

Toronto District School Board

Operational Procedure PR730

Title: **COVID-19 MASK**

Adopted: September 29, 2020

Effected: September 29, 2020

Revised: NA

Reviewed: NA

Authorization: Executive Council

1.0 RATIONALE

On August 6, 2020, in response to public health concerns relating to the COVID-19 pandemic, the Board of Trustees passed a resolution requiring the wearing of masks indoors for all students, staff, and visitors, with appropriate medical exemptions, where two metres of social distancing cannot be maintained. These measures are to be in place until such time as masks are no longer required or recommended in the general population to prevent the spread of COVID-19.

The COVID-19 Mask Procedure (the "Procedure") supports the implementation of this resolution, the Occupational Health and Safety Policy (P048), and the Student Health Support Policy (P092).

2.0 OBJECTIVE

To outline TDSB's mandatory requirements and process with regard to wearing masks on Board property during the COVID-19 pandemic.

3.0 DEFINITIONS

Board refers to the Toronto District School Board, which is also referred to as "TDSB."

Board Property refers to all schools, administrative and non-administrative Board buildings or lands, owned or occupied by the Board. Board-owned vehicles and machinery are also considered Board property.

4.0 RESPONSIBILITY

Associate Director, Business Operations and Service Excellence

5.0 APPLICATION AND SCOPE

This Procedure applies to all students, staff, parents/guardians, volunteers, third-party service providers, health/support professionals, and visitors on Board property.

6.0 PROCEDURES

Please see *Appendix A*

7.0 EVALUATION

This Procedure will be reviewed as required.

8.0 APPENDIX

Appendix A: COVID-19 Mask Procedure

9.0 REFERENCE DOCUMENTS

Policies:

- Occupational Health and Safety (P048)
- Student Health Support (P092)

Other Documents:

- Ontario Ministry of Education, Guide to Reopening Ontario's Schools (updated August 28, 2020)
- Returning to School: Guide to the Safe Reopening of the TDSB (August 2020)

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Updated on September 24, 2020. Material changes are highlighted in yellow for easy reference. TDSB reserves the right to update these provisions at its sole discretion.

Table of Contents

Background.....	2
Mask Use, Supply and Care.....	3
Mask Breaks.....	3
Types of Masks	3
Qualities of a Good Cloth Mask or Face Covering	4
Use of Face Shields as an Alternative to Masks	5
Other Face Coverings	5
Masks Not Approved for Use.....	6
Working and Learning at the TDSB.....	6
Staff/Visitors in TDSB Schools and Administrative Buildings	6
Students in TDSB Schools	6
Special Masks and Accommodations for Students with Special Needs	7
Student Transportation	8
Exemptions from Mask Wearing	8
Exemption Request Process	9
Dealing with Requests for Exemptions at School/Building Entrance	11
NEW - Interim Measures Due to Increased Health and Safety Risks	11
Balancing Rights and Risks.....	13
We'll Get Through This Together	13
Sources.....	15
Selected TDSB Policies and Procedures	15
Appendix A – Quick Guide for Staff.....	16
Appendix B – Mask Exemption Quick Guide for Students	17
Appendix C – Further Requirements and FAQs For Mask-Related Accommodations	18



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



This Procedure has been developed to address our collective responsibility to follow public health and Ministry of Education advice to implement measures known to be effective in combatting the transmission of COVID-19. Unless an exemption applies that would allow a student, staff or visitor to attend in person without a mask, the wearing of appropriate masks is mandatory at a TDSB school or building.

This document provides direction to staff, visitors, parents and students on the requirements of the TDSB's Covid-19 Mask Procedure, including information about exemptions.

Background

To protect our health and safety, all students, staff and visitors will be required to wear masks in TDSB schools, buildings and on school buses.

Staff are required to wear Level 1 or 2 medical masks at all times when indoors, and outdoors when unable to maintain a physical distance of two metres. Level 1 and 2 medical masks provide low to moderate barrier protection from aerosols, sprays and fluids, and are appropriate for general use.

School visitors, including **parents/guardians**, are required to wear a mask/face covering when indoors and outdoors on school property, such as during pick-up and drop-off.

Students must wear non-medical masks or face coverings while in school.

