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### 1000 GENERAL HEALTH AND MEDICAL

#### 5.1010 Philosophy

The School is committed to providing safe, healthy educational environments that enhance learning opportunities for students, instill confidence and trust in parents, and support staff in accomplishing our mission – ensuring the success of all children. To accomplish this, we rely on everyone to immediately report anything that creates dangerous or unsafe conditions at the School to the Principal or Executive Director for remedial action. In addition, students are expected to:

- Respect authority and conform to school rules of conduct;
- Be respectful of one another;
- Respect the rights and property of others, including teachers, students, and the school.



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### 5.1010.1 COVID-19 Modifications Policy (Rescinded August 18, 2022 & September 15, 2022)

**Rescinded: August 18, 2022**  
**Adopted: September 16, 2021**  
**Adopted: December 17, 2020**





### 5.1020 Reporting Incidents and Injuries

All incidents and/or injuries that occur on school property, on school transportation and at school-sponsored events must be immediately reported to the Principal. The Principal will timely notify the Executive Director of significant injuries and/or incidents. The Executive Director will advise the Board of Directors of major injuries and/or incidents on a regular basis.

An Incident Report form must be completed as soon as practicable and submitted to the Principal by the person supervising the student(s) at the time of the incident and/or injury. The Principal must provide copies of reports involving significant injuries and/or incidents to the Executive Director.

A child's parent or guardian should be advised of incidents and/or injuries involving his/her child, and, in cases of significant injuries and/or incidents, the parent or guardian should be contacted immediately. Minor injuries, such as scratches, may be attended to in the classroom or the office. However, teachers should not administer medication to students. If medical treatment is indicated, the emergency squad should be called and the child's health form should be available for the squad members to examine.



### 5.1030 Health Services

When a child is enrolled for the first time in either kindergarten or first grade:

Prior to November 1 of the school year, the child shall be screened for disorders in hearing, vision, speech and communication, for general health or medical problems, and for developmental disorders. This screening, or any of its elements, may be provided directly by the School or by contract with another person or governmental entity. The School may also establish a list of approved providers of screening services and request the parents to utilize one of these providers.

Prior to August 1 of the school year, the parents or guardians of the child must be provided with information about the screening program. If the School has determined that screening is to be obtained by the parents or guardians, it must prepare a list of providers together with information about screening services available in the community to those who cannot afford them. A parent or guardian may reject the requested screenings by signing a written statement to the effect that he/ she does not wish to have his/ her child receive such screening.

If the results of any health screening reveal the possibility of special learning needs, the School is required to conduct further assessment in accordance with laws regarding the education of children with disabilities.

Any child shall be exempted from the following examinations: (a) from a dental inspection if the child has been examined for dental defects by a regularly licensed dentist; (b) from a hearing test if he has been examined by a regularly licensed physician; and/or (c) from a vision test if he has been examined by a regularly licensed physician or optometrist. The parent shall provide evidence that the child was examined with the twelve (12) months immediately preceding the scheduled date of School examinations.

If the School provides hearing and vision screenings directly or by contract, the School shall:

1. Utilize methods and testing devices that are approved by the department of health;
2. Keep an accurate record of such tests and of measures taken to correct such hearing and visual defect on a form prescribed and furnished or approved by the Director of Health;
3. Make statistical data from such records available to official state and local health, education, and human services departments and agencies;
4. Make individual records available to such departments and agencies only where there is evidence that no measures have been taken to correct defects determined by such tests.

*R.C. 3313.50; R.C. 3313.673; R.C. 3313.69; R.C. 3314.03.*

**Adopted: April 18, 2019**



### 5.1040 First Aid

A first aid kit for treating minor injuries is maintained in the school office. The school secretary, or other employee designated by the Principal, is responsible for ensuring the kits adequately and appropriately supplied.

All staff members will complete First Aid training approved by the School upon commencement of employment, instructing them in First Aid procedures approved by the Ohio Department of Public Safety, EMS Division, as set forth in “*Emergency Guidelines for Schools.*” CPR training may be provided to selected school staff.

Standard Precautions (use of personal protective equipment including gloves, aprons, goggles and masks) must be utilized at all time with respect to all blood and body fluids.

The Ohio Department of Health: Dental First Aid Chart will be posted and proper procedures must be followed when a child suffers an injury to the mouth.



### 5.1050 Emergency Medical Procedures

#### Minor Illness or Accident

Examples of a minor illness or accident would be a headache, upset stomach, or minor cut or scratch.

In any case, staff shall notify the Principal if they must leave their work or classroom area to attend to a minor illness or accident.

#### Serious Illness Requiring Medical Attention

If a staff member or Student is seriously ill or injured, and needs medical attention, that employee or Student, or any employee or Student who believes another person is seriously ill or injured, and needs medical attention, shall notify the Principal or a staff member immediately.

