Return to School Buildings and Return to Work Questions  
December 16, 2020

1. **Question:** Have we evaluated how the kindergarten roll out has worked? Did the bandwidth hold? Did the mitigations work? How do staff report on feeling about how it went? Kindergarten was getting support at the beginning of their entry into school. Will 1st grade be afforded the same? (Zargarpur)

**Answer:** Please review the Elementary presentation and discussion from the December 2 School Board meeting. As explained there by associate superintendents and principals, the kindergarten rollout was exceptional (and we expect that success to continue with other levels). This was further exemplified in the video clip that featured our teachers. Kindergarten students were already familiar with teachers thanks to virtual learning experiences, and those returning were excited to be back and comfortable with their face coverings and other safety protocols. Concurrent learning, transportation, scheduling, and logistics have worked well thanks to an all-hands effort across the Division, guided by multiple task forces that shaped processes based on input for all stakeholders. Multiple mental health and socialization supports are in place. As always, any anecdotal reports of concerns or particular challenges will be followed up by principals and/or other appropriate staff.

- Pursuant to the success of our mitigation measures, as of December 9, 2020 there are no known COVID-19 outbreaks within schools. An outbreak in a school is defined as at least two confirmed cases of COVID-19 where persons are linked by a common exposure to an ill person, setting, event, and time period (such as being in the same school or class).
- Some issues with virtual learning connectivity remain, but these are generally associated with challenges involving the student’s or (remote) teacher’s personal network rather than with PWCS’ upgraded bandwidth.
- As discussed at the December 2 Board meeting, it was made a priority to have classroom assistance (TA or others) through the initial kindergarten acclamation process. Principals retain the flexibility to staff classrooms according to school needs. Consequently, some have chosen to provide additional support for first grade while others have not.

2. **Question:** I understand there have been de-staffings across the county and that it can be normal with budget adjustments but we are in a crisis and more support staff, especially for in person positions would be needed. Is there a way to preserve positions? (Zargarpur)

**Answer:** This year, enrollment has decreased by about 3,000 students due to the pandemic (primarily at the elementary level), with kindergarten enrollment showing the greatest impact. In accordance with normal budgeting protocols, reassignments of personnel from schools with enrollment losses have occurred throughout the Division, just as they do every year. However, overstaffing of teachers is down by more than 6% this year and there have been no layoffs. Instead, as discussed at the December 2 Board meeting, staff have been reassigned to duties and to areas of special need. Principals retain the flexibility to use available budget dollars and to assign available staff as needed to meet student and school needs. This is being accomplished without additional funding. See also Elementary Budget - Staffing Update memo in the December 11 Information Items for an overview on overstaffing from the Elementary budget perspective.
3. **Question:** When looking at the health data, I understand Dr. Anshur advises to look at the metrics in totality. Today’s hospital data is showing the capacity at 80.2% capacity with 10.8% COVID usage. It is in the yellow range. What does this mean for community burden? How much of a lag, if any, are we seeing in this data? Does the health department make any recommendation to the school division based on hospital burden? (Zargarpur)

**Answer:** As you noted, Dr. Ansher advises looking at the metrics in totality, the latest results of which were explained in the presentation by Ms. Huebner and her team at the last two Board meetings. Using that approach, and in close collaboration with the Prince William Health District, we have concluded that PWCS remains in the Moderate-High Risk category as of December 16, 2020, and are adhering to recommendations for the category under the school guidelines established by the Virginia Departments of Health (VDH) and Education. Community burden is currently at the highest level, as indicated by the Core Indicators on number of new cases and positivity rate of PCR tests. Hospital burden is considered high at 120% capacity. Signs to watch for are the reduction of elective surgeries or increased use of ventilators. Currently our bed usage in the region and locally is fluctuating, but not near the overburdened stage. VDH updates the local COVID-19 metrics daily, allowing prompt action by the Prince William Health District and PWCS, as needed.

