

Additional Information for School Health Offices

September 3, 2020

Introduction and Overview

School nurses have a critical role in monitoring and supporting the health and safety of students and school staff. The importance of this role has been magnified during the COVID-19 pandemic. The following guidance addresses many concerns of particular importance to school nurses, including:

- Proper use of personal protective equipment (PPE) for different staff and different healthcare scenarios,
- Guidance on medical waiting rooms,
- Key health office protocols needed during COVID-19,
- Procedures for working with specific populations, including students with special health care needs and students who require aerosol-generating procedures (AGPs),
- Working with and communicating with local boards of health.

School nurses and school administrators will also want to refer to other aspects of school guidance issued by DESE, notably the [Fall Reopening Facilities and Operations Guidance](#), which contains details on cleaning and disinfection and airflow. All DESE guidance related to COVID-19 can be found on the [DESE website](#) as well as compiled on the BU SHIELD [COVID-19 Resources website](#).

Personal Protective Equipment

Schools and districts must provide appropriate PPE to all direct service providers (DSPs), as outlined in the chart below. [Guidance for the proper use of PPE](#), as outlined by the Centers for Disease Control and Prevention (CDC), should be followed. For additional information regarding specific descriptions of particular pieces of protective equipment, please consult [Occupational Safety and Health Administration \(OSHA\) guidelines](#).

It is recommended that direct service providers at a minimum follow [OSHA guidance](#) for “Jobs Classified at Medium Exposure Risk.” **All staff must wear face coverings, with the exception of individuals for whom it is not safe to do so due to age, medical condition, or other health or safety considerations. Staff should wear appropriate PPE based on the specific interactions they are having with students (e.g., instruction, behavior support, activities of daily living, etc.). Please note that DESE provided [guidance on the provisioning of key safety supplies](#) on June 5, 2020 in order to help schools and districts determine the quantities of the protective equipment described below.**¹

¹ <http://www.doe.mass.edu/covid19/on-desktop/2020-0608guidance-summer2020-sped-services.docx>

Protective Equipment Recommendations for Direct Service Providers (DSPs)*

<i>Classification of Individual Wearing PPE</i>	<i>N95 or KN95 Respirator</i>	<i>Facemask</i>	<i>Cloth Face Covering</i>	<i>Eye Protection (Face Shield/Goggles)</i>	<i>Disposable Gloves</i>	<i>Gowns/Other Body Covering**</i>
DSPs in care areas of students with known or suspected COVID-19	X	X (with face shield if N95/KN95 not available)		X	X	X
DSPs in the same facility but not in the care areas for students with suspected COVID-19		X				
DSPs providing personal care to students without suspected COVID-19 where the DSPs could be exposed to spills or splashes of bodily fluids		X		X (preferred)	X	
DSPs performing or providing care during AGPs such as nebulizer treatments, chest physiotherapy (chest PT), and open tracheostomy suctioning	X			X	X	X
Transportation personnel/monitors who must come in direct physical contact with passengers (e.g. buckling/unbuckling, performing wheelchair safety services)			X		X	

*CDC recommends that guidance for healthcare providers be followed for [direct service providers \(DSPs\)](#).

DSPs include personal care attendants, direct support professionals, paraprofessionals, therapists, related services personnel, assistants, school nurses, health office staff, and any other staff who must come into close contact (6 feet or closer) with students with disabilities.²

**Disposable gowns are preferred but reusable gowns or other body coverings may be used if disposable gowns cannot be obtained.

