



August 5, 2020

MEMO RE: ELEMENTARY SCHOOL WAIVER PROCESS

To public and private elementary schools in Riverside County:

Although the County intends to participate in the school waivers process available for TK-6 education in counties on the statewide COVID-19 monitoring list, the California Department of Public Health (CDPH) has advised that counties with a 14-day case rate of greater than 200 per 100,000 residents should not grant waivers. Because of issues with the state's COVID-19 case database, CDPH has frozen the county data chart, leaving with Riverside at a rate of 202 per 100,000 residents.

Schools interested in applying should be aware that CDPH can also decline a waiver as part of state consultation, and based on conversations at the state level, until the State has a reliable case rate for the County and it is less than the 200/100K benchmark, the State will decline to accept waivers for Riverside County schools. This benchmark is based on the county as a whole; there is no state provision for waivers for regions within a county. Therefore, we will accept applications once the countywide case rate is reliable and below that threshold. In the meantime, distance education is permitted for all K-12 schools, and schools should encourage their communities to socially distance, wear facial coverings and avoid gatherings in order to facilitate sustained reductions in case rates.

Schools interested in applying should also be aware that, as part of the local process, written proof of consultation with community organizations, teachers' unions (if applicable) and parent organizations must be submitted, as required by state guidance for waivers (1). In addition, we will be requiring schools to present their response plan for an exposure to a case of COVID-19, their cohorting plan for assigning students to cohorts and maintaining them, and their every 2-month staff testing plan, in accordance with the requirements of the state school K-12 in-person instruction reopening framework (2). The County cannot act as this testing resource. Schools are advised to work with staff members' medical plans and advise if medical plans decline to allow this testing. Schools may also determine that contracting with a third-party testing provider may be useful and this is acceptable assuming antibody tests are not used. The state offers a searchable Testing Task Force Lab List (3), but any California-licensed laboratory or testing provider is acceptable.

The County recognizes that there will be questions regarding the application process. Schools may submit requests for technical advice, including adequacy of proposed documentation. Please do not submit reopening plans unless requested. This does not constitute a formal application, and schools should submit a formal application after the case rate issue is resolved and below the state benchmark. Technical advice does not guarantee acceptance of the application by the State or County. Requests for technical advice may be sent to rivco-schools@ruhealth.org.

Finally, schools should be aware that the County Public Health Department may choose a phased-in approach with a selection of schools per supervisorial district in order to evaluate risk and probability of outbreak, rather than opening all applicants at once. This will be based on the number of applications

Kim Saruwatari, M.P.H., Director

Cameron Kaiser, M.D., M.P.H., Public Health Officer



received and in which regions. Schools may be closed by the state or the local health officer if outbreak thresholds are exceeded. Waivers are strictly discretionary, are not automatically granted and may be withdrawn. All documents submitted will be public under the California Public Records Act.

Further public notice will be made when the case rate issue is resolved.

Attentively,

A handwritten signature in black ink, appearing to read "Cameron Kaiser". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Cameron Kaiser, MD, MPH, FAAFP
Public Health Officer
County of Riverside

Referenced Documents:

1. State guidance for waivers: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/In-Person-Elementary-Waiver-Process.aspx>
2. K-12 Reopening In-Person Learning Framework: <https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Schools%20Reopening%20Recommendations.pdf>
3. COVID-19 Testing Task Force Laboratory Listing: <https://testing.covid19.ca.gov/covid-19-testing-task-force-laboratory-list/>