

July 29, 2021

Debra Bogen, MD
Director
Allegheny County Health Department
542 Fourth Avenue
Pittsburgh, PA 15219

Dear Dr. Bogen:

We represent a group of healthcare workers in Allegheny County who are concerned about the safety of children and our community as school resumes in the coming weeks. In this letter, we hope to (1) highlight recent national guidance by the Centers for Disease Control and Prevention (CDC) and American Academy of Pediatrics (AAP) regarding a safe return to school amidst the COVID-19 pandemic, (2) note a concerning trend of announcements by local school districts that may not optimally follow this guidance, and (3) request that the Allegheny County Health Department issue an order applicable to county K-12 school districts, early care and education, and child care programs to ensure adequate compliance with national and state guidance and the safety of the community.

On July 9, 2021, the CDC released Guidance for COVID-19 Prevention in K-12 Schools¹ and Early Care and Education/Child Care Programs,² which was updated on July 27, 2021. Among other mitigation recommendations, this guidance emphasizes the promotion of vaccination for all eligible individuals, recommends indoor mask wearing by all unvaccinated individuals ages 2 and older, and recommends physical distancing of at least 3 feet within K-12 classrooms to reduce SARS-CoV-2 transmission risk. In addition, due to new evidence on the Delta variant, the CDC now “recommends universal indoor masking for all teachers, staff, students, and visitors to K-12 schools, regardless of vaccination status.”

On July 16, 2021, the Pennsylvania Departments of Health and Education indicated³ that separate state guidance would not be issued, and advised “school entities to follow current CDC guidance, to the greatest extent possible, when creating and implementing mitigation policies and practices for their communities.” On July 19, 2021, the AAP issued guidance recommending universal masking of students and staff regardless of vaccination status.⁴

Importantly, children under 12 are not yet eligible for vaccination, and as of the date of this letter only about 40% of county residents ages 15-19 are fully vaccinated.⁵ Simultaneously, the Delta variant, which

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/child-care-guidance.html>

³ <https://www.education.pa.gov/Schools/safeschools/emergencyplanning/COVID-19/messages/July2021/Pages/July16.aspx>

⁴ <https://services.aap.org/en/pages/2019-novel-coronavirus-covid-19-infections/clinical-guidance/covid-19-planning-considerations-return-to-in-person-education-in-schools/>

⁵ <https://www.health.pa.gov/topics/disease/coronavirus/Vaccine/Pages/Dashboard.aspx>

is >60% more transmissible than the Alpha variant⁶ (and the Alpha variant is 50% more transmissible than the original Wuhan lineage), has become the dominant strain in the United States and is driving increasing rates of COVID-19 around the country. This leaves schools as a potential location for outbreaks to develop if the above mitigation strategies are not followed. While fortunately COVID-19 tends to be less severe in children than in adults, illness, hospitalizations, and deaths do occur, and infected children may also secondarily transmit to vulnerable adults in the community, including their parents, grandparents, and others.

Although it is imperative to ensure a safe return to school by following the above guidance, some local school districts have begun announcing their health and safety plans⁷, many of which do not go far enough to ensure the above guidance is followed. For instance, many schools are announcing that masks will be optional throughout the district, including in schools comprised of entirely unvaccinated students, such as elementary schools. Given these deviations from CDC guidance, we write to advocate that the Allegheny County Health Department issue an order to mandate compliance with CDC guidance. Specifically, we request the following components of such an order:

1. Mask use is required while indoors for all people including students, teachers, and staff age 2 and older in all K-12 school districts, early care and education, and child care programs, regardless of vaccination status (unless medical or developmental conditions prohibit use).
2. Maintain at least 3 feet of distance between students within K-12 classrooms, as per CDC guidance

For reference, the enclosed table summarizes our recommendations alongside the CDC and AAP guidance.

We emphasize continued promotion of COVID-19 vaccination as the single best strategy to protect individuals in our community during the ongoing pandemic. However, until all members of our community have had the opportunity to be vaccinated, we believe we owe our children at least the above efforts to keep them and their family members safe.

Sincerely,

⁶ <https://khub.net/documents/135939561/405676950/Increased+Household+Transmission+of+COVID-19+Cases+-+national+case+study.pdf/7f7764fb-ecb0-da31-77b3-b1a8ef7be9aa>

⁷ <https://www.post-gazette.com/news/education/2021/07/19/COVID-19-health-mask-mandate-Woodland-Hills-Pittsburgh-Public-Schools-North-Allegheny-Upper-St-Clair-Avonworth-Fox-Chapel/stories/202107160117;>
[https://triblive.com/local/south-hills/west-jefferson-hills-school-district-looks-forward-to-return-to-normalcy-this-fall/;](https://triblive.com/local/south-hills/west-jefferson-hills-school-district-looks-forward-to-return-to-normalcy-this-fall/)
[https://triblive.com/local/bethel-park-school-district-preps-for-back-to-school/;](https://triblive.com/local/bethel-park-school-district-preps-for-back-to-school/)
[https://triblive.com/local/south-hills/brentwood-borough-school-district-passes-first-version-of-back-to-school-plan/;](https://triblive.com/local/south-hills/brentwood-borough-school-district-passes-first-version-of-back-to-school-plan/)
[https://triblive.com/local/valley-news-dispatch/a-divided-highlands-school-board-passes-plan-for-return-to-in-person-classes-5-days-a-week/;](https://triblive.com/local/valley-news-dispatch/a-divided-highlands-school-board-passes-plan-for-return-to-in-person-classes-5-days-a-week/)
<https://www.montourschools.com/apps/news/article/1466022>

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Table. Selected Recommended COVID-19 Mitigation Strategies

	Masks	Physical Distancing
CDC Guidance	“CDC recommends universal indoor masking for all teachers, staff, students, and visitors to K-12 schools, regardless of vaccination status.”	“CDC recommends schools maintain at least 3 feet of physical distance between students within classrooms, combined with indoor mask wearing by people who are not fully vaccinated, to reduce transmission risk. When it is not possible to maintain a physical distance of at least 3 feet, such as when schools cannot fully re-open while maintaining these distances, it is especially important to layer multiple other prevention strategies, such as indoor masking.”*
AAP Guidance	“All students older than 2 years and all school staff should wear face masks at school (unless medical or developmental conditions prohibit use).”	Refers to CDC recommendations.
Our Recommendations for an ACHD Order	Mask use is required while indoors for all people including students, teachers, and staff age 2 and older in all K-12 school districts, early care and education, and child care programs, regardless of vaccination status (unless medical or developmental conditions prohibit use).	Maintain at least 3 feet of distance between students within K-12 classrooms, as per CDC guidance.

*Guidance for K-12 schools. CDC guidance on physical distancing for early care and education/child care programs recommends “physical distancing to the extent possible indoors.”