The TDSB's requirements are consistent with the [City of Toronto requirement](#) that anyone aged two years and older must wear a mask/face covering in indoor public spaces, with possible exemptions. Toronto Public Health [recommends](#) that all students wear a mask/face covering while indoors at school. The requirement for all school board staff to wear medical masks follows the direction of the Ministry of Education.

For the purpose of this document, masks and face coverings will be collectively referred to as "masks", and reference to "parents" includes guardians.



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Mask Use, Supply and Care

Parents are encouraged to provide masks for their children; however, schools, administrative buildings and buses will be equipped with extra masks.

Staff may place orders for masks and other Personal Protective Equipment (PPE) directly through the TDSB Distribution Centre [online catalogue](#) and processed through SAP. For questions, please contact 416-397-2766 or email DC@tdsb.on.ca. Please do not purchase masks/PPE from other vendors unless approved by the TDSB.

Students and staff should bring either paper bags, breathable cloth bags, fanny packs, or Ziploc bags to store clean and dirty masks (separately) during mask breaks, recess, or when not wearing a mask. Plastic bags are not recommended unless needed for short periods of time.

Mask Breaks

During the school day, staff will allocate time for students and themselves to have mask breaks, including outdoor time (if possible) where masks can be temporarily and safely removed and stored.

Staff who work from administrative sites should speak with their managers regarding the scheduling of breaks when masks may be temporarily removed.

Types of Masks

There are commonly three types of masks:

Disposable

Disposable masks are available in drug stores and many retail outlets, or can be ordered online. They are 3-layered, with stretchable elastic ear loops. After wearing for a day, these masks/face coverings should be discarded and not used again. Non-medical or medical versions of these masks are appropriate.

Reusable

Reusable masks look very similar to disposable masks but are made from cloth material



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



that provides protection. Reusable masks can be used daily but do need to be washed in hot water frequently. They can also be purchased at many retail outlets or ordered online, however the quality of these masks may vary.

Reusable Homemade

You can also make masks from household or purchased fabric/materials. For instructions on making masks using fabric, visit the [Government of Canada website](#). Note: Homemade masks and materials are not tested against any standards and may not be as effective in blocking virus particles that may be transmitted by coughing or sneezing.

Clear Face Masks

People who are D/deaf, hard of hearing, have autism spectrum disorder (ASD) and other developmental disabilities, and people for whom English is an additional language may rely on seeing the whole face for communication.

People with ASD and other developmental issues rely on being able to see the whole face in order to interpret language and understand communication, and may be unable to identify a person even from a minor appearance change, such as wearing a mask/face covering. TDSB staff working with these individuals may wear clear face masks when working with students and use medical masks otherwise. These masks are provided by the TDSB.

Qualities of a Good Cloth Mask or Face Covering

A good cloth mask should:

- Be at least two layers of tightly woven cotton or linen.
- Cover over nose, mouth and chin, and be easy to breathe through.
- Fit securely to the head with ties or ear loops without gaping or impairing vision.
- Be comfortable to avoid the need for adjustments when wearing.
- Maintain their shape after washing and drying.
- Not contain non-breathable materials such as plastic.

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Proper Use of a Mask:

- Do not share your mask with others.
- Wash your hands before putting on and after taking off a mask.
- Place the mask over your nose, mouth and chin.
- Avoid touching your face and mask while using it.
- Change your mask as soon as it is moist or dirty.
- For disposable masks, discard and do not use again after wearing for a day.
- Do not leave your mask tucked under your chin, hanging from your ear, or on your forehead.
- Remove the mask by the ear loops without touching the front of the mask.
- For reusable cloth masks, put in a bag or directly in the laundry bin to be washed after use.
- Launder cloth masks with other items using the hot cycle and dryer or follow the care instructions provided by the manufacturer.

Use of Face Shields as an Alternative to Masks

- A face shield features a looser fit and transparency, but is not an alternative to a mask. When used alone, face shields are not as effective as masks/face coverings. However, face shields can be considered for use only in certain circumstances (e.g., when masks are short supply, when wearing masks interferes with speech clarity, for those impacted by heat stress, etc.).
- In situations where a student, staff or visitor is not wearing a mask due to an approved exemption, a face shield may be required as an alternative measure of protection.

