

Pima Rose Academy, Inc.
COVID-19 SCHOOL MITIGATION PLAN

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 office/school environment, Pima Rose Academy, Inc. (“Pima Rose Academy”) has adopted this mitigation plan (“Plan”), following consideration of mitigation strategies and recommendations as outlined by the Centers for Disease Control and Prevention (“CDC”) and the Arizona Department of Health Services.ⁱ This Plan may be revised by Pima Rose Academy 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.”ⁱⁱ 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.”ⁱⁱⁱ

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.”^{iv}

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 Pima Rose Academy/school environment.^v As such, this Plan does not guarantee against potential transmission of COVID-19 in Pima Rose Academy or schools. Rather, it reflects Pima Rose Academy’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.

Pima Rose Academy will determine which of the strategies set forth below are appropriate and will be implemented when the School is operating in a traditional model (students on-campus physically), a hybrid model (some students on-campus physically and others distance learning), and a virtual model (all students distance learning with on-site support services as required by Executive Order 202-51). Because community spread levels will change and intermittent emergency school closures are possible, the appropriate strategies will also change from time-to-time during the school year.

Designated COVID-19 Point of Contact

Pima Rose Academy’s designated point of contact for COVID-19 related concerns, including reporting positive test results or COVID-19 symptoms, is Lisa Cothrun, lisa.cothrun@rosemanagement.com, 520-797-4884, ext. 1107.

Proactive Mitigation Strategies^{vi}

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

- A. *Staying Home when Appropriate.* Pima Rose Academy will encourage employees and students to stay home when they: (a) feel sick, (b) have tested positive for COVID-19 or are showing COVID-19 symptoms. Students or staff members who become sick at school will be promptly isolate from other students and be sent home as soon as possible.** Pima Rose Academy will encourage students/families to notify Pima Rose Academy's designated COVID-19 Point of Contact if the staff or a household member has COVID-19 symptoms. Staff members must notify Pima Rose Academy's designated COVID-19 Point of Contact if they or a household member have COVID-19 symptoms.

**Note: The CDC does not currently recommend that schools conduct universal symptom screenings or testing of students. Therefore, Pima Rose Academy will strongly encourage parents and caregivers to monitor their children for signs of infectious illness, and to instruct their students who are sick to not attend school. Pima Rose Academy nonetheless will instruct employees to watch for signs of possible staff illness during the school day.^{vii}

- B. *Hand Hygiene.* Pima Rose Academy 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 after bathroom use, before and after recess, and at other appropriate times during the day. Pima Rose Academy will support healthy hygiene behaviors by providing adequate supplies, including soap and hand sanitizer.
- C. *Respiratory Etiquette.* Pima Rose Academy will encourage staff and students to cover coughs and sneezes and follow hand-hygiene protocols immediately thereafter.
- D. *Signs and Messages.* Pima Rose Academy will post signs in highly visible locations that promote everyday protective measures (e.g., hand hygiene, respiratory etiquette, wearing face coverings., physical distancing) and describe how to stop the spread of germs.^{viii}
- E. *Face Coverings.* Pima Rose Academy will implement its optional face covering policy for students and employees.
- F. *Cleaning and Disinfection.* Pima Rose Academy will clean frequently touched surfaces (e.g., computer equipment, student desks, door handles, sink handles, drinking fountains) within Pima Rose Academy at least daily or between uses, when reasonably feasible. Pima Rose Academy will follow cleaning and disinfection best practices and procedures, to the extent possible.
- G. *Ventilation.* Pima Rose Academy will ensure that building ventilation systems operate properly, to ensure circulation of outdoor air as much as possible.
- H. *Shared Objects.* Pima Rose Academy will discourage staff/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.

- I. *Absenteeism*. Pima Rose Academy will monitor absenteeism patterns among students and staff and will identify and plan for alternative coverage with respect to critical job functions and positions. Pima Rose Academy may alert local health officials about large increases in student and staff absenteeism, particularly if absences appear to be due to respiratory illnesses.
- J. *Food Service*. Pima Rose Academy does not offer food service. Student can bring their own meals, utensils and purchase pre-packaged items available in the vending machines.
- K. *Field Trips and Assemblies*. Pima Rose Academy will pursue virtual activities and events in lieu of field trips, special performances and school-wide meetings as possible and when circumstances require.

Reactive Mitigation Strategies^{ix}

When a student or staff member tests positive for COVID-19, Pima Rose Academy 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. *Pima Rose Academy/School Notification of Positive Test*. Pima Rose Academy 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, staff member or household member.
- B. *Coordination with Local Health Officials*. Upon learning of a positive COVID-19 test result in someone who has been in at the Pima Rose Academy/Schools, Pima Rose Academy will promptly seek guidance from local health officials to determine an appropriate course of action in light of the circumstances. At a minimum, the affected individual will be quarantined from Pima Rose Academy/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. If an outbreak* of COVID-19 occurs at the Pima Rose Academy/School, Pima Rose Academy will notify the local health department using any required or suggested notification method.

Such actions may include, but are not limited to:

1. Short-term limitations on, or restrictions for in-person instruction with respect to a particular student, cohort, or the School generally.
2. Enhanced cleaning/disinfection of areas of Pima Rose Academy/School used by the affected individual.
3. Extended Pima Rose Academy/school dismissal/closure, either for a portion of the Pima Rose Academy Office/School or Pima Rose Academy/School entirely.^x

* An “outbreak” is defined as two or more laboratory-confirmed COVID-19 cases among students or staff with onsets within a 14-day period, who are epidemiologically linked, do not share a household, and were not identified as close contacts of each other in another setting.^{xi}

- 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, Pima Rose Academy will provide notification to appropriate staff and parents regarding confirmed COVID-19 cases at Pima Rose Academy/School. Contact tracing will be handled by the local health department.

Re-Entry Mitigation Strategies^{xii}

When a student or staff member has been required to stay home from work/school: (a) following a positive test for COVID-19; (b) after showing symptoms of COVID-19; Pima Rose Academy will implement the following mitigation strategies related to re-entry on Pima Rose Academy/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 Positive COVID-19 Cases, Positive COVID-19 test without symptoms and Following Recent Close Contact with a Person with COVID-19:*

1. Pima Rose Academy will follow the Pima County Health Department isolation and quarantine recommendations through contact tracing and case investigations.

Compliance with Applicable Guidance

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

ⁱ CDC Guidance: <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/index.html>; AZDHS, “Safely Returning to In-Person Instruction”: <https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/novel-coronavirus/covid-19-safely-return-to-in-person-instruction.pdf>.

ⁱⁱ “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”).

ⁱⁱⁱ “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”).

^{iv} Importance of Reopening.

^v 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.

^{vi} 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”).

^{vii} “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?).

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

^{ix} 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>.

^x 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?).

^{xi} Definition is provided by AZDHS, “Safely Returning to In-Person Instruction”: <https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/infectious-disease-epidemiology/novel-coronavirus/covid-19-safely-return-to-in-person-instruction.pdf>.

^{xii} 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. 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>