² <http://www.doe.mass.edu/covid19/on-desktop/2020-0608guidance-summer2020-sped-services.docx>

Respiratory Protection Program

The Occupational Safety and Health Administration (OSHA) requires a "written respiratory protection program with required worksite-specific procedures and elements for required respirator use" when respirators are used in the workplace.³ Massachusetts law also specifies that requirements for Massachusetts workplaces include public sector workplaces and be "as strict as OSHA. No stricter or more lenient."⁴ Under OSHA standards, N95 respirators and their alternatives are respirators that filter particles from the air when appropriately fitted on the user. The Massachusetts Department of Labor Standards provides a [template for a Respiratory Protection Program](#). A Respiratory Protection Program includes the following elements:

- A **Program Administrator** who is responsible for administering the respiratory protection program.
- **Supervisors** who are responsible for ensuring that the respiratory protection program is implemented in their particular areas.
- The requirement that employees are not permitted to wear respirators until a physician or other licensed healthcare professional has determined that they are **medically able to do so** (OSHA provides a [health questionnaire](#) to be reviewed with the physician).
- The requirement that employees who are required to wear respirators will be **fit-tested**.

It is possible that a municipality already has a Respiratory Protection Program in place that can address the needs of the school/school district in that municipality. School administration should check with their local public health department and/or fire and rescue department if needed to implement a new Respiratory Protection Program.

Special Considerations for PPE for Students and Staff who are Deaf or Hard of Hearing

The following should be considered when working with students and staff who are deaf or hard of hearing (DHH) and for the needs of students and staff who must be able to see the lips of the speaker:

- Purchase clear masks or shields for staff and students.
- If an anti-fog solution or spray is used on the inside of masks or face shields, refer to the Material Safety Data Sheet (MSDS) for the product to ensure safe use.
- Account for an interpreter in the classroom for students and staff who are deaf or hard of hearing, and determine the logistics of social distancing.

Designated Medical Waiting Rooms

Information about the designated medical waiting room for students presenting with COVID-19 symptoms that need to be separated from other students until they can be picked up can be found in the [Fall Reopening Facilities and Operations Guidance](#). Below are additional details about medical waiting rooms that may be helpful for school nurses.

Staffing, Communication, and Staff PPE

Per DESE guidance on protocols for students that become symptomatic during the school day, each student referred to the designated medical waiting room for pickup by a caregiver will have

³ <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

⁴ <https://www.mass.gov/news/osha-safety-for-public-sector-highlights-of-updated-law-mgl-c149-ss6-12>

an assessment by the school nurse prior to transfer to the medical waiting room. Staff that are supervising children in the designated medical waiting room must always wear appropriate PPE. If staff are able to maintain 6 feet of physical distance from students in the medical waiting room a face mask and eye protection is adequate. Staff that are directly interacting with students in the medical waiting room should wear PPE for DSPs in care areas of students with known or suspected COVID-19 (N95 respirator or alternative, or facemask and eye protection, gloves, and gowns). Designated medical waiting rooms do not need to be staffed by a school nurse or other medical professional but can be staffed by an adult school staff person who is CPR/AED certified. Schools should maintain records of adult staff present in the designated medical waiting room for contact tracing purposes. DSPs are delegated the task of monitoring the designated medical waiting room by the school nurse per the Board of Registration in Nursing Advisory Ruling 9803.⁵ DSPs staffing the designated medical waiting room should be in close communication with the school nurse. This type of delegation (delegation of activities) can be performed by a Registered Nurse (RN) or a Licensed Practical Nurse (LPN) and does not require registration with the MDPH.

Masks for Students

All students in the designated medical waiting room must always wear a facemask. Students should wear a facemask that is a disposable surgical mask; if the student had been wearing a cloth face covering at school, the school should provide a disposable surgical mask for the student to wear while in the designated medical waiting room. While wearing gloves, place the student's cloth mask into a plastic bag to return home with the child, dispose of the gloves, and perform hand hygiene.

Multiple Students with COVID-19 Symptoms

Ideally, students with COVID-19 symptoms should be isolated, separate from other students, until they can be picked up by a parent or guardian. However, there may be situations when more than one student is experiencing COVID-19 symptoms at the same time. If possible, these students should be kept in separate isolation spaces until they can be picked up; however, identifying multiple isolation rooms in a given school building is likely very difficult. When multiple students must share the designated medical waiting room at the same time, they must remain masked and 6 feet apart at all times. Partitions may be used to provide an additional barrier between students if available. Any hard surfaces in designated medical waiting rooms, including partitions, should be cleaned and disinfected after students leave the designated medical waiting room, according to protocols outlined in the [Fall Reopening Facilities and Operations Guidance](#).

