Bureau of Indian Education School Reopening Plan

The Bureau of Indian Education (BIE) School Reopening (Plan) is intended to provide guidance to BIE schools regarding:

- Guidelines for school reopening
- Considerations for teachers and staff
- School building mitigation and cleaning
- Health screening
- Social distancing and other safety protocols

BIE goals for the Plan include:

- Provide reopening directives to BIE-operated schools for developing individual school site reopening plans.
- Provide reopening guidance to Bureau-funded schools, including Tribally-controlled schools, who may utilize the Plan’s recommendations to support their individual school site reopening plans.
- Serve as structural guidance for formal government-to-government Tribal consultation as well as separate engagement events with pertinent union organizations, such as the Federation of Indian Service Employees (FISE), and national Tribal organizations like the National Indian Education Association (NIEA). Formal Tribal consultation and stakeholder engagement events will be scheduled to occur in summer 2020 to provide schools adequate time to develop localized reopening plans for the 2020-2021 School Year.
- The intended purpose of the Tribal consultation and stakeholder engagement is to ensure that BIE is meeting the needs of its students, schools, and Tribal communities during the COVID-19 Pandemic recovery.

To develop this Plan, BIE gathered information from across its divisions, incorporated common practices and supports planned for implementation by states, and utilized national state-level recommendations by the WestEd Regional Comprehensive Center and Council for Chief State School Officers (CCSSO).¹

¹ This resource draws on a resource created by CCSSO that is based on guidance from multiple sources to include: the Centers for Disease Control and Prevention, the White House, American Academy of Pediatrics, Learning Policy Institute, American Enterprise Institute, Rutgers Graduate School of Education, the World Health Organization, the Office of the Prime Minister of Norway as well as the departments of education/health and/or offices of the governor for Idaho, Montana, New York, Texas and Washington, DC.
### Guidelines for School Reopening

- Reopening based on local decision-making in coordination with local public health officials.
- Accommodations made available for special populations of students, including students with disabilities.

### Key Questions

- How do you want to bring students and teachers back to physical school sites, particularly if you still need social distancing in place to ensure safety?
- How will you decide when reopening is best for your local community?
- How will you communicate this information?
- Once you reopen, what will the decision-making process look like to trigger another closure?

### BIE Recommendations

- Any action taken to reopen a school should be done in coordination with a school’s respective BIE Education Program Administrator (EPA) and should utilize guidance from pertinent local, state, and Tribal officials as well as local public health officials.
- In keeping with Centers for Disease Control and Prevention (CDC) guidance, school administrators should consider state, Tribal, local emergency orders, level of community transmission, the ability to provide personal protective equipment (PPE) to staff and students, and other preventative measures for staff and students.
- Where states are open but local Indian Tribes served by the school requests a school site stay closed, school administrators should consult with local Indian Tribes and make a local determination.
- The decision to reopen a school should generally be made when local infection rates have slowed significantly and other parts of the local economy have reopened. This should be coordinated with the respective BIE Chain of Command for approval.
- School reopening should be informed by CDC School Decision Tools.²

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Schools will need to adapt reopening plans to include evolving guidance from public health officials based on a better understanding of COVID-19 risks and the related mitigation strategies. Public health officials may recommend only reopening schools when certain hygiene and social distancing measures are in place.

- Depending on local circumstances, schools will need to consider closing playgrounds, suspending non-essential activities, holding meetings online, limiting on-campus visitors, administering COVID-19 tests, and requiring temperature checks for students and faculty entering buildings.
- Classrooms, common areas, school buses, and other areas will need to undergo regular deep cleanings to minimize the spread of COVID-19.
- Identifying and procuring any needed PPE as recommended by public health officials, including gloves, face masks, hand soap, hand sanitizer, and disinfectant. Some of these items will require working with local health authorities, while others may be more widely available but will require budgetary planning to accommodate procurement. Schools should consider when developing plans that even if a school reopens, some parents may decide to keep their child at home during a local outbreak.

The path to reopening must be based on the public health recommendations, in coordination with the BIE Chain of Command, and informed by CDC School Decision Tools to guide the gradual relaxation of the intensive social distancing measures adopted as a result of COVID-19. Any consideration about reopening must consider the wide variability of circumstances that Indian Tribes, states, local communities, and schools confront. Depending on the public health situation, school leadership should plan for possible waves of stopping and starting on-site instruction, partial or staggered site closures and openings, or other developments (as informed by local health facilities, population vulnerability, and more).

**Special Populations**
Based on current medical knowledge, the risks to students with high-risk medical conditions, especially mechanical ventilation-dependent children or children with tracheostomies, should inform whether individual students should continue a distance learning program or receive home or hospital instruction even after a school reopens. Student data should be gathered and cross tabulated on a monthly basis by teachers and school leadership regarding distance learning to ensure parity in education delivery to all students. Under the Individuals with Disabilities Education Act (IDEA), once a school provides distance learning to the general population, they are obligated to provide related services for students under an Individualized Education Program (IEP). School administrators should continue to utilize guidance from the U.S. Department of Education regarding special populations, in coordination with BIE support staff from its Division of Performance and Accountability (DPA). BIE DPA will continue to serve schools by providing schools with templates to revise any of the Every Student Succeeds Act (ESSA) formula or discretionary grants schools received and assist with Continuous Learning Plan Templates and Budget Revision Templates to assist with any grant activity changes necessary due to the closure of schools sites from the COVID-19 pandemic.