If a staff member is unsure about the severity of a person's condition or unable to evaluate the situation, he/she shall call the Principal's Office and:

1. Provide the name of person who is ill or injured.
2. Indicate where the injured or ill person is located in the building.
3. Describe the main symptoms observed.
4. Request medical assistance.
5. Indicate whether it will be necessary to call the Rescue Squad.
6. Stay with the person and do not attempt to move him or her.
7. Be sure there is a person posted to route the Rescue Squad to the ill employee.
8. Be sure the area is clear of unnecessary traffic and on-lookers.

#### Critical Illness

Examples of critical illnesses are:

- Loss of consciousness
- No pulse
- No breathing
- Profuse bleeding
- Seizure
- Severe fall
- Severe chest pain

If you notice a co-worker or a Student with these symptoms, immediately dial "911" and follow the procedures listed under "Serious Illness".



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In cases of serious or critical illness when the office is closed, dial 911 and follow the same procedures. Also, please notify a co-worker or a Student so he or she can direct the Rescue Squad to the proper location. It may be necessary for someone to wait at an entrance for the Rescue Squad if the doors are locked.



### 5.1060 Emergency Medical Authorization

The School will annually distribute to Parents or guardians of all Students the "Emergency Medical Authorization Form." In the event emergency medical treatment for a Student is necessary, the School will adhere to the instructions on the authorization form.

Emergency Medical Authorizations will be kept in a separate, easily accessible file in the care of the Principal during the school year. At the end of the school year, the authorizations will be stored until being replaced the following school year.

Any time a Student or a group of Students are taken away from the School's facilities as participants in a school event, the staff in charge of the event must take the Emergency Medical Authorizations for those Students. This includes, and is not limited to, music trips, athletic trips, field trips, and academic contest participants. This does not include Student spectators at events.

Whenever it is necessary for staff members to use emergency procedures in order to care properly for a Student, they are to take standard safety precautions, follow the procedures described in the Emergency Medical Procedures policy, and are not to abide by any "Do Not Resuscitate" (DNR) agreement that may exist for a Student, unless ordered to do so by a court of law.



### 5.1070 Control of Communicable Disease

The School recognizes that control of the spread of communicable disease is essential to the well-being of the school community and to the efficient operation of the School.

For purposes of this policy, “communicable diseases” shall include: Amebiasis, Campylobacteriosis, Chickenpox, Cholera, Conjunctivitis, Cryptosporidiosis, Cyclosporiasis, Diarrhea (infectious or unknown cause), Diphtheria, Escherichia coli (E. coli) O157:H7 or hemolytic uremic syndrome (HUS), Giardiasis, Hepatitis A, Measles, Meningitis (aseptic, and viral meningoencephalitis, but not including arthropod-borne disease), Meningococcal disease, Mumps, Pediculosis, Pertussis (whooping cough), Plague, Rubella, Salmonellosis, Scabies, Shigellosis, Smallpox, Streptococcal infection, Tuberculosis (TB), Typhoid, Viral hemorrhagic fever (VHF), Yellow fever, Yersiniosis. This list is not exhaustive and may be modified in accordance with State and Federal law.

In order to protect the health and safety of the Students, school personnel, and the community at large, the School shall follow all State and Federal laws and Board of Health regulations which pertain to communicable disease.

On the recommendations of a physician or a nurse, a teacher may exclude from the classroom and the Principal or his/her designee may exclude from the building or isolate in the School, any Student who appears to be ill or has been exposed to the communicable disease.

The School shall:

1. instruct teaching staff members in the detection of disease and measures for its prevention and control;
2. remove from School property to the care of a responsible adult any Student identified and excluded in accordance with this policy;
3. prepare standards for the readmission of a Student who has recovered from communicable disease; and
4. file reports as required by law and the State Department of Health.

The Ohio Department of Health’s Communicable Disease Chart will be posted.

Students will be excluded from school for the following reasons:

- Vomiting/diarrhea in the school or report of repeated/recurrent vomiting at home after dinner the night before. Student needs to be free of vomiting for 24 hours;
- Temperature of 100 or higher in school or at home within the last 24 hours without anti-fever medication;
- Strep infection is suspected, but results of a throat culture have not been received;
- Positive throat culture for strep throat. Student may return after 24 hours of antibiotic treatment if the student’s condition is improved with no fever, fatigue, etc.;
- Symptoms of acute illness such as persistent cough, runny nose with body aches;
- Active infestation of head lice;
- Pus-like drainage from the eyes;



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- Severe headache, severe earache, severe or persistent abdominal pain;
- A rash suspected to be contagious;
- Wheezing/coughing episode in an asthmatic which is not relieved by prescribed medication;
- Injuries that require medical attention;
- Severe emotional concerns.

The following communicable disease reports must be made to the local health department as required by the Ohio Department of Health: chicken pox cases (weekly, individual cases should be reported to the local health department where the Student resides); influenza (when absentee rates are high); and, Class A communicable diseases (immediately).

Whenever a Student, teacher, or other school employee is found to be ill or suffering from tuberculosis in a communicable stage, or another communicable disease, the individual will be excluded from the school and advised to consult with a physician. All staff members must obtain a TB test and receive the results prior to commencing employment. A positive TB test result will require follow-up care.