Additional Considerations

School nurses are encouraged to work with their district leadership and Local Boards of Health (LBOH) as appropriate to develop plans and procedures that address:

- Students who cannot be picked up immediately.
- Students who do not have transportation home other than the school bus.
- Students who urgently need clinical care beyond the capacity of the school nurse.

⁵ <https://www.mass.gov/doc/ar-9803-delegation-to-uap/download>

- Notification procedures for students who do not initially test positive for COVID-19 but who spent an extended period of time in the designated medical waiting room with a student who has tested positive for COVID-19.

Health Office Protocols

Medication Drop-Off and Pick-Up

Due to the COVID-19 pandemic, most school districts are limiting access to school buildings to students and staff only, and have developed procedures for student drop-off and pick-up which keep caregivers outside the building as much as possible. This requires school nurses to create a process for safe delivery and pickup of student medications in the school setting.

When possible, medication drop-off and pick-up should be conducted by the school nurse on days before school begins and after school ends under appropriate social distancing and masking protocols. Such events have been conducted via a “drive-through” or “drive up” method, or otherwise outdoors with social distancing measures. This process can also be conducted indoors in a controlled fashion, limiting visitors to a designated entrance/exit and section of the school building. For medication delivered outside of such events, such as a new prescription or refill of medication, the school nurse may, per regulation,⁶ designate a staff person at the point of entry to the school who can be responsible for receipt of the medication from the caregiver and its appropriate locked storage until the nurse can retrieve it. The designated staff person will assume responsibility for counting the medication, communicating the amount delivered to the parent and documenting the receipt of the medication per regulation 105 CMR 210. School nurses may develop a system and/or form for documenting the count and receipt of medication that includes parent and designated staff person signatures.

When possible, unused, discontinued, or outdated student medications should be returned to parents/guardians. The procedures outlined above for medication drop-off may be followed for medication pick-up. Regulations also allow for these medications to be destroyed by the school nurse rather than returned; parental consent is encouraged but not required.⁷

Physical Exam Requirements

The requirements for physical examination of students pursuant to 105 CMR 200.100 (B) should continue to be followed.

The Department encourages in-person physical examination of all students, when possible, to help detect physical and developmental abnormalities. However, given that the current public health emergency has created delays at many medical offices and increased the use of telemedicine, the Department recommends the following flexibility in timing and modality of physical examinations during the public health emergency:

- A telemedicine well-child visit may be substituted for an in-person physical exam for the purposes of school attendance (with exceptions noted below). Video telemedicine visits are preferred over phone-only visits. However, a telemedicine well-child visit may not

⁶ 105 CMR 210.008 <https://www.mass.gov/doc/105-cmr-210-the-administration-of-prescription-medications-in-public-and-private-schools/download>

⁷ 105 CMR 210.008(G) <https://www.mass.gov/doc/105-cmr-210-the-administration-of-prescription-medications-in-public-and-private-schools/download>

substitute for an in-person physical exam if the physical exam on file is older than four years.

- For students submitting documentation of a recent in-person physical exam:
 - For elementary and high school students (typically, 4th and 10th grade), the exam may be conducted up to two years before or within 120 days of school start.
 - For middle school students (typically, 7th grade), the exam should be conducted one year before or within 120 days of school start.
- For all students, exclusion from school for lack of documentation of a well-child visit during the 120-day grace period is discouraged.

An in-person physical exam is required for the following groups of students:

- For students entering school for the first time (typically pre-kindergarten or kindergarten), an in-person physical exam should be conducted one year before or within 90 days of school start. Excluding students from school for lack of documentation of an in-person physical exam during the 90-day grace period is discouraged.
- A student transferring from another school system shall be examined following the school entry recommendation for students entering school for the first time, above.
- For students seeking to participate in athletics, an in-person physical exam should be conducted annually prior to a student's participation in competitive athletics. Students who have not had this in-person exam should not be excluded from school, but may not participate in competitive athletics.