**School Based Health Services**
Schools will play a critical role in the overall whole-child development process and quality of life for families. Mental and emotional well-being for students and staff have positive psychological and academic impacts. Schools should consider access to support like counseling services and access to free school meals for students if school sites continue to be closed or close in the future. Schools should consider having guidance in
3 John P. Bailey and Frederick M. Hess, *A Blueprint for Back to School*, (American Enterprise Institute, May 2020), 9, https://www.aei.org/research-products/report/a-blueprint-for-back-to-school/?mkt_tok=eyJpIjoiTVRJd05EVXpNekpsT1dVMSIsInQiOiJi2cXp2MmViQjctT38CbGVyTzZwcmV0TENNS3piSjh3SUFSQ3JUHY2WSYSZzNTWnpZTJpLhhneCnbmdllK2Rza2lTHM4YTJZ0SpaUXoVX81NEVFYVFsODRTX3hQXZbVlcl2VZ2XRv1MwWGpIWE1ndmF0dUSROehFemV2M3Z1n0%3D.


place regarding trauma-informed social and emotional learning. Collaboration with school nurses, where practicable, will be essential and schools should involve school health staff in the planning phase for reopening and consider collaborative strategies that address and prioritize immunizations and other health services for students, including mental and behavioral health services. BIE is evaluating how it can provide additional support for mental health services by utilizing the use of excepted service appointments under U.S. Office of Personnel Management (OPM) 5 CFR 213.3102(i)(3) to address the need for hiring additional staff in response to COVID-19. Additionally, BIE will actively work with Indian Health Service and the Department Public Health Corps to maximize available resources to local schools.

Further, supervisors are encouraged to take employees’ mental health into consideration. Many insurance companies cover telehealth in some manner, which allows patients to seek medical and behavioral health care over the phone or virtually. The Employee Assistance Program (EAP) may be used by federal staff in need of counseling assistance.  

Other resources for BIE employees include:
- Coping with Stress During COVID-19
- Disaster Distress Helpline

**Residential Boarding Schools/Dormitories**

BIE residential facilities will follow the same guidelines described for schools within this Plan. However, prior to travel, students should be provided with and briefed on the CDC – Coronavirus and Travel in the United States guidance. Students should be directed to utilize PPE in transit to BIE sites, including face coverings while traveling. BIE sites will provide PPE when students fly from school to their homes. Schools will work to provide travel options that meet student needs and address any concerns they may have. If students and parents are not comfortable with flying, the school will work to arrange additional modes of transportation to support student safety, to the extent practicable. If students cannot travel home, the BIE site will continue to house such students in their dormitory rooms until cleared to travel. BIE will ensure that residential staff continue to provide such students with necessary services, such as meal service and medical screening. It is recommended that students are not allowed to travel to BIE sites to receive on-site instruction, but continue to have access to distance learning supports, if they originate from higher transmission areas or “hot spots”.

If residential facilities are notified of a suspected COVID-19 diagnosis, the facility will adhere to the existing BIE student check-out policy and isolate any students and follow mitigation guidance, as necessary per the recommendations herein. As is the case with all BIE schools, each BIE operated residential program is faced with its own unique set of circumstances and challenges. Dormitory social distancing measures will necessarily vary based upon the dormitory infrastructure at each school. Residential facilities should review CDC guidance and reduce the maximum number of students allowed in a single room, as needed, to adhere to social distancing guidelines. If an outbreak should occur, and the residential program is ordered to “lock-down” by a responsible government agency, then the BIE will adhere to the applicable public health “lock-down” order. For instances in which an entire dormitory is affected, the BIE site will adhere to site-specific prevention and mitigation strategies described herein. The BIE site will immediately engage its BIE Chain of Command and local public health providers to ensure students and staff have immediate access to medical care and the necessary mitigation protocol is implemented.

**BIE Postsecondary**
Similar to the BIE workforce, the workforce at BIE’s postsecondary institutions – Haskell Indian Nations University (HINU) and Southwestern Indian Polytechnic Institute (SIPI) – is generally within the at-risk population, so the two institutions should follow the general guidelines recommended herein, as practicable. Both institutions have already prepared preliminary scenarios for the beginning of the 2020-2021 School Year. These scenarios include:

- **HINU** – Has developed three scenarios for resumption of activities in the fall that include: (1) Delivery of all courses online for the fall semester. Courses could be offered synchronously, asynchronously or some combination of both; (2) delivery of courses face-to-face, with proper PPE and health/safety protocols, on campus for a small number of students in combination with online courses for off-campus students nation-wide; or (3) delivery of nearly all courses in a traditional face-to-face classroom setting, with proper PPE and health/safety protocols, on an essentially open campus for 800 students, with some online courses offered.

- **SIPI** – The continuation of distance education programming through the Fall 2020 trimester with on-site education delivery beginning in spring 2021.

Communication

Effective school reopening requires diligent efforts to communicate with parents, educators, and community members. Careful reopening plans will not be successful if parents or educators are not confident about the measures in place. Where schools open with significant modifications to schedules, classes, or logistics, minimizing confusion will depend on clear and consistent communication and support from BIE’s Chain of Command.

