



November 20, 2020

Honorable Gavin Newsom
State Capitol, 1303 10th Street, Suite 1173
Sacramento, CA 95814

Governor Newsom,

We write to you as elected superintendents of 22 California county offices of education, serving 125 school districts, many of which are small and rural, and approximately 127,000 students, to express our overall support for your recent efforts to build greater capacity and equity in state COVID testing. We fully appreciate, too, and support the in-person instruction and student services expectation you committed all schools to last June when signing SB 98. In addition, we are writing to provide you with specific feedback and recommendations regarding your school-centered, capacity building efforts from the unique perspective of small and rural schools and districts serving students in our state's most geographically remote communities.

Eight months have elapsed between the closing of school facilities and the current environments of fully reopened to closed (distance learning) school settings our communities are experiencing in mid-November. We continue to navigate circumstances and challenges in our schools, communities, and counties that have no historical precedent and for which no point of reference exists. This is especially true for counties with smaller, geographically isolated populations within the state. Our purpose in writing this letter is provide you and your staff with an informed perspective on the unique conditions faced by our communities. We request your consideration of our recommendations designed to enhance the capacity of our districts to address the needs of the whole child within historically disadvantaged rural counties and to provide in-person instruction and support services to as many of our students as possible.

Currently, more than 961,000 cases of COVID-19 have been reported in California, resulting in almost 18,000 deaths. We understand this is not the end of the pandemic and that these numbers will continue to rise, as additional COVID transmission occurs. We know, too, that smaller counties must expect significant case rate increases and that due to a health care capacity shortage in our communities we are most vulnerable in the event of a large outbreak. Given the current conditions and health system capacity shortages in our counties, we are acutely aware of the importance of building a testing infrastructure in all regions of our state that will ensure adequate surveillance testing that meets current CDPH guidelines. Currently, rural California lacks that capacity. We must be able to build capacity to respond to these changes and the flexibility to increase in-person instruction to the fullest extent practicable given each of our unique needs and situations.

Our students have experienced learning loss to the same degree as vulnerable and at-risk students throughout California. In addition, we ask that you consider the data from our counties showing that our students are also disproportionately suffering from social-emotional trauma related to their isolation and anxiety regarding COVID-19. Rural counties throughout California are reporting increases in crisis calls by youth under the age of 18, sometimes increasing by over 200%, as is the case in Tuolumne County. Additionally, the number of referrals to Child Welfare Services have been impacted significantly. In Del Norte County, April referrals were down by almost 60% over the previous year and down 27% in total between March 16, 2020 and October 1, 2020, due to the lack of contact between students and mandated reporters. In Modoc County, the number of referrals was almost three times the normal number of referrals since the closure of facilities. Our students are also being referred for temporary, involuntary psychiatric commitment (5150) more than ever before, and the number of students with health/suicide plans, students attempting suicide, and students reporting suicidal thoughts and ideations to families and other community members have increased significantly. Students in our rural counties often have limited or no access to adequate mental health practitioners and the complication of not attending schools in person is limiting counseling, educational psychological intervention, behavioral intervention, and social-emotional learning even more. It must be a state and local policy imperative that the most vulnerable and isolated students in rural communities have access to in-person mental health services throughout and immediately following this pandemic.

For these unique reasons, our goal is to work collaboratively to return our students safely, progressively, and intentionally to a comprehensive educational environment, which is so critical, both educationally and emotionally, to our rural counties. We emphasize that while many of the issues experienced by our students and staffs may not be unique to our counties, the solutions must be. As we look to the second half of our academic year, we all agree that several issues must be addressed and that state policy and local service delivery solutions must take into consideration the unique challenges that face rural areas. Only by considering the needs of the students through a lens of the reality of rural needs can we truly address the issue of equity in returning our students to school.

Accordingly, we respectfully ask that you consider the following concerns and recommendations as you work to reopen our schools and help to ensure that they remain open:

1. **Surveillance Testing** - Again we want to "thank you" for recognizing rural districts and county offices of education in the early adopters surveillance testing pilot and let you know that we endorse this effort. Furthermore, we appreciate your understanding that rural counties are uniquely disadvantaged to implement testing, due to the lack of capacity, so, again, your support and focus on prioritizing rural counties is valued. Many times, it is assumed that we have the same health care infrastructure, supports, and access as urban and suburban areas. This is simply not true.

We know the time is coming when we all might need increased testing efforts for certificated and classified staff, and we, like you, want to be proactive and not reactive in our approach. Given the number of staff, we believe that these surveillance-testing plans will be a great asset moving forward.

In regard to students, however, we believe health care privacy, parental notification concerns and the inability of students under the age of 13 to self-administer these tests make the testing

of students in school settings prohibitive. Student testing is simply beyond our capacity, and we do not believe that it is the appropriate role of rural schools (most of whom do not have school nurses) to implement student testing. Until the State has built out the health care system infrastructure to test all students across all counties, rural or otherwise, we urge you to postpone any guidance or directive regarding student testing, understanding that we have a critical absence of testing and health support networks.

