



District Wide Safety Plan

2023/2024

Updated July 2023

Purpose

The Troy City School District-wide School Safety Plan was developed pursuant to Commissioner's Regulation 155.17. At the direction of the Troy City School District Board of Education, Troy City School District appointed a District-wide School Safety Team and charged it with the development and maintenance of the District-wide School Safety Plan.

Identification of School Teams

The Troy City School District has appointed a District-wide School Safety Team consisting of, but not limited to: students, teachers, administrators, parent representative; school safety personnel; and other school personnel. The members of the team are as follows:

Superintendent of Schools
Deputy Superintendent
Asst. Superintendent of Business
Director of Facilities and Security
Asst. Superintendent of Human Resources
Middle School Principal
High School Principal
School 2 Principal
Troy Community School Principal
School 14 Principal
School 16 Principal
School 18 Principal
Carroll Hill Principal
Head Custodian
Troy Police SRO's
Questar Health & Safety
(2) Teacher reps PTO
Board of Education Member
Athletic Director
CSEA rep
(2) Nurses

CHIEF EMERGENCY OFFICER:

The Chief Emergency Officer, required by Education Law §2801-a, is defined by both the statute and the implementing regulation, §155.17(a) as either the superintendent or the superintendent's designee. Education Law §2801-a and the implementing regulations, require the Chief Emergency Officer to coordinate appropriate safety, security, and emergency training for district and school staff, annually update all Building-Level Emergency Response Plans, assist with decisions related to security related technology and development of policies for the use of such technology, and to ensure that required evacuation and lock-down drills are conducted in accordance with the requirements of Education Law §807. This position will be filled by Superintendent.

PUBLIC HEALTH EMERGENCY – CONTINUATION OF OPERATIONS PLAN

The Troy City School District has developed a Public Health Emergency – Continuation of Operations Plan. This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. These laws were amended by the passing of legislation S8617B/A10832 signed by the Governor of New York State on

September 7, 2020, requires public employers to adopt a plan for operations in the event of a declared public health emergency involving a communicable disease. The plan includes the identification of essential positions, facilitation of remote work for non-essential positions, provision of personal protective equipment, and protocols for supporting contact tracing.
See Appendix 3.

SCHOOL INCIDENT COMMAND STAFF:

Each building has established a SCHOOL EMERGENCY RESPONSE TEAM (SERT) with the following roles:

Incident Command- Sets objectives, strategies and overall responsibility for safe response, and makes decisions (administrators, Superintendent); has Incident Command Training.

Public Information Officer - Communicates with media & parents as the designated District spokesperson (Superintendent, district). Has media training.

Safety Officer - Establish safe zones, monitors for protective equipment and safe/unsafe conditions. Can suspend work activities if unsafe. Has advanced training in HAZMAT, emergency response and worker safety.

Liaison- Is the go-between IC and other response facilities, briefs school administration.

OPERATIONS

- Facilities Team-Conduct sweeps and assess damage, survey and controls utility systems, investigate, report & deal with fires, secures damaged areas (Facilities staff)
- Evacuation/Shelter Team-gather reports on missing persons & report to command post, organize staff & students for safe relocation, manage student supervision, coordinate evacuation site, manage personal needs-food, sanitation
- Search & Rescue Team-check with accountability captain for missing persons, search for injured/missing persons, coordinate transportation for first aid needs, report injuries to command post, assist with first aid
- First Aid Team-Procures and organizes first aid area and supplies, maintains first aid station, provides first aid care, coordinates with EMS, reports status to command post, keeps records of where injured are taken and by whom, ensures injured who are transported for further medical care are tagged with name, address, medical & contact information, prepare for medication administration and special needs populations (Nurse, first aid responders)
- Reunification team-accounts for all students at all times, manages release of students, maintains copies of student emergency cards, sign-out sheets, validates identification and documents release of student by name and time, ensures staff remains with students until all are released and accounted for, reports status to command post (attendance)
- Crisis Response- assist students, staff and families and with needs, counseling for both responders & staff/students (guidance)

PLANNING/FINANCE

- Planning/Finance Team – tracks resources, documents events, controls maps, handles demobilization (administrative)

LOGISTICS

- Logistics Team –Provides resources and services necessary for incident, coordinates communication equipment, handles transportation, coordinates food, water & sanitation, response personnel, medical services for responders, manages traffic, set up cones, maintains flow, direct emergency assistance to correct locations, directs parents to reunification area, directs media to media outpost, arranges appropriate transportation vehicles-busses, other (transportation).

Each team shall be led by a team leader.

Concept of Operations

This District-wide School Safety Plan provides an overview on how the school district will operate in the event of emergency situations. The School Safety plans will be further descriptive of how to carry out the plan.

The District Wide School Safety Plan will be reviewed by the District Wide School Safety Team and assessed based on local environment, emergency potential, incident trends, and best practices developed both internally and externally with other schools, BOCES Health & Safety & SERT Team, local emergency responders and community resources.

In the event of an emergency or violent incident, the initial response to all emergencies at an individual school will be by the School Emergency Response Team. The communication designee will notify the district Superintendent by the best means available at that time.

Upon the activation of the School Emergency Response Team, the Superintendent of Schools or his/her designee will be notified and, where appropriate, local emergency officials will also be notified as per the plan.

The district will utilize Troy PD & FD to supplement the district's efforts through existing protocols by additional support, resources and coordination of the emergency by the following:

- Troy law enforcement will assist with building reviews, prevention and staff training.
- Local law enforcement and emergency services participate in planning & training exercises and develop strategies for managing building-level emergencies.
- A protocol exists with Red Cross for the High School building for use of sheltering during times of emergency.

D. Plan Review and Public Comment

Pursuant to Commissioner's Regulation, Section 155.17 (e) (3), this plan will be made available for public comment at least 30 days prior to its adoption. The district-wide plan may be adopted by the School Board only after at least one public hearing that provides for the participation of school personnel, parents, students and any other interested parties. The plan must be formally adopted by the Board of Education.

Full copies of the District-wide School Safety Plan and any amendments will be submitted to the New York State Education Department within 30 days of adoption.

This plan will be reviewed periodically during the year and will be maintained by the District-wide School Safety Team. The required annual review will be completed on or before September 1 of each year after its adoption by the Board of Education. A copy of the plan will be available at the District Office.

Section II: Risk Reduction/Prevention and Intervention

Prevention/Intervention Strategies

Program Initiatives

The programs and activities the district utilizes for improving communication among students and between students and staff, and reporting of potentially violent incidents, such as the establishment of:

- Non-violent conflict resolution training programs
- Multicultural education programs; School wide assemblies and academic programs
- Intramurals, music programs, homework clubs and other club activities
- After school programs/clubs; art, drama, trivia, business, homework, student council, school newspapers, technology, theater, computer, yearbook, mock trial, science, and ski club; freshman/sophomore/junior/senior class leaders, band and chorus, Olympics of Visual Arts, Odyssey of the Mind, and others.
- Contracted After School Child Care (YMCA), After School Program
- Athletics: soccer, cross country, football, basketball, track, baseball & softball; cheerleading, interscholastic
- Youth-run programs: Student Council Government
- School Resource Officer(s)
- Individual and group counseling with guidance office, Psychologist, Social Worker
- Training programs under guidance to include: Anger management, bullying, sexual harassment, date-rape, diversity included in group/classroom/guidance & PE
- Drug & alcohol surveys
- Adoption of in-school suspension program that incorporates behavior modification skill training & counseling services to help address the underlying causes of student defiance and misbehavior
- Comprehensive Code-of-Conduct for students, employees and visitors to school premises that describes appropriate behavior, reporting mechanisms and consequences for non-compliance, located on website, posted in buildings
- Substance abuse prevention programs
- After School detention
- Peer mediators club

The district utilizes the following strategies to create a positive, safe learning environment for students:

- School Resource Officers (Troy Police)
- Mentoring programs for new students, students at risk (grades 6-12) which includes weekly meetings and monthly large group activities
- Mentoring and Social Worker intervention for elementary school students
- Adjusting scheduling to minimize potential for conflicts or altercations
- School Community Partnership

Training, Drills, and Exercises

All administrators are required to participate in:

- School Violence Prevention
- ICS for Schools
- Table top exercises

ERT members shall be trained in the above, plus:

- Bomb threat training
- Emergency Response, sweeper training
- Other training as required to fulfill effective response

Annual multi-hazard school safety training & drills for staff and students includes the following:

- Annual review of the Building Level Emergency Plan for each building
- Early go-home drill to test evacuation & sheltering procedures
- Fire drills (8 per year)
- Bus drills
- Lock down drills (4 per year)
- Table top exercise
- Live drill
- Emergency Management Team exercise
- Detection of potentially violent behaviors- awareness through staff meetings, violence assessment forms
- Students with disabilities have structured care plans
 - Training of staff in the following activities:
 - Lifting and carrying wheelchair students and staff when fire or other rescue personnel are not readily available
 - Planning for the notification of deaf students
 - Checking lavatories and special education areas
 - Inclusion of persons with disabilities in all emergency drills
 - Medical needs requiring specific procedures

After each drill or exercise, the principal and safety team will review the actions to test the components of our own emergency response plan, with local and county emergency response and preparedness officials and BOCES Health and Safety as appropriate and provide a summary of response to the Superintendent.

School security personnel include the following positions, job descriptions and number of each:

- School Resource Officers - 2
- Hall Security Monitors - 39

The hiring and screening process include the following:

- Interview
- Screening of potential new employees which includes:
 - Providing a resume and three references
 - Fingerprinting (for all new employees hired after July 1, 2001)

The required training of hall monitors and other school safety personnel acting in a school security capacity includes:

- De-escalation of potentially violent situations
- Positive communication techniques
- Characteristics of the school population

Implementation of School Security/Staffing

Our policies and procedures related to school building security include the following:

- School safety resource officers
- Locked outside doors
- Entrance security and/or single point of entry
- All doors shall be locked when rooms are unattended by adults
- All chemical storage/use rooms shall be locked when unattended
- Hall monitors
- Adult supervision in hallways/locker/bus loading and all areas students are present
- Monitor hallways, entranceways, exits and outside grounds during school hours for unusual occurrences or unauthorized visitors
- Participate in both building and district safety teams
- Participate in school investigation
- Staff photo IDs
- Video surveillance
- School Resource Officer
- Security audits by security and safety professionals
- Policies on locker use
- Student, staff & visitor code of conduct
- Classroom management
- Greeting students & visitors at the door
- A sign at the main entrance will direct all visitors to "Report to the Office"
- All visitors are required to sign in, and if they need access to other areas of the building, they will be issued a "Visitor" ID tag or escorted by an employee
- Video cameras will be utilized to monitor certain locations
- Radio communication devices will be utilized for inside to outside communication during Physical Education classes, recess and other outside activities
- Bus cameras

Vital Educational Agency Information

The communications teams shall maintain information on each educational agency located in the school district, including school population, number of staff, transportation needs, and the business and home telephone numbers of key officials of each such educational agency by an annual review and update at the beginning of each school calendar year or as key people change roles.

B. Early Detection of Potentially Violent Behaviors

We disseminate informative materials periodically regarding the early detection of potentially violent behaviors, which include the identification of family, community and environmental factors to teachers, administrators, parents and other persons in parental relation to students of the school district or board, students and other persons deemed appropriate to receive such information.

To prepare for violent incidents and lessen their impact, staff is trained annually. Topics may include identifying early warning signs in students, early intervention/prevention strategies, or development of violence prevention instruction; based on recommendations from the health and safety team, other relevant topics and an assessment of current needs of the district/school may be included. Specific violence assessments are conducted when needed or recommended.

C. Hazard Identification

Sites of potential emergency for fire, natural disaster, violence include the following:

- All school buildings
- Playground areas
- Properties adjacent to schools
- On and off-site athletic fields
- Buses
- Off-site field trips
- Hazardous locations within the community have been evaluated and are spelled out in the building level plans

Troy Police, Fire and Mohawk Ambulance are all within close proximity of the school district.

Section III: Response

A. Notification and Activation (Internal and External Communications)

Members of the communications team are designated to contact appropriate law enforcement officials off our designated list in the event of a violent incident.