Mandated Screenings

At this time, requirements for health screenings (vision, hearing, height, weight, postural, and SBIRT) pursuant to M.G.L. c.71, §§57 and 97 and 105 CMR 200.400 and 105 CMR 200.500 remain suspended, per the [Order of The Commissioner of Public Health Exempting School Committees or Boards of Health from Conducting Health Screenings](#) issued on April 28, 2020. The Commissioner reserves the right to rescind this suspension of screening requirements during the 2020-2021 school year; once the waiver is lifted, screening should resume as soon as possible. The Department will provide guidance for resuming screenings.

Immunization Requirements/Records

Immunization requirements should continue to be followed. Documentation of immunization status should be submitted to schools within 60 days of school start; however, excluding students from school based on immunization status during the 60-day grace period is discouraged except in the case of a documented school-based outbreak of a vaccine-preventable disease.

Note that beginning with the 2020-2021 school year, influenza vaccine is required for all students.⁸ Students must receive influenza vaccine for the current season by December 31, 2020, and students newly enrolling between January 1st and March 31st must have a documented dose of influenza vaccine for the current influenza season (along with all other required vaccinations) when they start school.

⁸ <https://www.mass.gov/doc/faq-influenza-vaccine-requirement-for-school-attendance/download>

Occupational Exposure and Return to Work Guidance

Licensed school health professionals are health care workers. In the case of an occupational exposure to COVID-19, school nurses should follow guidelines for health care workers in DPH's Occupational Exposure and Return to Work Guidance.⁹ Health care workers may continue to work after an exposure if they are not experiencing COVID-19 symptoms and were wearing appropriate PPE at the time of exposure. All health care workers should wear appropriate PPE and self-monitor for symptoms that may be consistent with COVID-19.

If health care workers are experiencing COVID-19 symptoms or have tested positive for COVID-19, they should isolate. Detailed return to work guidance to determine the duration of isolation can be found in the Occupational Exposure and Return to Work Guidance.

Health Education Related to COVID-19

The school community should share responsibility for educating students and staff on proper hand hygiene. Resources can be found on the CDC and MDPH websites.¹⁰ Handwashing with soap and water for at least 20 seconds is the best practice. However, hand sanitizer containing at least 60% alcohol should be substituted when handwashing is not readily available. School Nurses are responsible for training school building staff on the safe use, adverse effects, and hazards of hand sanitizer. For training materials, please see the CDC website.¹¹

School nurses can find training materials regarding the donning and doffing of PPE on the [BU SHIELD website](#). These materials may be used for training health care, teaching and other school staff on the proper use and disposal of PPE in the school setting.

Use and Availability of Hand Sanitizer

This guidance is a supplement to the guidance, *Handwashing Recommendations and Alcohol-based Hand Sanitizer Use in Schools* that was issued from the Massachusetts Department of Public Health (MDPH) School Health Services Unit (SHU) June 30, 2020.¹²

- Alcohol-based hand sanitizers have been linked to many child overdoses, even deaths, in schools.¹³ It is imperative that steps be taken to avoid inappropriate hand sanitizer exposure.
 - Hand sanitizer stations should be set up where school staff are typically present, such as common areas, hallways, and the front of classrooms. Do not place hand sanitizer dispensers in locations that children frequent unsupervised, like bathrooms or empty hallways. Please evaluate the position of each hand sanitizer dispenser and assess the ability to keep the location supervised. This vigilance is key for the safety of all students.
 - Be aware that younger students may ingest hand sanitizer unintentionally and exhibit symptoms such as drowsiness, eye irritation, abdominal pain, nausea, and

⁹ <https://www.mass.gov/doc/healthcare-personnel-occupational-exposure-return-to-work-guidance/download>

¹⁰ <https://www.mass.gov/service-details/handwashing-education-materials-for-the-general-public>

¹¹ <https://www.cdc.gov/handwashing/index.html>

¹² <https://www.mass.gov/doc/handwashingsanitizer-guidance/download>

¹³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5657893/>

vomiting. Always contact Poison Control with any ingestion or exposure of toxic material.

