

## **EMPOWER COLLEGE PREP COVID-19 SCHOOL MITIGATION PLAN**

In preparation for offering in-person learning, and in an effort to minimize risks associated with the COVID-19 pandemic in the school environment, Empower College Prep (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.”<sup>1</sup> 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.”<sup>2</sup>

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.”<sup>3</sup>

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.<sup>4</sup> 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: Brian Holman, [brian.holman@empowercollegeprep.org](mailto:brian.holman@empowercollegeprep.org), 602-689-0671.

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<sup>1</sup> “The Importance of Reopening America’s Schools this Fall,” CDC website, <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/reopening-schools.html> (hereafter, “Importance of Reopening”).

<sup>2</sup> “Preparing K-12 School Administrators for a Safe Return to School in Fall 2020,” CDC website, <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/prepare-safe-return.html> (hereafter, “Preparing for Safe Return”).

<sup>3</sup> Importance of Reopening.

<sup>4</sup> 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.

## **Proactive Mitigation Strategies**<sup>5</sup>

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”<sup>\*</sup> 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. The School strongly encourages 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 will instruct employees to watch for signs of possible student illness during the school day.<sup>6</sup>

<sup>\*</sup>“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.”<sup>7</sup>

- 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.<sup>8</sup>

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<sup>5</sup> Adapted from “Considerations for Schools: Operating Schools During COVID-19,” <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html> (hereafter, “Considerations for Schools”).

<sup>6</sup> “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?).

<sup>7</sup> AZDHS “‘Release from Isolation and Quarantine’ Guidance,” at Glossary of Terms, <https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/novel-coronavirus/public-resources/release-from-isolation.pdf>

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

- E. *Face Coverings*. The School will request all individuals on campus wear a face mask when within six feet of other individuals on campus.
- 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 measures when maintaining six feet of distance is not feasible.<sup>9</sup> Such efforts may include modified room layouts, physical barriers/guides, and/or closing or staggering use of communal spaces or wearing face masks.
- I. *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.

### **Reactive Mitigation Strategies**<sup>10</sup>

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.

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<sup>9</sup> 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?).

<sup>10</sup> Adapted from “Interim Guidance for Administrators of US K-12 Schools and Child Care Programs to Plan, Prepare, and Respond to Coronavirus Disease 2019 (COVID-19),” <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/guidance-for-schools.html>.

Such actions may include, but are not limited to:

1. Short-term limitations on, or restrictions for, in-person learning 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.<sup>11</sup>
- 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**<sup>12</sup>

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 in-person learning, 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 72 hours with no fever without 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 72 hours with no fever without use of fever-reducing medication; and

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<sup>11</sup> 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?).

<sup>12</sup> Adapted from “When You Can be Around Others After You Had or Likely Had COVID-19,” [https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprevent-getting-sick%2Fwhen-its-safe.html](https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprevent-getting-sick%2Fwhen-its-safe.html). See also, “Release from Isolation and Quarantine Guidance,” Arizona Department of Health Services, <https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/novel-coronavirus/public-resources/release-from-isolation.pdf>

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.