

August 21, 2020

Senator Robert Cowles and
Representative Samantha Kerkman, Co-chairpersons
Joint Legislative Audit Committee
State Capitol
Madison, Wisconsin 53702

Dear Senator Cowles and Representative Kerkman:

Under the provisions of 2019 Wisconsin Act 185, we have completed a review of the best practices guidance for transitioning from virtual instruction to in-person instruction that the Department of Public Instruction (DPI) posted on its website. As required by Act 185, DPI posted its guidance by June 30, 2020.

To independently identify best practices for transitioning from virtual instruction to in-person instruction, we reviewed more than 65 documents from international, federal, and state entities, as well as other organizations. These best practices pertain to health, school governance and operations, scheduling considerations, learning objectives, remote learning and technology, personnel, facilities, and extracurricular activities.

We found that DPI's guidance included almost all of the best practices that we had independently identified. However, it did not include two best practices that we had independently identified. In addition, it relied on information that the Wisconsin Interscholastic Athletic Association (WIAA) had developed for extracurricular activities, but this information did not address certain types of extracurricular activities not overseen by WIAA.

In August 2020, DPI updated its guidance and indicated that it plans to make additional updates. When doing so, we recommend that DPI provide additional guidance related to certain best practices and make its guidance easier to use.

We appreciate the courtesy and cooperation extended to us by DPI. A response from the State Superintendent of Public Instruction follows the appendices.

Respectfully submitted,

Joe Chrisman
State Auditor

JC/DS/ss

Best Practices for Transitioning from Virtual Instruction to In-Person Instruction ■

2019 Wisconsin Act 185, which was enacted in April 2020, requires the Legislative Audit Bureau to use risk-based criteria to review selected programs affected by Act 185 and selected expenditures made with funds authorized by Act 185. The Department of Public Instruction (DPI) was required by Act 185 to post on its website by June 30, 2020, guidance to schools on best practices for transitioning from virtual instruction to in-person instruction. Under the provisions of Act 185, we have completed a review of the guidance that DPI posted on its website.

On June 22, 2020, DPI posted on its website an 87-page document containing best practices for transitioning from virtual instruction to in-person instruction.

On June 22, 2020, DPI posted on its website an 87-page document containing best practices for transitioning from virtual instruction to in-person instruction. In August 2020, DPI converted this document into a web-based format that is available at <https://dpi.wi.gov/education-forward>. DPI's guidance notes that school districts are statutorily responsible for determining their operations. DPI indicates that school districts and schools should use the guidance to discuss with local public health authorities appropriate plans for providing instruction during the 2020-21 school year.

To develop its guidance, DPI indicated that it worked with a number of organizations, including the Department of Health Services, the Wisconsin Association of School District Administrators, the Association of Wisconsin School Administrators, the Wisconsin Council of Administrators of Special Services, the Wisconsin Association of School Business Officials, the Wisconsin Association of School Boards, the Wisconsin Education Association Council, and the Cooperative Educational Service Agency Statewide Network.

To complete our review of DPI’s guidance, we independently identified best practices related to transitioning from virtual instruction to in-person instruction. Appendix 1 lists selected best practices that we independently identified. To identify these best practices, we reviewed more than 65 documents from international, federal, and state entities, as well as other organizations. Appendix 2 lists selected documents that we reviewed. We then determined the extent to which DPI’s guidance included the best practices that we had independently identified. We did not attempt to determine whether schools should provide virtual instruction or in-person instruction during the 2020-21 school year.

We grouped the best practices that we independently identified into eight categories.

We grouped the best practices that we independently identified into eight categories:

- health, including using touch-free thermometers to screen individuals entering school buildings;
- school governance and operations, including limiting the sharing of classroom supplies;
- scheduling considerations, including staggering arrival and dismissal times and locations;
- learning objectives, including providing additional support to students who require accommodations;
- remote learning and technology, including using a variety of formats that include online and offline resources;
- personnel, including identifying critical job functions and cross-training staff to ensure backup staff exist;
- facilities, including disinfecting frequently touched items and surfaces; and
- extracurricular activities, including limiting large gatherings and assemblies.