We will inform all educational agencies within a school district of a disaster or an act of violence by means of:

- Telephone, Intercom, two-way radio, cell phone
- Fax/Email
- Emergency Responders
- Local Media

In the event of an emergency, or impending emergency, the communications team will notify all principals/designees of facilities within the district of the impending emergency and to take the appropriate action.

Parents, guardians or persons in parental relation to the students will be contacted in the event of a violent incident or an early dismissal by the communications team by phone and/or website and/or letter.

B. Situational Responses

Multi-Hazard Response

The District has multi-hazard response plans for each school to take actions in an emergency that may include the following hazards:

Criminal:

- Threats of Violence
- Suspected weapon
- Suicide
- Hostage/Kidnapping
- Intruder
- Civil Disturbance

Natural Hazards:

- Earthquake
- Flood
- Hurricane/Tropical Storm
- Electrical Storm/Tornado
- Explosive/Bomb Threat/Fire
- Natural/Weather Related
- Winter Storm

Technological Hazards

- Hazardous Material Release
- Radiological
- Biological
- Air Pollution

Explosion/Fire

- Fire
- Gas Leak

Systems Failure

- Building Structure Failure
- Electrical System Failure
- Heating System Failure
- Transportation Fleet Loss
- Sewage System Failure
- Water system failure

Medical Emergencies

- School Bus Accident
- Mass Causality
- Transportation Disaster
- Epidemic/Pandemic

Others as determined by the District-wide School Safety Team

Due to security reasons, specifics are listed in each building plan.

Responses to Acts of Violence: Implied or Direct Threats

Our district's policies and procedures for responding to implied or direct threats of violence by students, teachers, other school personnel and visitors to the school include the following:

- Assume all threats are serious
- Immediately report threat to school administrator or designee

- Use of staff trained in de-escalation or other strategies to diffuse the situation
- Trained staff/administrator to conduct an assessment interview of the subject making threat
- Determine level of threat with Superintendent/Designee
- Contact appropriate law enforcement agency, if necessary, as well as parent/guardian

- Monitor situation, adjust response as appropriate, and include the possible use of the Emergency Response Team
- Appropriate collection of information and documentation for School Safety and Educational Climate (SSEC) reports
- Maintain confidentiality of person reporting threat to the greatest extent possible

The training and professional development that is available to assist personnel with the above responses include: training in de-escalation or identification of early warning signs of potentially violent behavior, threat analysis and is included in annual updates.

Acts of Violence

Our district's policies and procedures for responding to acts of violence by students, teachers, other school personnel and visitors to the school, includes the following:

- Zero-tolerance policies for school violence
- Determine level of threat with trained staff
- If the situation warrants, isolate the immediate area and evacuate if appropriate
- Inform Building Principal/Superintendent
- If necessary, initiate lockdown procedure, and contact appropriate law enforcement agency
- Monitor situation; adjust response as appropriate; if necessary, initiate early dismissal, sheltering or evacuation procedures
- Discipline, legal action

Response Protocols

Our district's selection of appropriate responses to emergencies include protocols for responding to bomb threats, hostage taking, intrusions, and kidnappings. The following protocols are provided as examples:

- Activation of SERT
- Assemble Incident Command Team
- Plans to safeguard students and staff
- Procedures to provide transportation, if necessary
- Procedures to notify parents
- Procedures to notify media
- Procedures to unify parents with students
- Debriefing procedures

Arrangements for Obtaining Emergency Assistance from Local Government

The arrangements for obtaining assistance during emergencies from emergency services organizations and local government agencies include the following:

- Incident Command Team in an emergency contacts dispatch point or 911 center for fire or EMS response
- SERT is activated
- Communications team contacts Troy police for notification and/or assistance.

Procedures for Obtaining Advice and Assistance from Local Government Officials

In order to obtain advice and assistance from local government officials including the county or city officials responsible for implementation of Article 2-B of the Executive Law we shall work through Troy Police:

- Communications team in an emergency will contact emergency management coordinator and/or the highest-ranking local government official for obtaining advice and assistance by notifying Troy Police.

– The district has identified resources for an emergency from the following agencies: American Red Cross, Troy Fire /Police Departments.

District Resources Available for Use in an Emergency

During an emergency, the following district resources are available:

- Facilities for sheltering
- Buses for transportation are under contract
- Trucks for transporting materials
- Machinery for moving items, supplying electricity, lighting
- Emergency response equipment, lights, first aid supplies, barriers, emergency response kits, temporary shelter
- Personnel with advanced training in emergency services, crisis management
- Food for temporary sheltering
- Personal needs (blankets, medicine, toilet facilities)

Procedures to Coordinate the Use of School District Resources and Manpower during Emergencies

The School Emergency Response Team is authorized to make decisions regarding the staff members assigned to provide assistance during emergencies. The team shall also coordinate the use of school district resources and manpower during emergencies.

Protective Action Options

The following actions shall be taken in response to an emergency where appropriate, and the District shall initiate contact with local media and the parent notification system.

- **Early dismissal** - for situations that warrant sending students home safely prior to the end of regular school day.
- **Evacuation** - for situations that warrant removing the students/staff from the school buildings.
- **School cancellation** – when situations warrant the safety of the students to remain at home. If the school remains closed or closes early because of hazardous road/weather conditions, there shall be NO activities sponsored by the school in any of the school facilities.
- **Lock Down/Lock Out** - during situations of hostile criminal act or where students/staff must be safely secured, provisions shall be in place to secure the building and occupants.
- **Security of a Crime Scene** - procedures are in place to protect any area from disturbance where a potential crime has been committed.
- **Weather Related**-the designated district employee will investigate road conditions and shall contact and report conditions and recommendations to the Superintendent.
- **Questar III (BOCES), Private & Parochial Transportation** – If the district is closed because of hazardous conditions of roads, students who live in the district will not be transported to Questar III or private/parochial school. If schools other than Troy City Schools close because of hazardous road conditions in that district, students living in the district will not be transported to Questar III classes or to private/parochial schools in that district.
- **Post Incident Response** - for initiating and establishing crisis intervention to affected employees/students and Critical Incident Stress De-Briefing for response personnel.

Section IV: Recovery

After an incident the school teams shall meet and review the following:

- Document findings
- Tabulate costs
- Assesses any changes needed to the plan, added training or resources
- Reevaluate the current violence prevention and school safety activities and to determine if there are any further items needed
- Ensure appropriate de-briefing and counseling services have been put in place
- Determine if any additional resources are still needed post-incident
- Restock any supplies needed
- Meet with staff, students, families, and the public, and or other methods to communicate with affected persons-students, staff, families, other affected schools
- Coordinate substitutes as needed
- Prepare staff to handle phone calls – content and volume
- Update Board
- Provide for communal support, grief and/or memorial services
- Protocols for tributes and memorials
- Address cultural awareness
- Develop lessons learned

District Support for Buildings & Mental Health Services

Our district resources will support the Emergency Response Teams and the Post-Incident Response Teams in the affected school(s) by:

- Providing time & place for regular (quarterly) meetings
- Financial resources for supplies
- Training to fulfill duty needs
- Authority to lead in emergency situations

APPENDICES

(Not required to be filed with the Commissioner of Education)

Appendix 1:

Listing of all school buildings covered by the District-wide School Safety Plan with addresses of buildings, and contact names and telephone numbers for building staff.

Appendix 2:

SRO Memorandum of Understanding

Appendix 3:

Public Health Emergency – Continuation of Operations Plan

Appendix 4:

Emergency Remote Instruction plan

Appendix 1

The Enlarged City School District of Troy New York

Building List

Carroll Hill Elementary

112 Delaware Ave.

Troy N.Y 12180

Principal – Sabina Dinardo

Phone – 518-328-5701

School #16

475 First Street

Troy N.Y. 12180

Principal – Dr. Tracy Ford

Phone -518-328-5101

School #2

470 Tenth Street.

Troy N.Y. 12180

Principal – Amanda Klopott

Phone- 518-328-5601

School # 18

412 Hoosick Street.

Troy N.Y. 12180

Principal – Virginia Don Vito - MacPhee

Phone-518-328-5501

Troy Community School

1010 Fifth Ave

Troy N.Y. 12180

Principal – James Canfield

Phone- 518-328-5083

Troy Middle School

1976 Burdett Ave

Troy N.Y. 12180

Principal – Ian McShane

Phone- 518-328-5301

School # 14

1700 Tibbits Ave

Troy N.Y. 12180

Principal – Karen Cloutier

Phone-518-328-5801

Troy High School

1950 Burdett Ave

Troy N.Y. 12180

Principal – Joseph Mariano

Phone-518-328-5401

Appendix 2

SRO Memorandum of Understanding

**MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF TROY, THE
TROY CITY SCHOOL DISTRICT, AND THE LANSINGBURGH CENTRAL
SCHOOL DISTRICT FOR THE SCHOOL RESOURCE OFFICER PROGRAM**

This **MEMORANDUM OF UNDERSTANDING ("MOU")** is made this _____ day of October, 2018, by and between the City of Troy, a political subdivision of the State of New York ("the City"), and the Troy City School District ("TCSD") and the Lansingburgh Central School District ("LCSD")

RECITALS:

WHEREAS, the School Resource Officer (SRO) program is a joint venture of the TCSD, LCSD and the City; and

WHEREAS, the program has a character of "Community Policing," which includes collaboration with other agencies through enhancing communication and rapport; delivering prevention, intervention, and criminal justice education services; and maintaining safe learning environments.

NOW, THEREFORE in consideration of the mutual promises and covenants contained herein, the receipt and sufficiency of which is hereby acknowledged, and in accordance with §§ 119-0 of the General Municipal Law the City agrees to employ SROs to perform the duties described in this agreement, according to the terms and conditions set forth below:

I. Purpose of the SRO Program

The SRO program will focus on developing rapport with students, providing law enforcement assistance to school personnel, parents and student and identifying and counseling troubled youth, thereby diverting them from the criminal justice system. Through such activities in the schools and the community, the program helps students, parent, and educators to develop a better understanding of the role of law enforcement officers and to create a more positive concept of the judicial system.

II. SRO Obligations

- a. The SROs will build rapport and trust with students by maintaining a high level of visibility on campus during the regular school day and by attending school activities and other school and community programs. Such assignments will be included in the SROs' regular duties in order to avoid the need for overtime compensation.
- b. The SROs will be available to school administrator as an educational resource in understanding the application and enforcement of criminal laws.
- c. The SROs will act as liaisons with various community youth service agencies and work with school personnel on student referrals to these agencies.
- d. The SROs shall respond to calls for service in and around campus. The SROs shall respond in a customary manner according to training and standard law enforcement techniques to criminal activity which is observed or suspected by the SRO or school staff. SROs will not respond to or be responsible for requests to resolve routine discipline problems involving students. The administration of student discipline, including student code of conduct violations

and student misbehavior, is the responsibility of school administrators, unless the violation or misbehavior involves criminal conduct.

e. The SRO's primary responsibility will be to carry out the purpose of the program as outlined in Section I when schools are in session during the regular academic year.

f. The SRO shall be in uniform as directed by the Chief of the City of Troy Police Department ("Police Department").

g. The SRO's hours will be flexible subject to the approval of the Chief of the Police Department, in order to carry out the purpose of the program as outlined in Section I

(a) above. The SROs remain employees of the City and as such are ultimately supervised, evaluated, and directed by the Chief of the Police Department.

III. City Obligations

a. Upon the full approval and execution of this Agreement by the City and the School Districts and the appropriation of necessary funds by the City to pay the costs associated therewith the City, with the concurrence of the superintendent shall provide SROs to the TCSD and the LCSD.

b. The City shall, at its expense, assign police officers from the Police Department to work as SROs at Troy High School and Troy Middle School in the TCSD and Knickerbacker Middle School and Lansingburgh High School in the LCSD. These SROs will work on either a full-time or part-time basis, pending the manpower requirements on the Police Department. SROs will work primarily during regularly scheduled school days. It is understood that there may be training needs or other instances when the SRO may work outside the school at the discretion of the Chief of the Police Department.

c. SROs assigned pursuant to this MOU shall be made available to the TCSD and the LCSD no later than one week prior to opening day of the regular school year.

d. The City shall provide SROs which have been certified as law enforcement officers and shall have obtained the necessary training and skills customary for officers in the Police Department.

e. The Chief of the Police Department will assign SROs to fill vacancies at schools as necessary and as available.

f. On days when schools are not in session, SROs will be assigned to duties by the Chief of the Police Department.

