

February 28, 2021

Dear Commissioner Riley,

We are a group of physicians and public health experts from across the state of Massachusetts. We write to express our concerns with the Return to School guidelines recently released by the CDC on Feb 12, 2021, and to reinforce our conviction that the guidelines set out by the Department of Elementary and Secondary Education (DESE) in June 2020 are more appropriate to guide Massachusetts, particularly with regard to ***distancing between students*** and that opening schools to in-person learning should reflect within school transmission rather than strictly community COVID prevalence rates.

Missing from the CDC's guide is the protective impact of processes that Massachusetts has done well. Massachusetts has implemented broad, effective mitigation measures in its schools throughout the state. From DESE's guidance for the 2020/2021 academic year, districts have implemented in-person learning with a range of protective steps that include: consistent mandatory mask/face covering use among teachers, staff, and students; ventilation upgrades; symptom screening prior to school entry; hand hygiene protocols; podding for our younger learners; increased diagnostic testing and now the launch of pooled weekly surveillance testing supported by the state. Many of these recommendations are in full force, which make closer spacing between students when masked (i.e. when not eating) both reasonable, and much needed to increase in-person learning in many current classroom configurations.

By using this multi-layered infection control approach, school districts across Massachusetts have safely remained open for in-person learning, with only rare instances of in-school transmission. This has occurred even at community prevalence rates significantly higher than those set forth by CDC. The CDC itself released a study showing that community spread is not an indicator of within-school transmission; mitigation can tip the schools to be much lower risk than other community locations. Massachusetts private and public schools have opened with as little as 3 feet of distance between students and have proven that with these other mitigation measures, in-school transmission is exceedingly rare. The closer spacing fails when these other mitigation pieces are not in place. This mirrors data from other states and other countries.

We have also seen that the risks to students of not being in school are dramatic. Students are more isolated learning from home, and consequently suffer more mental health issues, as well as physical health concerns, increased rates of non-accidental trauma, and learning loss. Remote learning is not a reasonable long-term substitute for in person school. Every effort must be made to return the students of Massachusetts to in-person education in order to combat these other concerns, that are also of public health importance.

In sum, we urge DESE to continue to adopt policies and regulations consistent with an approach that is likely to lead to return of children to school this spring and fall. We can continue to be a national leader in how to have kids in schools and staff and students safe. We are happy to add more detail where needed and help wherever we can, including further conversations with you and your staff.

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