DPI’s Guidance

DPI’s guidance included almost all of the best practices that we had independently identified.

We found that DPI’s guidance included almost all of the best practices that we had independently identified. However, we found that DPI’s guidance did not advise school districts and schools to review and potentially revise staff contracts and employment documents to reflect virtual instruction and flexible leave time policies. It also did

not advise school districts and schools to determine the level of staff and student absenteeism that will disrupt teaching and learning. Individual school districts and schools may choose to use such information to make decisions that are appropriate to address their local needs.

DPI's guidance did not include guidance for certain extracurricular activities.

We found that DPI's guidance contained hyperlinks to the Wisconsin Interscholastic Athletic Association's (WIAA's) website, which includes specific guidance for athletic activities that WIAA oversees. However, WIAA does not oversee certain extracurricular activities, such as cheerleading, theater productions, and debate clubs, and WIAA's website contains no guidance for these activities. DPI's guidance also included no guidance for these activities.

We found that DPI's guidance included hyperlinks to more than 125 websites and documents, including those developed by DPI and other entities. DPI's guidance included multiple hyperlinks to more than 20 of these websites and documents. We found that some hyperlinks to the same website or the same document were not labeled consistently, and the guidance did not contain an appendix or resource page that listed all hyperlinks.

DPI indicated that it plans to periodically update its guidance.

DPI indicated that it plans to periodically update its guidance. On June 24, 2020, the Assembly Committee on Education discussed DPI's guidance during an informational hearing. At this hearing, concerns were raised about the feasibility of the guidance's recommendation that school districts and schools achieve a 10-to-1 student-teacher ratio in each classroom and other learning environments. DPI indicated that this ratio was intended to promote physical distancing. On June 29, 2020, DPI posted on its website updated guidance that it indicated was based on feedback it had received from legislators and school officials. We reviewed this updated guidance and found that it continued to emphasize the importance of physical distancing, but that DPI had removed references to the 10-to-1 student-teacher ratio.

On July 23, 2020, the Senate Committee on Government Operations, Technology and Consumer Protection held an informational hearing to discuss virtual schools in Wisconsin. At this hearing, DPI indicated that in-person instruction should be the default learning environment, if local public health authorities consider in-person instruction to be safe.

When DPI next updates its guidance, it should provide additional guidance and make its guidance easier to use.

When DPI next updates its guidance to school districts and schools, it should advise them to review and potentially revise staff contracts and employment documents to reflect virtual instruction and flexible leave time policies. DPI should advise them to determine the level of staff and student absenteeism that will disrupt teaching and learning. In addition, DPI should provide guidance on how school districts and schools can offer extracurricular activities that are not overseen by

WIAA. DPI should also make its guidance easier for school districts and schools to use by labeling hyperlinks consistently and by including an appendix or resource page that lists all hyperlinks.

☑ Recommendation

We recommend the Department of Public Instruction:

- *advise school districts and schools to review and potentially revise staff contracts and employment documents to reflect virtual instruction and flexible leave time policies, advise them to determine the level of staff and student absenteeism that will disrupt teaching and learning, and provide them with guidance on offering extracurricular activities that are not overseen by the Wisconsin Interscholastic Athletic Association;*
- *make its guidance easier for school districts and schools to use by labeling hyperlinks consistently and by including an appendix or resource page that lists all hyperlinks; and*
- *report to the Joint Legislative Audit Committee by September 30, 2020, on the status of its efforts to implement these recommendations.*

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Appendices ■

Appendix 1

**Selected Best Practices for Transitioning from
Virtual Instruction to In-Person Instruction, by Category****Health**

- Use touch-free thermometers to screen individuals entering school buildings.
- Screen students for mental health or trauma and provide the necessary support.
- Monitor absenteeism of students and staff and alert local public health authorities if large increases occur.
- Determine the level of staff and student absenteeism that will disrupt teaching and learning.
- Protect confidential student information and health information.
- Create an isolation room for individuals who develop symptoms of illness during the school day.

