



**FAQ Update 9-21-2020
Personal Protective Equipment (PPE)**

This is a working document, which may be updated frequently due to the rapidly changing response to this pandemic emergency and ongoing Federal guidance updates.

Please review the [PPE Guidance Chart](#) for more information on required PPE in school settings.

Masks/Face Coverings - Adults, including educators and staff, are required to wear a mask/face covering. Students age five and above are required to wear a mask/face covering that covers their nose and mouth. (Updated 7/31/20) Masks are recommended for children ages two to four, when developmentally appropriate. (Updated 7/31/20). Masks/face coverings must be worn by all students on the bus. Face shields may be an alternative for those students with documented medical or behavioral challenges who are unable to wear masks/face coverings. (Updated 8/12/20). The same applies to staff with medical or other health reasons for being unable to wear face coverings. Face shields worn in place of a face covering must extend below the chin and back to the ears. An exception for wearing a mask or a face shield applies only to an individual participating in voluntary school sports during vigorous physical exercise (Updated 09/09/20). Nothing in this framework's mask/face covering requirements should be interpreted as preventing a school from making accommodations on an individualized basis as required by state or federal disabilities laws. (Updated 9/15/20)

Remember that all decisions made regarding a student in special education or on a 504 plan are individualized and child specific.

- 1. If the Speech Language Pathologist (SLP) recommends a student wear a face shield during treatment because of the nature of the treatment, is that enough for a student with a speech impairment (articulation or other intervention that requires observing the mouth) to use a shield instead of a mask? (Otherwise, intelligibility is significantly compromised.) Is a Doctor's note still required?**

During a speech language session in which articulation is the goal, and the practitioner needs to be able to see a child's mouth, the child can wear a shield. The child may also wear a mask with a see through cut out, which is the equivalent to a regular face mask. It also may be possible to use a plexiglass barrier. If you use a plexiglass barrier, the SLP should also wear a mask and a shield. In the case of using the

plexiglass barrier the child should wear a shield, as a shield and plexiglass are not equivalent.

If a student must see the SLPs mouth in order to engage in treatment, the practitioner may choose to video their face performing the task prior to the session and show it to the child in the session while wearing their face covering. Another option would be wearing a mask with a clear shield.

If the child is wearing a shield without a mask in the session, they must be in an area away from other students or where 6-foot distancing can be maintained. The SLP should wear both a mask and a shield if the practitioner cannot maintain 6' distancing.

2. I am under the impression that staff who need to be within 6' of a student have to wear an N95 mask? Is my impression correct?

An N 95 mask is only required when staff are working with someone who has COVID-19 or if staff is performing or present during aerosol generating procedures such as nebulizer treatments, chest PT, suctioning, or trach care. If staff do not have an N95 mask available, they should wear a face mask and a shield.

3. My school nurse stated that if anyone closer than 6 feet, those staff need both a mask and a shield.

Yes, that is correct. Refer to the [PPE Guidance Chart](#) for more information.

4. What happens when a child arrives at school without a face mask?

Each SAU will need to develop policies around expectations for masks and other PPE. It would be ideal if the SAU communicated what would happen to a child if they arrive to school without a mask to all parents. If an identified student arrives at school without a mask and cannot tolerate wearing a mask, you should conduct an IEP meeting as soon as possible with the parent to develop a plan. The IEP team would want to explore alternate accommodations which would safely allow students to participate in instruction in person. You will want to consider the following:

- Spacing
- Ventilation
- Child's capacity to maintain physical distancing
- How the disability impacts ability to comply with wearing a mask
- Levels of outbreak of Corona Virus cases in surrounding areas
- Staff capacity

The team must develop a plan to increase compliance with mask wearing and add this to the IEP goals. Services may be provided remotely if health and safety factors prevent a child from participating in instruction in person. If staff are working with a student who cannot tolerate a mask, they will need to wear a medical disposable mask and a shield and attempt to maintain 6-foot distancing.

If noncompliance with mask wearing is identified as a behavior and a child is sent home, a manifestation determination meeting may be scheduled to determine whether the noncompliance is a manifestation of the child's disability. Maine Unified Special Education Regulations Birth to 20 (MUSER) states that within 10 school days of any decision to change the placement of a child with a disability because of a violation of a code of student conduct, the SAU, the parent, and relevant members of the child's IEP Team (as determined by the parent and the SAU) must review all relevant information in the student's file, including the child's IEP, any teacher observations, and any relevant information provided by the parents to determine whether or not the behavior is related to the disability (DISCIPLINE OF CHILDREN WITH DISABILITIES (MUSER XVII.1.E)). It is important to consider policies the SAU may have developed around PPE requirements. The SAU should develop IEP goals around compliance with wearing PPE.

