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CDC Publishes New Guidance for the Reopening of Schools to In-person Learning

By Susan Keating Anderson

On Friday, February 12, the Centers for Disease Control and Prevention (CDC) released additional guidance addressing recommended practices in the reopening of schools, titled Operational Strategy for K-12 Schools through Phased Mitigation ("Operational Strategy"). The CDC published this Operational Strategy as an additional resource intended to complement its array of prior guidance relating to maintaining school operations during the COVID-19 pandemic, as well as the U.S. Department of Education's Handbook on Strategies for Safely Reopening Elementary and Secondary Schools. Links to the various related guidance are contained in the Operational Strategy, which can be viewed here.

The Operational Strategy emphasizes a "layered mitigation" approach that includes five key strategies:

- 1. Universal and correct use of masks
- 2. Physical distancing measures
- 3. Handwashing and respiratory etiquette;
- 4. Cleaning and maintaining healthy facilities; and
- 5. Contract tracing, coupled with isolation and quarantine measures, administered in collaborations with the health department.

Published almost a year after the COVID-19 pandemic began, the Operational Strategy confirms that there is evidentiary support suggesting that the districts which have strictly implemented mitigation strategies have been able to safely maintain in-person instruction, and that K-12 in-person school instruction "is not a primary driver of community transmission." Importantly, it also recognizes the disparate impact the COVID-19 pandemic has had on school communities with lower resources.

The Operational Strategy highlights the essential functions schools provide in society, and states that "K-12 schools should be the last setting to close after all other mitigation measures in the community have been employed, and the first to reopen when they can do so safely." In furtherance of this principle, the Operational Strategy addresses many of the mitigation measures already taken by numerous Ohio school districts to safely reopen and maintain in-person learning. Recommended components of the layered mitigation approach include prioritizing in-person educational instruction over extracurricular activities, providing virtual schooling options for high-risk students, cohorting or podding students to minimize transmission risks and facilitate testing and contract tracing methods, and prioritizing in-person instruction for those students with disabilities who require the direct provision of services in the school environment.

The Operational Strategy also includes recommended approaches to implementing mitigation measures depending on the level of transmission present in the community and whether the district has implemented testing of staff or students to screen for positive cases. For those schools that implement test screening, it provides recommendations on how to do so, including "pooled testing" for students. It further emphasizes the importance of prioritizing vaccinations for all school employees.



Like so many of the issues faced by school administrators and boards of education, the Operational Strategy's recommendations need to be evaluated with consideration of the interests and impact on all stakeholders in the school community. Bargaining considerations, particularly as it relates to testing and vaccination protocols, should also be identified prior to implementing any mandatory programs.

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