In preparation for offering on-site support services or in-person instruction, as contemplated by Executive Order 2020-51, and in an effort to minimize risks associated with the COVID-19 pandemic in the school environment, Academy (the “School”) has adopted this mitigation plan (“Plan”), following consideration of mitigation strategies and recommendations as outlined by the Centers for Disease Control and Prevention (“CDC”). This Plan may be revised by the School administration as necessary to reflect the most current public health standards, without the need for Governing Board approval of the revised Plan.

Introduction

CDC guidelines recognize that “extended school closure is harmful to children,” resulting in negative impacts “on the social, emotional, and behavioral health, economic well-being, and academic achievement of children in both the short-term and long-term.”1 At the same time, the CDC recognizes that “opening schools – like opening any building or facility – does pose a risk for the spread of COVID-19.”2

Following consideration of “the full spectrum of benefits and risks,” “the available evidence provides reason to believe that in-person schooling is in the best interest of students, particularly in the context of appropriate mitigation measures similar to those implemented at essential workplaces.”3

The mitigation measures contained within this Plan recognize that it is impossible to completely eliminate risks that COVID-19 – or any other communicable disease – will be transmitted within the school environment.4 As such, this Plan does not guarantee against potential transmission of COVID-19 in the School. Rather, it reflects the School’s continued commitment to and reasonable efforts aimed at maintaining a safe and healthy educational environment, despite risks acknowledged by the CDC and other health experts.

Designated COVID-19 Point of Contact

The School’s designated point of contact for COVID-19 related concerns, including reporting positive test results or COVID-19 symptoms, is:
Ms. Mal Cooper, PACE Academy, 6711 E 2nd St., Prescott Valley, AZ 86314.
Cooper @PaceAcademy.com - 928-775-9675

Proactive Mitigation Strategies5

As applicable, and except as otherwise directed by or after consultation with local health officials, the School will implement the following proactive mitigation strategies in attempting to minimize the spread of COVID-19:

A. Staying Home When Appropriate. The School will encourage and require employees and students to stay home when they: (a) feel sick, (b) have tested positive for or are showing COVID-19 symptoms, or (c) have recently had “close contact”* with a person with COVID-19. Students or staff members who become sick at School or are identified as having had close contact with a person with COVID-19 will be promptly isolated from other students and sent home as soon as possible.**
“Close contact” is defined as “any individual who was within 6 feet of an infected person for at least 15 minutes starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to positive specimen collection) until the time the patient is isolated.”

**Note: The CDC does not currently recommend that schools conduct universal symptom screenings or testing of students. Therefore, the School will strongly encourage parents and caregivers to monitor their children for signs of infectious illness, to immediately inform the School any time their children have close contact with a person with COVID-19, and to instruct their students who are sick or have had close contact with a person with COVID-19 to not attend School. The School nonetheless will instruct employees to watch for signs of possible student illness during the school day.”

B. **Hand Hygiene.** The School will encourage and reinforce handwashing with soap and water for at least 20 seconds, or as appropriate, use of hand sanitizer that contains at least 60% alcohol. The School will support healthy hygiene behaviors by providing adequate supplies, including soap and hand sanitizer.

C. **Respiratory Etiquette.** The School will encourage staff and students to cover coughs and sneezes and follow hand-hygiene protocols immediately thereafter.

D. **Signs and Messages.** The School will post signs in highly visible locations that promote everyday protective measures (e.g., hand hygiene, respiratory etiquette, wearing face coverings) and describe how to stop the spread of germs.

E. **Face Coverings.** The School will implement its face-covering policy for students and employees, as contemplated by Executive Order 2020-51.

F. **Cleaning and Disinfection.** The School will clean frequently touched surfaces (e.g., playground equipment, door handles, sink handles, drinking fountains) within the School and on buses (if applicable) at least daily or between uses, when reasonably feasible. The School will follow cleaning and disinfection best practices and procedures, to the extent possible.

G. **Shared Objects.** The School will discourage students from sharing items that are difficult to clean or disinfect. If library books are available to students, they will not be re-shelved until they are disinfected or for at least 48 hours.

H. **Social Distancing.** The School will encourage staff and students to maintain social distancing (at least six feet apart), when feasible, and will endeavor to employ other separation measures when maintaining six feet of distance is not feasible. Such efforts may include modified room layouts, physical barriers/guides, and/or closing or staggering use of communal spaces.

I. **Food Service.** The School will minimize transmission risk in food service by taking steps such as: encouraging students to bring their own meals as feasible, serving pre-packaged meals (rather than buffet style), and using disposable food service items (e.g., utensils, dishes). If the School cafeteria space cannot be modified to account for social distancing for all students, some or all students may be required to eat in other locations or at staggered lunchtimes.

J. **Visitors.** The School will limit nonessential visitors, volunteers, and activities involving external groups or organizations as possible – especially with individuals who are not from the local geographic area (e.g., community, town, city, county). At certain times, parents may not be allowed to volunteer in classrooms or allowed on campus except for the front office.