*O.R.C. §3313.71*





### 5.1070.1 Use of Face Masks/Coverings

The health and safety of students, staff, and volunteers is paramount to the School. For this reason, and in light of the COVID-19 pandemic, and guidance from the Ohio Department of Health (“ODH”), the Ohio Department of Education, and the Center for Disease Control (“CDC”), the School will comply with this policy for the remainder of the 2022-2023 school year.

The School will follow the mandates and requirements set forth by the federal, state, and local governments, the (“CDC”), Ohio Governor, ODH, local county health department, Ohio Department of Education, and other applicable entities (“Directing Entities”) as it relates to the protecting the health of students. If any of these Directing Entities or the School administration in its discretion, requires staff, students, and/or visitors to wear face masks/coverings while attending school, reporting to work at a school, or visiting a school, the School will follow and enforce such directives. If any part of this policy conflicts with applicable mandates, restrictions, or requirements from these Directing Entities, the School will comply with the applicable mandate, restriction, or requirement.

Except as provided herein, all students, faculty, staff, and volunteers, regardless of vaccination status, are recommended to wear face masks/coverings at all times when:

- In any indoor location including, but not limited to, classrooms, gymnasiums, offices, locker rooms, hallways, cafeteria, and/or locker bays;
- In crowded outdoor settings or during activities on school property that involve sustained close contact with others who are not members of their household;
- Waiting for a school bus outdoors and unable to maintain a distance of six feet or more from individuals who are not members of their household; or
- Riding a school bus.

Should there be a significant increase in COVID-19 cases within the school community, which shall be determined by the School administration, the School administration shall have the authority to require face masks/coverings at all times in the foregoing situations and in accordance with this policy.

To the extent that the School provides transportation services for its students, students shall be required to wear face masks/coverings while being transported on school buses. If a student receives transportation services through a school district transportation provider that requires face masks/coverings, the School will follow and enforce such directives, to the extent permitted by law and state and federal guidance.

Visitors over the age of two (2) will also be recommended to wear a face mask/covering while in any indoor location on the school’s property, and while outdoors on school property and unable to consistently maintain a distance of six feet or more from individuals who are not members of their household.

In implementing this policy, consideration should be given for the age and developmental level of the child and the physical situation the child is in at that moment. Face masks/coverings are most essential in times when physical distancing is difficult.



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At minimum, face masks/coverings must:

- Cover an individual's mouth, nose, and chin.
- Bandanas are not permitted.

In addition, it is strongly recommended that face masks/coverings:

- Fit snugly against the side of the face so there are no gaps;
- Not create difficulty breathing while worn; and
- Be held secure through either a tie, elastic, etc. to prevent slipping.

Face masks/coverings shall not include masks designed to be worn for costume purposes, and all face masks/coverings shall meet the requirements of the appropriate dress code policies and code of conduct.

Exemptions. The requirement to wear a face mask/covering does not apply when:

- The individual has a medical condition including respiratory conditions that restricts breathing, mental health conditions, or a disability that contraindicates the wearing of a face mask/covering;
- The individual is communicating or seeking to communicate with someone who is hearing impaired or has another disability, where an accommodation is appropriate or necessary;
- The individual is actively participating in outdoor play, recess and/or physical education activity unless in crowded outdoor settings or during activities that involves sustained close contact with others;
- The individual is actively participating in outdoor athletic practice, scrimmage, or competition, or indoor sports in which the mask may become a hazard;
- The individual is seated and actively consuming food or beverage;
- Where students and staff can maintain distancing of at least six feet and removal of the face mask/covering is necessary for instructional purposes, including instruction in foreign language, English language for non-native speakers, and other subjects where wearing a face mask/covering would prohibit participation in normal classroom activities, such as playing an instrument;
- Students are able to maintain a distance of six feet or more and a mask break is deemed necessary by the educator supervising the educational setting;
- The individual is alone in an enclosed space, such as an office;
- When an established sincerely held religious requirement exists that does not permit a face mask/covering; or
- When wearing a mask would create a risk to workplace health, safety, or job duty, as determined by relevant workplace safety guidelines or federal regulations.

If face masks/coverings are required:

The School Principal or his/her designee shall have the authority to determine if and when masks may be temporarily removed pursuant to an exemption in consultation with local health authorities and state and federal guidance.

Face shields that wrap around the face and extend below the chin can be considered as an alternative, in the sole discretion of the School, where an exemption applies.



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Exemptions will be considered on a case-by-case basis. If any of the above exemptions are applicable, a request for such exemption must be submitted in writing to the Human Resource Director and the School Nurse Program Coordinator, or in the case of a student, to the School Principal and his/her designee, the School Nurse Program Coordinator and a decision on the request will be provided in writing by the School. An individual may, on a case-by-case basis, be required to wear a face shield or other face mask/covering as appropriate for an accommodation of this face mask/covering requirement. The School may also discuss other possible accommodations for the student or staff member. Such discussion shall follow applicable law and School policies and procedures for requests for accommodation, including but not limited to Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act.

