



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF THE SECRETARY OF HEALTH

August 23, 2021

Ms. Diane M. Ellis-Marseglia, LCSW, Chair  
Mr. Robert J. Harvie Jr., Vice Chair  
Mr. Gene DiGirolamo, Commissioner  
Bucks County Administration Building  
55 East Court Street  
Doylestown, PA 18901

Dear Commissioners Marseglia, Harvie, and DiGirolamo:

As you know, the Pennsylvania Department of Health (PADOH), the Department of Education (PDE), and the entire Wolf Administration have made it a priority to support schools and ensure a safe transition to in-person learning this fall. To that end, PADOH and PDE continue to recommend school entities to follow current Centers for Disease Control and Prevention (CDC) guidance, to the greatest extent possible, when creating and implementing mitigation policies and practices for their communities. This is especially important for our younger students who are still not eligible for the COVID-19 vaccine and remain dependent on other mitigation strategies to protect them and their families.

PADOH recently reviewed the Bucks County Health Department (BCHD) [2021-2022 School Reopening Guidance and Frequently Asked Questions](#) published on August 15, 2021. As we begin our third school year impacted by the COVID-19 pandemic, I appreciate your leadership and initiative to issue this much needed guidance for our school communities. However, after careful review, I am concerned with several of the responses provided in the BCHD guidance document and hope you can address these before the school year begins in earnest.

Specifically, numerous aspects of the BCHD guidance are inconsistent with the CDC and PADOH recommendations and disregard evidence-based public health best practices. As a local health department, BCHD is responsible for the prevention and control of diseases. A summary of the department's primary concerns includes:

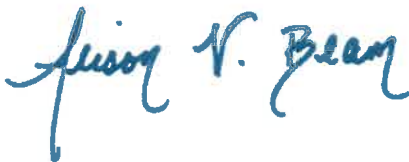
- BCHD does not recommend that persons who have symptoms consistent with COVID-19 should be tested, which is counter to both CDC and DOH recommendations. The response for a diagnosis of COVID-19 is different from the response for other febrile illnesses, and being able to identify COVID-19 cases is critical for both personal and public health. Per CDC and DOH guidance, the isolation period for individuals with COVID-19 is 10 days; symptomatic and asymptomatic cases may be able to transmit virus during this entire period and should be excluded from school. By not encouraging testing, BCHD's ability to identify cases and respond to outbreaks will be diminished.
- Schools are required to report cases of COVID-19 to DOH. See 35 P.S. §§ 521.4, 521.5; 28 Pa. Code § 27.3. BCHD's official stance in the [2021-2022 School Reopening Guidance and Frequently Asked Questions](#) of "strongly recommending" parents to report cases to the school impedes that effort. Additionally, it is unclear as to how BCHD will

“closely monitor COVID-19 and its variants” without knowing how many cases are in schools or other non “highest-risk settings.”

- The BCHD policies regarding the isolation period and other guidance for both asymptomatic and symptomatic cases will allow for infectious people to be in schools, resulting in unvaccinated populations (e.g., children under the age of 12) being at increased risk for infection, serious disease, and death. It is unclear how BCHD conducted their analysis of SARS-CoV-2 infectiousness, as there is no definitive evidence of this published in the scientific record. For example, the BCHD suggested 3 day waiting period is completely inconsistent with CDC or DOH recommendations and is not supported by published scientific understanding of SARS-CoV-2 transmissibility and infectiousness.
- The BCHD policy of allowing asymptomatic close contacts to remain in school rather than to quarantine for the recommended period of time means that persons who go on to become COVID-19 cases will expose others. In addition to being in direct opposition to the shared stance of CDC and DOH, these BCHD recommendations are contrary to the vastly growing scientific body of evidence around SARS-CoV-2 transmission. Moreover, this BCHD policy which would allow close contacts an opportunity to further spread disease in the school setting, and in turn require more school exclusion time, could endanger our shared goal of keeping as many students and staff safely in-person as possible.

We know this has been a difficult time for our students, teachers, staff, families, and entire school communities. Our hope is that by providing clear, consistent, and evidence-based public health best practices our students will be able to resume in-person learning and some semblance of normalcy for the 2021- 2022 school year. Without this clear messaging – or worse, with the inconsistent and alarming messaging included in the BCHD guidance document – I fear our school leaders will not be equipped with the tools to keep our children safely in school. Given these concerns and concerns related to current community transmission levels, I respectfully ask you work with BCHD to update its guidance to align with the CDC and PADOH guidance, while still considering local conditions. Currently, Bucks County is experiencing high levels of community transmission according to CDC. I appreciate your attention to this issue and would be pleased to discuss further as needed.

Sincerely,



Alison V. Beam, JD  
Acting Secretary of Health