IV. School District Obligations

a. The TCSD and the LCSD shall provide the SROs with the following resources: Secure workspace in the schools during the regular school year suitable to allow for privacy in student/faculty communication and maintain confidential records, office equipment and supplies and other such materials as necessary for the SROs to carry out their assigned educational duties.

b. On a school-day to school-day basis, the TCSD and the LCSD principals shall work in cooperation with the SROs.

c. The TCSD and the LCSD shall provide training as required to the SROs on topics such as school discipline procedures, adolescence, and special needs.

d. The TCSD and the LCSD shall ensure that staff cooperates with police investigations and any subsequent actions related to crime or criminal activity on campus.

V. Required Payments

As consideration for this MOU, the TCSD acknowledges its obligation and agrees to pay the City the total sum of \$70,000.00 per school year as and for the cost of two (2) SRO for the TCSD and the LCSD acknowledges its obligation and agrees to pay the City the sum of \$35,000.00 per school year as and for the cost of one (1) SRO for the LCSD. The City will pay the remainder of the costs for the SROs.

VI. Standing Meetings

The Chief of the Police Department and the Superintendent of the TCSD and the LCSD shall make themselves or their representatives available for standing meetings a for the purpose of identifying problems and evaluating progress under the MOU.

VII. Term of Agreement

This MOU shall be effective for a one (1) year term commencing on October 1, 2018, and shall automatically renew for subsequent one (1) year terms on October 1st of each calendar year. notwithstanding anything in this MOU to the contrary, this MOU automatically terminates in the event that, in any fiscal year, the City fails to appropriate sufficient funds to meet the costs of this program. In addition, this MOU may be terminated at any time by either party upon thirty (30) days written notice of the intent to terminate to the other party.

VIII. Third Parties and Assignment

This MOU is for the sole benefit of the parties and no person or entity shall have any rights under this agreement as a third-party beneficiary. There shall be no assignment of the responsibilities and benefits created by this MOU.

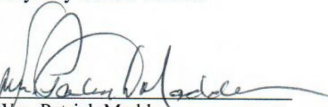
IX. Entire Agreement

This MOU expressly supersedes any prior agreement between the parties hereto and represent the entire agreement between the parties notwithstanding any previously written or oral understandings between the parties on the same subject. No amendment or modification shall be valid unless in writing.

WITNESS the following signatures in agreement to the above terms and conditions:


Troy City School District


Lansingburgh Central School District


Wm. Patrick Madden
Mayor, City of Troy

Brian G. Owens
Chief of Police, City of Troy

Appendix 3

PUBLIC HEALTH EMERGENCY – CONTINUATION OF OPERATIONS PLAN

Troy City School District



Public Health Emergency – Continuation of Operations Plan

Date of Revision/Review: March 1, 2021

Purpose	4
Scope	4
Requirements	4
Essential Titles.....	4
Remote Work and Telecommuting.....	6
Staggered Work Shifts.....	8
Transportation.....	9
Driver/Monitor/Aide/Maintenance	9
Cleaning and Sanitizing	9
Personal Protective Equipment.....	9
Exposure and Response	11
Emergency Housing for a Public Health Emergency.....	13
Appendix I.....	14
Infectious Disease Preparedness and Response Plan	15
Appendix II.....	36
COVID-19 School Reopening Facilities Cleaning & Disinfection Protocol.....	36
Appendix III.....	38
Record of Updates/Revisions	38

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable.

This plan has been developed with the input of Troy Administrators Association, Troy Teachers Association, CSEA, and UPSEU, as required by the amended New York State Labor Law.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship.

This plan has been approved in accordance with requirements applicable to the agency, jurisdiction, authority, or district, as represented by the signature of the authorized individual below.

As the authorized official of the Troy City School District, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable, to address public health emergency planning requirements.

Signed on this day: March 2, 2021

By: John Carmello

Title: Superintendent of Schools

Signature: 

Purpose

On September 7, 2020, Governor Cuomo signed into law Chapter 168 of the Laws of 2020 that requires public employers, including public school districts, to adopt a continuation of operations plan in the event that the governor declares a public health emergency involving communicable disease. The legislation (S.8617-B/ A.10832) amends subdivision 2 of section [2801-a of New York Education Law](#) to require that District Safety Plans include protocols for responding to a declared public health emergency involving a communicable disease that are “substantially consistent” with the provisions of section 27-c of the Labor Law.

Scope

The Public Health Emergency Continuation of Operations Plan (PHECOP) identifies the varied aspects of providing a safe work environment for continued education of students and district operations during a declared public health emergency. Essential roles and critical functions are outlined to assist in delivering required assets and support to instructional and non-instructional functions to effectively continue district operations during a declared public health emergency. Planning and response efforts ultimately support the whole school community: students, parents and staff of our district.

Requirements

Essential Titles

The following provides a list and description of positions and titles considered essential in the event of a state-ordered reduction of in-person workforce, as well as a justification for such consideration for each position and title. This anticipates how certain positions/titles may be necessary to assist in response to a pandemic or communicable disease outbreak.

- Per S8617B/A10832:
 - ‘essential employee’ is defined as a public employee or contractor that is required to be physically present at a work site to perform their job
 - ‘non-essential employee’ is defined as a public employee or contractor that is not required to be physically present at a work site to perform their job
 - Note that per NYS Department of Health COVID-19 toolkit guidance, school staff are not essential workers.

A list of district-identified essential job functions and workers can be found on the chart below. It is important to note that those performing essential job functions will abide by the staggered schedule, in order to maintain and ensure safety for all employees. Whenever possible, employees should work from home and only be on-site at district premises for the completion of the essential functions listed below.

Department	Essential Position or Title	Description
Operations and Maintenance	Director of Facilities Assistant Director of Facilities Maintenance Workers Head Custodians Custodial Workers	Maintain the cleanliness and continued functioning and maintenance of school buildings. Deep clean as necessary based on state and local health department requirements for public health emergencies. Assist with building operations in the event of district provided childcare for fire responders/health care workers
Grounds	Director of Facilities Assistant Director of Facilities Maintenance Workers	Snow removal and groundskeeping
District Administration	Superintendent Asst Superintendents District based Administrators Clerical Support	Required to ensure continuity of the response efforts; coordinated response with state and local health departments; communication to families and staff; ensure all essential daily functions are completed
Information Technology	Network Engineer & Technicians	Maintain internet capability, including remote learning and working from home. Provide troubleshooting for internet and program access. Assist with internet connectivity to ensure Digital Equity.
Transportation	Director of Transportation Bus Drivers Bus Aides	To transport food to students who receive home meals and/or to transport students in the event they are attending in person instruction. Distribution of technology (laptops, hotspots, etc.) as necessary for Digital Equity
Food Service	Food Service Director Food Service Workers Support Staff (as needed)	To prepare and distribute meals to students. (for those at home with remote learning and at district childcare for first responders/health care workers)

Business Office	Asst. Superintendent for Business Treasurer Payroll Clerk Accounts Payable Purchasing	Processing of payroll deposits and checks; timely payment of district bills; processing and approving purchase orders for emergency supplies related to the public health emergency
Building Level Administration & Clerical Support	Building Administrators Clerical Support	Required to ensure continuity of the response efforts; communications to parents and staff; processing of purchase orders for emergency supplies; timely payment of building bills
Faculty and Staff	Teachers Related Service Providers Teaching Assistants, School Nurse	Assist with district provided childcare for first responders/health care workers as required. Assist with distribution of meals to students as needed. Should it become necessary to meet a student's needs under IDEA and/or Section 504 regulation (FAPE), teachers/related service providers may be deemed essential on an as needed basis.

Remote Work and Telecommuting

The following is a description of the protocols the district will follow in order to enable all non-essential employees and contractors to telecommute. This description is not limited to, facilitating or requesting the procurement, distribution, downloading and installation of any needed devices or technology, including software, data, office laptops or cell phones, and the transferring of office phone lines to work or personal cell phones as practicable or applicable.

To enable all non-essential employees and contractors to telecommute, the District will follow a contingency plan in a similar format as during the pandemic shut down with full remote instruction in March 2020.

Non-essential employees will complete telecommuting agreements prior to working remotely in the event that the district will need to close for an extended period of time. Staff required to work remotely will be provided with adequate district technology support to carry out their normal daily work functions. All district phones are able to be programmed to transfer to personal phone lines, which will be conducted to ensure continuity communications.

Non-essential employees will continue to have access to various digital platforms, including, but not limited to:

Remote Instructional Technology Platforms

Email and video conferencing technology and software	Google Classroom Suite- Learning Management System Grades 3-12
eSchoolData	Seesaw- Learning Management System K-2
Amplify Reading K-5	Google Suite Tools (Docs, Slides, Forms, etc.)
Other digital instructional platforms programs required to support remote learning	

Additional Remote District Technology Platforms

WinCap Web	eSchoolData
IEP Direct	IT/Help desk technology, work order systems, remote access
Raptor Visitor Management	Google Suite Tools (Docs, Slides, Forms, etc.)
Work order system(s)	Fill with additional district technology to support office functions

District Technology Hardware, Software, and Devices

Laptops and Chromebooks	Video/webcam hardware
Virtual Private Network (VPN) access	Other computer hardware as needed (i.e. printers)
Specialty software available by download	District issued cell phones for appropriate staff

Staggered Work Shifts

In the event of a public health emergency, the school district has determined that essential employees / outside contractors will follow a predetermined work shift schedule set by the district in an effort to minimize viral contact or employee overcrowding within the building.

Essential Employee Title / Outside Contractor	Building Name	Shift / Work Hours
Custodial & Maintenance	Troy High School Troy Middle School Elementary Schools	<i>1st Shift: 6:00am - 2:30pm, 8:00am - 4:30pm</i> <i>2nd Shift: 2:00pm - 10:00pm,</i>
Faculty	Troy High School Troy Middle School Elementary Schools	<i>Elementary (In-person or Hybrid Learning): 7:30am - 2:30pm, Secondary 8:30am - 3:15pm</i>
Cafeteria	Troy High School Troy Middle School Elementary Schools	<i>1st Shift: 6:00am - 2:30pm</i>
Aides	Troy High School Troy Middle School Elementary School's	<i>Elementary (In-person or Hybrid Learning): 7:30am - 2:30pm, Secondary 8:30am - 3:15pm</i>
Administration	Business Office / Superintendent's Office	<i>1st Shift: 7:00am - 3:00pm, 7:30am - 3:30pm, 8:00am - 4:00pm, 8:30am - 5:00pm</i>
Contractors	Districtwide, as needed	<i>1st Shift: 7:00am - 2:30pm</i> <i>2nd Shift: 2:00pm - 10:30pm</i>
Questar III BOCES	District-wide	<i>1st Shift: 8:00am - 4:30pm</i>
After School Program	Elementary Schools	<i>2:30pm - 6:00pm</i>

*Outside contractors will coordinate with district officials to determine the best work shift schedules that will work within contractual agreements, maintain work productivity, and minimize the potential spread of viral contact.

Transportation

For transportation needs, in the event of a public health emergency, the school district will ensure all predetermined protocols and procedures as mentioned in the district's reopening plan are adhered to. All employees (bus drivers, aides, monitors, etc.) who operate or occupy a district owned vehicle are subject to social distancing, face coverings, and daily health screenings.

Driver/Monitor/Aide/Maintenance

- All employees will be provided all necessary PPE to perform their duties safely. Maintenance personnel operating school owned vehicles will be required to disinfect high touch surfaces periodically during the occupancy of their vehicle.
- Maintenance employees will operate their designated vehicles solo and passengers/coworkers are prohibited.
- All employees are encouraged to sanitize their hands frequently before and after operating vehicles.

Cleaning and Sanitizing

- Each bus will have all high traffic areas properly cleaned between each run.
- Each bus utilized in the school day will be sanitized at least once daily.
- Maintenance vehicles will be routinely cleaned and sanitized placing emphasis on high touch surfaces.