Any school nurse or staff member who cares for individuals with COVID-19 symptoms must use appropriate personal protective equipment (“PPE”), provided by the School, in accordance with Occupational Safety and Health Administration (“OSHA”) or Public Employment Risk Reduction Program (“PERRP”) standards\*\*\*.

If face masks/coverings are required, and no exemption has been applied, students and/or staff who violate this policy shall be subject to disciplinary action in accordance with the applicable Student Code of Conduct/Student Discipline Code, staff handbook, and in accordance with policies of the School.

\*\*\*Note regarding this policy: the Board shall comply with PERRP and OSHA requirements for all Board employees. However, School staff members employed by a management company are subject only to OSHA requirements and are not subject to PERRP requirements provided above.

**Adopted: August 18, 2022 & September 15, 2022**

**Adopted: November 18, 2021**

**Adopted: August 19, 2021**

**Adopted: September 17, 2020**

**Adopted: August 20, 2020**



### 5.1080 Control of Non-Casual Contact Communicable Diseases

The Board seeks to provide a safe educational environment for both Students and staff. This can best be accomplished by assuring all persons in the school community understand the method of transmission and prevention of diseases that are not contracted through air-borne pathogens, but rather, through direct contact with body fluids and excretions, especially blood, vomit, feces, or urine. The Board is also committed to assuring the confidential status of individuals who may have been diagnosed with a blood-borne communicable disease.

For purposes of this policy, these diseases shall include:

1. HIV (human immunodeficiency virus);
2. AIDS (acquired immune deficiency syndrome);
3. AIDS related complex (condition)
4. HAV, HBV, HCV (Hepatitis A, B, C);
5. other diseases that may be specified by the State Board of Health as contact communicable diseases.

The Board recognizes that Students who have contracted these diseases may not exhibit symptoms for many years after exposure and may, in fact, not be aware that they have contracted the disease. They are, however, able to transmit the disease to other individuals.

The Board directs the Executive Director, or his/her designee, to assure that Students who reveal the fact they have contracted one of these diseases will have their status safeguarded in accordance with State and Federal law dealing with confidentiality and that their civil rights will be respected. Should a Student be unable to attend school as a result of illness, an alternative education program shall be provided in accordance with the Board's policy, Ohio law and administrative guidelines.



### 5.1081 Serious and Communicable Disease Policy

It is the policy of the School that employees with infectious, long-term, life-threatening, or other serious diseases or illnesses may work as long as they are able to perform the duties of their job without undue risk to their own health or that of Students, other employees, or members of the public.

An employee who is diagnosed as having an infectious, long-term, life-threatening, or other serious disease or illness is encouraged to notify the Principal or his/her designee of the condition as soon as possible and should provide the Executive Director or his/her designee with any pertinent medical information needed to make decisions regarding job assignments, ability to continue working, or ability to return to work. The School may require a doctor's certification of an employee's ability to perform job duties. In addition, the School may request that an employee undergo a medical examination by a physician or other health care provider determined by the School.

An employee may be subject to an isolation requirement if he or she is infected with one of the diseases or conditions specified by the Ohio Health Department. Employees diagnosed with one of the following diseases must immediately report the diagnosis to the Principal or his/her designee: Amebiasis, Campylobacteriosis, Chickenpox, Cholera, Conjunctivitis, Cryptosporidiosis, Cyclosporiasis, Diarrhea (infectious or unknown cause), Diphtheria, Escherichia coli (E. coli) O157:H7 or hemolytic uremic syndrome (HUS), Giardiasis, Hepatitis A, Measles, Meningitis (aseptic, and viral meningoencephalitis, but not including arthropod-borne disease), Meningococcal disease, Mumps, Pediculosis, Pertussis (whooping cough), Plague, Rubella, Salmonellosis, Scabies, Shigellosis, Smallpox, Streptococcal infection, Tuberculosis (TB), Typhoid, Viral hemorrhagic fever (VHF), Yellow fever, Yersiniosis. This list is not exhaustive and may be modified in accordance with State and Federal law.

The School will attempt to maintain the confidentiality of the diagnosis and medical records of employees with serious diseases and illnesses, unless otherwise required by law. Information relating to an employee's serious disease or illness will be treated as confidential and ordinarily will not be disclosed to other employees.

The School will comply with applicable occupations safety regulations concerning employees exposed to blood or other potentially infectious materials. Universal precautions, work practice controls, and personal protective equipment will be used where appropriate to limit the spread of diseases in the workplace. Compliance with the Infectious Diseases Policy of the School is mandatory and failure to abide by the policy may subject the employee to discipline, up to and including discharge.

Employees concerned about being infected with a serious disease or illness by a Student, co-worker, or other person should convey this concern to the Principal or his/her designee. Employees who refuse to work with or perform services for a person known or suspected to have a serious disease or illness, without first discussing their concern with the Principal or his/her designee, will be subject to discipline. In addition, where there is little or no evidence of risk of infection to the concerned employee as determined by the Principal or his/her designee, the employee's continued refusal to work may be found unreasonable and could result in discipline, up to and including termination.