4. **Question:** Is there a way to show PWCS staff they are valued in either compensation or messaging? (Zargarpur)

**Answer:** Sincere appreciation of staff efforts is a part of almost every written and in-person communication from Dr. Walts and the Superintendent’s Staff. Principals, directors, supervisors, and managers have been urged to follow their lead and are doing so. Such praise can also be found across PWCS communication channels such as the website and “The Scoop!” We are making every effort to continue to demonstrate appreciation and respect for all staff going forward. See recent examples below:

![Staff Appreciation](image)

Regrettably, some employees who disagree with leadership decisions (whether by the administration or School Board) occasionally interpret and/or communicate that such decisions are signs of disrespect. We are endeavoring to promptly address any such misperceptions. While financial demonstrations of appreciation would certainly have a positive impact on staff perceptions, they do pose challenges. How much is enough to make an employee feel valued? Too little might be viewed as insulting. What would be equitable, as all employees are working harder than ever? Whatever the answers to these questions, they come with a big price tag that PWCS is ill-equipped to cover amid enrollment-related budget cuts and COVID-related expenses. It is also important to recognize that eligible PWCS employees received an average 2.8% step increase this year; this was not matched by all area school divisions, leading some to consider a one-time bonus. Note also that CARES funding has been exhausted and that additional funding from state and federal sources is targeted and not useable for enhanced compensation.
5. **Question**: What is the best way for homeschooling families to make sure their Notice of Intent is received so that there is no issue with truancy? (Zargarpur)

**Answer**: Details are explained on the PWCS Home Instruction page, and reflect current conditions: [http://www.pwcs.edu/departments/student_services/registration_new_students_and_transfers_/home_instruction](http://www.pwcs.edu/departments/student_services/registration_new_students_and_transfers_/home_instruction)

Online submissions are confirmed through the web process. The Home Instruction Page notes that: “You do not need to use the online notification system if you have already mailed, emailed, or faxed your 2020-21 home instruction documents. We will gladly honor those document submissions and work diligently to process them and provide you with notice of compliance as quickly as possible.” Those who still have additional questions about home instruction may call 703-791-7257.

6. **Question**: Are we able to use counseling staff to help check in on students who are not seemingly connected to their classes? (Zargarpur)

**Answer**: Please see response to mental health question in the October 21 Board Q&A. The efforts described are ongoing and focused on students who have been identified by parents/guardians and teachers as having difficulties. School counselors will continue to reach out to and assist specific students as identified.

7. **Question**: Before adding a cohort into the buildings, can these teachers/staff have an opportunity to pair with a staff member who is teaching concurrently to get support? (Zargarpur)

**Answer**: Many schools are already carrying out such opportunities, using their teachers who have been serving students in person for some time now. We will seek other opportunities to take advantage of such peer exchanges, whether in-person, virtually or through training materials as other schools prepare to receive students. Teachers interested in this kind of “pairing” should alert their principals. Additionally, we have Instructional Technology Coaches (ITCs) in each school who provide coaching and ongoing support on concurrent learning.

8. **Question**: Before adding a cohort into the building, can the ITC and/or TSPC confirm that the technology is available and works? (Zargarpur)

**Answer**: Staff have been and continue to confirm the operation of technology systems in connection with recent upgrades. Appropriate personnel will be reminded (as will Principals) of the need to make certain that technology is functioning properly as schools reopen, as well as to assist teachers with inevitable technology challenges.

9. **Question**: At the last meeting, the message about metrics included some language that included the word “death.” Some staff heard it as the division is waiting for a PWCS death. The resulting impression is that staff is not valued. What might we do to assure staff they are indeed values? (Zargarpur)

**Answer**: The word “death” was used in a November 19 Board meeting as part of the term “death rate” and only as an illustration that an increase in death rate is among the tragic, but currently hypothetical events that might require a reassessment of the risk threshold being used to guide our return to in-person learning. The rigorous VDH/VDOE risk guidance is explained in all pandemic updates, (usually without any reference to death) as well as on the website and in addressing any specific concerns/misconceptions. It is unfortunate that the focus on a single word led a few individuals to feel undervalued (and may have been used to advance that misperception in some social media posts). PWCS is constantly striving to communicate appreciation to all staff. See question 4 above.
10. **Question:** Some of my constituents would like to see if PWCS could run a middle or high school pilot program. Has there been any movement on this idea? (Zargarpur)

**Answer:** Staff has explored the possibility by examining brief pilot efforts undertaken by Fairfax County Public Schools. No decision has been made, in part due to the time that may be needed for interactive meetings with teachers in advance of any such pilot. Actual school time is short between now and the impending return of willing middle and high school students; teachers and students both have full calendars.

