CHALLENGE SCHOOL INC.
COVID-19 SCHOOL MITIGATION PLAN
Edited September 2022

In an effort to minimize risks associated with the COVID-19 pandemic and illness in the school environment, Challenge School Inc. dba Challenge Charter School (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") and the Arizona Department of Health Services.[1] 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."[2] 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."[3]

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."[4]

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.[5] 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.

The School 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). 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

The School's designated points of contact for COVID-19 related concerns, including reporting positive test results or COVID-19 symptoms, is: Principal Wendy Miller and Assistant Principal Tammy Neitch using 602-938-5411 and info@challengecharterschool.net.

Proactive Mitigation Strategies[6]

As applicable, to the extent possible, 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 COVID-19 or are showing COVID-19 symptoms, or (c) have recently had "close contact"* with a person with COVID-19, including any household member. 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 will encourage students/families to notify School's designated COVID-19 Point of Contact if the student or a household member has COVID-19 symptoms. Staff members must notify the School's designated COVID-19 Point of Contact if they or a household member have COVID-19 symptoms.

   *"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."[7]

   **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.[8]

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 after bathroom use, before and after recess, and at other appropriate times during the day. The School will support healthy hygiene behaviors by providing adequate supplies, including soap and hand sanitizer as appropriate.

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

D. *Face Coverings*. The School will have a face covering policy for students and employees, as required by Executive Order 2020-51. Face coverings are currently optional.

E. *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.

F. *Ventilation*. The School will ensure that building ventilation systems operate properly, to ensure circulation of outdoor air as much as possible. To the extent the School provides transportation for students, the vehicles used by the School will implement reasonable ventilation strategies. Activities, including lunches, may take place in alternative locations.

G. *Shared Objects*. The School will discourage students from sharing items that are difficult to clean or disinfect.

H. *Social Distancing*.* The School will encourage staff and students to maintain social distancing (at least three feet apart), when feasible.

I. *Absenteeism*. The School will monitor absenteeism patterns among both students and staff and will identify and plan for alternative coverage with respect to critical job functions and positions. The School 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*. 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 lunch times.

K. *Visitors*. The School will limit nonessential visitors, 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.

L. *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.

M. *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[9]

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, staff member or household member.

B. *Coordination with Local Health Officials*. If an outbreak* of COVID-19 occurs at the School, the School 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, on-site support services or in-person instruction with respect to a particular student, cohort, or the School generally.

2. Enhanced cleaning/disinfection of areas of the School used by the affected individual.

3. Extended school dismissal/closure, either for a portion of the School or the School entirely.[10]

* 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.[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 confirmed COVID-19 cases in the School.

Re-Entry Mitigation Strategies[12]

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 5 days since symptoms first appeared; and
2. At least 24 hours with no fever without use of fever-reducing medication; and
3. Symptoms (such as cough or shortness of breath) have improved.

B. *Following a Positive Test for COVID-19 but without Symptoms*: At least 5 days have passed since the positive test.

C. *Following Recent Close Contact with a Person with COVID-19*: 5 days after the exposure.

D. *Following a Negative Test but with Symptoms*:

1. At least 24 hours with no fever without 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.

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[1] 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.

[2] "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").

[3] "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").

[4] Importance of Reopening.

[5] 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.

[6] 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").

[7] 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

[8] "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?).

[9] 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.

[10] 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?).

[11] 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.

[12] 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