The School has discretion to subject an employee to an examination by a physician or other health provider determined by the School in order to protect the health of all Students, school employee and the public. The School may place an employee on a communicable disease involuntary leave of absence when the employee has contracted a communicable disease that puts others in imminent danger of death.



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or serious illness or injury in the workplace or if an examination finds that the employee has contracted a communicable disease.

The School may require any employee who was placed on a communicable disease involuntary leave of absence to obtain and present certification from a physician or other health care provider as determined by the School that the employee is able to resume work without risking the health of others.

These provisions do not limit an eligible employee's ability to utilize accrued paid time off (if any) or unpaid leave under the Family and Medical Leave Act, if applicable, during a communicable disease involuntary leave of absence.

*R.C. 3313.71 and O.A.C. 3701-3-13*



### 5.1090 Infectious Disease Policy

Viral infections may be present in human blood or other bodily fluids. Therefore, the following routine procedures should be used when providing care that will expose the care giver to human blood, bodily fluids and excrement. These procedures are necessary to safeguard against caretaker infection and the spread of infection within the classroom environment.

1. The caretaker should observe good hand washing after any exposure to blood, bodily fluids and/or before caring for another child.
2. Disposable gloves must be worn to protect against possible open lesions on the caretaker's hands.
3. Any open lesion on the child's body must be covered.
4. Any pregnant caretaker should wear a surgical mask when providing care involving exposure to a child's excrement.
5. Surfaces soiled with blood, urine, feces, vomits, etc., must be thoroughly washed with soap and water and then be disinfected with the disinfectant agent provided (MATAR or its equivalent). Use per manufacturer's recommendation.
6. Personnel cleaning the spill must wear disposable gloves and wash hands thoroughly after removal of contaminated gloves.
7. Mops and towels must be thoroughly rinsed in the disinfecting agent and properly stored if they are to be reused. If further use will not occur, they must be properly double bagged and disposed with other waste materials.



### 5.1100 HIV Policy

The School will not discriminate against any person based on infection with HIV and will endeavor to educate all members of the school community about the nature of HIV infection; how it is spread; and, how to prevent infection. Annually, staff will be educated about Bloodborne Pathogens.

Where the Principal is informed by a staff member of his/her HIV+ status, or by parents of a student's HIV+ status, the Principal will obtain a signed authorization from such person (or parent in the case of a minor child) which specifically authorizes release of information concerning or relating to the condition to potentially impacted individuals. The authorization for release shall be in a form required by Ohio law (if any), and adhere to all local, State and Federal laws concerning confidentiality. The Principal shall consult with all authorized, potentially impacted individuals to develop an appropriate, safe and supportive plan of action, which will be periodically reviewed.





### 5.1110 Control of AIDS

Recognizing the ongoing research on AIDS and such diseases as Hepatitis B, the Board maintains an ongoing commitment to educating staff, while continually reviewing policies to ensure that they reflect the most current research. This policy must be used when dealing with infectious diseases of Students which are passed through direct contact of body fluids.

#### Educational Commitment

The Board recognizes that the most effective way to handle the issue of venereal diseases such as AIDS and other infectious diseases is through the educational process. The first line of defense is prevention. Therefore, all teachers may include material appropriate to the age and grade of the children with whom they are working, regarding the transmission of AIDS and other diseases such as Hepatitis B. If the Parent or guardian of a Student provides a written request to be excused from taking venereal disease instruction, then the student shall not receive the instruction.

#### Recommendations

1. Decisions regarding the type of educational setting for (HTLV-III/LAV) infected children should be based on the behavior, neurological development and physical condition of the Student and the expected type of interaction with others in that setting. These decisions are best made using the team approach including the Student's physician, the Student's Parents and personnel associated with the proposed educational setting. In each case, risks and benefits to both the infected Student and to others in the setting should be weighed.
2. For most infected school-aged children, the benefits of an unrestricted setting would outweigh the risks of their acquiring potentially harmful infections in the setting and the apparent nonexistent risk of transmission of HTLV-III/LAV. These Students should be allowed to attend school.
3. For some Students infected with HTLV-III/LAV who lack control of their body secretions, or who display behavior such as biting, or who have uncoverable, oozing lesions, a more restricted environment may be advisable until more is known about transmission in these settings. Such Students should be cared for and educated in settings which minimize exposure of other Students to blood or body fluids.
4. The School should follow the routine procedures listed below when providing care involving exposure to a Student's body fluids and excrement:
  - a. The caretaker should observe good hand washing after exposure to blood and body fluids and before caring for another Student.
  - b. Gloves shall be worn on the caretaker's hands.
  - c. Any open lesions on the Student's person should be covered.
  - d. Any pregnant caretaker should wear a surgical mask and gloves when providing care involving exposure to a Student's excrement.