- Older students have been observed ingesting hand sanitizer intentionally to attempt to become intoxicated through the oral, nasal (inhalation), dermal, mucosal, or ocular routes. Deliberate mucosal exposures have been reported in the anal or vaginal route using a tampon delivery system.
- Over 80 hand sanitizer brands were recalled by the United States Food & Drug Administration (FDA) on July 2, 2020. Please see the FDA website for more information and a complete list of recalled hand sanitizer brands.¹⁴ Please be aware that some child-friendly brands, like Hello Kitty®, are on the recall list. School Nurses should cross reference the school districts/schools hand sanitizer brand to the FDA list of recalled hand sanitizer brands. Many recalled hand sanitizers are still being circulated in the United States.

School districts/schools are advised to have the School Physician write a standing order for the use of hand sanitizer in school. Please see Appendix A for a sample standing order. More details on how this order should be written can be found in the MDPH SHU guidance, [*Handwashing Recommendations and Alcohol-based Hand Sanitizer Use in Schools*](#), from June 30, 2020.

- As early in the school year as possible, a notice should be sent home to parents/guardians informing them that hand sanitizer will be used in their child’s school building and give them an option to opt out. This can be part of a school/district existing notice regarding standing orders for other “over-the-counter” products.
- Parents and guardians have a right to opt their child out of hand sanitizer use in school. Schools/school districts need to put a plan in place to manage opt out notification to appropriate staff. Teaching regarding what to do with opt outs can be presented with all other reopening staff professional development/COVID-19 training. Extra hand washing opportunities should be advised for students who are not using hand sanitizer to keep the teachers and other students in the classroom safe.

CPR during COVID-19

Please refer to the American Heart Association guidelines on this topic found at: <https://cpr.heart.org/en/resources/coronavirus-covid19-resources-for-cpr-training>

Health Office Procedures for Specific Populations

Parents/guardians should be encouraged to consult their child’s health care provider to discuss the appropriateness of students with high risk medical conditions attending in-person instruction. This group includes students who depend on mechanical ventilation and children with tracheostomies. A collaborative approach should be used to inform decision-making relative to how the student can safely access in-person instruction. Assessment of in-person instruction is particularly important in medium- and high-risk COVID-19 areas as shown on the [MPDH COVID-19 Community-Level Data Map](#).

¹⁴ <https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-hand-sanitizers-methanol>

Aerosol-Generating Procedures

AGPs are those that are more likely to generate higher concentrations of infectious respiratory aerosols than coughing, sneezing, talking, or breathing. These procedures potentially put staff at increased risk for pathogen exposure and infection. AGPs put school health professionals at risk and should be performed in the school setting during COVID-19 only as necessary. Discuss alternative treatments to AGPs with the student's providers prior to the start of school.

Aerosol-Generating Procedures Room

Nurses should perform AGPs in a separate room away from other students and staff. Procedures should be conducted with an open window, while remaining more than 6 feet away from the student. Use of a portable HEPA filtration unit can provide additional protection and should be strongly considered.¹⁵ Appropriate PPE for DSPs performing or providing care during AGPs should be worn at all times while in the AGPs room (N95 respirator or alternative, eye protection, gloves, and gowns). Hard surfaces should be disinfected between students, and it is advised to let the room air out with an open window between students as long as possible; the length of time necessary to air out the room depends on the quality of ventilation, and nurses should consult with facilities personnel in their school for more information.¹⁶ The room should have good ventilation and ability to close the door. Keep the door to the AGPs room closed at all times, and limit movement of staff/students in and out of the room.

For some students, the need to undergo an AGPs is urgent, and moving to a specific room may not be feasible. Planning for these students should occur prior to school start. The classroom should have a window that can be opened, and appropriate PPE for the AGP should be securely stored in the classroom. In the event that an urgent AGP is needed, a staff member should remove all other students and caregivers from the room while the AGP is being performed. Hard surfaces should be disinfected after the procedure is performed, and it is advised to let the room air out with an open window before students and staff return to the space. If possible, remain evacuated from the room for the remainder of the day.