Other Face Coverings

- Cloth masks or face coverings can be an added public health measure for containing the spread of COVID-19 when they are used in combination with frequent handwashing, physical distancing and staying home when sick.
- For **students** who wear a niqab or burka, whether a face mask needs to be worn as well should be considered on a case-by-case basis, taking into account the above [Qualities of a Good Cloth Mask or Covering](#). If appropriate for that student, a mask that fastens over the hijab may be considered as an accommodation.

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



- For **staff**, hijabs, niqabs and burkas may not be designed to filter respiratory droplets and may not be effective. A medical mask will have to be worn underneath these coverings. Make sure the mask fully covers the nose and mouth and fits snugly under the chin, over the bridge of the nose and against the sides of the face.
- Individuals who wear a hijab, niqab or burka may require privacy to put on or remove face masks. Other forms of accommodation should be considered in conversation with the individual.

Masks Not **Approved** for Use

Some commercially available masks have exhalation (breathable) valves or openings that make the mask more breathable for the person wearing it. However, these masks also allow infectious respiratory droplets to spread outside the mask. Masks with exhalation valves are therefore not to be used because they do not protect others from COVID-19 and do not limit the spread of the virus.

Working and Learning at the TDSB

The following sets out important information about TDSB's mask requirements and exemptions. In addition, please see [Appendix "A"](#) Quick Guide for Staff and [Appendix "B"](#) Quick Guide for [Students](#).

Staff/Visitors in TDSB Schools and Administrative Buildings

Ministry of Education requires that all school board staff wear Level 1 or Level 2 medical masks (to be supplied by the TDSB), both indoors and outdoors, unless an exemption applies.

School visitors, including parents/guardians, are required to wear a mask/face covering when indoors and outdoors on school property, such as during pick-up and drop-off.

Students in TDSB Schools

Following guidance from the Toronto Public Health and the Ministry of Education, the TDSB requires that all students wear masks while indoors on school property, unless an exemption applies.



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



The City of Toronto has also produced a helpful fact sheet for parents and students on [Preparing for School during COVID-19](#). Parents and students are encouraged to review this resource and contact their school Principal to address any concerns.

Special Masks and Accommodations for Students with Special Needs

Students with expressive communication difficulties, including those with articulation problems, neurologic issues, and many others, may be disproportionately adversely affected by having to wear a mask at school. In addition, some students may face challenges with the enhanced health and safety protocols in place to help maximize physical distancing. To address these concerns, schools will work with families and Special Education & Inclusion Consultants to [explore strategies to best support students and staff](#) during this time.

Consider using transparent face masks (e.g., no fog clear window masks, Mingle Mask) when working with individuals who are D/deaf, hard of hearing, or may have communication exceptionalities and/or sensory needs who require access to speech reading and/or facial expressions.

Some students are not able to wear masks due to serious medical conditions and are also at high risk for COVID-19. In addition, the conditions at their school (e.g., congregated and integrated sites) and on buses may not enable appropriate physical distancing, good ventilation and other preventative measures. Special care and attention will be given to ensuring adequate staff, drivers, and other supports are in place for these students. Parents are strongly encouraged to work proactively with the school Principal, special education staff, and transportation staff to determine and coordinate safety measures that can be implemented to support these special needs.

Some individuals are able to wear masks, but may not be able to keep the mask on at all times, or whose tolerance may increase or decrease over time. Under these circumstances, accommodation measures should be reviewed and adjusted as necessary.

Special masks and PPE for staff who work with students with special needs are available for order in the TDSB Distribution Centre [online catalogue](#).

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Student Transportation

- [Masks are required \(unless an exemption applies\)](#) for all students and drivers
- Parents should raise any concerns with masks with school staff and [Toronto Student Transportation Group](#) (TSTG) staff well in advance
- While waiting for a bus at a bus stop, students and parents should maintain physical distancing where possible
- Drivers will be trained on mask wearing policy and exemptions, and will have a supply of disposable masks on board the buses

Exemptions from Mask Wearing

Some students, staff and visitors will be exempt from wearing masks in TDSB schools, buildings and while riding on school buses. **We expect all staff and students to be respectful of those who wear masks and those who cannot wear a mask for medical and other reasons for which an exemption applies.**

Students, parents and staff must therefore expect that there will be individuals in the school, building, or bus who will not be wearing masks because they qualify for an exemption.

