

# COVID-19 Cloth Face Covering (Mask) Requirement

## Purpose

This policy provides guidance to all employees, students, and visitors regarding the use of face coverings when working in Arlington Public School (APS) facilities, on school division property, in school division vehicles with more than one occupant, or while otherwise performing work on behalf of Arlington Public Schools. This policy and guidelines attempt to balance the wellbeing of our community while recognizing the challenges of wearing a face covering at all times in the school and work environment unless medically exempt. There are times when wearing a face covering is simply not feasible, in which case students, employees, and visitors are required to maintain at least six-foot separation.

## Scope

All APS employees, students, and visitors who are in school division facilities or on school division property, travel in school division vehicles or who otherwise come into contact with other employees, students, and visitors while performing work on behalf of Arlington Public Schools, are subject to the requirements of this policy.

## Definitions

Cloth Face Covering: refers to any cloth/fabric covering for the face, secured to the head with ties or ear loops, for the purpose of covering the mouth and nose completely and with the effect of inhibiting transmission of respiratory particles. The CDC lists five criteria for cloth face coverings, which should:

- Fit snugly but comfortably against the side of the face
- Be secured with ties or ear loops
- Include at least 2 layers of fabric
- Allow for breathing without restriction
- Be able to be laundered and machine-dried without damage or change to shape.

Gaiters, balaclavas, masks with valves and other similar face coverings are not in compliance with recommendations and therefore are not considered an appropriate face covering for work or school. This term is not intended to indicate any medical or otherwise graded face covering.

Personal Protective Equipment (“PPE”): School Division issued equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, coveralls, vests and full body suits, and face masks appropriate for the specific workplace environment and duties. PPE is intended to be worn by employees as part of their job duties to mitigate hazards as identified by a hazard analysis.

Physical Distancing: The practice or ability to keep a distance of at least six feet from other people in public places during the outbreak of a contagious disease in order to minimize exposure and reduce the transmission of infection.

## **Employee Use**

Cloth face coverings are used to keep a person from potentially transferring respiratory droplets to other individuals. Proper physical distancing, handwashing, refraining from touching one's face, and wearing face coverings, taken together, have been shown to be effective in slowing the spread of coronavirus.

Cloth face coverings are not personal protective equipment (PPE) and shall not be used in place of School Division issued PPE under any circumstances. PPE is intended to be worn by employees as part of their job duties to mitigate hazards as identified by a hazard analysis. Employees who are assigned these types of job duties are issued appropriate PPE by the School Division as necessary. Cloth face coverings shall be worn by employees when they are not engaging in work activities where they are required to wear PPE. Workplace PPE can range from surgical masks and N-95 respirators, to face shields and full mask respirators.

Cloth face coverings are not intended to replace the consistent practice of physical distancing or personal hygiene habits such as frequent hand washing and avoiding touching one's face. Employees shall continue to practice physical distancing and personal hygiene when wearing a cloth face covering, wherever possible.

Cloth face coverings are not intended to allow employees who are showing symptoms of an infectious illness, such as the cold, flu, or coronavirus, to report to work. Employees who are showing signs of illness shall not report to their work location with or without a cloth face covering. Employees who are sick or who suspect they may be sick must stay home per school division policy. If an employee becomes sick at work, he/she should alert his/her supervisor and be sent home immediately.

Current CDC guidance advises that medical face coverings and respirators be reserved for healthcare workers and other first responders. Employees who are not required to wear PPE (such as N95 respirator face coverings or face shields) to perform their job duties are strongly discouraged from wearing these items in the workplace or while performing official School Division duties.

Disposable face coverings, such as surgical and procedural face coverings, are intended for brief, single use purposes and should be immediately disposed of once the wearer removes the face covering. Employees are required to properly dispose of such face coverings immediately after use, to include throwing the face covering in a trash receptacle and then thoroughly washing their hands with soap and water or using a hand sanitizer with at least 60% alcohol. Used disposable face coverings shall not be placed or disposed of anywhere on School Division property other than in a trash receptacle.

## **Employee Face Coverings Requirements**

In general, employees are required to wear a face covering any time they are sharing an enclosed space with another person or within six feet of another person indoors or outdoors.