Schools should improve communications by utilizing the following techniques:

- Utilize appropriate BIE Chain of Command, including direct support from BIE EPAs, regarding individual reopening plans for the 2020-2021 School Year and School Operations Division for facilities support and potential mitigation needs.
- Implement a local communication plan to reach teachers and parents by leveraging telephonic communications, social media, websites, and email.
- Among the most important considerations is the health and safety of students and school personnel. Schools need to provide clear guidance based on their local, Tribal, and state decisions regarding reopening.
- BIE will support individual school reopening plans by implementing a comprehensive communications strategy to include feedback through formal consultation and the implementation of a BIE School Reopening Task Force to ensure local schools have the support needed to reopen safely, to the extent practicable.
- Reminder that consistency with BIE directives is essential as you communicate with stakeholders.
- BIE, taking direction from the U.S. Department of the Interior (DOI) Office of Emergency Management (OEM) is supporting your schools by planning and implementing DOI’s response to COVID-19.
- BIE continues to monitor and update its website with the most recent information and resources to help support school administrators, teachers, students, families, staff and communities as we reopen schools.

School Reopening Plans

School administrators are responsible for the development of their individual reopening plans for the 2020-2021 School Year with approval from the respective BIE EPA and should include the components and recommendations outlined in this Plan. EPAs hold the authority to reopen
and/or close school sites. The decision should be made in consultation with BIE Associate Deputy Directors (ADD), school leadership, Tribal leadership, local Public Health Officials and Local Incident Commands, if applicable.

**BIE School Reopening Task Force**
As states similarly develop their reopening plans in preparation for the 2020-2021 School Year, they are implementing task forces to develop their individual plans for schools. BIE’s Task Force will work to prepare for Tribal consultation and review recommendations by BIE stakeholders and implement approved recommendations by BIE leadership. Upon completion of the Plan, Task Force members will work with designated schools to ensure school leaders have individual reopen plans that address the guidance provided herein. Members of the Task Force will include participants from the pertinent BIE Divisions, including the Chief Academic Office, School Operations, Performance and Accountability as well as schools leaders from BIE’s Associate Deputy Director divisions. The Task Force will provide weekly reports, through the Chief of Staff, to the Assistant Secretary – Indian Affairs.

**White House Guidance**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Criteria</th>
<th>Reopen</th>
<th>Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>14-day period of downward trajectory of documented cases or positive tests as a percentage of total tests. Declining rates of flu-like symptoms and hospital capacity to care for all patients</td>
<td>Businesses begin to reopen. Telework encouraged. Large venues open with physical distancing Minimize non-essential travel</td>
<td>Remain closed Vulnerable populations continue to shelter in place</td>
</tr>
<tr>
<td>2</td>
<td>28-day period of downward trajectory of documented cases or positive tests as a percentage of total tests. Declining rates of flu-like symptoms and hospital capacity to care for all patients</td>
<td>Continued opening of businesses. Non-essential travel permitted.</td>
<td>Schools open Vulnerable populations continue to shelter in place</td>
</tr>
<tr>
<td>3</td>
<td>42-day period of downward trajectory of documented cases or positive tests as a percentage over total tests. Declining rates of flu-like symptoms and hospital capacity to care for all patients</td>
<td>Businesses and large venues can operate without physical distancing.</td>
<td>Schools open</td>
</tr>
</tbody>
</table>

The above CDC Decision Tree is helpful in considering when school sites may safely reopen.
Once school sites open, the below CDC Decision Tree describes circumstances that could trigger the need to close.11
General Guidelines

Cleaning and Sanitation
- Common areas cleaned frequently (e.g., every two hours)
- Frequent disinfecting of door handles, desks and other common spaces
- Require handwashing in regular intervals
- Keep libraries, gyms, and playgrounds off limits unless they can be sanitized between groups or they are being used as additional classroom space
- Students help clean where practical, such as their individual desk space

Hygiene
- Schools should implement CDC recommendations, including frequent handwashing
- Schools provide hand sanitizer; and may require the use of masks by staff/students
- Staff training on hygiene standards, such as frequent handwashing; use of CDC posters and videos

Sick Policies
- Develop protocol to regulate visitors
- Implement temperature checks and/or symptom screening at least twice per day, including upon arrival to school.
- Require staff to wear protective gear when taking students’ temperature, such as masks and gloves, and clean thermometers after each use
- Require anyone (students or staff) with COVID-19 symptoms to stay home or report them upon arrival, before entering the building
- Stay home if sick until symptom-free for one day
- Require a 14-day quarantine for any staff and students who have had direct contact with someone diagnosed with COVID-19

Class Sizes
- Consider breaking larger classes into smaller groups
- Physical distancing (6 feet) within classrooms; use of outdoor space, gyms, and secondary school classrooms
- Set up schedule for students to alternate school days or attend for half days

Social Distancing
- Consider use of face coverings by all staff and students
- Keep students with the same group and in the same classroom, with teachers rotating in and out when practical
- Provide six feet of separation in cafeterias during meal time
- Consider students eating lunch in the classroom at their desks to limit mixing of students
- Cancel extracurricular activities
- Prevent any non-school staff, including parents, from entering school buildings by implementing student drop-off at entrance
• Consider staggering of arrival/dismissal times to limit social interaction
• Consider reducing bus loads to allow for one student per seat
• Consider smaller groups of students that are staggered for outside play
• Determine using barriers on buses for employees and at entrances of building for the staff administering the temporal thermometer scans.
• Develop specific walkway lanes to ensure adequate separation if students and staff must move between classrooms.
• Explore software that is being used for digital imaging to track temperature upon entry of facilities.