11. **Question:** I have asked for an audit or review of PPE equipment in our schools. (Jessie)

**Answer:** See memo on PPE Reviews in the December 11 Information Items, which will be conducted by the Office of Risk Management and Security Services (ORMSS) and is summarized below:
- ORMSS is tasked with providing inspections of schools for compliance regarding COVID-19 related guidance.
- This office will utilize its administrative coordinators, investigators, and crisis management staff to complete these inspections on a monthly basis.
- The first inspections will take place prior to Winter Break, during the week of December 14-18.
- ORMSS staff will advise each school administrative team on arrival and review findings before departing.
- The focus will be on quickly mitigating any concerns noted before departure.
- Areas of review include, but are not limited to, the main entrance, main office, clinic, classrooms, restrooms, and hallways.
- First and foremost, assessments will note the availability of hand sanitizer/soap, access to cleaning supplies (Oxivir spray/towels/cloths), and placement and use of plexiglass.
- The results will be shared with the School Board.

12. **Question:** Regarding staff that faced over-staffing- where are we in the process of over-staffing? How do the numbers compare to previous years? (Jackson)

**Answer:** Please see both the response to Question #2 above and the Elementary Budget - Staffing Update item in the December 11 Information Items for an overview on overstaffing from the elementary budget perspective. Division-wide, these are the declared overstaffs and placement status known to HR as of the week of December 7.

**Classified:**
- 18-19 data: 30 overstaffs ~ 19-20 57.8 overstaffs
- 20-21 data: 45 overstaffs ~ all overstaffs have been placed

**Instructional:**

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Note: Overstaffing of teachers is down by more than 6% this year when compared to last year and there have been no layoffs.
Instructional still needing a placement: 2 Total
2 teachers from Victory ES ~ one will be placed at King ES in January due to a resignation;
1 Teacher from Mullen ES
Mountain View ES: .4 PE and .2 FTE Gifted. Not able to place, no vacancy at this time; notified principal and associate

13. **Question:** We received the PALS test info. How were these administered this year? Why might some schools have higher numbers for interventions this year than last? Do we know what trends are shown? (Zargarpur)

**Answer:** The PALS was administered in a nonstandard/remote format due to the 100 percent virtual model. All students in grades K-3 were assessed this fall.
- Kindergarten: The testing window was much earlier than the traditional data sets. Typically, kindergartners have 6 weeks of instruction prior to Fall PALS. However, this year, the window was two weeks from the start of school. Therefore, we are not able to establish trends in the comparison data.
- Grades One-Three: Typically, only students who are new to Virginia and students who received summer interventions are assessed in the fall. However, this year we administered the assessment to all students in grades 1-3. There are no data trends in grades 1-3 because we have traditionally not assessed all students in grades 1-3 at that time.

14. **Question:** As you know, stakeholders ask many questions. One that has come from staff and concerned family members is if the school division could offer COVID testing (either randomly or as part of a procedure if a building seems to have more cases popping up). Does the division have any position on this idea at this time? (Zargarpur)

**Answer:** Below is the link to the information on testing from the CDC. At this time, PWCS does not have a plan in place to utilize testing as we currently do not have a high level of transmission in our schools and we have no outbreaks identified by the Virginia Health Department. Testing is something that should be done in collaboration with the local health district and the PWHD stands ready to assist if our Division should decide this is a need. Information is available at: [CDC guidance on testing in schools](#).

15. **Question:** I am concerned about how concurrent instruction is going younger elementary classes. I know it is still new, but is there a way to provide that extra adult to help manage kids, even if they are shared between classes? Destaffing resulted in some kindergarten teachers being on their own. Is there a way those positions can be reinstated? Can we use substitutes for support? (Zargarpur)

**Answer:** When concurrent instruction for Pre-K and Kindergarten students began on November 10, Dr. Walts requested that each school ensure that an additional adult would be available for the first eight days of school, which was the time until Thanksgiving Break. All preschool classes were already staffed with a teacher assistant. At the kindergarten level, schools are staffed according to a formula that ensures compliance with the VDOE requirement of a full-time teacher assistant in any kindergarten class that has more than 24 students. As a result, in any given year, the majority of our kindergarten classes have teacher assistants, but a number of them may not. As we began concurrent instruction, schools that didn’t have a teacher assistant already in place used other staff members to assist. As we continue to move forward, schools may use existing staff in alternate ways and can also use their flex funds to provide additional support for concurrent learning, which may include additional staffing support and/or material resources as needed.
16. **Question:** I greatly appreciated the reminder from the Superintendent about how it is imperative that safety concerns are reported. However, this question is to follow up on my earlier inquiries (from the last Board meeting and School Board questions 9/16). Can we please consider collecting data from the Anonymous Tip line and the new safety email? It can be quantitative (i.e. a table of possible concerns with a simple check), but it is imperative that we collect and analyze data pertaining to staff concerns about safety. (Jackson)