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- e. Use any other precautionary measures required or recommended by the County Health Department or other medical authorities.
- E. The School should follow the routine procedures listed below in dealing with spills involving blood or other body fluids.
  - 1. Surfaces soiled with blood, urine, feces, vomits, etc. should be thoroughly washed with soap and water, then disinfected with a 10% solution of household bleach and water (1-part bleach to 9 parts water). This solution should be freshly prepared for each use.
  - 2. Personnel cleaning the spill shall wear gloves and wash hands thoroughly when finished.
  - 3. Disposable towels should be used whenever possible.
  - 4. Mops should be thoroughly rinsed in the disinfectant solution.
- F. Evaluation to assess the need for a restricted environment should be performed regularly based on current medical information.
- G. Mandatory screening as a condition for school entry is not warranted based on available data.
- H. Persons involved in the care and education of HTLV-III/LAV infected children should respect the Student's right to privacy, including maintaining confidential records. The number of personnel who are aware of the Student's condition should be kept to the absolute minimum needed to assure proper care of the Student and to detect situations where the potential for transmission may occur, (e.g. bleeding injury).



### 5.1120 Control of Blood-Borne Pathogens

The School seeks to protect those staff members who may be exposed to blood-borne pathogens and other potentially-infectious materials in their performance of assigned duties at the School.

If the School identifies a category of employee whose duties create a reasonable anticipation of exposure to blood and other infectious materials, then it shall:

1. provide for inoculation of the Hepatitis B vaccine at no cost to the staff member and in accordance with Federally-mandated scheduling;
2. ensure proper training in the universal precautions against exposure and/or contamination including the provision of appropriate protective supplies and equipment;
3. establish appropriate procedures for the reporting, evaluation, and follow-up to any and all incidents of exposure;
4. provide for record-keeping of all of the above which complies with both Federal and State laws; and
5. develop an exposure control plan.



### 5.1130 Hand Washing Procedures

Hands must be washed routinely:

- A. Before reporting to work;
- B. Before and after student contact;
- C. Before leaving the work area;
- D. After handling equipment and cleanup;
- E. Before eating, applying cosmetics or inserting contact lens; and
- F. After using toilet facilities.

The Procedure to be followed is:

- A. Wet hands and wrists liberally with hot water;
- B. Apply small amounts of liquid soap;
- C. Wash hands and wrists for a minimum of 30 seconds, using friction one hand upon the other;
- D. Rinse well under running water, allowing water to flow from wrist to fingertips;
- E. Dry hands thoroughly using at least 2 paper towels; and
- F. Turn off faucets with the paper towels used for drying hands and discard used towels.

*Students' hands should be washed routinely. Handwashing is the preferred method to disinfect and cleanse one's hands. For those teachers who choose to use hand sanitizer the following procedure should be followed.*

- A. Hand sanitizer should be kept in an area on or near the teacher's desk for proper supervision.*
- B. Students must ask permission prior to using hand sanitizer.*
- C. Staff will consult the instructions on the label of the hand sanitizer regarding proper use.*
- D. At the end of the school day the hand sanitizer should be put away and not accessible.*

\*In absence of water, provided hand disinfectant may be substituted.



### 5.1140 Head Lice Infestation Procedure

#### Screening

- a. It is not necessary to screen the entire school or classroom.
- b. Lice examination will be performed on individual students suspected of having head lice due to signs of infestation or a report of close contact with an infested person.
- c. Trained school personnel (and the school nurse when at the school) will screen close contacts, including siblings, of all infested children.

#### Identification

- a. A single louse or nit close to the scalp is enough to indicate infestation and warrant treatment.
- b. Identification of an active case of head lice is made when a student has one or more live lice and/or multiple nits  $\frac{1}{4}$  inch or less from the scalp.

#### Exclusion

- a. Exclusion can wait until the end of the school day. Students will be excluded from returning to school until properly treated.
- b. Parents/Guardians will be notified either in person or via telephone.
- c. Care must be taken to protect the confidentiality of infested students. Names of infested students will be shared only with school personnel who need to know.
- d. Parents/Guardians will be given a letter with written instructions regarding treatment options, prevention methods, and requirements for readmission to school. (See School Health Manual) A copy of the letter should also be placed in the nurse mailbox with the date sent and the student/classroom involved.

#### Treatment and follow-up of infested students and their close contacts is key to control.

- a. Parents are expected to treat the child's hair with an appropriate pediculicide on the date that the child's infestation has been identified.

The American Academy of Pediatrics recommends the use of a pediculicide like NIX<sup>®</sup> or RID<sup>®</sup> (ask your pharmacist for assistance).

- i. Package directions must be followed carefully.
- ii. Nits must be removed from the child's hair.