Personal Protective Equipment

The following protocols will be implemented by the district to procure personal protective equipment (PPE) for essential employees, based upon tasks and needs related to the public health emergency. Specific information related to required storage and accessibility can be found in **Appendix I, Infectious Disease Preparedness and Response Plan**

Procurement

1. The district will abide by the Board of Education Procurement Policy. In the event an Executive Order by the Office of the Governor indicates that schools may suspend their procurement policy temporarily due to the public health emergency, the district reserves the right to suspend the BOE Procurement Policy per Governor's directive. (i.e. [Executive Order 202](#) - 3/7/2020 for COVID-19)
2. The district will secure and provide PPE for employees.
3. Procurement of PPE, other than basic preliminary purchases, will be done on a consolidated basis.
4. The district will provide employees with an acceptable face covering at no-cost to the employee and have an adequate supply of coverings in case of replacement.
 - a. Staff will be allowed to wear their own face covering pending district approval.
5. Information shall be provided to staff and students on proper use, removal, and washing of cloth face coverings.
6. Masks are most essential in times when physical distancing is difficult.
7. The district will promote and reinforce the use of PPE among all staff.
8. Specialized PPE (N95s, face shields, gowns, gloves, etc.) may be required for specific work tasks and will be provided as deemed necessary by a hazard assessment.
 - a. Those individuals that are required to wear N-95 respirators will be medically screened and fit-tested prior to use to assure they are physically able to do so.

PPE Supply Management

The purchasing department will work with each department to determine the overall PPE needs of the district. Centralized purchasing will be used when possible.

All types of PPE must be:

- Selected based upon the hazard to the staff.
- Properly fitted and periodically refitted, as applicable (e.g., respirators).
- Consistently and properly worn when required.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.
- The district will maintain an inventory of PPE in accordance with the NYS Education Department, NYS Department of Health and CDC guidelines. PPE will be continually restocked as needed.
- Storage of personal protective equipment will be on campus and comply with the manufacturer's storage recommendations for each item.
- PPE equipment will be readily available to all employees through identified disbursement protocols.

Exposure and Response

Effective prevention and mitigation steps are required to prevent the spread and/or contraction of the virus/disease. In the event an employee or contractor is exposed to a known case of the identified virus/disease, exhibits symptoms of the virus/disease, or tests positive for the virus/disease, the district will follow the current guidance from the Center for Disease Control, the New York Department of Health and the local health department. Appropriate cleaning and disinfection protocols will be followed. Steps will be followed to isolate the positive case and contact trace exposed individuals for quarantine. Contact tracing protocols will be implemented and followed in accordance with the local health department requirements as the lead agency. Established protocols shall not violate any existing federal, state, or local law, regarding sick leave or health information privacy.

1. Detailed actions for both daily and emergency cleaning of work areas, common area surfaces and shared equipment can be found in **Appendix II**, COVID-19 School Reopening Facilities Cleaning & Disinfection Protocol.
2. The District will adhere to privacy, accommodation, and HIPAA laws, and any federal or state requirements relating to protection of identified individuals during the public health emergency.
3. The District will adhere to any federal or state paid / unpaid leave provisions regarding quarantine, testing, exposure, and treatment protocols during a declared public health emergency.
 - a. Represented employees will have access to contractual leave as outlined in their respective bargaining unit agreements.
 - b. Non-represented employees have access to leave based on their current job titles and as outlined in board policy.
4. Contact tracing protocols will be implemented and followed in accordance with the local health department requirements as the lead agency.

Onsite Documentation

The following are protocols to limit exposure and facilitate contact tracing during a public health emergency. These protocols are for documenting precise hours and work locations, including off-site visits, for essential employees and contractors will be established. They are designed only to aid in tracking of the disease and to identify exposed employees and contractors for contact tracing and to facilitate the provision of any benefits which may be available.

On-Site Employee Contact Documentation

- Complete daily health screening questionnaire prior to arrival on site or immediately upon arrival on site. If symptomatic, do not enter.

- Employees should use a swipe badge or electronic access system if available. Such a system can be used to stagger access and limit staff numbers to reduce unnecessary interactions.
- Use district contact tracing forms
- Record person to person contacts (other than incidental contacts) as they occur
- Record accurate times of contact
- Masks must be worn at all times
- Social distance whenever possible, if a task limits social distancing re-examine the task to see if there is another way for it to be accomplished
- Conduct virtual meeting and interactions whenever possible
- Stagger task that involves multiple individuals to use the same space to improve social distancing
- Limit internal travel to location required by designed duties or tasks
- Limit number of staff in public location such as bathrooms or break rooms
- Turn all contact sheets in at the end of each workday

Vendor Contact Documentation

- Vendors must wear face covering at all times while on site
- Vendors must social distance wherever possible
- Deliveries should be scheduled in advance to minimize contact with staff.
- Establish a delivery drop zone where material can be dropped off at designated times contact free
- Vendors who must enter the facility and interact with staff will be screen with a daily health screening questionnaire
- If staff must interact with vendors, they must record the interaction on the district contact tracing form, including accurate times of interaction
- Clean/disinfect the delivery area(s) between uses.
- Vendor visits/meetings that do not involve delivery must be done remotely

Contractors - Construction project related Contact Documentation

- Contractors must complete a daily health screening questionnaire with their employer either prior to arrival on site or immediately upon arrival on site. If symptomatic do not enter.
- Contractors must wear face-coverings at all times while on district grounds
- Contractor tasks should be scheduled to reduce or eliminate interaction with all district staff. The use of closed off zones or after-hours work should be considered.
- If contractors are required to interact with district staff or work in a shared space the district staff must record this interaction on the district contact tracing form, including accurate times of contact
- Contractor and related project meeting must be remote whenever possible

Off-Site Employee Contact Documentation

(The following pertains to employees who work off site; not from home, or must leave the main location to conduct district business:)

- Complete daily health screening questionnaire prior to going to any off-site location
 - Complete screening survey at designated location as well
- Wear a mask at all times
- Social distance whenever possible
- Schedule virtual visits or meetings whenever possible
- Minimize the number of different locations visited in a day
- Record all person-to-person contacts (other than incidental contacts) as they occur
- Record accurate contact times
- Inquire about possible symptoms or exposure of individuals at locations that may need to be entered that are not business. If there are noted symptoms, or known exposure, do not enter these locations

Emergency Housing for a Public Health Emergency

Coordination with the local health department may be necessary in the event emergency housing is necessary during a public health emergency. The District may lodge identified essential employee(s) at a local hotel, if available.

Appendix I

Infectious Disease Preparedness and Response Plan

Troy City School District



Infectious Disease Preparedness and Response Plan

Date of Revision/Review: April 21, 2020

Infectious Disease Preparedness and Response Plan

This plan was developed to help identify risk levels at Troy City School District and to determine appropriate control measures to implement when faced with infectious diseases. This plan will assist in implementing engineering, administrative, and work practice controls including personal protective equipment (PPE) in order to prepare and respond to infectious diseases.

Risk Factors

Employee risk of occupational exposure to infectious diseases during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends on the individual's job requirements, including the requirement for social distancing. During pandemics, the Occupational Safety and Health Administration (OSHA), may issue guidance on occupational risks for workers. In addition to the levels of occupational risk, there are factors that can greatly affect mortality and certain individual's ability to fight specific infectious diseases.

The Occupational Risk Pyramid depicts the four exposure risk levels in the shape of a pyramid to represent probable distribution of risk. Most job functions within the district will fall in the **medium** exposure risk level.

(<https://www.osha.gov/Publications/OSHA3993.pdf>)

Occupational Risk Pyramid



- **Very high** exposure risk jobs with a high potential for exposure to known or suspected sources of infectious diseases during specific medical, postmortem, or laboratory procedures. Staff in this category include:
 - Healthcare and morgue staff performing aerosol-generating

procedures on or collecting/handling specimens from potentially infectious patients or bodies of people known to have, or suspected of having, an infectious disease at the time of death.

- **High** exposure risk jobs with a high potential for exposure to known or suspected sources of an infectious disease. Staff in this category include:
 - Healthcare delivery, healthcare support, medical transport, and mortuary staff exposed to known or suspected infectious disease patients or bodies of people known to have, or suspected of having, infectious disease at the time of death.
- **Medium** exposure risk jobs that require frequent/close contact with people who may be infected, but who are not known or suspected patients. Staff in this category include:
 - Those who may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings), including individuals returning from locations with widespread infectious disease transmission.
- **Lower** exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected nor frequent close contact with (i.e., within 6 feet of) the general public.
 - Staff in this category have minimal occupational contact with the public and other coworkers.

Please refer to Appendix A of this document for OSHA's Occupational Risk Pyramid and individual factors affecting risk levels specifically for COVID-19.

Risk Control

Monitoring of current situations will be crucial. Federal and state, local department of health (LDOH) recommendations will be followed for situations that may arise as a result of outbreaks, such as:

- Increased rates of staff absenteeism.
- The need for social distancing, staggered work shifts, downsizing operations, delivering educational services remotely, and other exposure-reducing measures.
- Interrupted supply chains or delayed deliveries.
- Positive cases of infectious disease that require facility closures.

Conducting essential operations with a reduced workforce should be planned in advance through Continuity of Operations Planning (COOP). These mission critical

functions would include at least:

- Payroll
- Benefits management for staff
- Accounts receivable/payable
- Delivery of educational services remotely
- Meal distribution programs and backpack programs
- Building cleaning and sanitization
- IT Support

Risk Reduction

Protecting staff will depend on emphasizing basic infection prevention measures. All staff should implement good hygiene and infection control practices. An aggressive communication plan in the school buildings and community help promote basic infection prevention measures should include:

- Promoting frequent and thorough hand washing by communicating to staff, students, contractors, visitors, and other individuals the importance of washing their hands.
 - Hand washing should last at least 20 seconds and include scrubbing all surfaces and under the nails.
 - If soap and running water are not immediately available, provide alcohol-based hand sanitizer containing at least 60% alcohol.
 - Handwashing should be conducted immediately when soap and running hot water is available.
- Encourage or enable staff to stay home if they are sick.
- Encourage respiratory etiquette, including covering coughs and sneezes.
 - Provide staff, students, and visitors with tissues and trash receptacles.
- Social distancing
- Discourage staff and students from using other's cell phones, desks, offices, or other work tools and equipment, whenever possible.

Regular housekeeping practices are also necessary in assisting in keeping facilities open. Proper cleaning, sanitizing, and disinfecting procedures are required to be completed by maintenance staff. Facility directors and staff must:

- Follow manufacturer's instructions for use of all cleaning and disinfection products must be followed at all times (e.g., concentration, application method, contact time and required PPE).
- Ensure selected disinfectant products are on the approved Environmental Protection Agency (EPA) List for use against emerging viral pathogens.

A comprehensive list of approved cleaning, sanitizing, and disinfecting products can be found in Appendix B of this document.

District policies and procedures should be written in advance to address the following needs:

- Reduction in essential workforce
 - Telecommuting
 - Job rotations
 - Staggered shifts
- Distance learning
- Meal/food preparation
- Childcare operations

Policies and Procedures for Prompt Identification and Isolation of Sick People

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting staff, students, visitors, and others. The district must inform and encourage staff to monitor for signs and symptoms of any suspect contagions. Nursing staff must also have the proper resources to manage students presenting symptoms as school.

Federal, State, and LDOH guidance must be followed regarding protocols for:

- Stay at home,
- Self-quarantine,
- Mandatory isolation
- Return to school or work

Procedures for immediately isolating staff or students who have signs and/or symptoms of a contagious pathogen:

- Move potentially infectious people to a location away from staff, students, and other visitors. Isolation rooms or areas should be designated areas until potentially sick people can leave the building.
- Follow Federal, State and Local guidance to take steps to limit spread of the respiratory secretions of a person who may have a virus. This would include providing the infected person with a face mask.
- Restrict the number of personnel entering isolation areas.
- Protect staff in close contact with (i.e., within 6 feet of) a sick person or who may have been exposed to or have made contact with a person carrying an infectious disease using additional engineering and administrative controls, safe work practices, and PPE. Staff whose activities involve close or prolonged/repeated contact with sick people are addressed further in later sections covering workplaces classified at medium and very high or high exposure risk.