Nebulizer treatments and other considerations for children with chronic respiratory conditions/asthma

Aerosols generated by nebulizers are derived from medication in the nebulizer. It is uncertain whether aerosols generated from this procedure may be infectious and so, out of an abundance of caution, they should be treated as AGPs.¹⁷

- For students with respiratory conditions, the continued use of regular preventive (controller) and rescue (albuterol) inhalers is critical.
- School health professionals should work with primary care providers to identify alternatives to nebulizer treatments, such as metered dose inhalers (MDIs) with a spacer, in the school setting whenever possible. However, if no alternative to nebulizer use is feasible for an individual student, nebulizer treatments can be allowed in the school setting and must take place in the AGP room.

¹⁵ https://www.ashrae.org/file%20library/about/position%20documents/pd_infectiousaerosols_2020.pdf

¹⁶ <https://www.cdc.gov/infectioncontrol/guidelines/environmental/appendix/air.html>

¹⁷ <https://www.mass.gov/doc/update-to-defining-aerosol-generating-procedures-and-recommended-ppe/download>

- Students who regularly use a rescue inhaler with a spacer should be permitted to do so with supervision.
- For students needing a rescue inhaler without a spacer, the child should be permitted to use the inhaler by removing the portion of the face covering over the mouth for the inhalation of the medication, re-covering the mouth/nose, and then permitting exhalation to avoid mixing air particles. Students who self-administer will need to be trained in this procedure. Six feet of separation from adults and other students should be maintained.
- CDC guidance states it is uncertain whether aerosols generated by nebulizer treatments are potentially infectious. For some people with asthma, using a peak flow meter can trigger a cough. But based on limited data, forceful exhalation is not considered an aerosol-generating procedure associated with increased risk of transmitting the virus that causes COVID-19.¹⁸

More information on considerations for children with asthma can be found at <https://www.aafa.org/managing-asthma-and-covid19-in-school>.

Suctioning

Maintaining an open airway for students is an essential health care service but has additional medical challenges due to the need for PPE, space, and cleaning requirements to ensure the safety of students and staff. School nurses, school staff, families, and medical providers should collaborate to develop a plan of care that seeks to avoid or minimize the need for urgent procedures like suctioning.

Nasal/oral or inline (closed system) tracheostomy

Oral or nasal suctioning is not considered an AGPs if completed with a bulb syringe or mushroom adapter. Tracheostomies that are set up with a closed or in-line suction system are not considered AGPs as the entire suctioning process is contained in a closed system. If those procedures are done:

- The nurse or school staff member must use PPE for DSPs providing personal care to students without suspected COVID-19 where the DSPs could be exposed to spills or splashes of bodily fluids (facemask, eye protection, and gloves).
- The space should be separate with good ventilation and ability to close the door. Use of a portable HEPA filtration unit can provide additional protection and should be strongly considered.
- The room should undergo complete routine cleaning and wiping down of hard surfaces after the procedure is complete. When cleaning, staff members should wear PPE (facemask and gloves).

Open tracheostomy suctioning

Open suction of a tracheostomy where the caregiver is working on an open tracheostomy is considered an AGP. If this procedure is done:

- Use the AGPs room whenever possible.
- Limit the people in the room to the student and staff performing the procedure.
- The nurse or school staff member must use PPE for DSPs performing or providing care during AGPs (N95 respirator or alternative, eye protection, gloves, and gowns).

¹⁸ <https://www.cdc.gov/coronavirus/2019-ncov/downloads/FAQ-schools-child-care.pdf>

- The space should be separate with good ventilation and ability to close the door. Use of a portable HEPA filtration unit can provide additional protection and should be strongly considered.
- When the procedure is completed, the room should be closed for as long as possible to allow aerosolized particles to settle.
- The room should undergo complete cleaning and wiping down of hard surfaces after the procedure is complete. When cleaning, staff members should wear PPE (N95 respirator or alternative, eye protection, gloves, and gowns).