**Answer:** We only recently began using the email, healthandsafety@pwcs.edu as a way to communicate concerns about the health plan and its implementation. Consequently, there is insufficient information to make any determinations about the effectiveness of protocols. However, our student positive test data continues to show low numbers of cases for our in-person learners (see December 11 update). To date, we have received five emails at the healthandsafety@pwcs.edu email address with questions on a variety of issues about the Return to School. Only three calls have been received on the tipline; a question about mitigation strategies, a concern about a teacher not following quarantine protocol (found to be inaccurate) and another concern about distancing by a high school teacher (which was addressed with the individual, though this issue was not noted by other observers).

17. **Question:** Given budget constraints, site-based management, and the new instructional practices how do we ensure equity and collection of best practices? How do school leaders communicate and collect data on practices that work best? (Jackson)

**Answer:** Each week, all elementary school principals along with their assistant principals meet as a professional learning community to discuss a wide array of topics related to school leadership during the pandemic. Weekly topics of discussion include best instructional practices for virtual and in person learning, data monitoring and discussions around the implementation of standards-based practices, building management, and ensuring mitigation factors are implemented. In addition, formative data for reading and math is currently being monitored by all schools, as was the practice prior to this school year. At other levels, the Division also has many groups that share successful ideas and best practices. These groups/forums include principal level meetings and collaborative meetings, administrative intern and assistant principal cohorts, teacher leaders, department chairs, and lead teachers. They use a variety of data sources including reports from the data warehouse, teacher observations, as well as various assessment tools used at individual schools and in classrooms at all levels.

18. **Question:** How are we screening for gifted students during this virtual time period, specifically for early elementary students? (Jackson)

**Answer:** We continue to accept referrals for gifted evaluation at all grade levels from parents, professionals, and the students themselves. There is no change to the state regulation requiring us to complete the identification process within 90 instructional days. Many components of our multicriteria identification process are currently being completed virtually, including gathering assessment data, grades and levels, parent and professional reports, and work samples. However, some parts of the process must be completed in person. These include standardized aptitude tests, math problem sets, and controlled writing samples. At this time, gifted resource teachers are working with families to coordinate in-person testing sessions for individual and small groups of students. During testing sessions, all established safety protocols and mitigation strategies are utilized. Division-level gifted identification/placement committees are meeting to review cases and make eligibility and placement decisions on schedule. We plan to continue universal screening for gifted education using the Cognitive Abilities Test (CogAT) in 3rd grade and Naglieri Nonverbal Ability Test (NNAT) in 2nd, 6th, and 9th grades. The testing window for these assessments is January 26 - February 26, 2021.
19. **Question:** Given that some sports have resumed with restrictions what is PWCS’ plan on marching bands and orchestra as part of the phase-in? (Jackson)

**Answer:** We are still working with principals to determine the best way to proceed with after-school choir, band, and orchestra rehearsals. Normally, these activities are scheduled on an “as-needed” basis to supplement face-to-face instruction and prepare for performances with a live audience, not as a regularly scheduled activity, like clubs and athletics. Staff to student ratios in these programs are often far less advantageous than in sports, making supervision and safety mitigation, which is quite extensive in the performing arts, a bigger challenge. Regardless of whether after-school music rehearsals resume before or after the return of high school students to in-person learning in buildings, they will only be able to happen in a much more limited fashion with significantly smaller groups of students while we are operating under our current mitigation measures. Marching band program teachers have tentatively planned to hold practices during football season, provided they can be conducted in a manner that allows for adherence to all safety mitigation measures.

20. **Question:** When will bell times/schedules be finalized for next quarter? (I understand there are many factors, i.e. bus runs, but I believe the community would benefit from knowing the plan for when bus times/bell times/start times will be finalized.) (Jackson)

**Answer:** Information will be available after the latest ParentVUE data is received to finalize routing. It will be communicated after Winter Break.