Develop, Implement, and Communicate about Workplace Flexibilities and Protections

When faced with a contagious disease outbreak, the district shall:

- Follow the recommendations of Federal, State, and Local authorities.
 - Maintain regular or routine proactive communication with these authorities
- Ensure that sick leave policies are flexible and consistent with state and local guidance and that employees are aware of these policies.
- Maintain flexible policies that permit employees to stay home to care for a sick family member. Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual.
- Encourage staff to follow the guidance of their physician or LDOH for notification of illnesses and stay at home procedures.
- Monitor staff concerns about pay, leave, safety, health, and other issues that may arise during infectious disease outbreaks.
- Provide adequate and appropriate training regarding essential worker functions. Ensure protocols are in place for staff health and safety, including proper hygiene practices and the use of any workplace controls. Informed staff who feel safe at work are less likely to be unnecessarily absent.

Implement Workplace Controls

The best way to control a hazard is to systematically remove it from the workplace, rather than relying on staff to reduce their exposure. During an outbreak, when it may not be possible to eliminate the hazard, the most effective protection measures are (listed from most effective to least effective):

1. Engineering controls
2. Administrative controls
3. Personal Protective Equipment (PPE)

There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect staff from exposure.

Engineering Controls

Engineering controls involve isolating employees from work related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on staff behavior. Engineering controls may differ depending on the infectious disease. Controls may include:

- Increasing HVAC ventilation rates in the work environment.

- The HVAC system will require an evaluation to determine if this control method will be viable.
- Installing physical barriers, such as clear plastic sneeze guards.
 - Such barriers will require an evaluation prior to installation to maximize its efficiency.
- Utilizing exterior/outside methods for meal and schoolwork distribution.
 - Use of bags and boxes
- Isolation rooms and areas for sick students to use prior to being picked up or leaving the building(s).
 - If possible, select isolation rooms with secondary access so that compromised student(s) do not travel back into the shared space.

Administrative Controls

Administrative controls require action by the staff or employer. Typically, administrative controls are changes in work policy or procedures to minimize exposure to a hazard. Examples of administrative controls include:

- Encouraging or enabling sick staff to stay at home.
- Minimizing contact among staff, students, and visitors by replacing face-to-face meetings with virtual communications and implementing telecommuting when feasible.
- Establishing alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week.
- Discontinuing nonessential travel to locations with ongoing outbreaks.
 - Please refer to Appendix A of this document for COVID-19 related travel restriction guidance.
- Developing emergency communications plans, including a forum for answering staff and family concerns and internet-based communications.
- Providing staff with up-to-date education and training on contagious disease risk factors and protective behaviors (e.g., cough etiquette and care of PPE, when necessary).
- Training staff who need to use protective clothing and equipment how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties. Training material should be easy to understand and available in the appropriate language and literacy level for all staff.

Safe Work Practices

Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard. Examples of safe work practices include:

- Providing resources and a work environment that promotes personal hygiene. For example, provide tissues, trash cans, alcohol-based hand sanitizer

containing at least 60 percent alcohol, cleaners, disinfectants, and disposable towels for staff to clean, sanitize, and disinfect their work surfaces.

- Requiring regular hand washing and use of alcohol-based hand sanitizer when hand washing is not readily available. Staff should always wash hands when they are visibly soiled and before and after removing any PPE.
- Post age-appropriate hand washing signs in restrooms.

Personal Protective Equipment (PPE)

While engineering and administrative controls are considered more effective in minimizing exposure to contagions, PPE may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies.

Examples of PPE include gloves, goggles, face shields, face masks, and respiratory protection, when appropriate. During an outbreak of an infectious disease, recommendations for PPE specific to occupations or job tasks may change depending on job tasks, updated risk assessments for staff, and information on PPE effectiveness in preventing the spread of the disease.

All types of PPE must be:

- Selected based upon the hazard to the staff.
- Properly fitted and periodically refitted, as applicable (e.g., respirators).
- Consistently and properly worn when required.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.
- Storage of personal protective equipment will be on campus and comply with the manufacturer's storage recommendations for each item.
- PPE equipment will be readily available to all employees through identified disbursement protocols.

Employers are obligated to provide designated staff with PPE needed to keep them safe while performing their jobs. The types of PPE required during an outbreak will be based on the risk of being infected with the contagious disease while working and job tasks that may lead to exposure. This may be directed by the federal, state and or LDOH.

Staff, including those who work within 6 feet of patients known to be, or suspected of being, infected and those performing aerosol-generating procedures, need to use respirators per National Institute for Occupational Safety and Health (NIOSH) standards. These staff would be required to be in a respiratory protection program and follow the requirements to wear a respirator.

Information for Specific Viruses, Pathogens, or Infectious Diseases that are

currently present or are an ongoing threat currently on a specific site will be included within Appendix A of this document.

Information requiring the use of facemasks for COVID-19 is located in Appendix A of this document.

Annual Review

This plan should be reviewed annually and be updated as needed. Annual reviews and updates will be recorded in Appendix C of this document.

Appendix A

COVID-19 Specific Guidelines

COVID-19 Specific Guidelines Begin on the Following Page

OSHA Worker Exposure Risk to COVID-19

The Occupational Risk Pyramid depicts the four exposure risk levels in the shape of a pyramid to represent probable distribution of risk. *Most job functions within the district will fall in the **medium** exposure risk level for COVID-19.*

(<https://www.osha.gov/Publications/OSHA3993.pdf>)

Occupational Risk Pyramid



- **Very high** exposure risk jobs with a high potential for exposure to known or suspected sources of infectious diseases during specific medical, postmortem, or laboratory procedures. Staff in this category include:
 - Healthcare and morgue staff performing aerosol-generating procedures on or collecting/handling specimens from potentially infectious patients or bodies of people known to have, or suspected of having, an infectious disease at the time of death.
- **High** exposure risk jobs with a high potential for exposure to known or suspected sources of an infectious disease. Staff in this category include:
 - Healthcare delivery, healthcare support, medical transport, and mortuary staff exposed to known or suspected infectious disease patients or bodies of people known to have, or suspected of having, infectious disease at the time of death.
- **Medium** exposure risk jobs that require frequent/close contact with people who may be infected, but who are not known or suspected patients. Staff in this category include:
 - Those who may have contact with the general public (e.g., schools,

high-population-density work environments, some high-volume retail settings), including individuals returning from locations with widespread infectious disease transmission.

- **Lower** exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected nor frequent close contact with (i.e., within 6 feet of) the general public.
 - Staff in this category have minimal occupational contact with the public and other coworkers.

Individual Factors Affecting Risk Levels for COVID-19

Staff may also have individual factors that will impact risk levels depending on the infectious disease. These factors include, but are not limited to the following for COVID-19:

- Older age (65 years and older)
- Presence of chronic medical conditions, including immunocompromising conditions such as:
 - Chronic lung disease or moderate to severe asthma
 - Serious heart conditions
 - Individuals in cancer treatment, having recent transplants
 - HIV or aids
 - Prolonged use of corticosteroids
 - Severe obesity
 - Diabetes
 - Chronic kidney disease and undergoing dialysis
 - Liver disease
- Pregnancy
- Certain personal lifestyle choices (i.e. drug use)

Source: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html>

Current Executive Orders and Directives

Please visit the following website to view all current executive orders and directives issued by the NYS Governor's office: <https://www.governor.ny.gov/executiveorders>

COVID-19 Related Travel Restrictions

For COVID-19 related travel advisories for New York State, regularly check the following website for updated information: <https://coronavirus.health.ny.gov/covid-19-travel-advisory>

Centers for Disease Control and Prevention

Steps to Help Prevent the Spread of COVID-19 if you are Sick

Steps to help prevent the spread of COVID-19 if you are sick

FOLLOW THE STEPS BELOW: If you are sick with COVID-19 or think you might have it, follow the steps below to help protect other people in your home and community.

Stay home except to get medical care

- **Stay home:** People who are mildly ill with COVID-19 are able to recover at home. Do not leave, except to get medical care. Do not visit public areas.
- **Stay in touch with your doctor.** Call before you get medical care. Be sure to get care if you feel worse or you think it is an emergency.
- **Avoid public transportation:** Avoid using public transportation, ride-sharing, or taxis.



Separate yourself from other people in your home, this is known as home isolation

- **Stay away from others:** As much as possible, you should stay in a specific “sick room” and away from other people in your home. Use a separate bathroom, if available.
- **Limit contact with pets & animals:** You should restrict contact with pets and other animals, just like you would around other people.
 - Although there have not been reports of pets or other animals becoming sick with COVID-19, it is still recommended that people with the virus limit contact with animals until more information is known.
 - When possible, have another member of your household care for your animals while you are sick with COVID-19. If you must care for your pet or be around animals while you are sick, wash your hands before and after you interact with them. See COVID-19 and Animals for more information.



Call ahead before visiting your doctor

- **Call ahead:** If you have a medical appointment, call your doctor’s office or emergency department, and tell them you have or may have COVID-19. This will help the office protect themselves and other patients.



Wear a facemask if you are sick

- **If you are sick:** You should wear a facemask when you are around other people and before you enter a healthcare provider’s office.
- **If you are caring for others:** If the person who is sick is not able to wear a facemask (for example, because it causes trouble breathing), then people who live in the home should stay in a different room. When caregivers enter the room of the sick person, they should wear a facemask. Visitors, other than caregivers, are not recommended.



Cover your coughs and sneezes

- **Cover:** Cover your mouth and nose with a tissue when you cough or sneeze.
- **Dispose:** Throw used tissues in a lined trash can.
- **Wash hands:** Immediately wash your hands with soap and water for at least 20 seconds. If soap and water are not available, clean your hands with an alcohol-based hand sanitizer that contains at least 60% alcohol.



Clean your hands often

- **Wash hands:** Wash your hands often with soap and water for at least 20 seconds. This is especially important after blowing your nose, coughing, or sneezing; going to the bathroom; and before eating or preparing food.
- **Hand sanitizer:** If soap and water are not available, use an alcohol-based hand sanitizer with at least 60% alcohol, covering all surfaces of your hands and rubbing them together until they feel dry.
- **Soap and water:** Soap and water are the best option, especially if hands are visibly dirty.
- **Avoid touching:** Avoid touching your eyes, nose, and mouth with unwashed hands.



Avoid sharing personal household items

- **Do not share:** Do not share dishes, drinking glasses, cups, eating utensils, towels, or bedding with other people in your home.



[cdc.gov/COVID19](https://www.cdc.gov/COVID19)

- **Wash thoroughly after use:** After using these items, wash them thoroughly with soap and water or put in the dishwasher.

Clean all “high-touch” surfaces everyday

Clean high-touch surfaces in your isolation area (“sick room” and bathroom) every day; let a caregiver clean and disinfect high-touch surfaces in other areas of the home.



- **Clean and disinfect:** Routinely clean high-touch surfaces in your “sick room” and bathroom. Let someone else clean and disinfect surfaces in common areas, but not your bedroom and bathroom.
 - If a caregiver or other person needs to clean and disinfect a sick person's bedroom or bathroom, they should do so on an as-needed basis. The caregiver/other person should wear a mask and wait as long as possible after the sick person has used the bathroom.
- High-touch surfaces include phones, remote controls, counters, tabletops, doorknobs, bathroom fixtures, toilets, keyboards, tablets, and bedside tables.
- **Clean and disinfect areas that may have blood, stool, or body fluids on them.**
- **Household cleaners and disinfectants:** Clean the area or item with soap and water or another detergent if it is dirty. Then, use a household disinfectant.
 - Be sure to follow the instructions on the label to ensure safe and effective use of the product. Many products recommend keeping the surface wet for several minutes to ensure germs are killed. Many also recommend precautions such as wearing gloves and making sure you have good ventilation during use of the product.
 - Most EPA-registered household disinfectants should be effective. A full list of disinfectants can be found [here](#).

Monitor your symptoms

- **Seek medical attention, but call first:** Seek medical care right away if your illness is worsening (for example, if you have difficulty breathing).
 - **Call your doctor before going in:** Before going to the doctor's office or emergency room, call ahead and tell them your symptoms. They will tell you what to do.
- **Wear a facemask:** If possible, put on a facemask before you enter the building. If you can't put on a facemask, try to keep a safe distance from other people (at least 6 feet away). This will help protect the people in the office or waiting room.
- **Follow care instructions from your healthcare provider and local health department:** Your local health authorities will give instructions on checking your symptoms and reporting information.