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- iii. Nit removal by family members is to continue daily until all nits are removed.
- b. For those who prefer a non-chemical treatment, the National Pediculosis Association recommends the manual removal of lice and their nits using the LiceMeister<sup>®</sup> Comb.
  - i. See the website: <http://www.headlice.org/> for more information about this procedure.
  - ii. All nits must be removed before the child will be allowed to re-enter the classroom
- c. No matter which method is chosen, the following tasks must also be accomplished on the day the child is treated. Treatment of the hair will not prevent re-infestation if the environment has not been treated:
  - Wash clothing and bed linens in hot water. Include coats and hats.
  - Wash combs, brushes and all hair accessories in soap and hot water.
  - Vacuum furniture, carpeting and the interior of the car, then replace the bag on the vacuum cleaner.
  - Place stuffed animals, pillows, etc. that are not able to be washed in a plastic bag.
  - Check all family members and treat if you find lice or nits.
  - Contact friends, family and neighbors with whom your child has had contact within the last month. This way they will be able to check their families and treat them if they are infested. This will help stop the spread of this pest.

Students are to be examined upon readmission by trained school personnel (and the school nurse when at the school).

- a. Parents are required to bring the child to school after treatment for inspection before re-entering the classroom.
- b. If a pediculicide has been used,
  - i. There must be an obvious reduction in the number of nits over time with no nits within ¼” of the scalp.
  - ii. The child will be excluded from school if there are any live lice found and/or there are nits within ¼” of the scalp.
- c. If a pediculicide has not been used, the child must be “NIT-FREE” before being allowed to re-enter the classroom.
- d. The school nurse is to be notified. The nurse will re-examine students with a history of infestation in not less than two weeks or ten working days. The re-examination is to continue as above until no evidence of re-infestation is found in two successive examinations.
- e. The parents/guardians are to be instructed that lice treatment is to be repeated in 7-10 days according to manufacturer’s recommendations, and no more than three times per month.



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- f. Parents are to continue to examine their child's head daily for three weeks until clear and then weekly.

### Reportable Disease

- a. Pediculosis Capitis is a Class C reportable disease.
- b. When an epidemic of head lice is suspected, it must be reported to the local health department.
- c. Parents/Guardians of the other students in the class of an infested student may be informed in writing regarding the recognition, prevention, and treatment of this condition when more than three cases are reported within a single classroom

### Documentation

- a. Incidents of head lice infestation will be filed in the nurse's communicable disease file for the school year.



### 5.1150 Health Examinations and Immunizations

Students enrolled in the School are required to have, at the time of initial entry into School and at the beginning of each School year thereafter, written evidence on file that they have been immunized against diphtheria, tetanus, pertussis, poliomyelitis, measles (rubeola), mumps, chicken pox, rubella, hepatitis B, and meningococcal disease, as required by Ohio law and applicable Ohio Department of Health regulations and guidelines (collectively “Laws”). Adequate written evidence of such required immunizations shall consist of a statement indicating that the Student has received the required immunizations, including the immunizations received and the date of receipt, signed by a licensed physician, an official from another school, a public health department, or the Parent. In the case of a Parent’s statement, the Principal, in his/her sole discretion, may require any other evidence as s/he believes is needed to determine compliance with this policy including, but not limited to, a physician’s statement.

#### B. Record and Reporting

The School shall keep an immunization record for each student, available in writing to the student’s parent or guardian. No later than October 15 of each year, the School shall report a summary of the immunization records of all initial entry students to the director of health using the prescribed online reporting form, which may be accessed on the following website: <https://www.odh.ohio.gov/odhprograms/bid/immunization/schdayca.aspx>.

#### C. Exclusion and Readmission

In the event that a student has not received the required immunizations OR the student is not “in the process of being immunized”, and the Student’s Parent has failed to submit adequate written evidence of the required immunizations as set forth in this policy, the Student shall be:

- Excluded from School until such time as the Student’s Parent submits adequate written evidence that the Student has received the required immunizations or is “in the process of being immunized”, or that the Student is exempted from immunization requirements in accordance with this policy.
- ✓ Permitted to remain in School for no more than fourteen days after initial enrollment in the School or, for a student previously enrolled in the School, no more than fourteen (14) days after the beginning of the school year.

Students who do not comply with this policy and any other immunization requirements of Laws shall be excluded from School no later than the fifteenth (15<sup>th</sup>) day after admission or, for students not being initially admitted, no later than the fifteenth day (15<sup>th</sup>) after the beginning of the school year.

Any Student who is admitted or commences a school year who is “in the process of being immunized”, and who does not complete the required immunizations, shall be excluded from School no later than the fifteenth (15<sup>th</sup>) day of the following school year.

“In the process of being immunized” means the student has been immunized against mumps, rubeola, rubella, and chicken pox, and if the student has not been immunized against polio, diphtheria, pertussis, tetanus, hepatitis B, and meningococcal disease, the student has received at least the first dose of the immunization sequence, and presents written evidence to the Principal of each subsequent dose required to obtain immunization at the intervals prescribed by the Director of Health.





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Any Student who is excluded for failure to comply with this policy shall be readmitted upon submission to the Principal of adequate written evidence, as set forth above, of compliance with this policy and the Laws.

