

Additional Information for School Health Offices

updated June 21, 2022

Introduction and Overview

Schools provide safe and supportive learning environments for students and multiple studies have shown that transmission rates within school settings, when multiple prevention strategies are in place, are typically lower than or similar to community transmission levels.¹ School nurses have an important role in monitoring and supporting the health and safety of students and school staff and supporting safe in-person learning. The following guidance, updated for the 2021-2022 school year and condensed in spring 2022, addresses areas of particular importance to school nurses, including:

- Proper use of personal protective equipment (PPE),
- Guidance on nurse's offices and 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 and CDC.^{2,3} 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 should follow the [DPH Comprehensive PPE guidance](#) to guide the proper PPE needed to care for students and staff in the school setting. *School health offices and medical waiting rooms, as the health care practice locations of licensed clinical providers, are subject to the mask requirements for certain locations.*⁴

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.⁵ Massachusetts law also specifies that requirements for Massachusetts workplaces include public sector workplaces and be "as strict as OSHA. No stricter or more lenient."⁶ Under OSHA standards, N95 respirators and their alternatives are respirators that filter particles from the air when appropriately fitted on the user. Please visit the Massachusetts Department of Labor Standards, which provides a [template for a Respiratory Protection Program](#).

¹ <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-guidance.html>

² <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-guidance.html>

³ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/direct-service-providers.html>

⁴ <https://www.mass.gov/info-details/covid-19-mask-requirements#mask-requirements-in-certain-locations->

⁵ <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

⁶ https://www.mass.gov/doc/osha-safety-for-public-sector-highlights-of-updated-law-mgl-c149-s6/download?_ga=2.46155367.1949382023.1640797190-371029588.1640699954

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, fire and rescue department and/or their local hospital to learn if they are able to provide components of the Respiratory Protection Program, like fit testing.

Designated Medical Waiting Rooms

While medical waiting rooms are no longer required, districts/schools should consider maintaining medical waiting rooms for the purpose of separating students or staff who have tested positive on a BinaxNOW rapid antigen test in school, or who are symptomatic with negative or unknown vaccination status. Staff that are supervising children in the designated medical waiting room should wear appropriate PPE per [DPH Comprehensive PPE guidance](#). 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. These staff are delegated the task of monitoring the designated medical waiting room by the school nurse per the Board of Registration in Nursing Advisory Ruling 9803.⁷ Individuals 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.

Health Office Protocols

Physical Exam Requirements

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

The Department continues to encourage in-person physical examination of all students, when possible, to help detect physical and developmental abnormalities. By definition, a physical exam cannot take place during a telemedicine visit, whether it is conducted via phone or video. School nurses are encouraged to prioritize for follow up students who do not have a recent (less than 4 years) record of physical examination on file.

Mandated Screenings

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 have resumed for the 2021-2022 school year. Districts will need to consider how screenings can resume in a safe and effective manner given the changes to the school environment. Districts should consider prioritizing screenings for selected students at greatest risk at the start of the school year, which include:

⁷ <https://www.mass.gov/doc/ar-9803-delegation-to-uap/download>

Age/Grade Level

- **Preschool and Kindergarten students** are at greater risk for negative outcomes when screening opportunities are missed. This age group has a potential for greater developmental impact related to undiagnosed hearing and/or vision loss.^{8,9,10}
- **High school** will be the final opportunity for most students to receive a universal hearing and vision screening, so every effort should be made to include students who did not receive their final screening (typically, during 10th grade) due to the pandemic.

Type of Screening

- Based on data collected by the MDPH School Health Unit regarding numbers of referrals and completed referrals for mandated screenings, vision screening with appropriate adaptations¹¹ and follow-up to eye care for timely intervention¹² should continue to be a priority. Remote learning has increased the level of visual demand for children of all ages.
- Additionally, Screening, Brief Intervention and Referral to Treatment (SBIRT) for problem substance use occurs only twice during a student's educational experience, once in middle school and once in high school. These screenings should be prioritized.