If you develop **emergency warning signs** for COVID-19 get **medical attention immediately**.

Emergency warning signs include*:

- Difficulty breathing or shortness of breath
- Persistent pain or pressure in the chest
- New confusion or inability to arouse
- Bluish lips or face

*This list is not all inclusive. Please consult your medical provider for any other symptoms that are severe or concerning.

Call 911 if you have a medical emergency: If you have a medical emergency and need to call 911, notify the operator that you have or think you might have, COVID-19. If possible, put on a facemask before medical help arrives.

How to discontinue home isolation

- People **with COVID-19 who have stayed home (home isolated)** can stop home isolation under the following conditions:
 - **If you will not have a test** to determine if you are still contagious, you can leave home after these three things have happened:
 - You have had no fever for at least 72 hours (that is three full days of no fever without the use medicine that reduces fevers)
 - AND
 - other symptoms have improved (for example, when your cough or shortness of breath have improved)
 - AND
 - at least 7 days have passed since your symptoms first appeared
 - **If you will be tested** to determine if you are still contagious, you can leave home after these three things have happened:
 - You no longer have a fever (without the use medicine that reduces fevers)
 - AND
 - other symptoms have improved (for example, when your cough or shortness of breath have improved)
 - AND
 - you received two negative tests in a row, 24 hours apart. Your doctor will follow CDC guidelines.



In all cases, follow the guidance of your healthcare provider and local health department. The decision to stop home isolation should be made in consultation with your healthcare provider and state and local health departments. Local decisions depend on local circumstances.

More information is available [here](#).

Additional information for healthcare providers: [Interim Healthcare Infection Prevention and Control Recommendations for Persons Under Investigation for 2019 Novel Coronavirus](#).

Source: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/sick-with-2019-nCoV-fact-sheet.pdf>

New York State Department of Health

Interim Guidance on Executive Order 202.16 Requiring Face Coverings for Public and Private Employees Interacting with the Public during the COVID-19 Outbreak



Department
of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

Interim Guidance on Executive Order 202.16 Requiring Face Coverings for Public and Private Employees Interacting with the Public During the COVID-19 Outbreak

April 14, 2020

Background:

In December 2019, a new respiratory disease called the novel coronavirus (COVID-19) was detected. COVID-19 is caused by a virus (SARS-CoV-2) that is part of a large family of viruses called coronaviruses. Recently, community-wide transmission of COVID-19 has occurred in the United States, including New York where the number of both confirmed and suspected cases is increasing. To reduce the community-wide transmission of COVID-19, Governor Andrew M. Cuomo has taken aggressive action through [Executive Order 202](#), as amended, to combat the spread of this infectious disease, reducing the density of people in areas of common congregation by closing the in-person operations of non-essential businesses and prohibiting all non-essential gatherings of individuals of any size for any reason.

Executive Order:

[Executive Order 202.16](#), issued on April 12, 2020, provides the following directive:

For all essential businesses or entities, any employees who are present in the workplace shall be provided and shall wear face coverings when in direct contact with customers or members of the public. Businesses must provide, at their expense, such face coverings for their employees. This provision may be enforced by local governments or local law enforcement as if it were an order pursuant to section 12 or 12-b of the Public Health Law. This requirement shall be effective Wednesday, April 15 at 8 p.m.

Guidance:

Essential businesses, as well as state and local government agencies and authorities, must procure, fashion, or otherwise obtain face coverings and provide such coverings to employees who directly interact with the public during the course of their work at no-cost to the employee.

- Businesses are deemed essential by the Empire State Development Corporation (ESD), pursuant to the authority provided in Executive Order 202.6. Please visit the ESD [website](#) for specific information on essential businesses. For the purpose of this guidance, essential businesses shall also provide face coverings to contractors, including independent contractors.
- Face coverings include, but are not limited to, cloth (e.g. homemade sewn, quick cut, bandana), surgical masks, N-95 respirators, and face shields. Please visit the Centers for Disease Control and Prevention's "Coronavirus Disease 2019 (COVID-19)" [website](#) for [information](#) on cloth face covers and other types of personal protective equipment (PPE), as well as instructions on use and cleaning.

- Direct interaction with the public shall be determined by the employer, but, at a minimum, shall include any employee who is routinely within close contact (i.e. six feet or less) with members of the public, including but not limited to customers or clients.
- Employees are allowed to use their own face coverings, but shall not be mandated to do so by their employer. *Further, this guidance shall not prevent employees from wearing more protective coverings (e.g. surgical masks, N-95 respirators, or face shields) if the individual is already in possession of such PPE, or if the employer otherwise requires employees to wear more protective PPE due to the nature of their work (e.g. healthcare).*
- Employees are required to wear face coverings when in direct contact with members of the public, except where doing so would inhibit or otherwise impair the employee's health. *Employers are prohibited from requesting or requiring medical or other documentation from an employee who declines to wear a face covering due to a medical or other health condition that prevents such usage.*
- Employees who are unable to wear face coverings and are susceptible to COVID-19 based on the "Matilda's Law" criteria (i.e. individuals who are 70 years of age or older, individuals with compromised immune systems, and individuals with underlying illnesses) should consult with their employer to consider [reasonable accommodations](#), including but not limited to different PPE, alternate work location, or alternate work assignment with fewer interactions with the public. Employers should work with their employees to see if they can be accommodated to ensure the employee can continue to deliver essential services in the safest manner possible.
- If an employer is unable to procure, fashion, or otherwise obtain face coverings for their employees, they may consult with their local office of emergency management to determine if extra supplies exist within the municipality for this purpose and, if so, they may submit a request for face coverings. Please note that quantities are extremely limited and are prioritized for health care workers and first responders. *Not being able to source face coverings does not relieve an employer's obligation to provide such face coverings to their employees.*
- Nothing in this guidance shall supercede the respiratory protection equipment requirements set forth by the United States Department of Labor's Occupational Safety and Health Administration (OSHA).

Additional Information:

New York State Coronavirus (COVID-19) Website

<https://coronavirus.health.ny.gov/>

United States Centers for Disease Control and Prevention Coronavirus (COVID-19) Website

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Sour
eo2C

New York State Department of Health Interim Cleaning and Disinfection Guidance for Primary and Secondary Schools for COVID-19



ANDREW M. CUOMO
Governor

Department
of Health

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

Interim Cleaning and Disinfection Guidance for Primary and Secondary Schools for COVID-19

Background:

In December 2019, a new respiratory disease called Coronavirus Disease 2019 (COVID-19) was detected in China. COVID-19 is caused by a virus (SARS-CoV-2) that is part of a large family of viruses called coronaviruses. To help prevent spread of COVID-19, schools should continue to educate students, faculty and staff about proper hand and respiratory hygiene.

Hand hygiene:

- Regular hand washing with soap and water for at least 20 seconds should be done:
 - Before eating;
 - After sneezing, coughing, or nose blowing;
 - After using the restroom;
 - Before handling food;
 - After touching or cleaning surfaces that may be contaminated; and
 - After using shared equipment like computer keyboards and mice.

If soap and water are not available, use an alcohol-based hand sanitizer. School medical directors should approve and permit the use of alcohol-based hand sanitizers in their facilities without individual's physician orders as alcohol-based hand sanitizers are considered over-the-counter drugs. Student use of alcohol-based hand sanitizers should always be supervised by adults. Parents/guardians can inform the school that they do not want their child to use alcohol-based hand sanitizers by sending a written notice to the school.

Respiratory hygiene:

- Covering coughs and sneezes with tissues or the corner of elbow; and
- Disposing of soiled tissues immediately after use.

What steps should schools in NYS take for COVID-19?

Now:

Schools should continue performing routine cleaning. Specific high-risk locations warrant cleaning and disinfection at least daily.

If an individual with laboratory confirmed COVID-19 was symptomatic in a school-setting:

Cleaning and disinfection throughout the school.

Routine Cleaning:

Soiled and frequently touched surfaces can be reservoirs for pathogens, resulting in a continued transmission to people. Therefore, for pathogenic microorganisms that can transmit disease through indirect contact (transmission through contaminated surfaces), extra attention must be paid to surfaces that are touched most often by different individuals. **As part of standard infection control practices in school settings, routine cleaning should be continued.**

In New York State, all primary and secondary schools are required to use green cleaning products. For additional information on the laws regarding the use of green cleaning products, see the [Policies, Guidelines and Report](#) section of NY's Green Cleaning Program website. Routine cleaning of school settings include:

- Cleaning high contact surfaces that are touched by many different people, such as light switches, handrails and doorknobs/handles.
- Dust- and wet-mopping or auto-scrubbing floors.
- Vacuuming of entryways and high traffic areas.
- Removing trash.
- Cleaning restrooms.
- Wiping heat and air conditioner vents.
- Spot cleaning walls.
- Spot cleaning carpets.
- Dusting horizontal surfaces and light fixtures.
- Cleaning spills.

Specific high-risk locations within a school warrant cleaning and disinfection before a confirmed case of COVID-19 occurs in the school.

Examples of these locations include:

Health Office

- Clean and disinfect health cots regularly (after each student use)
- Cover treatment tables and use pillow protectors
- Discard or launder coverings after each use

Lunchrooms

- Clean and disinfect lunch tables regularly (at least once daily)

Athletic Rooms

- Establish a regular cleaning schedule for shared environmental surfaces such as wrestling mats or strength-training equipment
- Disinfect mats and other high-use equipment at least daily

Other Frequently Touched Surfaces

- Clean and disinfect frequently touched surfaces at least once daily after students have left for the day

Cleaning and Disinfection:

Cleaning removes germs, dirt and impurities from surfaces or objects, while disinfecting kills germs on surfaces or objects. **If a laboratory confirmed case of COVID-19 was symptomatic while in the school setting, custodial staff should perform cleaning and disinfection of frequently touched areas throughout the school.**

Step 1: Cleaning: Always clean surfaces prior to use of disinfectants in order to reduce soil and remove germs. Dirt and other materials on surfaces can reduce the effectiveness of disinfectants. For combination products that can both clean and disinfect, always follow the instructions on the specific product label to ensure effective use. In New York State, all primary and secondary schools, state agencies, and state authorities are required to use green cleaning products. For additional information on the laws regarding the use of green cleaning products, see the [Policies, Guidelines and Report](#) section of NY's Green Cleaning Program website.

Step 2: Disinfection: Cleaning of soiled areas must be completed prior to disinfection to ensure the effectiveness of the disinfectant product. **NYS Green Cleaning Program does not address the use of disinfection products. Disinfection products may be used in school settings as needed at any time.** If EPA- and DEC*-registered products specifically labeled for SARS-CoV-2 are not available, disinfect surfaces using a disinfectant labeled to be effective against rhinovirus and/or human coronavirus. If such products are unavailable, it is also acceptable to use a fresh 2% chlorine bleach solution (approximately 1 tablespoon of bleach in 1 quart of water). Prepare the bleach solution daily or as needed. EPA- and DEC*-registered disinfectants specifically labeled as effective against SARS-CoV-2 may become commercially available at a future time and once available, those products should be used for targeted disinfection of frequently touched surfaces.

Examples of frequently touched areas in schools:

- Classroom desks and chairs;
- Lunchroom tables and chairs;
- Door handles and push plates;
- Handrails;
- Kitchen and bathroom faucets;
- Light switches;
- Handles on equipment (e.g., athletic equipment);
- Buttons on vending machines and elevators;
- Shared telephones;
- Shared desktops;
- Shared computer keyboards and mice; and
- Bus seats and handrails.

Note: Computer keyboards are difficult to clean due to the spaces between keys and the sensitivity of its hardware to liquids. When shared, they may contribute to indirect transmission.

Locations with community use computers should provide posted signs regarding proper hand hygiene before and after using the computers to minimize disease transmission. Also, consider using keyboard covers to protect the hardware against spills and facilitate cleaning.

- Label directions must be followed when using disinfectants to ensure the target viruses are effectively killed. This includes adequate contact times (i.e., the amount of time a disinfectant should remain on surfaces to be effective), which may vary between five and ten minutes after application. Disinfectants that come in a wipe form will also list effective contact times on their label.
- For disinfectants that come in concentrated forms, staff should carefully follow instructions for making the diluted concentration needed to effectively kill the target virus. This information can be found on the product label.

