HEALTHCARE FACILITY HUB • SCHOOL REOCCUPANCY SERIES

School Reoccupancy Quick Card: 2026–2028 Gap Operating Standards

FIELD SUMMARY

Current version — Nov 1, 2026. Update history: https://healthcarefacilityhub.org/school-reoccupancy-wildfire-smoke-no-standard/

THE FUNDAMENTAL FACT: "THERE IS NO INDOOR AIR QUALITY STANDARD"

California Department of Education standing recovery FAQ (reviewed Aug 25, 2026): "*There is no indoor air quality standard.*" No state number to test against, no statutory pass-fail line to clear. School districts reopened after the January 2025 wildfires on local judgment, county health directives, and exposure controls. AB 1642 (signed Sept 15, 2026) does not create an interim school clearance standard.

1. WHAT AB 1642 ACTUALLY ORDERS FOR SCHOOLS (HSC § 25402.6)

Health and Safety Code § 25402.6 directs the Department of Toxic Substances Control (DTSC), collaborating with CDE and state agencies, to publish **advisory, nonregulatory guidance** for Local Educational Agencies (LEAs) no later than **July 1, 2028**.

Statutory Mandate	What HSC § 25402.6 Requires in the July 1, 2028 Guidance Document
Health vs. Reopening	Balance between protecting the health of pupils, staff, and community members and reopening schools as expeditiously as possible to promote stability.
Testing Best Practices	Suggested best practices for pre- and post-remediation testing, remediation, and restoration, including finding, evaluating, and selecting appropriately licensed personnel.
Hazard Interpretation	Information on wildfire hazards, interpreting testing results for close/reopen decisions, and techniques to reduce ongoing exposure and recontamination.
Resources & Funding	Directory of federal, state, and local entities providing technical expertise and available emergency funding sources.
Legal Status	**Advisory, nonregulatory**. Describes a methodology, not a regulatory pass-fail standard. Expressly exempt from Administrative Procedure Act (APA).

2. THE HOUSE NUMBER IS NOT A SCHOOL NUMBER (HSC § 25402.3)

AB 1642 established a numeric clearance standard for **residential properties only** (effective Jan 1, 2027 through 2028/2029 regulations). By statutory text, it **does not apply to schools**.

Residential Standard Component	Statutory Threshold (Houses Only)
Interior Lead Dust: Floors	**5 µg/ft²** (40 CFR § 745.227(e)(8)(viii))
Interior Lead Dust: Window Sills	**40 µg/ft²** (40 CFR § 745.227(e)(8)(viii))
Interior Lead Dust: Window Troughs	**100 µg/ft²** (40 CFR § 745.227(e)(8)(viii))
Wildfire-Caused Asbestos	Cal/OSHA construction standard & federal NESHAP

THE LOCAL POLICY WARNING:
If a school district adopts residential 5/40/100 µg/ft² as its campus reoccupancy benchmark, it is making a **voluntary local policy choice**, not complying with a state school standard. Districts must formally minute this distinction to prevent legal exposure or false claims of state regulatory compliance.

3. HOW REOCCUPANCY WAS ACTUALLY DECIDED IN 2025 (THE REAL PREDECESSORS)

In the absence of a state number, districts and county health agencies executed reoccupancy through a four-part framework:

Guidance Source	Operational Requirements	Decision Tool & Verification
CDE Recovery FAQ (Reviewed Aug 25, 2026)	• **Ventilate ≥24 hours** once outdoor air is satisfactory. • **Replace HVAC filters:** MERV 8 minimum, MERV 13+ preferred if system capacity allows. • **Clean:** Gentle ash sweep, HEPA vacuum, wet-clean hard floors, desks, bookcases, toys, athletic gear, fountains. • **NO OZONE GENERATORS:** Forms formaldehyde & ultrafine particles.	**Outdoor Air AQI:** Closures & activity modifications driven by outdoor AQI, filtration, and site conditions under state *Get Smart about Wildfire Smoke* and OEHHA AQI school guidelines.
LA County Public Health (FAQ March 17, 2025)	• Inspect & clean outdoor playgrounds/equipment. • Maintain MERV 13+ filtration; seal windows/doors. • Keep occupants indoors during wind events. • Retain remediation experts for environmental testing.	**Distance to Debris:** Soil/environmental testing keyed to proximity to uncleared debris from phased removal operations.
Pasadena Public Health (Guidance April 15, 2025)	• **Soil lead screening:** DTSC 80 ppm threshold triggers evaluation (not an automatic cleanup order). • **Exposure controls:** Close exposed-soil fields & school gardens; entry track-in controls; mandatory handwashing; daily wet-mopping.	**Qualified Soil Testing:** Strongly recommended for mapped areas until lab results or remediation verify safety.
LAUSD 11-School Pattern (Palisades 2025 Precedent)	• **8 Standing Schools:** Air, soil, dust sampling found no significant risk; minor arsenic/lead exceedances mitigated. Handled via cleaning, filtration, and monitoring. • **3 Burned Schools:** Separate construction/soil-removal track (thousands of tons excavated).	**Standing vs. Burned Triage:** Standing schools clean, filter, monitor. Burned schools are heavy civil construction projects.

4. WHAT A FACILITY LEADER DOES WITH A TWO-YEAR GAP (2026–2028)

Rule 1: Stop Waiting for a State Standard PRACTICE

The July 1, 2028 guidance will describe balance, testing practices, and personnel selection. Building your reoccupancy file now on the 2025 county pattern means you are already executing what the state will recommend.

Rule 2: Build a Clearance File Anyway EVIDENCE

Even without a statutory clearance line, minute a complete file: licensed personnel engaged, sampling scope, comparison values chosen and justification, cleaning/filtration logs, and the reopen/close rationale.

Rule 3: Ventilation Is a Standing Control ENGINEERING

MERV-rated filtration, HEPA capture, and wet methods are standing plant engineering controls. A measurement is only as defensible as the documented method behind it; "no standard exists" requires more rigor, not less.

Rule 4: Execute Soil-Track Triage Early EXPOSURE

Check proximity to uncleared debris. If mapped or near burn footprints, close dirt fields/gardens, install boot walk-offs, mandate handwashing, and execute daily wet-mopping pending qualified professional testing.

SUMMARY DECISION SEQUENCE FOR CAMPUS REOCCUPANCY:

1. Verify outdoor AQI satisfactory → 2. Run 24-hr flush & replace with MERV 8 / MERV 13 filters → 3. Execute HEPA vacuum & wet-clean of all hard surfaces (ban ozone generators) → 4. Classify standing vs. burned track → 5. Evaluate soil proximity (80 ppm screening threshold, close gardens/dirt fields) → 6. Document personnel, values, and decision rationale in formal Clearance File.