5. If the student's non mask wearing is not due to disability (i.e student has SLD) what should we do?

Each SAU will need to develop policies around expectations for masks and other PPE. The team should conduct an IEP meeting as soon as possible with the parent to discuss compliance with PPE and to develop a plan to increase compliance with wearing a mask.

6. What is the requirement for a student to wear a face shield?

Current guidance requires documentation to wear a face shield instead of a face mask as an accommodation. The exact language reads, "Face shields may be an alternative for those students with documented medical, behavioral challenges who are unable to wear masks/face coverings". This includes an IEP team and/or a 504 team. Please refer to the [6 Requirements for Safely Opening Schools in the Fall](#) on the Maine DOE home page.

7. Can a plexiglass barrier be used in place of a face shield?

In general, a plexiglass barrier is not a replacement for physical distancing or masking requirements. Individuals should continue to use a face mask when separated from children by plexiglass.

8. What do you do if a child cannot tolerate wearing a mask?

Although the SAU may have policies around expectations for wearing a face mask, the IEP Team might need to meet and develop goals for a child with a disability that could facilitate this. The team might want to consider an abbreviated day, a separate learning location, or remote instruction depending on the space available to the SAU.

If you are recommending an abbreviated day, please consider the following:

An abbreviated school day for more than 10 days is a “change in placement” and can be made only by the IEP Team.

If the child does not return to a full-time school day within 45 calendar days, the IEP Team must convene every 20 school days thereafter to:

- review progress toward returning to full-time school day;
- review progress in the educational setting; and,
- if the child is not progressing, determine what setting will allow the child to progress.

Develop a revised IEP with a re-entry plan for the child to return to a full-time school day within a reasonable period of time, no longer than 45 calendar days;

Delineate in the revised IEP with the re-entry plan the actions the SAU will take to assist the child to participate in a full day of school; and

Document in the Written Notice the basis for the determination of an abbreviated school day and how the determination is based on the individual needs of the child (INDIVIDUALIZED PLAN TEAM MEMBERSHIP (MUSER VI.I.L)).

9. We have a medically fragile student who we have been told cannot wear a mask or shield (CP and breathing issues). Can we offer education in the classroom with social distancing?

A child who cannot tolerate a face mask or a shield as a result of their disability may be in a classroom with other children if there is an environmental accommodation that can be provided to safely accommodate this student with other children. School personnel, including a school nurse, school physician (if one is working with the SAU), administration, and other school staff would have to determine the threat of health risk to other children in the classroom setting. This student would have to maintain physical distancing in order to provide this accommodation. Staff working with the child without a face shield should wear a medical disposable mask and a shield when working with a student who cannot tolerate PPE.

10. If a child cannot wear a face mask or a face shield, what is the school’s responsibility to accommodate?

If there is documentation received by the SAU, then alternative accommodations should be considered by an IEP team to provide access to instructional programming.

11. If a child has a medical note to be able to wear a face shield can they participate in a classroom instruction?

If a child can safely maintain 6-foot distancing, they can participate in instruction in a classroom with other students.

12. Is Asthma a reason not to wear a face mask?

Consult with your school or SAU physician to determine whether Asthma is a condition that prohibits a child or staff member from using a face covering.

13. Is it accurate that when students are in PE classes, they must physical distance 14 feet when PE is delivered outside?

Yes, you can participate in PE without a facemask outside as long as you are physically distancing at least 14 feet. If you are closer than 14 feet, either indoors or outside, you must wear a face mask. The Maine DOE issued guidance on this on 8/12/2020 called [PK-12 and Adult Education Public Health Guidance](#).

Schools should aim for six feet of distance between students where feasible. At the same time, a minimum physical distance of three feet between students has been established when combined with the other measures outlined in this list of safety requirements (e.g., masks/face coverings, use of outdoor spaces). Because of the reduced susceptibility in children and lower apparent rates of transmission, establishing a minimum physical distance of three feet is informed by evidence and balances the lower risk of COVID-19 transmission and the overarching benefits of in-person school. Schools should seek to maximize physical distance among individuals within their physical and operational constraints.

Students and staff must follow all required health and safety measures while on school grounds or engaged in school courses in other locations. Certain classes such as music, theater, dance, physical education, and the visual arts have unique characteristics that require special consideration. Research into how to safely engage in these types of activities is ongoing, and the following guidance will be updated as the research evolves ([PK-12 and Adult Education Public Health Guidance](#)).

14. What would constitute “behavioral challenges” that prevent a child from wearing a mask?

If a child is not compliant with wearing a mask for behavioral reasons, the team must work to support compliance with tolerating a mask. Involve your behavior specialists and teach and reinforce the necessary skills to comply with tolerating a face mask.