Disinfecting is the responsibility of school custodial staff. They are trained to use disinfectants in a safe and effective manner. Staff are reminded to ensure procedures for safe and effective use of all products are followed. Staff do not need to wear respiratory protection (e.g., masks) while cleaning. Safety instructions are listed on product labels and include the personal protective equipment (e.g., gloves) that should be used. Place all used gloves in a bag that can be tied closed before disposing of them with other waste. Wash hands with soap and water for at least 20 seconds immediately after removing gloves or use an alcohol-based hand sanitizer if soap and water are not available. Soap and water should be used if hands are visibly soiled.

*NYSDEC registration will not be listed on disinfection product labels. Information about disinfection product registration with NYSDEC can be found at: <http://www.dec.ny.gov/nyspad/products>. If you have any questions about NYSDEC pesticide registration, please call the NYSDEC Bureau of Pesticide Management at 518-402-8748.

More information:

New York State Department of Health's COVID-19 Webpage:
<https://www.health.ny.gov/diseases/communicable/coronavirus/>

Centers for Disease Control and Prevention Webpage:
<https://www.cdc.gov/coronavirus/2019-ncov/>

New York State Green Cleaning Program:
<https://greencleaning.ny.gov/>

Enhanced Green Cleaning Guidance To Reduce The Spread Of Communicable Disease:
https://greencleaning.ny.gov/DownloadCenter/Files/EnhancedGreenCleaningTrainingManual5_17_10.pdf

Source: https://coronavirus.health.ny.gov/system/files/documents/2020/03/cleaning_guidance_schools.pdf

Appendix B

Approved Cleaning, Sanitizing, and Disinfectant Products

Below is a comprehensive list of approved cleaning, sanitizing, and disinfectant products that are currently in use at Troy City School District.

Product Name	Manufacturer
Clean by Peroxy Cleaner/Sanitizer	Spartan
GS Neutral Disinfectant Cleaner Disinfectant	Spartan
BNC-15 Disinfectant	Spartan

***Note:** Products shall be used in accordance with the manufacturers label and directions

Appendix C

Annual Review/Updates

Date	Reviewed by	Changes and/or Revisions
4/21/2020	Tim LeVan	Original Document
6/22/2021	District Safety Committee	Updates as required
7/20/2023	Michael Otton	Updates as Required, added Emergency remote instruction plan appendix 4

Appendix II

Troy City School District

COVID-19 School Reopening Facilities Cleaning & Disinfection Protocol

The following is Troy City School District's cleaning and disinfection protocol for reopening during the COVID-19 pandemic. This protocol meets the requirements of the New York State Education Department (NYSED) and New York State Department of Health (NYSDOH) as well as all applicable Federal, State, and local authorities.

- Requirements:
 - Adhere to current federal, state and local guidance regarding COVID-19 at all times.
 - Indoor cleaning and disinfection:
 - Clean and disinfect each space at least daily
 - Maintain daily logs that include the date, time, and scope of cleaning and disinfection. Cleaners and custodians will use this to track their daily/nightly cleaning and disinfection schedules.
 - Clean and disinfect high touch surfaces frequently based upon levels of use:
 - Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, tablets, toilets and restrooms, faucets and sinks, etc.
 - Clean and disinfect shared equipment between each use by staff and/or students:
 - Desks, computers, copiers, office equipment, PE equipment, art supplies, etc.
 - School Health Offices
 - Required cleaning and disinfection after each use:
 - Cots, bathrooms, etc.
 - Health office equipment (blood pressure cuffs, otoscopes, stethoscopes, etc.) must be cleaned per manufacturer's directions
 - OT/PT Cleaning and Disinfection:
 - All equipment used is required to be cleaned and disinfected between each use.
 - Outdoor cleaning:
 - Outdoor areas require normal routine cleaning of high touch surfaces and do not require disinfection per Centers for Disease Control (CDC)
 - High touch surfaces:
 - Grab bars, railings, hand holds, rings, chains on swings, etc.

- High touch surfaces will be cleaned as needed based upon levels of use
- Procedures:
 - Cleaning:
 - Follow manufacturers recommendations for proper cleaning.
 - Cleaning procedures will be kept on hand in the buildings and grounds office.
 - Disinfecting:
 - Follow manufacturers recommendations for proper disinfecting.
 - Disinfecting procedures will be kept on hand in the buildings and grounds office.
- District approved disinfectants available for daily use:
 - EPA Approved Disinfectants:
 - The buildings and grounds department maintains a current listing of approved disinfectants.
 - EPA approved alternate disinfectants:
 - Bleach (1/3 cup to gallon mixture of bleach to water, Per NYSED and CDC guidance)
 - 70% or higher alcohol solutions, if available.
- Determining approved disinfecting products:
 - Refer to EPA List N for disinfectants for use against COVID-19
 - If a product is not on the list the CDC states “If you can’t find a product on this list to use against SARS-CoV-2, look at a different product's label to confirm it has an EPA registration number and that human coronavirus is listed as a target pathogen.”
 - Source: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>

Appendix III

Record of Updates/Revisions

Date	Reviewed by	Updates and/or Revisions
6/22/2021	District Safety Committee	Updates as required
6/2022	District Safety Committee	Updates as required
7/2023	District Safety Committee	Updates as required

Appendix 4

Emergency Remote Instruction Plan District-wide School Safety Plan (DWSSP) Required for the 2023-2024 School Year

Emergency Remote Instruction Plan (beginning 2023-2024)

This appendix addresses the 2022-2023 amendments of Sections 100.1, 155.17, and 175.5 of the Regulations of the Commissioner of Education Relating to Remote Instruction and its Delivery under Emergency Conditions, and the amendments of Sections 200.7, 200.16, and 200.20 of the Regulations of the Commissioner of Education Relating to Remote Instruction and its Delivery Under Emergency Conditions and Length of School Day for Approved School-Age and Preschool Programs Serving Students with Disabilities

INTRODUCTION

The Troy City School District developed the following Emergency Remote Instruction Plan to address the instruction of students if extraordinary circumstances prevent students and staff from physically attending school. The Emergency Remote Instruction Plan meets the requirements of New York State Education Commissioner's Regulations for inclusion in the 2023-2024 District-Wide School Safety Plan. Additionally, the plan adheres to guidance set forth in the following Board of Education policies: [5000 Student Policy](#); [5100 Attendance](#); [5150 School Admissions](#); [4200 Curriculum Management](#); [1900 Parent and Family Engagement](#); [4526 Acceptable Use Policy](#); [8630 Computer Resources and Data Management](#); [5300 Code of Conduct](#).

BACKGROUND INFORMATION

The NYS Education Department (NYSED) authorized a "snow day pilot" program during the Covid-19 pandemic 2020-2021 and 2021-2022 school years. This program allowed school districts to deliver instruction remotely on days in which they would otherwise have closed due to an emergency.

To give districts greater predictability, in September 2022, the NYSED Board of Regents amended section 175.5(e) of the Commissioner's regulations to codify this flexibility. Districts that would otherwise close due to an emergency may, **but are not required to**, remain in session and provide instruction through remote learning and count these instructional days towards the annual hours requirement for State Aid purposes. Instruction must be provided to all students and be consistent with the definition of remote instruction, as explained below. In addition, beginning with the 2023-2024 school year, such instruction must be consistent with the school district's Emergency Remote Instruction Plan.

NYSED also amended section 155.17 of the Commissioner's regulations to require public schools, BOCES, and county vocational education and extension boards amend their District-wide School Safety Plans to include plans for remote instruction beginning with the 2023-2024 school year. This gives the public an opportunity to provide feedback on such plans for remote instruction prior to their adoption. The Emergency Remote Instruction Plan must include the methods that the school district will ensure the availability of: devices; internet access; provision of special education and related services for students with disabilities; the expectations for time spent in different remote modalities.

Such plans also require that each chief executive officer of each educational agency located within a public school district report information on student access to computing devices and access to the internet each year.

NYSED additions to section 100.1 of the Commissioner's regulations define the term "remote instruction." This definition identifies various ways in which remote instruction may be delivered, but which must include, in all situations, regular and substantive teacher-student interaction with an appropriately certified teacher.

The NYS Board Regents adopted the amendments noted above that became effective as a permanent rule on September 28, 2022.

Sections 200.7, 200.16, and 200.20 of the Regulations of the Commissioner of Education were amended, and became effective September 13, 2022, and December 12, 2022, as an emergency action for the preservation of the general welfare to permit approved special education providers to provide remote instruction in the 2022-2023 school year on days they would otherwise close due to an emergency and to count such instructional days towards 14 minimum requirements and to identify the ways in which such remote instruction may be delivered. These amendments relate to remote instruction and its delivery under emergency conditions for students in approved private schools for the education of students with disabilities, state-supported schools, state-operated schools, and approved preschool special education programs. These updated regulations now provide the same flexibility for remote instruction under emergency conditions that was given to school districts. The effective date of the final rule was January 25, 2023.

REMOTE INSTRUCTION

The Commissioner's regulations define remote instruction as “instruction provided by an appropriately certified teacher, or in the case of a charter school an otherwise qualified teacher pursuant to Education Law §2854(3)(a-1), who is not in the same in-person physical location as the student(s) receiving the instruction, where there is regular and substantive daily interaction between the student and teacher.” For the purpose of this plan, remote instruction means the instruction occurring when the student and the instructor are in different locations due to the closure of one or more of the district's school buildings due to emergency conditions as determined by the Superintendent of Schools. Emergency conditions include, but are not limited to, extraordinary adverse weather conditions, impairment of heating facilities, insufficient water supply, prolonged disruption of electrical power, shortage of fuel, destruction of a school building, shortage of transportation vehicles, or a communicable disease outbreak, and the school district would otherwise close due to such an emergency.

UNSCHEDULED SCHOOL DELAYS AND EARLY RELEASES

Instructional hours that a school district scheduled but did not execute, either because of a delay to the start of a school day or an early release, due to emergency conditions, may still be considered as instructional hours for State aid purposes for up to two instructional hours per session day, provided the School Superintendent certifies such to NYSED, on the prescribed NYSED form, that an extraordinary condition existed on a previously scheduled session day and that school was in session on that day ([NYSED Part 175.5](#)).

The Emergency Remote Instruction Plan shall identify various ways in which instruction may be delivered, including synchronous and asynchronous instruction. In all situations, remote instruction requires regular and substantive teacher-student interaction with an appropriately certified teacher.

Synchronous instruction engages students in learning in the direct presence (remote or in-person) of a teacher in real time. During remote instruction, students and teachers attend together from different locations using technology. Asynchronous instruction is self-directed learning that students engage in learning without the direct presence (remote or in-person) of a teacher. Students access class materials during different hours and from different locations. During an emergency closing, synchronous instruction is the preferred method of instruction, whereas asynchronous instruction is considered supplementary instruction.

ENSURING ACCESSIBILITY AND AVAILABILITY (INTERNET, COMPUTERS/DEVICES)

The Troy City School District shall survey families to find out who has a reliable high-speed internet connection. A survey conducted in 2020 identified families who live in the district that do not have access, therefore remote learning is a challenge, if not impossible, for these students. Since 2020, every student who enrolls in the district provides information on internet access and computer accessibility. All survey information is stored and available in the eSchool and Parent Portal. When students do not have internet access, the district works with the families to

develop a plan to provide instructional materials for them as well as a process for recording attendance and grading. The district works with the community to provide locations where internet access could be used if they are able to use these locations.

Commissioner's regulation 115.17(f) outlines the annual data collection that districts must submit to SED every year by June 30. It requires the school district to survey families regarding internet and device access at the student's place(s) of residence. The chief executive officer (School Superintendent) shall survey students and parents and persons in parental relation to such students to obtain information on student access to computing devices and access to internet connectivity.

District policy 8131 Pandemic Planning and procedures are followed to ensure computing devices are made available to students or other means by which students will participate in synchronous instruction.