School Governance and Operations

- Limit the sharing of classroom supplies.
- Provide lunch in classrooms.
- Limit visitors to school buildings.
- Ensure face coverings are worn by everyone and social distancing measures are in place.
- Adequately communicate reopening plans and expectations with staff, students, and their families.
- Develop flexible leave and attendance policies.
- Maintain detailed lists of students and staff who are in contact with one another.
- Plan for future school closures and the provision of virtual learning.
- Review and update emergency contact lists.

Scheduling Considerations

- Stagger arrival and dismissal times and locations.
- Use cohort-based schedules to keep the same students together as much as possible.
- Use blended learning environments that combine virtual and in-person instruction in order to reduce class sizes.
- Consider a phased approach in which younger students return to school first.
- Consider alternate schedules or academic calendars that lengthen the school day or extend the school year into the summer.

Learning Objectives

- Provide additional support to students who require accommodations.
- Review assessment plans and adjust them accordingly in order to evaluate potential learning loss that has occurred and academic progress that has been made.

Remote Learning and Technology

- Use a variety of formats that include online and offline resources.
- Ensure access to computers or other necessary devices, as well as the internet.
- Continue providing remote learning for students who are considered at high-risk because of underlying health conditions.
- Create a technology support team that is available to assist staff, students, and their families.

Personnel

- Identify critical job functions and cross-train staff to ensure backup staff exist.
- Rotate teachers, not students, among classrooms.
- Review and revise staff contracts and employment documents.
- Train staff on safety actions and how to talk to students about pandemics.

- Provide professional development regarding virtual instruction.
- Ensure access to employee assistance programs and inform staff of available resources.

Facilities

- Disinfect frequently touched items and surfaces.
- Post signs on proper preventive measures.
- Establish one-way entrances and hallways.
- Ensure adequate supplies of cleaning and disinfecting supplies.
- Ensure proper ventilation and safety of water and other utility systems.
- Create a contingency plan that includes the required number of buses and budgetary implications.
- Consider installing plastic barriers where social distancing is not possible.

Extracurricular Activities

- Limit large gatherings and assemblies.
- Determine whether school facilities will be used by outside groups or for certain activities.
- Ensure athletics and activities follow appropriate safety and hygiene protocols.

Appendix 2

Selected Documents Related to Best Practices for Transitioning from Virtual Instruction to In-Person Instruction, by Type of Entity**Federal Entities**

Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes

Centers for Disease Control and Prevention (CDC)

<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

COVID-19 Control and Prevention

U.S. Department of Labor, Occupational Safety and Health Administration (OSHA)

<https://www.osha.gov/SLTC/covid-19/controlprevention.html>

Wisconsin State Entities

Education Forward: Reopening Wisconsin Schools

Wisconsin Department of Public Instruction

<https://dpi.wi.gov/education-forward>

COVID-19: Schools and Child Care

Wisconsin Department of Health Services

<https://www.dhs.wisconsin.gov/covid-19/schools.htm>

Wisconsin General Guidance for All Businesses—Best Practices to Reopen

Wisconsin Economic Development Corporation

<https://wedc.org/wp-content/uploads/2020/05/COVID-19-General-Guidelines.pdf>

Entities in Other States

Planning the 2020-21 School Year: A Framework and Toolkit for School and District Leaders for Feedback

Colorado Department of Education

<https://www.cde.state.co.us/planning20-21>

Maryland Together: Maryland's Recovery Plan for Education

Maryland State Department of Education

<http://marylandpublicschools.org/newsroom/Documents/MSDERecoveryPlan.pdf>

Pandemic Recovery Consideration: Re-entry and Reopening of Schools

Missouri School Boards' Association Center for Education Safety

<https://ams.embr.mobi/Documents/DocumentAttachment.aspx?C=ZfON&DID=GJGDM>

Launch Nebraska: Health Guidance for Summer Programming and Beyond

Nebraska Department of Education

<https://www.launchne.com/wp-content/uploads/2020/05/HealthGuidanceFinal2020.pdf>

