August 20, 2020

Dear School Administrators,

With the coronavirus (SARS-CoV-2/COVID-19) pandemic, we are facing unprecedented challenges. Since March 2020, schools across the country, and in San Francisco, have remained closed. Our goals are to control community infection, to minimize risk, and to maximize learning. Together, we share responsibility and accountability for managing the risks and achieving these goals.

Education is one of the strongest “social determinants of health.” Equity, racial equity and social justice are universal values that drive the City and County of San Francisco and the SFDPH policy decisions. We must come together as a city family and address this challenge for all our children, but especially for those who will otherwise be left behind because of historical and continuing structural inequities.

Until we have widespread immunity from an effective vaccine, we will continue to have risk of viral transmission. We now have more community transmission of the virus than any time since the pandemic began in San Francisco. We have high coronavirus infection case rates (> 6) per 100,000, putting San Francisco in “red” alert for community transmission.¹ Our hospitalizations are surging² and this factor along with the high case rate, resulted in San Francisco being placed on the state “watch list.”³

In spite of our high population density and large numbers of vulnerable groups, San Francisco is doing better than most locations because our policies are more health protective than State of California requirements. This will continue to be the case with in-person learning and with the school waiver process. In general, and with the understanding that these parameters may change as we learn more about viral transmission, the following community transmission health indicators should be met before waivers will be granted:

1. hospitalization trend stable or decreasing
2. case rate trend stable or decreasing
3. percent test positivity less than 3%⁴

We know much more today about COVID-19. The virus is extremely contagious and spreads primarily through respiratory droplets/aerosols from persons who do not have any symptoms (asymptomatic or pre-symptomatic). In general, younger children (especially ages 0 to 9 years)

¹ https://data.sfgov.org/stories/s/epem-wyzb
² https://data.sfgov.org/stories/s/wmxr-upyn
³ https://covid19.ca.gov/roadmap-counties/
⁴ Under the setting of robust testing, tracing, and supportive isolation (TTSI) of the highest transmission risk settings and neighborhoods. For comparison, New York City requires percent test positivity to be below 3%.
have less risk for infection and have milder illness. What we do not know is the cumulative risk of infection when students, teachers, and staff convene indoors across the city at various locations, many using mass transit.

We hope the following required interventions will mitigate these risks: universal masking, physical distancing, handwashing, environmental disinfection, moving activities outdoors, improved ventilation, accessible online programs, and a robust testing and tracing program to ensure success.

All schools must meet **minimum standards** before opening to in-person learning, including detailed plans describing how they will ensure adequate testing and contact tracing for their staff and students. In determining whether to support in-person learning, the SFDPH considers the following:

- State of California legal mandates and guidance,
- level of community SARS-CoV-2 transmission,
- level of public health and health care readiness, especially systems for testing, case investigation, contact tracing, and outbreak management, and
- level of school readiness to mitigate SARS-CoV-2 transmission risks at school and to adhere to public health requirements and recommendations.

Because San Francisco is on the “watch list”, some elementary schools (from Transitional Kindergarten to 6th grade) plan to apply for a waiver to start school under the current conditions. Schools seeking a waiver will need to demonstrate that they meet these standards as part of the application process. To fully evaluate any request for a waiver, each school applicant must be able to provide the following details:

- a **virtual learning program** to accommodate medically fragile children who cannot attend classes in person, to enable infected children to continue learning at home while they recover, to decompress classes to ensure adequate physical distancing, and to have an option for families who choose to minimize the risk of their child becoming infected because they have a person (or persons) at home who is at increased risk for severe illness from COVID-19.\(^5\)
- a **clear prevention plan** to achieve the public health mitigation principles outlined above and specified in the preliminary guidance for TK-12 schools re-opening released here.\(^6\)
- a **testing plan** for ensuring testing of their staff, including:
  - all teachers and staff must be tested *prior to returning* to school; ideally *within 7 days of returning in person*
  - all teachers and staff must be tested regularly according to the state framework\(^7\)
  - all schools that charge tuition must cover any testing costs not covered by health insurance
  - schools that do not charge tuition must cover any testing costs for staff that are not covered by insurance

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\(^6\) [https://www.sfdph.org/dph/alerts/covid-guidance/Preliminary-Guidance-TK12-Schools.pdf](https://www.sfdph.org/dph/alerts/covid-guidance/Preliminary-Guidance-TK12-Schools.pdf)

\(^7\) [https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Schools%20Reopening%20Recommendations.pdf](https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Schools%20Reopening%20Recommendations.pdf)
o a data monitoring plan to track infections, outbreaks, and effectiveness of prevention activities in both staff and students. This data may be requested by SFDPH to monitor school safety. SFDPH will provide standards and guidance in support for schools developing this plan.
o designated staff to assist SFDPH in data monitoring, and conducting case investigations and contact tracing for positive tests and outbreaks.

SFDPH will publish guidance describing the above elements in more detail, identifying potential testing resources, and offering some tools for data collection and planning. Any school that is planning to seek a waiver should send a brief letter of intent to Schools-childcaresites@sfdph.org. The letter should include:
• contact name and email address to send waiver application form:
• the number of schools involved,\(^8\)
• name(s) of schools,
• proposed grades to re-open,
• number of children and staff involved per site,
• and any proposed dates for school re-opening, if already determined, in order to allow SFDPH to assess the risk associated with the school opening (submission of the letter of intent does not guarantee that the school will be able to open on the proposed date, which will be dependent on final approval of the waiver application).

Please respond with the letter of intent within 5 business days of receipt of this letter.
The waiver application and planning documents required for approval will require more detailed information.

Thank you for your commitment to a healthy San Francisco, for all communities, and especially for all our children.

Sincerely,

Tomás J. Aragón, M.D., Dr.P.H.
Health Officer, City and County of San Francisco

\(^8\) Each individual school must be able to verify requirements listed in last paragraph of p. 2.