating utensils and trays.⁴¹
6. If food is offered at any event, have pre-packaged boxes or bags for each attendee instead of a buffet or family-style meal. Avoid sharing food and utensils and ensure the safety of children with food allergies.⁴²

Spaces, Scheduling and Activities



Food Service

7. Consider whether starting the year with multiple pre-packaged box lunches might be a good idea and then expand as the year goes on, if things seem to be going well.⁴³
8. Another option is to allow students to spread out into other supervised areas that are not typically used for lunch, such as a courtyard, student lounge area, or field house. Be sure to check if your state regulations allow this and supervise students to ensure social distancing if pursued.⁴⁴
9. You may need to utilize the lunchroom area along with other supplemental areas for lunch service and stagger and/or shorten schedules more than the school has done in the past.⁴⁵
10. The school can always choose to require students to eat lunch in their classrooms at their desks, again as long as appropriate social distancing is observed.⁴⁶

Hygiene Practices



Masks

1. Teach and reinforce use of cloth face coverings. Face coverings should be worn by staff and students and are most essential in times when physical distancing is difficult.⁴⁷
2. Individuals should be frequently reminded not to touch the face covering and to wash their hands frequently. Information should be provided to staff, students, and students' families on proper use, removal, and washing of cloth face coverings.⁴⁸
3. Cloth face coverings should not be placed on children younger than two years old, anyone who has trouble breathing or is unconscious, or anyone who is incapacitated or otherwise unable to remove the cloth face covering without assistance.⁴⁹
4. Cloth face coverings are meant to protect other people in case the wearer is unknowingly infected but does not have symptoms. Cloth face coverings are not surgical masks, respirators, or other medical personal protective equipment.⁵⁰
5. Schools can also choose to require persons entering the campus to wear face coverings. In some cases, the school will be mandated by state or local order to require persons entering the campus to wear facial coverings. It is best to follow the most restrictive policy in place for your jurisdiction.⁵¹
6. You should note that if the school requires employees to wear face coverings (even if mandated by law), you should pay for them as Personal Protective Equipment (PPE) and be aware that OSHA's PPE standard likely applies.⁵²
7. It is also recommended that, if the school is going to require face coverings and/or gloves for students and visitors, that you pay for and or provide these items. Many schools are providing civilian-grade face coverings (rather than the N-95 respirator masks) with the school logo.⁵³
8. If you are going to require individuals to wear face coverings, you should have an ample supply available in case persons entering campus forget to bring their face covering to school each day.⁵⁴

Hygiene Practices



Personal Hygiene

1. Teach and reinforce handwashing for at least 20 seconds with soap and water and increase monitoring to ensure adherence among students and staff.⁵⁵
2. If soap and water are not readily available, hand sanitizer that contains at least 60% alcohol can be used (for staff and older children who can safely use hand sanitizer).⁵⁶
3. Encourage staff and students to cover coughs and sneezes with a tissue. Used tissues should be thrown in the trash and hands washed immediately with soap and water for at least 20 seconds.⁵⁷



Cleaning and Disinfection

1. Clean and disinfect frequently touched surfaces (e.g., playground equipment, door handles, sink handles, drinking fountains) within the school and on school buses at least daily or between uses as much as possible.⁵⁸
2. Use of shared objects (e.g., gym or physical education equipment, art supplies, toys, games) should be limited when possible, or cleaned between uses.⁵⁹
3. If transport vehicles (e.g., buses) are used by the school, drivers should follow all safety protocols indicated for other staff (e.g., hand hygiene, cloth face coverings, etc.).⁶⁰
4. Develop a schedule for increased, routine cleaning and disinfection.⁶¹
5. Ensure safe and correct use and storage of cleaning and disinfection products, including storing products securely away from children.⁶²
6. Cleaning products should not be used near children, and staff should ensure that there is adequate ventilation when using these products to prevent children or themselves from inhaling toxic fumes.⁶³