Screening History

- Students who have no record of having a postural, height and weight (body mass index), hearing and/or vision screening.
- Students who have repeatedly had an abnormal postural, hearing and/or vision screening, or have deviated from their growth curve, and have no record of completing a referral.

Individual Student Need

- Students being evaluated for an Individualized Education Program (IEP) or 504 Plan.
- Students who exhibit signs of a problem, or are referred by a staff member, family member, or who self-refer.

If a school is advised to close due to an outbreak of infectious disease, suspend all in-person screenings until permitted to resume by local public health. Ensure that students whose caregivers have opted out of screening on religious grounds, in writing, are not screened. Screening personnel should document the parent or caregiver's decision. Finally, remember that children who have diagnosed neurodevelopmental delay (including cognitive or hearing impairment, speech delay, Down syndrome, motor disabilities such as cerebral palsy, and autism spectrum disorders) **should continue to be referred directly to an eye doctor for a comprehensive eye exam.**

⁸ Kulp MT, Ciner E, Maguire M, et al. Uncorrected hyperopia and preschool early literacy: results of the Vision in Preschoolers Hyperopia in Preschoolers (VIP-HIP) Study. *Ophthalmology*. 2016;123(4):681e689.

⁹ Bruce A, Kelly B, Chambers B, et al. The effect of adherence to spectacle wear on early developing literacy: a longitudinal study based in a large multiethnic city, Bradford, UK. *BMJ Open* 2018;8: e021277. doi:10.1136/bmjopen-2017-021277.

¹⁰ Allen D, Buz Harlor, Charles Bower. Hearing Assessment in Infants and Children: Recommendations Beyond Neonatal Screening. *Pediatrics* Oct 2009, 124 (4) 1252-1263; doi: 10.1542/peds.2009-1997.

¹¹ <https://preventblindness.org/covid-19-childrens-vision-screening/#1597935474766-7d9cd38e-0353>

¹² <https://childrensvision.preventblindness.org/when-to-take-your-child-eye-doctor/>

Safer Screening Practices

- Consider asking students about symptoms consistent with COVID-19 and recent exposure to someone who has tested positive for COVID-19 prior to screening.
- Limit exposure to students and/or adults to under 15 minutes.
- Maintain 6-foot distancing unless the screening procedure requires closer contact.
- If masking is desired or required (for example, a HCP is doing the screening), where possible consider using clear masks or other approved face coverings that allow students and staff to see each other's mouths and facial expressions.
- A face shield and/or divider may be used in addition to a face mask.
- Wash hands or perform proper hand hygiene before and after each screening (student and screener).¹³
- Disinfect all touched surfaces in between students with an appropriate disinfectant,¹⁴ making sure to follow manufacturer's instructions for disinfecting screening equipment.¹⁵
- Disposable eye occluders, headphone coverings, and other disposable barriers and tools may be useful for while conducting screening.

Exposure and Return to Work Guidance

Licensed school health professionals are health care workers. In the case of an exposure to COVID-19, school nurses should follow guidelines for health care workers in DPH's guidance, "Isolation and Quarantine for Health Care Personnel."¹⁶

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 10, 2021**.¹⁷

- Alcohol-based hand sanitizers have been linked to many child overdoses, even deaths, in schools.¹⁸ 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.
 - Consider the use of foaming hand sanitizer, which is more difficult to ingest.
 - Be aware that younger students may ingest hand sanitizer unintentionally and exhibit symptoms such as drowsiness, eye irritation, abdominal pain, nausea, and vomiting. Always contact Poison Control with any ingestion or exposure of toxic material.