Graduation
• Provide a live stream of graduation
• Consider limiting spectator attendance
• For larger schools, consider grouping graduates or providing multiple ceremonies
• Follow social distancing between families

Accommodations
For students, teachers, and staff in an at-risk group:
• Schools that reopen will need to take into consideration that some teachers and staff will fall into the at-risk category because of their age or other health risks
• These individuals should have additional accommodations afforded, including: teaching classes remotely, utilizing a larger classroom where social distancing is maintained, classroom modifications that afford additional protections such as rearranging desks, providing barriers between desks, etc., or given an option not to return until the risks are reduced
• Schools should develop adjusted staffing plans that may be needed to accommodate the number of employees staying home for medical reasons
• Students who are high risk or who have family members who are high risk should not be penalized for failing to attend and should continue to receive remote support
• Students at increased risk of severe illness should consider implementing individual plans for distance learning, e-learning to limit exposures and accommodations should also be extended to those students and staff who are required to quarantine due to exposure or potential exposure\(^\text{13}\)

BIE schools should have ensured appropriate Emergency Operation Plans (EOP) and teams are in place with an assigned lead for the following key areas:

- Academic Programming
- Physical & Structural Environment
- Business Environment
- Social, Emotional and Behavioral

EOPs should have defined roles and responsibilities for school administrators and work with their BIE Chain of Command. Schools should utilize EOP development tools and technical assistance from BIE Safety and Occupational Health Staff to update existing EOPs, so that as school sites reopen, the EOP team can monitor the reopening progression as outlined in their plan. BIE Safety and Occupational Health Staff will also specify shared or dependent responsibilities, if applicable, with the Bureau of Indian Affairs (BIA) and/or Indian Affairs Deputy Assistant Secretary-Management (DAS-M) for assistance with facilities support.

**Continued Monitoring**

The virus does not move, people move. The challenge in society getting back to normal is people movement. Threats may come from neighboring communities, and when travel restrictions have been lifted, neighboring states. BIE leadership encourages schools to remain vigilant in maintaining their highest emergency response measures.

**Quarantine**

Students and staff are immediately sent home if they exhibit any symptoms of the virus or if they report having been in contact with someone who is infected. If symptoms are identified upon arrival, the school should have the individual wait in a designated room until picked up. Schools should allow students to return to school only after they are symptom-free for one day.\(^\text{14}\)

Considerations:
14 “Action Steps for Parents if School is Dismissed or Children are Sick and Must Stay Home”, Centers for Disease Control and Prevention, last accessed May 28, 2020, https://www.cdc.gov/H1N1flu/schools/toolkit/pdf/parentfactsheet032310.pdf.
• Students with cold or pollen allergies are specifically allowed to attend school if they do not have a fever.
• Students who have had contact with someone with COVID-19 must self-quarantine for 14 days before returning to school.

School Closure
Administrators shall develop contingency plans utilizing their EOP, as based on their emergency preparedness plans, for closing classrooms or schools in the event that students or staff contract COVID-19.

Considerations:
• School Administrators should work with their respective EPA to coordinate closure activities and ensure appropriate waivers for instructional hours are in place, as needed.
• If one or more students or staff persons in a class is confirmed to have COVID-19 that class is suspended for 14 days; in high school this applies to all classes the person attended.
• If two or more cases are confirmed in a school, the school is closed for 14 days.

If schools close again, schools should follow the guidance below for pertinent staff to enter schools during closure.15
• Where possible, teachers and staff should continue to work remotely.
• Teachers and staff may enter the classroom for video instruction, to perform administrative duties, and/or to clean out their classrooms after mitigation has been implemented and only if they are well.
• Teacher and staff time at schools should be staggered at each individual campus to enable social distancing to be implemented effectively.
• Teachers and staff must be in the classrooms or offices by themselves and must maintain social distancing of at least six feet from one another.
• Teachers and staff should wear masks or face coverings.
• Teachers and staff must screen themselves before coming into school for common COVID-19 symptoms, including: new or worsening cough; shortness of breath; sore throat; loss of taste or smell; feeling feverish or a measured temperature greater than or equal to 100.0 degrees Fahrenheit; or known close contact with a person who is lab-confirmed to have COVID-19.
• Schools must screen staff upon entry into the school.
• Schools must clean and sanitize bathrooms, doorknobs, and other commonly touched surfaces.

Academic Programming
The COVID-19 pandemic has changed the landscape of education and has altered how academic instruction is provided.
• As schools reopen, consideration should be made to meet the needs of social distancing with scheduling options that might include: One day rotations for all students, two day rotations for all students, A/B week rotations with only half the student population on-site at a time.
• Reduced class sizes may become the norm, consisting of students placed in classes with desks that are placed six feet apart to adhere to social distancing and with some students utilizing distance learning models while others learning on-site.
• The school has the tools necessary to support distance learning, including, but not limited to: instruction, device availability and use at home, IT support staff, internet access, accessibility and security.
• Ensuring professional development is provided to staff to ensure successful delivery of instruction.
• Special academic areas such as art, health, and physical education may be offered remotely via video along with parent/teacher conferences, discipline conferences, 504, and IEP meetings.
• School leaders may need to research how to reallocate time to ensure instructional delivery support academic advancement.
• Build in dedicated time for teachers to collaboratively adapt curriculum pacing guides based on priority grade level expectations and objectives, while keeping at the forefront mitigation for the “loss of learning” that may have occurred.
• Inventory sources of data that document student academic work while out of school (parent feedback, submitted assignments, submitted projects, etc.).
• Administer and analyze diagnostic assessment results by content area and student.
• Determine actions that will be implemented immediately to target learning gaps for the most vulnerable or significantly impacted groups of students (i.e. students with disabilities, English learners, homeless students, children in poverty, etc.).
• Creative scheduling may also be needed. For example, if schools cannot teach all subjects in person, it may be beneficial to prioritize the teaching of math in person (or at least synchronously via distance learning).
• Time when students are not physically in school may be better utilized in one-on-one or small-group sessions that provide one-on-one educational instruction.
## CONSIDERATIONS FOR TEACHERS AND STAFF