### Indoor Settings

The risk of transmission increases significantly in common areas, and as such, employees in school division facilities are required to wear a face covering in all common areas, such as hallways, restrooms, stairwells, elevators, kitchen areas, cubicles, classrooms, etc.

Employees will **not** be required to wear a face covering when in an individual office with the door closed so long as they are the sole occupant of the office and remain in the office. Employees will be required to wear a face covering when in a cubical or open circulating space between workstations. Open circulating areas shall be treated as hallways and common areas.

#### Outdoor Workspaces

Employees may work in varied environments. While outdoor areas generally pose a lower risk of transmission of coronavirus, there are instances where our exterior work environment may still pose a risk to our employees or our constituents. Employees are required to wear face coverings whenever they are outside and unable to sustain six feet of separation from other people.

#### Special Circumstances

Employees may have special circumstances where the mask is blocking essential skill delivery (e.g., phonetic facial cue) and may be preventing students from accessing their education. In these limited circumstances a teacher may remove their mask for a very limited (i.e., less than 1-2 minutes) to show facial cues only if six-foot distance is maintained.

#### Vehicles

Vehicles are a particularly vulnerable space when carrying multiple occupants. Therefore, employees are required to wear a face covering anytime they are sharing a vehicle with another person. For obvious safety reasons, the driver's mask style and fit should not impair vision in any way. While it is not required to wear a face covering when driving alone, employees should recognize that the coronavirus can persist in the air, and it may therefore be prudent to wear a face covering, even when traveling alone in a vehicle.

### **Student Use**

Cloth face coverings are used to keep a student from potentially transferring respiratory droplets to other individuals. Proper physical distancing, handwashing, refraining from touching one's face, and wearing face coverings, taken together, have been shown to be effective in slowing the spread of coronavirus.

Cloth face coverings are not personal protective equipment (PPE) and shall not be used in place of School Division issued PPE under any circumstances. PPE is intended to be worn by students as part of the expectation as a student in Arlington to help mitigate hazards of COVID-19. Cloth face coverings are not intended to replace the consistent practice of physical distancing or personal hygiene habits such as frequent hand washing and avoiding touching one's face. Students shall continue to practice physical distancing and personal hygiene when wearing a cloth face covering.

Cloth face coverings are not intended to allow students who are showing symptoms of an infectious illness, such as the cold, flu, or coronavirus, to report to school. Students who are showing signs of illness shall not report to their school with or without a cloth face covering. Employees who are sick or who suspect they may be sick must stay home.

### **Student Face Coverings Requirements**

In general, students are required to wear a face covering while participating in any in person activities with Arlington Public Schools unless there's a medical exception.

#### Indoor Settings

The risk of transmission increases significantly in common areas, and as such, students in school division facilities are required to wear a face covering unless they are actively eating, drinking, in a life-threatening emergency, or have a medical emergency.

#### Outdoor Spaces

Students will engage in activities in varied environments. While outdoor areas generally pose a lower risk of transmission of coronavirus, there are instances where our exterior environment may still pose a risk to our students. Students are required to wear face coverings whenever they are outside and unable to sustain six feet of separation from others or ten foot for exercise (e.g., recess, athletics, etc.).

#### Transportation Vehicles

Vehicles are a particularly vulnerable space when carrying multiple occupants. Therefore, students are required to wear a face covering anytime they in an Arlington Public Schools vehicle.

### **Employee and Student Responsibilities**

Employees and students are responsible for following the requirements outlined in this policy. Employees and students shall only wear approved face coverings, to include school division issued cloth face coverings or personal face coverings that meet the requirements and restrictions outlined below.

- Employees and students are strongly encouraged to wear school division issued cloth face coverings, which the school division will make available.
- Employees and students may choose to wear their own personal face covering provided it meets the requirements outlined.
- Arlington Public Schools reserves the right and full discretion to determine whether any specific personal face covering meets the requirements outlined in this policy.
- If an employee or student chooses to wear a personal face covering, it shall, at a minimum, meet the following criteria:
  - be clean and in good condition
  - fully cover the nose and mouth
  - remain in place without being held by hands
  - be constructed of at least two layers of textile fabric
  - secure to the face with ear loops or ties
  - meet the CDC guidelines for cloth face coverings

- Employees and students are encouraged to resolve concerns related to face covering usage at the lowest possible level but may elevate concerns, if necessary.