Chest physiotherapy (chest PT)

Chest PT could potentially create aerosol particles, it is therefore recommended that this procedure occur with the following recommendations:

- The space should be separate with good ventilation and ability to close the door. Use of a portable HEPA filtration unit can provide additional protection and should be strongly considered.
- Limit the people in the room to the student and staff performing the procedure.
- The nurse or school staff member must use PPE for DSPs performing or providing care during AGPs (N95 respirator or alternative, eye protection, gloves, and gowns).
- When the procedure is completed, the room should be closed for as long as possible to allow aerosolized particles to settle.
- The room should undergo complete cleaning and wiping down of hard surfaces after the procedures are done. When cleaning, staff members should wear PPE (N95 respirator or alternative, eye protection, gloves, and gowns).

Urinary catheter care and catheterization

- Staff members must use PPE for DSPs providing personal care to students without suspected COVID-19 where the DSPs could be exposed to spills or splashes of bodily fluids (facemask, eye protection, and gloves) to prevent fluid crossing from the student to the staff in the forms of drainage or splatter.
- Students should also wear a face covering and/or non-medical face shield.
- A disposable absorbent covering or diaper should be used under the buttocks before and during the procedure to catch any drainage, deposit supplies, and contain supplies once the procedure is completed.
- Once the catheterization procedure is completed, gloves need to be removed, hands washed, and new gloves reapplied before dressing or assisting with dressing the student.
- After assisting the student, gloves need to be removed, hands washed, and new gloves reapplied to clean and disinfect the treatment area.

Gastronomy tube feedings

- Staff members must use PPE for DSPs providing personal care to students without suspected COVID-19 where the DSPs could be exposed to spills or splashes of bodily fluids (facemask, eye protection, and gloves) to prevent fluid crossing from the student to the staff in the forms of spillage, drainage, or splatter from feeding or gastric fluids.
- Students should also wear a face covering and/or non-medical face shield.
- Consider using a towel or a disposable absorbent covering around the stomach to catch any drainage, spilled feeding, or gastric contents.

- The DSPs should position the student to the side to avoid face-to-face interaction during the procedure.

IV/Central line access and diabetes care (and other procedures exposing the nurse to blood):

- Staff members must use PPE for DSPs providing personal care to students without suspected COVID-19 where the DSPs could be exposed to spills or splashes of bodily fluids (facemask, eye protection, and gloves).
- Students should also wear a face covering and/or non-medical face shield.
- Students with diabetes can often perform their own blood glucose monitoring, carbohydrate counting, and mild hypoglycemic and hyperglycemic care with little to no supervision. In the event that a child needs supervision and management by a nurse, the student should not be cared for in the medical waiting room.
- Insulin administration or management of the insulin pump and/or continuous blood glucose monitor can be done safely with minimal contact. Use gloves and wash hands when in contact with a student or supplies.
- Attempt to perform the procedure with the student positioned to the side to avoid face-to-face interaction during the procedure.

Working with Local Boards of Health

A “respiratory infection thought to be due to any novel coronavirus” is a reportable disease under 105 CMR 300, and thus should be reported “to the board of health in the community where the case is diagnosed or suspect case is identified.”¹⁹ Massachusetts law also allows the disclosure of personally identifiable information (PII) for the purposes of disease prevention and control, and local health authorities routinely communicate with school nurses around other reportable diseases for the purposes of disease prevention and control in the school setting.