In such cases, appropriate measures such as **face shields**, greater physical distancing, **clear barriers and/or study carrels**, enhanced cleaning, and other infection prevention and control measures will need to be considered. If increased distancing is employed, caution must be exercised so as not to stigmatize the student. The importance of increased distancing may depend upon current epidemiology and vulnerability (e.g., immune issues, etc.) of the staff/student or proximate staff/students.

Accommodations require consideration of the human rights needs of the person requesting an exemption, as well as medical and health and safety needs of others. Protecting students/families and staff who are at high risk for COVID-19 should be considered in relation to assessing the appropriateness and nature of a mask exemption. It is expected that all reasonable steps and considerations will be taken before a student is not permitted to attend school in person, or an employee is not permitted to attend work in person.

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



The following individuals are exempt from wearing masks:

- Individuals with a medical condition/disability that make it difficult to wear a mask. This can include:
 - Medical condition, mental health condition, cognitive condition or disability that prevents wearing a mask.
 - Medical condition that makes it difficult to breathe.
- People who are D/deaf and hard of hearing or are communicating with a person who is hearing impaired, and where the ability to see the mouth is essential for communication (note: TDSB has ordered different types of clear masks);
- Individuals who are unable to put on or remove masks without assistance; and,
- People who require accommodation in accordance with the *Ontario Human Rights Code*.

If students, staff and visitors are able to wear masks but choose not to, they do not qualify for a mask exemption and in-person attendance at school or the workplace without a mask will not be allowed.

Exemption Request Process

Staff, visitors, parents and students who seek an exemption based on one of the above-noted categories must inform the school Principal/manager as soon as possible of the request and exemption category, so that the request and possible alternative arrangements may be considered.

Staff may also contact the Disability Management Office and review [PR717 Workplace Accommodation for Employees with Disabilities](#) for more information on the disability accommodation process.

When dealing with a mask exemption request, Principals/managers should follow these requirements:

- The request for exemption **may** be granted where a medical certificate or note supports the request.
- Requests for exemption for medical reasons, where no medical certificate is



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



provided **or where TDSB already has relevant medical information, may** be accepted. We assume people are honest and truthful.

- Requests for exemption due to mental health condition, cognitive condition or disability that prevents wearing a mask or face covering **may** be accepted. Again, we assume people are honest and truthful without having to disclose personal, medical or mental health information.
- Requests for exemption due to inability to breathe: Principals/managers should make reasonable inquiries regarding this request. Are there asthma-related issues? Could a different type of mask be suitable (disposable vs. non disposable, cloth masks or homemade masks)? Although not a substitute for a mask, a face shield may be an option. Face shields provide limited protection but may be better than no mask at all.
- Students/staff who are D/deaf, hard of hearing, communicating with a person who is hearing impaired, or whose ability to see the mouth is essential for communication, should use masks designed for these circumstances.
- Individuals who are unable to put on or remove a mask without assistance may be able to do so with guidance or assistance.
- The procedural duty to accommodate under the Ontario *Human Rights Code* requires that the accommodation process unfold in a transparent, communicative, flexible, respectful, and cooperative manner. Principals/managers should inquire and consider the reasons for the request. For example, is the request being made based on protected grounds of discrimination such as religion or disability? This request may need further assessment by the Principal/manager that may not be able to be undertaken quickly. In such cases, Principals/managers should consult with their Superintendent first, and if necessary, the TDSB Human Rights Office. **Please see [Appendix C](#) for further guidance and FAQs for mask-related accommodations.**

Notwithstanding the above, if we have any reason to believe that the request for exemption does not or no longer relates to an actual medical need/disability, that the medical documentation provided is insufficient, or that the risk to the health and safety of others in the school or building outweighs the needs of the person seeking or who qualifies for an exemption, the TDSB reserves the right to seek further medical information, make additional inquiries, place additional measures, or modify its decision as necessary. In other words, even with a valid exemption, in-person

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



attendance may not be allowed if the risk to the health and safety of others outweighs the needs of the person with the exemption.