21. **Question:** For the next phase (2nd grade) is the new technology (i.e. headsets) installed in the classrooms? (Jackson)

**Answer:** We anticipate that all of the needed technology will be in classrooms and operating, as it has for previous return to school buildings phases.

22. **Question:** (also asked last week added to this question) Where are we in the process of over-staffing? Were we able to find positions for all teachers/staff who were over-staffed? (Jackson)

**Answer:** Please see response to question 12.

23. **Question:** Please give us an update on progress with returning sports under VHSL guidelines. Has there been consideration for postponing sporting competitions/events/games before the holidays? What would be the impact of postponing competitions/events/games until students return in January? (Wall)

**Answer:** Coaches and their teams are currently proceeding under the guidelines as communicated in Governor Northam’s Executive Order 67 in late November and the associated communications and directives by PWCS and the Virginia High School League (VHSL). As a part of the planning for the resumption of athletics and activities, alternate tryout start dates were prepared in case we were unable to begin on December 7. However, Season 1 practices started as scheduled last Monday, December 7 with basketball and sideline cheer. All other Season 1 sports practice/tryouts began December 14. The VHSL executive committee is expected to meet this week to discuss upcoming competition schedules. We will notify the Board if VHSL makes any changes to the schedule. Last week, VHSL announced then quickly rescinded a requirement of masks for all student athletes and coaches. However, because PWC is currently in a “time of substantial COVID-19 activity in the community” VHSL in alignment with the Virginia Department of Health is strongly encouraging the wearing of masks by athletes. Consequently, PWCS will continue to follow the mask guidance put out at the end of last week to all high schools. It is as follows:
Mask Guidance for Season 1 Sports

- **Basketball**: Mask must be worn at all times. This includes practice and competition.
- **Sideline Cheer**: Masks must be worn at all times. This includes practice and basketball games in which sideline cheer is involved. (Reminder: no stunting is allowed at this time.)
- **Wrestling**: Masks must be worn except when actively drilling against and/or wrestling another participant.
- **Indoor Track & Field**: Masks must be worn at all times. This includes practice and competition.
- **Swim & Dive**: Masks must be worn when on the pool deck and not actively participating. For clarity, swimmers and divers waiting their turn in a relay or to dive is considered active participation.
- **Gymnastics**: Masks must be worn except or when a gymnast is actually practicing a routine and/or on an apparatus.

**24. Question:** How is the division planning to address the critical educational needs of our youngest students as revealed by the PALS testing results? (Wall)

**Answer:** All students who do not meet the benchmark for PALS are provided intervention to address the areas of need identified on the assessment. Schools use reading specialists, Title I reading teachers, classroom teachers, trained paraprofessionals, and/or computer adaptive reading software to support students needing intervention. See also the information on Virginia Phonological Awareness Literacy Screening (PALS) Assessment in the December 11 Information Items and for reference, please see the response to Question #13 above.

**25. Question:** Please assess the feasibility of returning all willing and able K-3 (or K-2) students to the building for 4 days a week instruction. (Wall)

**Answer:** Four-day per week in-person instruction was among the options considered by PWCS task forces prior to the Board’s acceptance in July of the original Return-to-Learn. Since then, school staffing, risk mitigation measures (such as distancing plans and need for PPE) have all been predicated on the 50/50 hybrid model. Changing to a four-day per week option for some students is not feasible at this stage as it would require dramatic, highly disruptive, and cost-prohibitive changes to existing plans that must be executed on schedule and to deliver on our commitment to the current return-to-school schedule.

**26. Question:** If a student has chosen to return in person, may they still be able to attend a particular class over zoom from time to time, or at any time, without running afoul of attendance requirements? (For example, may a student have the ability to decide to attend over zoom instead of in person for a week while a family member awaits the results of a COVID test? And if so, do we have a process in place for notifying the teacher, or would it be acceptable for the student to simply show up to class “on zoom” instead of in person?) (Wall)

**Answer:** This can be done. Parents should contact the student’s school to advise of plans.

**27. Question:** Where are we in our ongoing efforts to improve concurrent instruction? What processes do we have in place to monitor the effectiveness of our professional development offerings? What processes do we have in place to gain input, feedback and suggestions from teachers who are using concurrent instruction in order to inform best practices within our division? (Wall)
**Answer:** We have hired consultants to share instructional best practices in concurrent/simultaneous instruction. These consultants have worked directly with school staff and also helped to build the capacity of our own student learning, professional learning, and EL programs and services staff to assess, learn, and deliver support to teachers and leaders in the field.