K. **Gatherings and Meetings.** The School will endeavor to pursue virtual group events, gatherings, or meetings, if possible. Where in-person gatherings or meetings are held, the School will limit group size to the extent reasonably possible and will promote social distancing of at least 6 feet.
between people, as reasonably feasible. Parent-teacher conferences may be held remotely, depending on community health indicators at the time. Some gatherings and meetings may be held outdoors, if possible.

L. **Field Trips and Assemblies.** The School will endeavor to pursue virtual activities and events in lieu of field trips, student assemblies, special performances, school-wide meetings, and spirit nights, as possible.

M. **Co-Curricular and Extracurricular Activities.** The School will consider limiting or canceling participation in co-curricular and extracurricular activities where social distancing is not feasible. The School may obtain the input of parents, students, and interested employees prior to making decisions regarding the continuation of certain extracurricular activities.

N. **Cohorting.** To the extent appropriate and feasible, the School will attempt to organize student and staff groupings so that they are as static as reasonably possible—i.e., have the same group of students stay with the same staff, and limit mixing between groups, if possible.

O. **Staggered Scheduling.** To the extent appropriate and feasible, the School will attempt to stagger use of facilities by cohort (e.g., arrival/drop-off times/locations) or put in place other protocols (e.g., block scheduling) to limit contact between cohorts and direct contact with parents as much as possible.

P. **Drop-Off and Pick-Up.** In addition to potential staggered pick-up and drop-off times, the School may implement additional requirements related to student drop-off and pick-up to alleviate any congestion during these times, including requiring parents to stay in their cars and creating specific locations for students to wait for pick-up at the end of the school day.

**Reactive Mitigation Strategies**

When a student or staff member tests positive for COVID-19, the School will communicate with and follow the guidance of local health officials in making decisions regarding appropriate reactive mitigation measures, including the extent to which School operations should be temporarily restricted or closed, in whole or in part, and if so, for how long.

A. **School Notification of Positive Test.** The School will encourage staff and students/families to notify School’s designated COVID-19 Point of Contact regarding any positive test result for COVID-19 with respect to any student or staff member.

B. **Coordination with Local Health Officials.** Upon learning of a positive COVID-19 test result in someone who has been in the School, the School will promptly notify local health officials and seek guidance to determine an appropriate course of action in light of the circumstances. At a minimum, the affected individual will be quarantined from the School on-site environment (including on-site support services or in-person instruction), and other responsive actions will be taken, as directed in consultation with local health officials or in compliance with their guidance.

Such actions may include, but are not limited to:

1. Short-term limitations on, or restrictions for, on-site support services or in-person instruction with respect to a particular cohort, or the School generally.
2. Enhanced cleaning/disinfection of areas of the School used by the affected individual.
3. Extended school dismissal/closure.11

C. **Communication with Staff, Parents, and Students.** Consistent with privacy requirements, including those of the Family Educational Rights and Privacy Act (“FERPA”), and in
consultation with local health officials, the School will provide notification to appropriate staff and parents regarding COVID-19 cases in the School.

Re-Entry Mitigation Strategies

When a student or staff member has been required to stay home from School: (a) following a positive test for COVID-19; (b) after showing symptoms of COVID-19; or (c) after recent close contact with a person with COVID-19, the School will implement the following mitigation strategies related to re-entry on the School campus. Such individuals will be permitted to return to School for on-site support services or in-person instruction, upon compliance with CDC and local health official guidelines, which currently provide:

A. Following an Illness Suspected or Confirmed to be COVID-19: After …
   1. At least 10 days* since symptoms first appeared; and
   2. At least 24 hours with no fever without the use of fever-reducing medication; and
   3. Symptoms (such as cough or shortness of breath) have improved.
   *20 days if severely ill or immunocompromised.

B. Following a Positive Test for COVID-19 but without Symptoms: At least 10 days have passed since the positive test.

C. Following Recent Close Contact with a Person with COVID-19: 14 days after the exposure.

D. Following a Negative Test but with Symptoms:
   1. At least 24 hours with no fever without the use of fever-reducing medication; and
   2. Symptoms (such as cough or shortness of breath) have improved.
Compliance with Applicable Guidance

If any part of this Plan conflicts with applicable local, county, state law, regulation, or public health guidance, the School will comply with the applicable law, regulation, or public health guidance.


3 Importance of Reopening.

4 As the CDC acknowledges, “even when a school carefully coordinates, plans, and prepares, cases [of COVID-19] may still occur within the community and schools.” Preparing for Safe Return.


7 “FAQ for School Administrators on Reopening Schools,” https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/reopening-schools-faqs.html (hereafter, “FAQ for School Administrators”) (What is symptom screening and does CDC recommend it for students and staff?).

8 Sample signs available via CDC Print Resources at https://www.cdc.gov/coronavirus/2019-ncov/communication/print-resources.html?Sort=Date%3A%3Adesc.

9 The CDC recognizes that maintaining six feet of distance will not always be feasible. See FAQ for School Administrators (Can physical distance between students in the classroom be less than 6 feet?).


11 Per CDC guidelines, “In most instances, a single case of COVID-19 in a school would not warrant closing the entire school.” FAQ for School Administrators (What should schools do if a student or school staff member tests positive for COVID-19?).