Hygiene Practices



1. If feasible, conduct daily health checks (e.g., temperature screening and/or or symptom checking) of staff and students. Some individuals infected with COVID-19 will not exhibit any symptoms, and thus temperature screening likely will not prevent all individuals who transmit the disease from entering the campus. CDC guidance recommends screening for fevers of more than 100.4 degrees Fahrenheit, but some states may recommend different thresholds.⁶⁴
2. Unless mandated by a local or state order, taking temperatures is not required. If you decide to screen employees, you should plan to check the temperatures of campus visitors, vendors, and contractors as well to ensure a safe school environment.⁶⁵
3. Health checks should be conducted safely and respectfully and in accordance with any applicable privacy laws and regulations.⁶⁶
4. The CDC's supplemental "Guidance for Child Care Programs that Remain Open" provides steps for screening children and the CDC's "General Business FAQs" offers guidance for screening staff.⁶⁷
5. If you decide to conduct temperature checks on students as campuses re-open, you should obtain parental consent, comply with privacy guidelines, and mitigate risk by not maintaining or storing biomedical information. You should also regularly check for updates on the ability to engage in these medical evaluations as this is a rapidly developing field.⁶⁸
6. If you choose to conduct screenings, you must ensure that you are acting in accordance with EEOC and ADA guidelines. This is because, under the ADA, taking an employee's temperature is considered a "medical examination" under the law. The ADA requires that any mandatory medical test be job related and consistent with business necessity. Given the high incidence of COVID-19 in the community, the EEOC has stated that taking an employee's temperature meets that standard because it is helpful in screening out employees who may have COVID-19 and thus spread it to the workplace. You should watch for changes in the EEOC's position on temperature taking (and other medical exams discussed below) as the incidence of COVID-19 in your community reduces.⁶⁹



Health Screenings

6. According to the EEOC's "Technical Assistance Questions and Answers," an employer may choose to administer COVID-19 testing to employees before they enter the workplace to determine if they have the virus. Ensure that any tests you administer are accurate and reliable. The U.S. Food and Drug Administration, CDC, and public health authorities provide guidance about what may or may not be considered safe and accurate testing. These are medical exams that must be conducted confidentially and the results need to be maintained in a separate medical file.⁷⁰

7. Provide PPE to any employees administering tests, as well as training on how to properly use the PPE. For those that may have an exposure to bodily fluids as part of their job, provide proper training on blood borne pathogens.⁷¹



Navigating Sickness in the School Community

1. Make sure that staff and families know that they (staff) or their children (families) should not come to school, and that they should notify school officials (e.g., the designated COVID-19 point of contact) if they (staff) or their child (families) become sick with COVID-19 symptoms, test positive for COVID-19, or have been exposed to someone with COVID-19 symptoms or a confirmed or suspected case.⁷²
2. Immediately separate staff and children with COVID-19 symptoms (such as fever, cough, or shortness of breath) at school. Individuals who are sick should go home or to a healthcare facility depending on how severe their symptoms are and follow CDC guidance for caring for oneself and others who are sick.⁷³
3. Work with school administrators, nurses, and healthcare providers to identify an isolation room or area to separate anyone who has COVID-19 symptoms or tests positive but does not have symptoms.⁷⁴
4. Establish procedures for safely transporting anyone who is sick to their home or to a healthcare facility. If you are calling an ambulance or bringing someone to the hospital, try to call first to alert them that the person may have COVID-19.⁷⁵
5. Close off areas used by a sick person and do not use these areas until after cleaning and disinfecting.⁷⁶
6. Wait at least 24 hours before cleaning and disinfecting. If 24 hours is not feasible, wait as long as possible. Ensure safe and correct use and storage of cleaning and disinfection product, including storing products securely away from children.⁷⁷
7. In accordance with state and local laws and regulations, notify local health officials, staff, and families immediately of any case of COVID-19 while maintaining confidentiality in accordance with the Americans with Disabilities Act (ADA).⁷⁸
8. Inform those who have had close contact with a person diagnosed with COVID-19 to stay home and self-monitor for symptoms and follow CDC guidance if symptoms develop.⁷⁹
9. Actively encourage employees and students who are sick or who have recently had close contact with a person with COVID-19 to stay home. Develop policies that encourage sick employees and students to stay at home without fear of reprisal, and ensure employees, students, and students' families are aware of these policies.⁸⁰