### KEY QUESTIONS
- How will you determine which staff are willing/able to return or gather data on who will be able to return?
- How will you address staff who are unable or uncomfortable to return?
- How will teachers/staff know how to limit the spread of COVID-19 as well as when it’s safe to end home isolation?
- How do you address administrators, teachers and other staff who are identified as ‘vulnerable populations’?
- How do you address staff who are ill, or who have family members who fall ill?
- How do you ensure enough substitute teachers are prepared?

### RECOMMENDATIONS

If you have a fever, cough or other symptoms, you may have COVID-19. Most people have mild illness and are able to recover at home. If you think you may have been exposed to COVID-19, contact your healthcare provider immediately. Teachers and staff should follow the guidance of the CDC to help prevent the spread of COVID-19 if sick as well as when/how to discontinue home isolation. Step-by-step guidance found here: [https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html](https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html)

**Vulnerable/High Risk Groups**

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:

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

Based on currently available information and clinical expertise, older adults and people of any age who have serious underlying medical conditions might be at higher risk for severe illness from COVID-19. To protect those at higher risk, it is important that everyone practices healthy hygiene behaviors. If you have staff members or teachers age 65 or older, or with serious underlying health conditions, encourage them to talk to their healthcare provider to assess their risk and to determine if they should stay home.

Many educators in BIE schools may be vulnerable to COVID-19, raising questions about how to protect them, whether they will want to work in schools next year, and how to respond to any resultant personnel shortages. Meanwhile, BIE will work with the union to revisit aspects of its agreement to help schools adapt to social distancing and to ensure that vulnerable teachers can work safely and productively. But, schools should have contingency plans in place to operate with reduced staff or bring in additional personnel supports, as possible. Evaluation of local staffing needs and personnel projections is critical to ensure support for reopening and continued operations.
COVID-19 Susceptible Personnel
For vulnerable personnel, statistics show that an estimated 18 percent of teachers and 27 percent of principals are considered vulnerable or may require flexibility to care for dependents. This rate is higher in BIE schools where there is an estimated 746 employees in the 53 BIE Operated Schools that could potentially retire and many that have health conditions that place them in the high-risk category.

- For all BIE employees, supervisors are encouraged to remain flexible and provide alternate arrangements to meet work-life balance concerns, including telework, alternate work schedules, and other available leave options to balance mission objectives and employees’ needs during the COVID-19 pandemic.
- For employees falling under Title I of the Family and Medical Leave Act (FMLA), they may be eligible to take leave under the Families First Coronavirus Response Act (FFCRA) for childcare or dependent adult care, when the family member’s place of care is closed for reasons related to COVID-19.
- For employees falling under title II of the FMLA, the option of using up to 104 hours of sick leave for dependent care is available when needed.
- BIE has already relaxed federal requirements for teacher credentialing to match the certifications of states in which schools are located but BIE will continue to monitor if states relax credentialing further to ensure parity in recruitment.
- Schools should consider non-traditional classroom configurations and relaxed class-size requirements to help address potential staffing shortages due to the many teachers currently at-risk who might not be able to enter classrooms this fall.
- Schools should also explore reassigning teachers who are uncomfortable dealing with the new teaching practices required, including working through online instruction or other non-instructional tasks which may be suitable and available.19

Strategies to Support Staff and Students at Higher Risk for COVID-19

- 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 that limit exposure risk).
- Offer options for students at higher risk of severe illness that limit their exposure risk (e.g., virtual learning opportunities).
- Consistent with applicable law, put in place policies to protect the privacy of people at higher risk for severe illness regarding participating with local authorities in broader COVID-19 community response efforts (e.g., sitting on community response committees).
BUILDING MITIGATION AND CLEANING

KEY QUESTIONS
- How do you ensure the building is cleaned and ready to welcome students?
- How often do you need to go through these protocols/procedures?
- What protocols do you put in place to clean throughout the day?
- How do I keep cleaning materials and safety equipment in stock?

RECOMMENDATIONS

Intensify cleaning, disinfection, and ventilation
Clean and disinfect common areas every two hours and frequently touched surfaces within the school and on school buses (e.g., playground equipment, door handles, sink handles, drinking fountains) and shared objects (e.g., toys, games, art supplies) between uses.
- Clean and disinfect school buses with regular deep cleanings before and after transit to minimize the spread.
- Ensure safe and correct application of disinfectants and keep products away from children.
- Ensure ventilation systems operate properly and increase circulation of outdoor air as much as possible by opening windows and doors, using fans, or other methods. Do not open windows and doors if they pose a safety or health risk (e.g., allowing pollens in or exacerbating asthma symptoms) risk to children using the facility.
- Take steps to ensure that all water systems and features (e.g., drinking fountains, decorative fountains) are safe to use after a prolonged facility shutdown to minimize the risk of Legionnaires’ disease and other diseases associated with water.