¹³ <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/clean-disinfect-hygiene.html>

¹⁴ <https://www.epa.gov/pesticide-registration/list-n-disinfectants-coronavirus-covid-19>

¹⁵ <https://www.asha.org/siteassets/uploadedFiles/Infection-Prevention-and-Control-for-Audiology-Equipment.pdf>

¹⁶ <https://www.mass.gov/info-details/covid-19-public-health-guidance-and-directives#health-care-professionals->

¹⁷ <https://www.mass.gov/doc/handwashingsanitizer-guidance/download>

¹⁸ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5657893/>

- 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.
- Please see the FDA website for updates on hand sanitizers consumers should not use.¹⁹ 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 document [*Administration of Alcohol-Based Hand Sanitizer: Waiver of Requirements under 105 CMR 210.000*](#), updated June 11, 2021.
- 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

A collaborative approach should be used to inform decision-making relative to how the student with special health care needs can safely access in-person instruction.

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 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, if possible, while remaining more than 6 feet away from the student. Use of a portable HEPA filtration unit can provide additional protection and

¹⁹ <https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-hand-sanitizers-methanol>

should be strongly considered.^{20,21} For updated guidance on recommended PPE for AGPs, please refer to [Update to Defining Aerosol Generating Procedures and Recommended PPE](#).

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.²² 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.²³

- 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.
- 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

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

²¹ Lindsley WG, Derk RC, Coyle JP, et al. Efficacy of Portable Air Cleaners and Masking for Reducing Indoor Exposure to Simulated Exhaled SARS-CoV-2 Aerosols — United States, 2021. MMWR Morb Mortal Wkly Rep. ePub: 2 July 2021. DOI: <http://dx.doi.org/10.15585/mmwr.mm7027e1>.

²² <https://www.cdc.gov/infectioncontrol/guidelines/environmental/appendix/air.html>

²³ <https://www.mass.gov/doc/update-to-defining-aerosol-generating-procedures-and-recommended-ppe/download>

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-19.²⁴

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 AGP 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 providing personal care to students without suspected COVID-19 where they could be exposed to spills or splashes of bodily fluids (facemask, eye protection, and gloves).
- Ideally, these procedures should take place in a separate space with good ventilation and ability to close the door. If this is not possible, these procedures may occur within the classroom, with physical distancing between the student and other students and adults of at least three feet, but as much as possible. 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 performing or providing care during AGPs (N95 respirator or alternative, eye protection, gloves, and gowns) unless the student is asymptomatic, fully vaccinated, and the COVID-19 status is unknown or negative OR the student is asymptomatic, not fully vaccinated, and a COVID-19 test obtained within the last three days is negative.²⁵ In this case staff members must use PPE for providing personal care to students without suspected COVID-19 where they could be exposed to spills or splashes of bodily fluids

²⁴ <https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html#Infection-Control>

²⁵ <https://www.mass.gov/info-details/ppe-testing-and-vaccine-supply-resources-during-covid-19>

(facemask, eye protection, and gloves) to prevent fluid crossing from the student to the staff in the forms of drainage or splatter.

- 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 performing or providing care during AGPs (N95 respirator or alternative, eye protection, gloves, and gowns) unless the student is asymptomatic, fully vaccinated, and the COVID-19 status is unknown or negative OR the student is asymptomatic, not fully vaccinated, and a COVID-19 test obtained within the last three days is negative.²⁶ In this case staff members must use PPE for providing personal care to students without suspected COVID-19 where they 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.
- 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).

Working with Local Boards of Health

COVID-19 is a reportable disease under 105 CMR 300, and thus should be reported to the local board of health. In limited circumstances, 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

²⁶ <https://www.mass.gov/info-details/ppe-testing-and-vaccine-supply-resources-during-covid-19>

specifically allows public health reporting and access to PHI for public health activities without requiring an individual's authorization.”²⁷ FERPA 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.”²⁸ 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.”²⁹

Notifying Local Boards of Health

School nurses must notify the LBOH of every *positive COVID-19* test performed in the school (both students and staff). Reporting results to the Department of Public Health using an approved electronic method satisfies this requirement.

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.

²⁷ http://www.maventraining.com/maven-help/pdf/LBOH_HIPAA_Letter_2017.pdf

²⁸ https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronavirus%20Frequently%20Asked%20Questions.pdf

²⁹ https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronavirus%20Frequently%20Asked%20Questions.pdf

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, 2021 through July 31, 2022.

Physician’s Signature

Date