Dealing with Community Members at High Risk

1. Offer options for staff at higher risk for severe illness (including older adults and people of all ages with certain underlying medical conditions) that limit their exposure risk (e.g., telework, modified job responsibilities).⁸¹
2. Offer options for students at higher risk of severe illness that limit their exposure risk (e.g., virtual learning opportunities).⁸²
3. Consistent with applicable law, put in place policies to protect the privacy of people at higher risk for severe illness regarding underlying medical conditions.⁸³
4. Implement flexible sick leave policies and practices that enable staff to stay home when they are sick, have been exposed, or are caring for someone who is sick.⁸⁴
5. Examine and revise policies for leave, telework, and employee compensation.⁸⁵
6. Leave policies should be flexible and not punish people for taking time off and should allow sick employees to stay home and away from co-workers. Leave policies should also account for employees who need to stay home with their children if there are school or childcare closures, or to care for sick family members.⁸⁶
7. Develop policies for return-to-school after COVID-19 illness. The CDC's criteria to discontinue home isolation and quarantine can inform these policies.⁸⁷



Visitor Policies

1. The school may allow parents and volunteers to assist at school, recognizing that they must be treated the same as any other person entering campus. If you require temperature and COVID-19 testing, these processes must be applied to all persons entering the campus.⁸⁸
2. In addition, all persons should be required to maintain social distancing, wear a facial covering, and wear other protective equipment if they are working with food or assisting in other ways (such as taking temperatures). The school may also choose not to allow others back onto the campus so as to avoid the risk of other potential exposures to COVID-19 by the community and to avoid the necessity of training, supervising, and managing third parties.⁸⁹
3. In the early stages of back-to-campus life, limiting the areas on campus visitors can access may be warranted. For example, if a school typically requires visitors to check-in at a central location but then permits the visitor to access most parts of the campus with proper ID and badging, it might want to limit access to the check-in location and a handful of administrative offices or conference rooms nearby.⁹⁰
4. Vendors may require additional access, in which case a school should attempt to schedule vendor visits at times when the fewest numbers of students and staff are present (e.g., before and after school). “Convenience visits,” such as allowing parents to have lunch in the cafeteria with their child or faculty family members to join employees for lunch, should be limited, at least in the initial stages of reopening. All visitors to the campus should be required to wear cloth face coverings.⁹¹



Communications

1. Consistent with applicable law and privacy policies, having staff and families self-report to the school if they or their student have symptoms of COVID-19, a positive test for COVID-19, or were exposed to someone with COVID-19 within the last 14 days in accordance with health information sharing regulations for COVID-19.⁹²
2. Create a plan for educating staff, families, and the public of school policies and alerting them to closures or restrictions in place to limit COVID-19 exposure (e.g., limited hours of operation). It also may be necessary to create a plan to communicate about illness and deaths in the community in the coming months.⁹³



Supporting Coping & Resilience

1. Encourage employees and students to take breaks from watching, reading, or listening to news stories about COVID-19, including social media if they are feeling overwhelmed or distressed.⁹⁴
2. Urge employees and students to eat healthfully, exercise, get enough sleep, and find time to unwind.⁹⁵
3. Encourage employees and students to talk with people they trust about their concerns and how they are feeling.⁹⁶
4. Consider posting signs for the national distress hotline (1-800-985-5990 or text “TalkWithUs” to 66746) or outlining steps to reach local counseling resources.⁹⁷

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- ¹ “Considerations for Schools,” Centers for Disease Control and Prevention, May 29, 2020; online at <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html>. “Back-To-School FAQs For Educational Institutions During The COVID-19 Era,” Fisher Phillips, May 22, 2020; online at <https://www.fisherphillips.com/resources-alerts-back-to-school-faqs-for-educational-institutions>. Madeline Will, “The Socially Distanced School Day,” *Education Week*, June 10, 2020; online at <https://www.edweek.org/ew/issues/reopening-schools/the-socially-distanced-school-day.html?cmp=eml-enl-eu-news-1-rm&M=59593831&U=19606&UID=c931a766dc2e3b5d07554b70baa733f7>. “Coronavirus disease (COVID-19) technical guidance: Guidance for schools, workplaces & institutions,” World Health Organization; online at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/guidance-for-schools-workplaces-institutions>.
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