Mitigation
- The BIE will not conduct COVID-19 testing of students or staff on-site but schools should screen students and staff each day.
- If a suspected or confirmed COVID-19 case is identified, the school should immediately notify local public health officials.
- School administrators should also contact BIE Safety and Occupational Health Manager Verlee Sayler (verlee.whitecalfe-sayler@bia.gov) immediately for guidance and assistance with mitigation support.

Cleaning
- Cleaning is frequent, especially high-touch surfaces in common spaces (every two hours).
- Wear disposable gloves to clean and disinfect.
- Clean surfaces using soap and water, then use disinfectant.
- Cleaning with soap and water reduces number of germs, dirt and impurities on the surface. Disinfecting kills germs on surfaces.
- Practice routine cleaning of frequently touched surfaces.
  - More frequent cleaning and disinfection may be required based on level of use.
- High touch surfaces include, but are not limited to:
  - Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
- Students should wipe their own desks.
- Toilets and sinks are cleaned at least four times per day.
• Tablets and computers are wiped after each use.

Disinfectants
• Recommend use of EPA-registered household disinfectant. Follow the instructions on the label to ensure safe and effective use of the product. Many products recommend:
  o Keeping surface wet for a period of time (see product label).
  o Precautions such as wearing gloves and making sure you have good ventilation during use of the product.

• Diluted household bleach solutions may also be used if appropriate for the surface.
  o Check the label to see if your bleach is intended for disinfection, and ensure the product is not past its expiration date. Some bleaches, such as those designed for safe use on colored clothing or for whitening may not be suitable for disinfection.
  o Unexpired household bleach will be effective against coronaviruses when properly diluted.
    Follow manufacturer’s instructions for application and proper ventilation. Never mix household bleach with ammonia or any other cleanser.
    Leave solution on the surface for at least 1 minute.

Soft surfaces
For soft surfaces such as carpeted floor, rugs, and drapes:
• Clean the surface using soap and water or with cleaners appropriate for use on these surfaces.
• Launder items, if possible, according to the manufacturer’s instructions. Use the warmest appropriate water setting and dry items completely.
• Disinfect with an EPA-registered household disinfectant. These disinfectants meet EPA’s criteria for use against COVID-19.

Electronics
For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines:
• Consider putting a cover on electronics that can be regularly wiped down.
• Follow manufacturer’s instruction for cleaning and disinfecting.
  o If no guidance is provided, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.

Laundry
For clothing, towels, linens and other items:
• Launder items according to the manufacturer’s instructions. Use the warmest appropriate water setting and dry items completely.
• Wear disposable gloves when handling dirty laundry from a person who is sick.
• Dirty laundry from a person who is sick can be washed with other people’s items.
• Do not shake dirty laundry.
• Clean and disinfect clothes hampers according to guidance above for surfaces.
• Remove gloves, and wash hands right away.
Cleaning and disinfecting your building or facility if someone is sick

- Close off areas used by the person who is sick.
- Open outside doors and windows to increase air circulation in the area.
- Wait 24 hours before cleaning and disinfecting. If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, and vending machines.
- Once area has been appropriately disinfected, it can be opened for use.
  - Workers without close contact with the person who is sick can return to work immediately after disinfection.
- If more than seven days since the person who is sick visited or used the facility, additional cleaning and disinfection is not necessary.

Cleaning and disinfecting outdoor areas

- Outdoor areas, like playgrounds in schools and parks generally require normal routine cleaning, but do not require disinfection.
  - Do not spray disinfectant on outdoor playgrounds - it is not an efficient use of supplies and is not proven to reduce risk of COVID-19 to the public.
  - High-touch surfaces made of plastic or metal, such as playground equipment grab bars and railings should be cleaned routinely.
  - Cleaning and disinfection of wooden surfaces (play structures, benches, tables) or groundcovers (mulch, sand) is not recommended.
- Sidewalks and roads should not be disinfected.
  - Spread of COVID-19 from these surfaces is very low and disinfectants are not efficient.

General cleaning recommendations

- School janitorial staff can clean and disinfect community spaces.
  - Ensure they are trained on appropriate use of cleaning and disinfection chemicals.
- Wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash.
  - Additional personal protective equipment (PPE) might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash.
  - Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area.
- Wash your hands often with soap and water for 20 seconds.
  - Always wash immediately after removing gloves and after contact with a person who is sick.
  - Hand sanitizer: If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.
- Additional key times to wash hands include:
  - After blowing one’s nose, coughing, or sneezing.
  - After using the restroom.
  - Before eating or preparing food.
Before and after providing routine care for another person who needs assistance (e.g., a child).

Additional considerations
- Educate and train staff performing cleaning, laundry, and trash pick-up to recognize the symptoms of COVID-19.
- Provide instructions on what to do if they develop symptoms within 14 days after their last possible exposure to the virus.
- Develop policies for worker protection and provide training to all cleaning staff on-site prior to providing cleaning tasks.
  - Trainings should include when to use PPE, what PPE is necessary, how to properly don (put on), use, and doff (take off) PPE, and how to properly dispose of PPE.
- Ensure pertinent staff are trained on the hazards of the cleaning chemicals used in the workplace in accordance with Occupational Safety and Health Administration’s (OSHA) Hazard Communication Standard (OSHA 29 CFR 1910.1200).