TROY CITY SCHOOL DISTRICT EMERGENCY CLOSURE REMOTE LEARNING PLAN

POLICIES	The plan adheres to guidance set forth in the following Board of Education policies: 5000 Student Policy ; 5100 Attendance ; 5150 School Admissions ; 4200 Curriculum Management ; 1900 Parent and Family Engagement ; 4526 Acceptable Use Policy ; 8630 Computer Resources and Data Management ; 5300 Code of Conduct .
INTERNET AND DIGITAL DEVICE ACCESS	<p>The school district provides all students in grades K-12 access to a personal computing device chromebook. In the event of an emergency, closing provisions will be made to the greatest extent possible to ensure that all students have their device at home for instruction.</p> <p>The school district participates fully in the SED Digital Access Survey along with locally developed surveys to assess how many students have internet access at home. The district provides hotspots to any families that indicate a need for reliable internet to facilitate access to learning at home.</p> <p>All faculty should have an alternative general activity for students in the instance that widespread power outages or other disruptions to connectivity occur preventing synchronous connection. If students lose connectivity, then the expectation is they will complete the alternate assignment provided.</p>
PEDAGOGY	<p>All teachers in elementary will use only Seesaw, Google Classroom, and Google Meet. Secondary teachers will use Google Classroom and Google Meet as their primary instructional platform.</p> <p>Several district provided instructional technology software programs are available to support instruction along with a wide array of other resources curated by faculty. Teachers will utilize these programs to differentiate instruction, accessing a variety of delivery methods that best suit their course, grade level, and teaching style. The instructional approach may include a combination of:</p> <p>Synchronous “Live” Instruction - Using Google Meet along with other digital platforms, teachers will deliver real time instruction to a full group or subset of students. Teachers may incorporate asynchronous or project based opportunities within this model.</p> <p><i>Teachers will make personal connections with all students during scheduled class times via Google Meet. These connections will allow teachers to take attendance,</i></p>

	<p><i>introduce new content or skills and will allow students to connect with their teachers and peers in order to be guided through lessons, ask questions, and maintain personal relationships. The duration of these synchronous connections depends on the grade level and daily instructional plan but should be the primary mode of instruction and substantial enough to guide learning.</i></p> <p><u>Asynchronous Instruction</u> - Using a variety of digital platforms, teachers will deliver captured or recorded lessons with associated expectations for students participation and assignment completion such as flipped classroom learning experiences. These activities may include teacher/student synchronous interactions for a portion of the lesson.</p>
STUDENT EXPECTATIONS	<p>All students will receive information on how to access course material and instruction from their teachers. Students are expected to follow all directions and requests to participate in instruction to the fullest extent possible. During synchronous instruction students are expected to be school ready. This includes being on time for class, engaging fully through video and audio as directed by their teacher, and presenting themselves in a manner that is in accordance with school expectations.</p> <ul style="list-style-type: none"> • All students are expected to practice appropriate digital etiquette and responsible behavior during assigned Google Meets: <ul style="list-style-type: none"> ◦ Mute yourself on meets as directed by your teacher ◦ Cameras are to be kept on during classroom meets unless directed specifically by your teacher to do otherwise. • Students are expected to work in an appropriate setting when participating remotely / on-line. Work places include a desk, table, kitchen counter, etc... Other locations are not appropriate or acceptable. • Student dress must be appropriate in all platforms - the Student Dress Code section of the Student Handbook / Code of Conduct applies to students in all platforms. <p>If there are any circumstances preventing full and appropriate participation the student should let the teacher know. As this is a required attendance day, students must fulfill expectations for satisfactory participation as determined by their teacher.</p>
DAILY SCHEDULE	<p>The virtual day will follow the same schedule framework as the HS, MS and Elementary School to which the student is assigned. As with all school schedules, appropriate breaks will be included in the daily schedule for students and faculty, including time for lunch. Students will attend all assigned classes at their scheduled time. The method of instructional delivery will vary to facilitate appropriate screen time per age level within these parameters. See below for sample elementary and secondary schedules:</p>

Time	Elementary Sample Schedule at Grade 2 (To Include Synchronous and Asynchronous Learning)
8:30-8:45	Morning Meeting Synchronous, Daily
8:45-9:00	Read Aloud
9:00-10:00	Reading Block
10:00-11:00	Math Block
11:00-12:00	Lunch/Recess
12:00-12:45	Writing Block
12:45-1:25	Science or Social Studies
1:25-1:40	Intervention
1:40-2:10	Special (Rotates based on the day)
2:10-2:30	Access Period - Social Emotional Supports/Enrichment/Intervention

Time	Secondary Sample Schedule (Grade 10) (To Include Synchronous and Asynchronous Learning)
8:30-9:11	Health
9:15-10:01	Geometry
10:05-10:46	Study Hall (Free Period)*
10:50-11:31	Global History
11:35-12:16	Lunch (On Your Own)
12:20-1:01	Spanish
1:05-1:46	Living Environment
1:50-2:31	PE/Science Lab
2:35-3:15	English 10
*Supports will be delivered during study hall time or as push in services.	

**COMMUNICATION
PROTOCOL:
INTERVENTION**

Teachers will follow the same communication protocols that are established in school for addressing areas of academic or behavioral need. This includes a combination of email, phone calls, and academic/behavioral referrals to the administration. All effective strategies should be accessed to maintain effective communication.

SPECIAL SERVICES

School districts are required to implement supports, services and accommodations, as indicated in students' IEPs or 504 Accommodation Plans, to the best of their ability, when providing virtual instruction.. NYSED recognizes that there may be limitations to implementing certain services or accommodations through remote instruction and as a result, encourages districts to apply a "lens of reasonableness" to their approach. FAPE may be provided consistent with the need to protect the health and safety of students with disabilities and those providing services to them.

Special education teachers who provide direct/indirect consultant services will initiate outreach to their students' general education teacher(s) to collaborate on

	<p>instructional modalities and any necessary accommodations or modifications required of assignments or assessments for the day.</p> <p>Special education teachers who teach resource room, self-contained special classes either content specific or specialized programs, should follow the same guidance and expectations as classroom teachers in regards to pedagogy, content, class meetings, and flexibility.</p> <p>Teaching assistants are available for instructional support by way of participating in class meetings, keeping up on classroom assignments and expectations, and serving as additional academic support.</p> <p>Related service providers are to provide “tele-therapy” services via Google Meets, to the best of their ability. Related service providers are expected to adhere to similar guidelines as other professionals in regard to student and teacher work at home, communication, and flexibility and they will use the students’ IEPs to determine an appropriate/reasonable level of communication and support.</p> <p>Documentation Requirements: Special education personnel are expected to document all supports and services provided to students during this time through the use of the district e-Learning Log. Document the manner, means, duration of time, follow up efforts, etc. IEP progress monitoring is required to be collected and reported to parents following the schedule listed on students’ IEPs. Medicaid session notes continue to be a requirement for eligible related service providers. Special education teachers/service providers are responsible to hold any virtual professional meetings already scheduled on a day that becomes a virtual instruction day.</p>
<p>NON-INSTRUCTIONAL SERVICES</p> <ul style="list-style-type: none"> ● TRANSPORTATION ● FOOD SERVICE ● MAINTENANCE ● CUSTODIAL ● CLERICAL/ADMINISTRATIVE SUPPORT 	<p>When a school district is in remote session, non-instructional services may still be required to report to work to perform critical services related to their area of expertise. In the event that the change to remote instruction is due to a snow or other weather emergency, such change will likely impact transportation and other critical services. Decisions whether or not non-instructional employees should report to work will be made and communicated in real time by the appropriate supervisor or administrator based on whether services can be provided in a safe and efficient manner.</p>

NYSED Plan Requirements

1. Policies and procedures to ensure computing devices will be made available to students or other means by which students will participate in synchronous instruction;
2. Policies and procedures to ensure students receiving remote instruction under emergency conditions will access internet connectivity;
3. Expectations for school staff as to the proportion of time spent in synchronous and asynchronous instruction of students on days of remote instruction under emergency conditions with an expectation that asynchronous instruction is supplementary to synchronous instruction;
4. A description of how instruction will occur for those students for whom remote instruction by digital technology is not available or appropriate;

5. A description of how special education and related services will be provided to students with disabilities and preschool students with disabilities, as applicable, in accordance with their individualized education programs to ensure the continued provision of a free appropriate public education; and
6. For school districts that receive foundation aid, the estimated number of instructional hours the school district intends to claim for State aid purposes for each day spent in remote instruction due to emergency conditions pursuant to section 175.5 of this Chapter.

INSTRUCTIONAL HOURS FOR STATE AID AND REPORTING REQUIREMENTS

Pursuant to Section 175.5 of Education Law the school district may decide to transition to remote instruction in the event emergency conditions dictate the closure of the PreK through Grade 12 facilities. Under the provisions of New York State Education Law and the District Emergency Remote Instruction Plan any instruction sessions provided during the closure of the school facilities are counted towards annual hour requirements for meeting 180 days required for State financial aid.

Annual Hourly Requirements for the purpose of apportionment of State Aid (for districts receiving foundation aid) are noted below:

- 900 instructional hours for pupils in full-day kindergarten and grades one through six
- 990 instructional hours for pupils in grades seven through twelve

The district estimates the number of instructional hours it intends to claim for State aid purposes for each day spent in remote instruction due to emergency conditions from a minimum of 1 remote instruction day due to emergency conditions, up to the full year's annual hourly requirement. The district remote instructional day is the same number of hours as an in-person instructional day. See sample elementary and secondary schedules below:

TRANSPORTATION

When a school district is in remote session, pupil transportation must be provided to students attending religious and independent schools, charter schools or students whose individualized education program (IEP) have placed them out of district. In the event that the change to remote instruction is due to a snow or other weather emergency, such change will likely impact transportation for students attending school outside of the district. Decisions not to transport need to be based on real-time information relevant to the safety of students, staff and vehicles. School districts and religious and independent schools, charter schools and other programs are encouraged to work together to ensure continuity of education while ensuring that transportation can be provided in a safe and efficient manner.

REPORTING

IMMEDIATELY

Whenever a school building must close to instruction due to the activation of its District-wide School Safety Plan or Building-level Emergency Response Plan, a *Report of School Closure* must be submitted to the Commissioner of Education by the School Superintendent as required under CR 155.17(f) via the NYSED Report of School Closure portal. Even when remote instruction is provided during an emergency closure, a *Report of School Closure* must be submitted. This also applies when instruction can be delivered in an interim location or via another instructional modality.

When it is determined that it is safe to re-open a school building after an emergency closure, the School Superintendent must notify the Commissioner by completing a corresponding *Report of School Re-Opening*, via the

NYSED Report of School Re-Opening portal.

The *Report of School Closure* is intended to provide immediate notification to the Commissioner regarding an emergency closure. The *Report of School Re-Opening* notifies the Commissioner of the re-opening and also collects the actual duration of the closure, the location and modality of instruction, and detailed information that may not have been available at the time of the closure.

Reasons for building closures may include, but are not limited to, natural disasters, power outages, instances of infectious disease, extraordinary adverse weather conditions and threats of violence. It is no longer required to submit a *Report of School Closure* for routine snow days.

ANNUALLY BY JUNE 30TH

The School Superintendent shall notify the NYSED Commissioner the results of the survey on student access to computing devices and access to internet connectivity through the Student Information Repository System (SIRS) every year by June 30th.

END OF THE SCHOOL YEAR

The school district shall report Emergency Remote Instruction through the State Aid Management System at the end of the school year. After the close of the school year starting with the ending of 2023-2024, the School Superintendent reports remote instructional days under emergency conditions through the State Aid Management System, and certifies this at the time NYSED's *Form A* is submitted as part of other required certifications. Using the NYSED prescribed form, the School Superintendent certifies to NYSED:

- That an emergency condition existed on a previously scheduled session day and that the school district was in session and provided remote instruction on that day;
- How many instructional hours were provided on such session day; and
- Beginning with the 2023- 2024 school year, that remote instruction was provided in accordance with the district's Emergency Remote Instruction Plan.

BOARD OF EDUCATION APPROVAL

As part of the District-wide School Safety Plan, the school district's Board of Education shall make the Emergency Remote Instruction Plan available for public comment and public hearing for no less than thirty days (30) prior to adoption. The plan must be adopted as part of the District Wide School Safety Plan annually prior to September 1st and posted on the district website in a conspicuous location.