Neither the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule nor the Family Educational Rights and Privacy Act (FERPA) prevent the disclosure of personally identifiable information for the purposes of disease prevention and control. “HIPAA does not interfere with state public health reporting laws, nor does it prevent access to protected health information (PHI) for public health surveillance, investigations, and interventions,” and “HIPAA specifically allows public health reporting and access to PHI for public health activities without requiring an individual's authorization.”²⁰ FERPA clearly allows for the disclosure of PHI from the educational record without prior consent of the parent/guardian in the case of a public health emergency: “educational agencies and institutions may disclose to a public health agency PHI from student education records, without prior written consent in connection with an emergency if the public health agency’s knowledge of the information is necessary to protect the health or safety of students or other individuals.”²¹ However, the school must follow the disclosure with documentation in the student record of the disclosure, the reason for it and to whom it was disclosed “within a reasonable period of time.”²²

¹⁹ <https://www.mass.gov/files/documents/2017/09/11/105cmr300.pdf>

²⁰ http://www.maventraining.com/maven-help/pdf/LBOH_HIPAA_Letter_2017.pdf

²¹ https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronaviruses%20Frequently%20Asked%20Questions.pdf

²² https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronaviruses%20Frequently%20Asked%20Questions.pdf

Notifying Local Boards of Health

School nurses must notify the LBOH of every *confirmed case of COVID-19* diagnosed in the school community (both students and staff), if the nurse has not already been notified of such by the LBOH. Parent report of a laboratory confirmed case is sufficient for LBOH notification, as well as a provider diagnosed presumed positive case. This information will assist LBOH with conducting contact tracing and determining whether changes in the educational models are warranted.

In regional school districts and collaboratives where students may come from multiple municipalities, the LBOH corresponding to the student's municipality of residence should be notified. In the case of residential schools, the LBOH corresponding to the location of the school (e.g., the student's residence) should be notified. If the residential school student lives at home on the weekends, that municipality's LBOH should also be contacted.

MAVEN use in contact tracing efforts

MAVEN access should be restricted to public health officials acting in their public health capacity. School nurses who have been acting as public agents to do contact tracing will need to separate those activities from their school nursing duties. However, some districts may choose to designate a school nurse to COVID-19 case management and contact tracing activities and a LBOH may choose to execute an MOU with the school district for that purpose. In that case, the designated school nurse should obtain limited access to MAVEN for school/district students/staff only and only for COVID-19.

Communication between School Nurses and Local Boards of Health

In the absence of a school health staff person with access to MAVEN, LBOH staff with access to MAVEN can and should communicate positive cases in the school community to a designated health care professional in that school community for the purposes of contact tracing and close contact notification. The designated school health professional can and should share student and staff information with the LBOH for contact tracing in the event of a positive case of COVID-19 in the school community. School health staff and LBOH staff should communicate prior to the start of school to identify designated staff conducting contact tracing efforts and to develop communication protocols for their community.

Appendix A: Sample Standing Order for use of hand sanitizer in schools

Properly trained school personnel may supervise the use of alcohol-based hand sanitizers to a [school district name] student provided the parent/guardian has not provided written notification to opt their child out of hand sanitizer use at school.

It will be given under the following conditions:

- If soap and water are not readily available, alcohol-based hand sanitizers with at least 60% ethanol (also referred to as ethanol or ethyl alcohol) or at least 70% isopropanol are an effective alternative for cleaning hands and are recommended as an alternative to soap and water by CDC and the Massachusetts Department of Public Health.

CONTRAINDICATIONS:

Previous reactions to alcohol-based hand sanitizers.

Hand sanitizers that are not alcohol based are not recommended.

Please refer to the “FDA updates on hand sanitizers consumers should not use,” at <https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-hand-sanitizers-consumers-should-not-use>

DOSAGE:

Per label instructions.

APPLICATION:

- Apply the gel, liquid, or foam product to the palm of one hand.
- Rub hands together.
- Rub the gel, liquid, or foam over all the surfaces of hands and fingers until hands are dry. This should take around 20 seconds.

POSSIBLE SIDE EFFECTS:

If skin irritation develops, discontinue use, and wash hands with soap and water immediately.

Eye pain can result if hand sanitizer is rubbed or squirted in the eye. Most eye exposures can be managed by copious flushing of the eye with water and will not require the child to be sent home or to a physician.

For any concerns regarding ingestion of hand sanitizer, immediately call Poison Control at 1-800-222-1222.

These standing orders must be renewed annually for each academic school year and are effective from August 1, 2020 through July 31, 2021.

Physician's Signature

Date