Alternative disinfection methods
- The efficacy of alternative disinfection methods, such as ultrasonic waves, high intensity UV radiation, and LED blue light against COVID-19 virus is not known.
  - EPA does not routinely review the safety or efficacy of pesticidal devices, such as UV lights, LED lights, or ultrasonic devices. Therefore, EPA does not currently confirm whether, or under what circumstances, such products might be effective against the spread of COVID-19.
- CDC does not currently recommend the use of sanitizing tunnels. There is no evidence that they are effective in reducing the spread of COVID-19. Chemicals used in sanitizing tunnels could cause skin, eye, or respiratory irritation or damage.
- CDC currently only recommends use of the surface disinfectants identified on List N against the virus that causes COVID-19.

Keeping Equipment in Stock
- School Administrators should:
  - Ensure appropriate staff are provided PPE and it is utilized in accordance with their position. Regardless of the task or operation (to include lunch services at schools), the minimum PPE, as identified through the CDC recommendations shall be utilized.
  - If the minimum PPE is not available or utilized as required, the task or operation shall not be performed.
  - Prioritize PPE for mission essential personnel and operations, during activities where prolonged close contact (within six feet) is unavoidable, etc.
  - Monitor PPE inventory, supply chain, available vendors and consider lead-time of PPE delivery when placing orders.
  - Utilize the April 24, 2020 BIE guidance regarding the “Optimizing the Supply of PPE”.
  - Please contact the BIE Safety and Occupational Health for assistance with any questions regarding PPE.
**HEALTH SCREENING**

<table>
<thead>
<tr>
<th>KEY QUESTIONS</th>
<th>RECOMMENDATIONS</th>
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<tbody>
<tr>
<td>• How will you screen students, staff and others who interact with each other to ensure they are healthy and not exhibiting signs of illness?</td>
<td>Health screening is critical to ensuring student and staff safety. Students and staff should be isolated and immediately sent home if there are any symptoms or if they have been in contact with someone who is infected. Quarantines of 1-14 days, depending on the circumstance, are rigorously enforced. In some cases, classrooms or schools are closed if there are any confirmed cases.</td>
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<tr>
<td>• Where will the screening take place?</td>
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<table>
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<tr>
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<tbody>
<tr>
<td><strong>Context</strong></td>
<td>Reopening based on local, state, and Tribal conditions, in coordination with local public health officials. Tribal self-governance is paramount to decision-making to protect the health and welfare of the community.</td>
</tr>
<tr>
<td><strong>Health screening</strong></td>
<td>Schools are not expected to provide onsite COVID-19 testing but should provide temperature and symptoms checks at least twice daily (upon arrival or first contact with school employees, before boarding a bus, and again prior to lunch). Parents and/or guardians should be instructed to have taken the students temperature no more than two hours before arrival to the school site.</td>
</tr>
<tr>
<td><strong>Quarantine and school closures</strong></td>
<td>If one or more students or staff persons in a class is confirmed to have COVID-19 that class will not meet for 14 days; in high school this applies to all classes the person attended. If two or more cases are confirmed in a school, the school is closed for 14 days for proper cleaning</td>
</tr>
<tr>
<td><strong>Group size and staffing</strong></td>
<td>No maximum class size; classrooms are large enough to ensure six feet separation. Subject-matter teachers could move between classes to limit student movement.</td>
</tr>
<tr>
<td><strong>Classroom space/physical distancing</strong></td>
<td>Physical distancing of six feet within classrooms. Use outdoor space, gyms, libraries and secondary school classrooms to provide additional classroom space.</td>
</tr>
<tr>
<td><strong>Arrival/dismissal</strong></td>
<td>Encourage parents and/or guardians to be on the alert for signs of illness in their children and to keep them home when they exhibit symptoms.</td>
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<td>No family members past entry.</td>
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<td>Staggered arrival and/or dismissal times.</td>
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<tr>
<td>Mealtimes</td>
<td>Eat at desks or, if cafeteria used, seating is assigned with six feet spacing.</td>
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<tr>
<td>Recreation</td>
<td>Inter-school sports may be suspended.</td>
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<td></td>
<td>Students sent outside as much as possible; play limited to small groups; outdoor space divided and use is staggered.</td>
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<tr>
<td>Transport</td>
<td>Students are encouraged to take their own transportation to school when possible.</td>
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<td></td>
<td>School buses allowed; only one student per seat. There may need to be additional bus routes added to address overcrowding as determined by the school administrators and based on local needs.</td>
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<tr>
<td></td>
<td>Schools should require cleaning and disinfection of seats, armrests, and grab handles at least once every eight hours, including before and after shifts of students are transported.</td>
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<tr>
<td>Hygiene</td>
<td>Frequent handwashing.</td>
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<td>Trainings to teachers and staff and CDC posters and videos provided.</td>
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<td>Masks may be required by school leadership.</td>
</tr>
<tr>
<td>Cleaning</td>
<td>Clean and disinfect common areas every two hours and frequently touched surfaces within the school and on school buses between uses.</td>
</tr>
</tbody>
</table>
Screening: Social Distancing
- Ask parents/guardians to take their child’s temperature either before coming to the school facility and screen students upon arrival. Upon their arrival, stand at least six feet from the parent/guardian and child.
- Make a visual inspection of the child for signs of illness which could include flushed cheeks, rapid breathing or difficulty breathing (without recent physical activity), fatigue, or extreme fussiness.
- You do not need to wear PPE if you can maintain a distance of six feet but should if social distancing is not possible.