Our professional development staff have developed “short stops” or mini-sessions targeted on simultaneous learning strategies for teachers at all levels. In addition, we have worked with the Return to Buildings Task Force to identify needs and best practices to share across schools. All professional development offerings are followed up with post-session surveys that solicit feedback from participants that help us to respond to opportunities to improve our services to teachers. In addition to gaining feedback from those who register in the Online Catalog, instructional coaches can visit classrooms where strategies are being incorporated to gain firsthand data on impact.

Our school-based instructional coaches have been engaged in the development of both on-demand/asynchronous resources as well as live coaching support, based on individual teacher needs. Content area supervisors schedule office hours opportunities to meet with teachers each week and utilize these sessions to determine teacher needs at the different levels. Additionally, instructional coaches will be hosting Open Forum sessions on Jan. 7 and 11 to provide an opportunity for educators to both learn from the experiences of educators who have already engaged in teaching using the simultaneous approach, and to solicit feedback that identifies any needs not currently addressed by the On-Demand or virtual professional learning that is being provided. Instructional coaches will recommend additional On-Demand sessions and segments from these sessions to support the needs of CLTs and individual educators.

28. **Question:** Can you please provide an update on our attendance numbers for the month of November. Do we continue to lose students, and what does this look by grade and school? How is the fall in attendance affecting the operating budgets of our schools, and what are our procedures for assisting schools who are facing budgetary issues? (Wall)

**Answer:** We are working on responses to these items, which will be provided at a later date.

29. **Question:** Where are we with our plans to study a revised start time schedule for the coming school year? (Wall)

**Answer:** The Office of Accountability and the Office of Transportation Services have been collaborating on the development of a comprehensive plan for studying and making a recommendation regarding an adjustment to school start times. The research shared in the Board Information Items in May and September 2020 identifies keys to the success of this process, including:

- Developing specific scenarios for consideration;
- Working with internal stakeholders to identify potential challenges and budget implications;
- Communicating with parents and other stakeholders about the identified scenarios;
- Surveying all key stakeholders about their preferences and concerns;
- Recommending an option to the School Board for action; and
- Disseminating a targeted communication campaign to provide stakeholders with ample time to adjust to the changes in advance of implementation.

The process of working with internal stakeholders is scheduled to begin in Spring 2021 and end with a recommendation to the School Board in December 2021 for implementation in the 2022-23 school year. Though the research and the science support later start times for adolescents, based on preliminary
research and the experiences of other school divisions, we believe that a full process involving internal and external stakeholders is essential in order for all to be aware of the impact the changing of start times will have at every level. Once a decision is made, providing ample time for everyone to adjust and prepare is critical to the success of the implementation. After the winter holidays, the Board will be provided with an Information Item detailing the specifics of the process, including timelines for engaging parents and other community members, while being mindful of the uncertainty of this school year and the number of surveys and questions parents are receiving about the current school year.

30. **Question:** What data have we gathered from our hotline and email hotline regarding the effectiveness of our mitigation strategies and protocols? What areas have we identified for improvement? Have we identified any additional critical needs? What areas are working well? (Wall)

**Answer:** Please see response to question 16.

31. **Question:** With regard to the questionnaire that we ask in person students and their families to review, can we make it conspicuously available on the website? I looked for it the other day, and could not find it on the website. Also, have we considered sending it out in hard copy to households to encourage compliance? (Wall)

**Answer:** Staff is reviewing the suggestion on the item’s placement.

32. **Question:** My understanding is that the Governor’s 10 person gathering rule and advice that employees work from home do not apply to schools. Were there any changes that we had to make/will be making because of the Governor’s announcements? Is there any basis in fact for the statement that “PWCS mitigation strategies cannot meet the Gov. Northam’s new stay-at-home orders”? 

**Answer:** As stated in the December 10 Update, “There are no new restrictions on schools.” PWCS continues to closely monitor and comply with all Virginia mandates and guidelines. We are confident that our existing efforts do and will continue to meet all requirements.