Dealing with Requests for Exemptions at School/Building Entrance

There may be times when exemption requests happen at the entrance to the school or building with no notice.

Requests for exemptions for different reasons, including refusal to wear a mask, may not be easily processed or resolved in a timely manner. Under these circumstances, Principals/managers should take the following steps:

- Respecting physical distancing at all times, have the student (or student with their accompanying parent or staff) wait in an area inside the school/building that has been designated for such situations. In the case of schools, this may be in the Wellness Room. In good weather, offer the option to wait outside the building, provided younger children are with a parent or have supervision.
- Collect all relevant information, including names, contact information and nature of the exemption/accommodation being requested.
- Contact your Superintendent or Manager for assistance in assessing the situation and course of action.

If the request for exemption/accommodation cannot be processed in a reasonable time frame, indicate to the student/parent/staff that more time is needed to process the request and two options are available: continue waiting or return to home for follow-up the next day or as soon as possible. **Interim measures as set out below may also be considered.**

It is not recommended that the student proceed to their class or that the employee proceed to their workplace in person during this time.

NEW - Interim Measures Due to Increased Health and Safety Risks

Significant increases in confirmed COVID-19 cases in Toronto and the province have caused the City of Toronto, the Ontario government and the TDSB, to review and modify its health and safety guidelines.

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Effective immediately, all students and staff who seek a mask exemption must at a minimum wear a face shield (or a face covering approved by the Principal/Manager) in order to enter a TDSB school or building pending assessment of the exemption request. While not a replacement for a mask/face covering, face shields provide some level of protection while allowing for in-person attendance.

Use of a face shield must be coupled with additional measures such as increased physical distancing, handwashing, hand sanitizer use, use of barriers/study carrels, placement in area with greater ventilation, etc.

For staff and students for who can wear masks but experience some difficulty with prolonged use, accommodations such as additional mask breaks (with physical distancing) may be reasonable.

There may be circumstances in which attendance with a face shield may still constitute an undue risk to the health and safety of staff and students in the school or building. In such cases, further alternative measures will need to be considered, including if necessary remote learning or working.

These interim measures will be in place even if a medical note/certificate is provided which supports an exemption, as the risk to the health and safety of others in the school or building may outweigh the needs of the person who qualifies for an exemption.

Due to the significant increase in COVID-19 cases in our communities and the resulting adjustments to COVID-19 Mask Procedure, this requirement applies immediately and retroactively, including to those whose mask exemption requests have already been approved. To be clear, individuals who already have a TDSB mask exemption will be required to wear a face shield (or face covering approved by the Principal/manager) in order to enter a TDSB school or building as an interim measure pending reassessment by the Principal/manager of the exemption request. If in the Principal/manager's opinion, evidence of the medical condition/disability is clear and undisputed, a reassessment is not required and the individual's exemption may continue.

For students with special education needs, please refer to [Special Masks and](#)

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



[Accommodations for Students with Special Needs](#) in this Procedure for additional information.

Balancing Rights and Risks

While individuals may choose to assume a reasonable degree of personal risk by not wearing a mask, it is important to understand the impact on the health and safety of others. The risk to public health and safety is an important factor to be considered when dealing with exemption requests or individuals who choose not to wear masks.

School Principals/managers should consider as many options or alternatives as possible to try to maximize the fulfillment of both human rights and the right to a safe working and learning environment.

Teachers and principals are expected to address student non-compliance first with non-disciplinary measures such as reminders, education, parental involvement, and only if necessary, a variety of progressive discipline strategies under [PR585 Board Code of Conduct](#). Should a Principal decide to suspend for non-compliance related to mask wearing and after following the principles of progressive discipline and applying mitigating and other factors, the Principal will use the suspension reason breach of the school or Board code of conduct and connect the suspension to the appropriate sections (e.g., in section 6.2 relating to promoting safety of people in the school, respecting the rights of others, and relating to student responsibilities under section 6.3). By using the “breach” reason the Superintendent will be involved in the suspension process.

We’ll Get Through This Together

The use of masks, along with other infection control measures, such as physical distancing, barriers, frequent hand washing, enhanced cleaning, screening, remote working or learning, self-isolation, contact tracing, and testing are key to fighting COVID-19 and ultimately, saving lives.