An employee or student wearing a face covering not in compliance with school division policy shall be directed to wear or provided a school division-issued cloth face covering. Employees who refuse to comply with this policy shall be sent home and may be subject to disciplinary action.

### **School Division Responsibilities**

The school division is responsible for timely distribution of school division-issued cloth face coverings to all employees and students. The school division is also responsible for responding in a timely manner to complaints that an employee or student is not wearing a face covering, to include but not be limited to counseling the individual on appropriate face covering usage.

### **Visitors in County Facilities**

In accordance with Commonwealth Executive Order, masks must be worn over the mouth and nose while in, “State or local government buildings when accessed for the purpose of securing public services...” and in accordance with Arlington Public Schools policy. To access Arlington Public Schools facilities, all visitors must always wear a mask while inside the building. Schools and departments may at their discretion provide single use masks to customers to facilitate provision of services.

### **Americans with Disability Act Exemption**

Employees are expected to comply with this memo to the maximum extent possible. Consistent with the Virginia Governor’s order and the US EEOC, any employee who cannot use a face covering due to a medical condition or disability will not be required to comply with this policy nor disclose the specific condition which conflicts with this memo to his/her supervisor. However, the employee immediately will be asked to discuss the need for a reasonable accommodation with the Human Resources. Such employees should comply with this guidance to the extent possible without endangering their or others health or safety.

### **Student Medical Exemption**

The following conditions are minimum standards for approval of exemption from a face covering during COVID-19 pandemic. In general, because of the high risk of contagion of this illness, an exemption from wearing a face covering must be reserved for a significant and medical condition that is disruptive to the general functioning of an individual’s life. Each case is reviewed by School Administrators in consultation with School Health on an individual basis. Original documentation from a provider should be submitted to the School with the request for an exemption form.

#### **Airway, Breathing, or Swallowing Problems**

Any condition that could cause serious life-threatening emergencies on a recurring basis that impact on the ability of an individual to breathe including, but not limited to: ventilator-assisted breathing; oxygen- assisted breathing; need for airway suction; frequent choking episodes; recurrent apnea; difficulty swallowing that results in an accumulation of secretions that are excessive and potentially requires suctioning;

severe uncontrolled asthma, chronic obstructive pulmonary disease, pulmonary fibrosis, cystic fibrosis, or any other serious respiratory compromise, or other medical conditions that impact breathing deemed medically necessary as reviewed by School Health in collaboration with the private physician(s) (MD, DO, NP, or PA).

### **Neuromuscular Disorders**

Any physical condition that makes it difficult for a child to remove a mask independently. This may include but is not limited to conditions such as Duchenne's muscular dystrophy, spastic quadriplegia, hypoxic-ischemic encephalopathy, or any other medical condition impacting an individual's ability to safely wear and independently remove a face covering. (Note: because of the importance of face coverings for the health and safety of everyone, strong consideration should be given by the requesting MD, DO, NP or PA for a face covering or shield for those students who have one-on-one assistance with close monitoring at all times.).

### **Behavioral Disorders or Cognitive Impairments**

Severe developmental/behavioral problems may include but are not limited to significant aggression, often requiring a one-on-one aide, such as Autism Spectrum Disorder with aggression, or Pervasive Developmental Disorder or significant cognitive impairment with aggression or oppositional behavior. These children typically would have an existing IEP or 504 Plan. (Note: because of the importance of face coverings for the health and safety of everyone, the requesting MD, DO, NP or PA should explain to the family that part of the child's new goals for activities of daily living will be learning how to accept and use a face covering or shield.).

### **Physical**

Any physical limitations of a severe nature that would place an individual at risk of injury if not assisted to remove a face covering, which may include but is not limited to severe impairment in the ability to use of both arms or other condition deemed medically necessary as reviewed by the district physician in collaboration with the private physician(s).

### **Compliance**

Employees and students are expected to comply with the COVID19 – Mask Policy and non-compliance with the policy is subject to disciplinary action. Student disciplinary action will be consistent with the Student Discipline Framework and employee disciplinary action will be consistent with Human Resources policy and procedures. Students and employees should not be held in non-compliance for the reason of material defect of a face covering or exemption status.