2. **Mental Health Support-** As was stated earlier, small counties suffer disproportionately from a lack of mental health providers necessary to meet the needs of our students, especially with the increased need brought about by COVID-19. Increases in students placed in a 5150 hold, involved in extreme CWS cases, and suffering from increased economic hardships are all leading to schools providing more support and intervention at higher levels than we ever have before. Additional funding for school counselors, school psychologists, mental health services provided through the County Department of Health and Human Services and other community mental health providers is essential to helping students and families alleviate the stress brought about by distance learning and the lack of access to in-person education.
3. **Special Education Support-** In our counties, a disproportionate number of our students receive special education services through Individual Education Plans. Students receiving these services have been particularly hard hit during this pandemic. These children often struggle more with technology than their typically developing peers and are denied access to school staff support when trying to learn at home. Our counties, in an average year, experience higher special education costs and have access to fewer qualified providers than larger counties due to our remote locations and/or distances between schools or districts. Moreover, the IDEA, provides students with disabilities the right to in-person instructional and specialized services. Recent OAH rulings have affirmed those rights and the responsibilities of LEAs to deliver in-person services even if schools are closed for other students. To meet the needs of our most at-risk students, we need to ensure that there is equitable funding that is equal to or greater than the state average.
4. **Substitute Teachers-** Currently, substitute teachers may only serve in a classroom for 30 consecutive days on an Emergency 30 Day Substitute Teaching Permit, unless they have a Teaching Permit for Statutory Leave (TPSL). Almost every small and/or rural county struggles to hire teachers every year, due to our remote locations, and we especially and persistently lack substitute teachers. With the additional complication of extended leaves due to COVID-19, we are unable to fill even daily teacher absences, much less those absences that are longer. Without these staff, we cannot even contemplate converting unused spaces on campuses to educational spaces for in-person teaching. We ask that the State expand the ability of substitutes holding a 30-Day Substitute Teaching Permit to substitute in a single classroom for as long as necessary during the State's COVID-19 response. With this change, we would be better able to meet the needs of our students and ensure that our classrooms could remain open to students.
5. **Personal Protective Equipment and Safety Supplies-** There are significant concerns that budgets, already tight and decreasing, will be further impacted as Federal funding ends December 30, 2020 and future funding, including budget deferrals, is uncertain. Our students, certificated, classified, and administrative staff, and our families need to be assured that COVID-

19 safety supplies and PPE will continue to be funded and available after January 1, 2021 at no additional cost to our county offices or districts.

6. **Close the Rural Digital Divide-** Many areas of our counties do not have access to high-speed Internet, which is essential for students to access meaningful distance education. No number of hot spots mounted on school buses, access points in parking lots, or willing wi-fi partners can fulfill the need for fiber, towers, repeaters, and other permanent technology without which students cannot access the education to which they are entitled. In fact, in many of our counties, hot spots will not work due to geographic impediments. Our families live in remote mountainous or tree-filled areas that block hot spot reception and even satellite signals.

Our schools are core to the functioning of our counties. Our local economy is predicated on parents' ability to go to work, on students' ability to meet employment or college entrance criteria after graduation, on students' ability to read on grade level by the end of 3rd grade, and on families receiving supports, services, and programs to ensure the wellbeing and safety of their children.

We understand that the challenges we all face are unprecedented and appreciate the opportunity to share our perspectives and recommendations. We ask that as you prioritize the needs of our youngest and most vulnerable students, the truly unique conditions and exceptional challenges experienced by rural communities and children be given special recognition and appropriate policy consideration when state policies are developed. Absent an understanding and appropriate attention to these differences, there is a great risk that the most vulnerable and at risk students in rural communities will be further marginalized.

Thank you for your time and consideration.

Sincerely,

Matthew P. Strahl

Digitally signed by Matthew P. Strahl
DN: cn=Matthew P. Strahl, o=Alpine County
Office of Education Alpine USD, ou=Alpine COE/
USD, email=mstrahl@alpinestudents.org, c=US
Date: 2020.11.18 16:29:19 -08'00'

Matthew Strahl
Superintendent, Alpine County Office of Education

Scott Nanik
Superintendent, Calaveras County Office of Education

Jeff Harris
Superintendent, Del Norte County Office of Education

Barry Simpson
Superintendent, Inyo County Office of Education

Patricia Gunderson
Superintendent, Lassen County Office of Education

Robert Russell

Robert Russell
Superintendent, Amador County Office of Education

Mike West
Superintendent, Colusa County Office of Education

Tracey Quarne
Tracey Quarne
Superintendent, Glenn County Office of Education

Brock Falkenberg
Superintendent, Lake County Office of Education

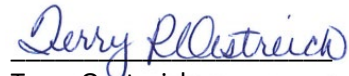
Jeff Aranguena
Superintendent, Mariposa County Office of Education



Michelle Hutchins
Superintendent, Mendocino County Office of Education



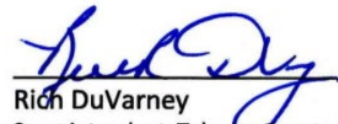
Stacey Adler
Superintendent, Mono County Office of Education




Terry Oestreich
Superintendent, Plumas County Office of Education



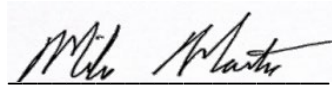
James Berardi
Superintendent, Sierra County Office of Education



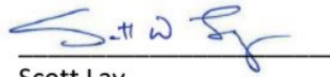
Rich DuVarney
Superintendent, Tehama County Office of Education



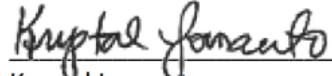
Cathy Parker
Superintendent, Tuolumne County Office of Education



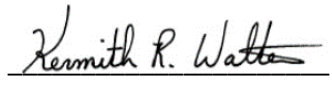
Mike Martin
Superintendent, Modoc County Office of Education



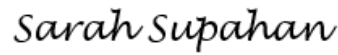
Scott Lay
Superintendent, Nevada County Office of Education



Krystal Lomanto
Superintendent, San Benito County Office of Education



Kermith Walters
Superintendent, Siskiyou County Office of Education



Sarah Supahan
Superintendent, Trinity County Office of Education



Francisco Reveles
Superintendent, Yuba County Office of Education