We understand that returning to work and school at this time is a source of significant stress and anxiety for many staff, parents and students. As a school community, we must work together to prevent the spread of COVID-19 and to maintain a healthy and safe work and learning environment.



APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Harassment, bullying, or discrimination of any type against individuals for wearing or not wearing masks, **or for implementing and enforcing TDSB COVID-19 Mask Procedure, will not be tolerated.** Concerns with mask-wearing should be raised with the Principal or Manager. Please do not confront the individual.

School staff should monitor for and address any harassment, bullying, or discrimination that is associated with wearing or not wearing a mask. Staff experiencing harassment, bullying, or discrimination are encouraged to report any incidents to their manager.

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



Sources

City of Toronto, [COVID-19 Guidance for Use of Face Masks and Coverings by Public](#) (Revised August 26, 2020).

Government of Canada, [Non-medical masks and face coverings: About](#) (Date Modified July 24, 2020).

Public Health Ontario, [Focus on Face Shields for Source Control of COVID-19](#) (July 16, 2020)

City of Toronto, [Preparing for School during COVID-19](#) (August 22, 2020).

Ontario Ministry of Education, [Guide to Reopening Ontario's Schools](#) (Updated August 28, 2020).

Ontario Human Rights Commission, [COVID-19 and Ontario's Human Rights Code – Questions and Answers](#) (Updated August 28, 2020)

Toronto District School Board, [Returning to School: A Guide to the Safe Reopening of the TDSB](#) (August 2020)

Toronto Student Transportation Group, [Transportation and COVID-19](#)

Selected TDSB Policies and Procedures

[P031 Human Rights](#)

[P037 Equity](#)

[P048 Occupational Health and Safety](#)

[P069 Accessibility](#)

[P092 Student Health Support](#)

[PR505 Parent Concern Protocol](#)

[PR515 Workplace Harassment Prevention and Human](#)

[Rights PR557 Behaviour on Buses](#)

[PR585 Board Code of Conduct](#)

[PR697 Promoting a Positive School Climate](#)

[PR699 Students with Special Needs: Management for Risk of Injury Behaviours](#)

[PR703 Bullying Prevention and Intervention](#)

[PR717 Workplace Accommodation for Employees with Disabilities](#)





Appendix A – Quick Guide for Staff

DO I HAVE TO WEAR A MASK IF...

I am unable to put on or take off a mask on my own?	No
I have a medical condition that is aggravated by a mask (e.g. eczema, severe breathing difficulties, etc.)?	No
I am receiving accommodation under the Ontario <i>Human Rights Code</i> due to a condition/circumstance that prevents me from wearing a mask?	No
I am drinking water, eating lunch, etc.?	No, masks may be temporarily removed while eating, drinking, or doing an activity that requires temporary removal (e.g., taking oral medication).
I am outside on school property (e.g. parking lot or field)?	No, as long as you are practicing physical distancing.
I am inside the school before or after regular class hours?	Yes
I am in the school hallways?	Yes
I am in the washroom?	Yes
I am in the staff room?	Yes, unless temporarily removing for eating and drinking, with physical distancing.

Learn more about [wearing, removing and storing face masks](#).





Appendix B – Mask Exemption Quick Guide for Students

DO I HAVE TO WEAR A MASK IF...

I am unable to put on or take off a mask on my own?	No
I have a medical condition that is aggravated by a mask (e.g. eczema, severe breathing difficulties, etc.)?	No
I am receiving accommodation under the Ontario <i>Human Rights Code</i> due to a condition/circumstance that prevents me from wearing a mask?	No
I am drinking water, eating lunch, etc.?	No, masks may be temporarily removed while eating, drinking, or doing an activity that requires temporary removal (e.g., taking oral medication)
I am outside (e.g. in the school yard, on the field)?	No, as long as you are practicing physical distancing.
I am seated at my desk during regular class hours?	Yes
I am in the school hallways?	Yes
I am in the washroom?	Yes

- Learn more about [wearing, removing and storing face masks](#).
- School staff will monitor for and address any discrimination, bullying or harassment that is associated with a student either wearing or not wearing a mask. Students and parents are encouraged to report any incidents to the teacher or school principal.