North Dakota K12 Smart Restart Guidance

North Dakota Department of Public Instruction

<https://www.nd.gov/dpi/sites/www/files/documents/Covid-19/NDK12restartguide.pdf>

Other Organizations

COVID-19 Planning Considerations: Guidance for School Re-entry

American Academy of Pediatrics

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

A Blueprint for Back to School

American Enterprise Institute

<https://www.aei.org/research-products/report/a-blueprint-for-back-to-school/>

Interim Guidance: Role of the School Nurse in Return to School Planning

National Association of School Nurses

https://higherlogicdownload.s3.amazonaws.com/NASN/3870c72d-fff9-4ed7-833f-215de278d256/UploadedImages/PDFs/COVID-19_Interim_Guidance_Role_of_the_School_Nurse_in_Return_to_School_Planning.pdf

Framework for Reopening Schools

United Nations Educational, Scientific, and Cultural Organization (UNESCO); United Nations International Children's Emergency Fund (UNICEF); World Bank; and World Food Program

<https://unesdoc.unesco.org/ark:/48223/pf0000373348>

Considerations for School-Related Public Health Measures in the Context of COVID-19

World Health Organization (WHO)

<https://www.who.int/publications-detail/considerations-for-school-related-public-health-measures-in-the-context-of-covid-19>

Response ■

August 19, 2020

Joe Chrisman, State Auditor
Legislative Audit Bureau
22 East Mifflin Street, Suite 500
Madison, WI 53703

Dear Mr. Chrisman:

The Department of Public Instruction (DPI) appreciates the opportunity to respond to the recommendations provided by the Legislative Audit Bureau (LAB) to the Education Forward guidance on reopening, and now operating, schools under COVID-19. Below, please find DPI's responses to each of the items mentioned in your review.

1. *Advise school districts and schools to review and potentially revise staff contracts and employment documents to reflect virtual instruction and flexible leave time policies, advise them to determine the level of staff and student absenteeism that will disrupt teaching and learning, and provide them with guidance on offering extracurricular activities that are not overseen by the Wisconsin Interscholastic Athletic Association.*

DPI accepts these recommendations. DPI will update Education Forward to advise school districts to evaluate their staff contracts, employment policies and documents regarding virtual instruction and flexible leave time. Education Forward will also be updated to advise school districts to examine the impact of student and staff absenteeism on teaching and learning. DPI will soon be expanding Education Forward to address other extracurricular activities. The department has prioritized additions to this guidance based on the needs of school districts. When the guidance was first published, information on athletics overseen by the Wisconsin Interscholastic Athletic Association was requested frequently by school districts. The DPI has been receiving requests recently on extracurriculars related to the arts and will soon publish this addition to Education Forward. Arts activities include: music, forensics, and theatre. If there are other requests for guidance on extracurriculars, the DPI will consider those additions. Until that time, school districts are recommended to follow general guidelines offered by the department on infection control and mitigation.

2. *Make its guidance easier for school districts and schools to use by labeling hyperlinks consistently and by including an appendix or resource page that lists all hyperlinks.*

Joe Chrisman
August 19, 2020
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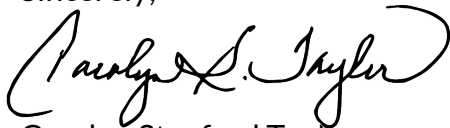
DPI accepts this recommendation. DPI will review Education Forward to ensure hyperlinks are labeled consistently and will publish an appendix listing all hyperlinks in the document.

3. *Report to the Joint Legislative Audit Committee by September 30, 2020, on the status of its efforts to implement these recommendations.*

DPI will report to the Joint Legislative Audit Committee on the status of the department's work on the accepted recommendations.

Thank you for the time you have taken to review Education Forward.

Sincerely,

A handwritten signature in black ink that reads "Carolyn S. Taylor". The signature is fluid and cursive, with a large loop at the end of the last name.

Carolyn Stanford Taylor
State Superintendent

CST:jk

cc: Robert Soldner, Assistant State Superintendent, DPI
Jennifer Kammerud, Senior Policy Advisor, DPI