Screening: Barrier/Partition Controls
- Stand behind a physical barrier, such as a glass or plastic window or partition that can serve to protect the staff member’s face and mucous membranes from respiratory droplets that may be produced if the child being screened sneezes, coughs, or talks.
- Make a visual inspection of the child for signs of illness, which could include flushed cheeks, rapid breathing or difficulty breathing (without recent physical activity), fatigue, or extreme fussiness.
- Conduct temperature screening (follow steps below)
  - Perform hand hygiene
  - Wash your hands with soap and water for 20 seconds. If soap and water are not available, use a hand sanitizer with at least 60% alcohol.
- Don disposable gloves.
- Check the child’s temperature, reaching around the partition or through the window.
- Make sure your face stays behind the barrier at all times during the screening.
- If performing a temperature check on multiple individuals, ensure that you use a clean pair of gloves for each child and that the thermometer has been thoroughly cleaned in between each check.
- If you use disposable or non-contact (temporal) thermometers and you did not have physical contact with the child, you do not need to change gloves before the next check.
- If you use non-contact thermometers, clean them with an alcohol wipe (or isopropyl alcohol on a cotton swab) between each client. You can reuse the same wipe as long as it remains wet.

Screening: Personal Protective Equipment
If social distancing or barrier/partition controls cannot be implemented during screening, personal protective equipment (PPE) can be used when within six feet of a child. However, reliance on PPE alone is a less effective control and more difficult to implement, given possible PPE shortages and training requirements.
- Upon arrival, wash your hands and put on a facemask, eye protection (goggles or disposable face shield that fully covers the front and sides of the face), and a single pair of disposable gloves. A gown could be considered if extensive contact with a child is anticipated.
- Make a visual inspection of the child for signs of illness, which could include flushed cheeks, rapid breathing or difficulty breathing (without recent physical activity), fatigue, or extreme fussiness, and confirm that the child is not experiencing coughing or shortness of breath.
- Take the child’s temperature.
  - If performing a temperature check on multiple individuals, ensure that you use a clean pair of gloves for each child and that the thermometer has been thoroughly cleaned in between each check.
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<td>After each screening, remove and discard PPE, and wash hands.</td>
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<td>Use an alcohol-based hand sanitizer that contains at least 60% alcohol or wash hands with soap and water for at least 20 seconds.</td>
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<td>If hands are visibly soiled, soap and water should be used before using alcohol-based hand sanitizer.</td>
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<td>If your staff does not have experience in using PPE:</td>
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<td>o</td>
<td>Check to see if your facility has guidance on how to don and doff PPE. The procedure to don and doff should be tailored to the specific type of PPE that you have available at your facility.</td>
</tr>
<tr>
<td>o</td>
<td>If your facility does not have specific guidance, the CDC has recommended sequences for donning and doffing PPE.</td>
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SOCIAL DISTANCING AND OTHER SAFETY PROTOCOLS

KEY QUESTIONS

- How will you ensure social distancing, hand washing and other safety protocols are instituted within a school facility to mitigate spread?
- How will you provide appropriate social distancing for the teachers, principals and school-based staff who are in the high-risk category for COVID-19?
- How will you group students with staff?
- How will you adjust student transportation to meet social distancing requirements?
- How will you use outdoor space to help meet social distancing needs?

RECOMMENDATIONS

Staff members and students should exercise social distancing. While not always possible in an indoor structured environment, it is critical to facilitate as much social distancing with children as often as possible (e.g., do not have children wait in lines, eliminate family style eating for snacks and meals, limit sharing of objects). There will be a need to encourage outdoor play in staggered groups and disinfect equipment between groups. Students and staff should wash hands after outdoor play.21

Ways you can ensure appropriate social distancing at your school facility include, but are not limited to:

- No more than ten individuals (staff and children) clustered in any given activity.
- To the degree possible, keep the same group of children and staff together each day (as opposed to moving children).
- Maximize spacing between individuals in a classroom, including while at tables and in group and individual activities.
- No large group activities and activities requiring children to sit or stand in close proximity, e.g., circle time.
- Minimize classroom mixing on the playground, in the cafeteria, in the restroom, and other shared spaces.
- Stagger arrival and dismissal times.
- Encourage curb- or door-side drop-off and pick-up of children.
- Restrict field trips and inter-school athletics.
- Encourage administrative staff to telework when possible.
- Restrict all outside volunteers or visitors, except adults approved to pick up or drop off enrolled children.
- Ensure adequate supplies to minimize sharing of high-touch materials to the extent possible or limit use of supplies and equipment by one group of children at a time and clean and disinfect between uses.
- 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 of foods and utensils.
- Avoid sharing electronic devices, toys, books, and other games or learning aids.
- Cancelling assemblies, sports games and other events that create crowded conditions.
- Create space for desks to be at least six feet apart.
Social distancing in classrooms
Typically the goal is to keep students six feet apart from each other in class and in other settings. This is accomplished either by reducing class size to allow spreading students out in the classroom, or by having very large classroom spaces within which students can spread out. Schedules for arrival, dismissal, class changes, lunchtime, and recess should be staggered to keep group sizes small and to enforce social distancing. Sports and physical education should be cancelled, although outdoor play in small supervised groups is encouraged. In some contexts, students may need to attend school for half days or alternate days to support distancing.

Schools should:

- Establish and continue communication with local, state and Tribal authorities, as well as local public health officials, to determine current mitigation levels in your community.
- Protect and support staff and students who are at higher risk for severe illness, such as providing options for telework and virtual learning.
- Follow CDC guidance highlighted in this Plan.
- Provide teachers and staff from higher transmission areas or “hot spots” to telework and provide options as feasible to eliminate travel to schools.
- Limit use to ensure external community organizations that use the facilities also follow this guidance.

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