Appendix C – Further Requirements and FAQs For Mask-Related Accommodations

This appendix provides additional guidance on handling mask accommodation requests, taking into account increased COVID-19 infection rates and the dual need to accommodate people at high risk as well as those seeking a mask exemption.

Topics covered:

1. Is there a valid human rights exemption/accommodation need?
2. Asking questions
3. Planning an accommodation
4. What happens while waiting for a decision on accommodation?
5. Role of the person seeking accommodation in the accommodation process

1. Is there a valid human rights exemption/accommodation need?

General disagreement with wearing masks is not a valid reason for an exemption.

Sharing symptoms like “stress,” “pain” or “feels unwell” – things that many people commonly experience – may not amount to a disability, but may suggest a need for Principals/managers to look into whether there is a condition needing accommodation (this is called “the duty to make reasonable inquiries”).

Principals/managers should also ask about the potential need for accommodation if it is noticed that a staff/student is having trouble breathing, or having other challenges with masks. For instance, are there asthma-related difficulties, other underlying health issues, or other protected-grounds that pose barriers to wearing a mask?

2. Asking questions

Principals/managers may ask questions to those seeking accommodation or ask for (more) medical information if needed including when:

- It is not clear the request is because of a protected human rights ground;
- More information is needed to establish that accommodation is needed;
- More information is needed to establish the type of accommodation that is needed; and
- The accommodation that has been asked for would create a significant risk to others.

Sometimes Principals/managers may decide that a medical letter is needed from a

APPENDIX A: COVID-19 MASK PROCEDURE (PR730)



physician to confirm the need for accommodation and the type of accommodation needed. Medical letters must address:

- Whether the person has a disability (but does not need to name the disability, except in limited circumstances where this information is necessary in order to properly determine the accommodation measures).
- The needs, limitations and restrictions (what the person can and cannot do) because of the disability in relation to wearing various types of masks, and also alternatives to a mask including a face shield, single-layer mask, or other alternatives. This includes how long the person can wear the various face coverings before needing a break, and how long the break should be, etc.

The medical information requested by TDSB must be the least intrusive of the person's privacy while still giving the organization enough information to make an informed decision about the accommodation. All such information must be treated as confidential and disclosed only to those who need to know in order to assess or implement an accommodation.

For more information, please refer to the Ontario Human Rights Commission's [policy position on medical documentation requests](#).

3. Planning an accommodation

Whether an accommodation can be granted or continue, and what form of accommodation is appropriate may depend upon the health and safety risk profile of the staff and students in the school (and their family members/close friends), the COVID-19 infection rates in the school or community, and the current advice from the Ministry of Education and public health authorities.

Take steps to gather information to assess the risks of a person without a mask attending at the school or building. Where appropriate, principals/managers may consider notifying staff/parents to identify any actual or potential health and safety risks to be considered in making reasonable accommodation measures.

For example, are there any staff or students who are medically vulnerable or who are in close contact with those who are (e.g., elderly family members). Could a different type of mask be suitable (disposable vs. non disposable, cloth masks or homemade masks)? Instead of an exemption, would more frequent mask breaks or sitting near a window for greater ventilation accommodate the need? Although not a substitute for a mask, where a standard face mask cannot be worn, a face shield or single layer mask or face covering may be better than no covering at all.



4. What happens while waiting for a decision on accommodation?

The Principal/manager will decide whether the staff/student needs to stay home or whether a temporary accommodation in the school/workplace is possible. This may depend on many factors including the status of the pandemic, nearness of high risk individuals, ability to distance, whether other forms of face covering or PPE can be worn, and whether there are legitimate potential grounds for an accommodation. For more information, please review the [Interim Measures](#) section of this document.

5. Role of the person seeking accommodation in the accommodation process

Persons seeking an accommodation must do their part, including by:

- Making accommodation needs known, in writing if possible and without delay;
- Answering questions or giving information about what they can or cannot do, including information from health care providers;
- Taking part in discussions about possible solutions;
- Once a plan is in place, sticking to the plan or letting the TDSB know if other accommodation is needed; and
- Always working with the TDSB through the accommodation process.

If a person does not cooperate or does not provide needed medical or other information, TDSB may not have to accommodate them and in-person attendance may not be allowed. In such case, remote learning or working measures will need to be considered.