



S E A C
Special Education Advisory Council
1010 Richards Street Honolulu, HI 96813
Phone: 586-8126 Fax: 586-8129
email: spin@doh.hawaii.gov
October 1, 2020

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Advisory Council**

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Hawaii State Board of Education
P. O. Box 2360
Honolulu, HI 96814

RE: III. C. Board Action on directives regarding Department of
Education's use of Department of Health's Guidance for Schools
COVID-19 (revised as of September 16, 2020)

Dear Chair Payne and Members of the Board,

The Special Education Advisory Council (SEAC) applauds your leadership in addressing urgent and widespread concerns regarding student and educator health and safety and a lack of clear criteria for transitioning between instructional delivery modes. We support your proposed directive to the Department to incorporate the latest Department of Health (DOH) COVID-19-related guidance for schools into key HIDOE guidance documents, while at the same time seeking greater clarification and scientific data pertaining to the rationale behind the DOH determination of its Learning Model Parameters.

Establishing minimum thresholds and clear criteria for transitioning schools from distance learning to hybrid or in-person learning are necessary to ensure a safe, effective and consistent response to the ever changing impact of COVID-19. Providing some predictability and planning time for families and school staff related to changes in instructional delivery modes is equally important.

SEAC's one concern with your proposed motion relates to proposal numbers 3a and 3b related to the mitigation strategies of mandated physical distancing between all individuals on campus and mandatory mask wearing. This proposal does not acknowledge exceptions for some students with underlying physical, cognitive and mental health disabilities.

The Board is aware from listening to numerous testimonies from special education teachers and educational assistants providing in-person instruction to preschoolers and students with significant physical disabilities, that they are required to physically support these students



with direct instruction, toileting, and other essential activities. They are often unable to maintain a six foot distance from their students. Nor are they able to always prevent students from moving closer than six feet to other students.

With regards to mandatory masking, the September 25, 2020 version of the Return to Learn: School Reopening Plan - Health & Safety handbook contains this note:

There are exceptions for face coverings/masks due to physical or mental health conditions with a note from a U.S. licensed physician, APRN, or PA. Refer to the Centers for Disease Control and Prevention’s “Additional Considerations for the Use of Cloth Face Coverings Among K12 Students.”

The referenced CDC guidance includes the following statements:

- *CDC recognizes that wearing masks may not be possible in every situation or for some people. In some situations, wearing a mask may exacerbate a physical or mental health condition, lead to a medical emergency, or introduce significant safety concerns.*
- *Some people, such as people with intellectual and developmental disabilities, mental health conditions or other sensory sensitivities, may have challenges wearing a mask. They should consult with their healthcare provider for advice about wearing masks.*
- *People who are deaf or hard of hearing—or those who care for or interact with a person who is hearing impaired—may be unable to wear masks if they rely on lipreading to communicate.*
- *Younger children (e.g., preschool or early elementary aged) may be unable to wear a mask properly, particularly for an extended period of time.*

The CDC also recommends that “adaptations and alternatives should be considered whenever possible to increase the feasibility of wearing a mask or to reduce the risk of COVID-19 spreading, if it is not possible to wear one.” Some of their suggested adaptations and alternatives include:

- Wearing clear masks to facilitate communication with individuals who are deaf or hard of hearing,
- Prioritizing wearing of face masks for younger children at times when it is difficult to maintain a distance of 6 feet from others (for example, during school drop off or pick up, or when standing in line at school).
- Ensuring proper mask size and fit for younger children and providing them with frequent reminders and education on the importance and proper wear of masks.

SEAC offers the additional adaption that principals be given guidance on how to allocate classrooms, so that students with disabilities who are unable to tolerate mask wearing are given adequate space to promote mitigation strategies.



In keeping with the CDC health and safety considerations for individuals with disabilities, SEAC recommends that you acknowledge in your proposal the need for exceptions for mandatory social distancing in the provision of direct support for students with disabilities where it is not feasible to maintain a six-foot distance between individuals. We also recommend a similar acknowledgment of exceptions to mandatory mask wearing for students with disabilities when it is not advisable or recommended by a physician. This will help to provide greater awareness in schools and in the larger community that certain accommodations may need to be afforded very young students and students with disabilities and/or medical conditions, while still making every effort to maintain health and safety.

Mahalo for this opportunity to express our views. SEAC stands ready to work collaboratively with the Department and the Board to find creative solutions to the delivery of quality educational services to students with disabilities.

Respectfully,


Martha Quinan
Chair


Ivalee Sinclair
Legislative Committee Chair