#### D. Exemptions

Students may be exempted from required immunizations, subject to any requirements of Laws under the following circumstances:

1. A Parent may present a written statement to the Principal of objection to immunization for reasons of conscience, including religious convictions.
2. A Parent may present a written statement signed by a physician certifying that certain or all required immunizations are medically contraindicated.
3. A Parent may present a written statement from the Parent or physician that the student has a history of measles (rubeola), mumps, and/or chicken pox and need not be immunized against the disease(s) for which the history so exists.
4. Pursuant to Ohio Department of Health regulations and guidelines, a parent may present laboratory testing results signed by a physician demonstrating that detectable rubella antibody is present in the Student and the Student need not be immunized against German measles (rubella).
5. Any other circumstances required by the Laws.

The Principal may require any other evidence she/he believes is needed to consider a request for exemption and, in his/her sole discretion, may determine whether to grant an exemption under the Laws to required immunizations.

The School may deny admission to a Student otherwise exempted from the chicken pox immunization requirement, if the Director of the State Department of Health notifies the Principal that a chicken pox epidemic exists in the School's population. The denial of admission shall cease when the ODH notifies the Principal that the epidemic no longer exists. The academic standing of a Student who is denied admission during a chicken pox epidemic may be preserved in accordance with the admission, testing and other policies of the School and subject to Principal and Board approval.

#### E. Tuberculosis Testing

The Board and School shall follow the requirements and recommendations of Ohio law and the Ohio Department of Health, if any, with regard to tuberculosis testing of students.

*R.C. 3313.67; 3313.671*

**Adopted: April 18, 2019**



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.1160 Immunization Records

Prior to being enrolled in the School, a child’s parent or guardian must provide a complete medical report, including immunization records, signed by the child’s physician, including: evidence that the child has been immunized against mumps, poliomyelitis, diphtheria, pertussis, tetanus, rubeola, rubella and varicella. The School will maintain a copy of each student’s immunization record and shall make these records available to the child’s parent upon request. A copy of the school’s summary immunization report shall be provided to the Ohio Department of Health no later than October 15<sup>th</sup> of each year on the forms prescribed by the director of health. Students must be excluded from school on the 14<sup>th</sup> day of school if the immunization record is not on file at the school and is not in compliance with the state requirements.

The following Table represents the State-mandated immunization requirements for 2023-2024

### Immunization Summary for School Attendance - Ohio

VACCINES	<p style="text-align: center;"><i>FALL 2022</i>  <b>IMMUNIZATIONS  FOR SCHOOL ATTENDANCE</b></p>
<p style="text-align: center;"><b>DTaP/DT (Pediatric or Tdap/Td (Adult)</b></p> <p>Diphtheria, Tetanus, Pertussis</p>	<p><b><u>Kindergarten</u></b>  Four (4) or more doses of DTaP or DT, or any combination. If all four doses were given before the 4<sup>th</sup> birthday, a fifth (5) dose is required. If the fourth dose was administered at least six months after the third dose, and on or after the 4<sup>th</sup> birthday, a fifth (5) dose is not required. *</p> <p><b><u>Grades 1-12</u></b>  Four (4) or more doses of DTaP or DT, or any combination. Three doses of Td or a combination of Td and Tdap is the minimum acceptable for children age seven (7) and up.</p> <p><b><u>Grades 7-12</u></b>  One (1) dose of Tdap vaccine must be administered prior to entry. **</p>
<p style="text-align: center;"><b>POLIO</b></p>	<p><b><u>Kindergarten – 10<sup>th</sup> Grade</u></b>  Three (3) or more doses of IPV. The FINAL dose must be administered on or after the 4<sup>th</sup> birthday regardless of the number of previous doses. If a combination of OPV and IPV was received, four (4) doses of either vaccine are required. ***</p> <p><b><u>Grades 11-12</u></b>  Three (3) or more doses of IPV or OPV. If the third dose of either series was received prior to the fourth birthday, a fourth (4) dose is required; If a combination of OPV and IPV was received, four (4) doses of either vaccine are required.</p>
<p style="text-align: center;"><b>MMR</b></p> <p>Measles, Mumps, Rubella</p>	<p><b><u>Grades K-12</u></b>  Two (2) doses of MMR. The first must have been received on or after the child’s first birthday. The second dose must be administered at least 28 days after dose one (1).</p>
<p style="text-align: center;"><b>HEP B</b></p> <p>Hepatitis B</p>	<p><b><u>Grades K-12</u></b>  Three (3) doses of Hepatitis B. The second dose must be administered at least 28 days after the first dose. The third dose must be given at least 16 weeks after the first dose and at least 8 weeks after the second dose. The last dose in the series (third or fourth dose), must not be administered before age 24 weeks.</p>
<p style="text-align: center;"><b>Varicella (Chickenpox)</b></p>	<p><b><u>Kindergarten-11</u></b>  Two (2) doses of varicella vaccine must be administered prior to entry. Dose one (1) must be administered on or after the first birthday. The second dose should be administered at least three (3) months after dose one (1); however, if the second dose is administered at least 28 days after the first dose, it is considered valid.</p> <p><b><u>Grade 12</u></b>  One (1) dose of varicella vaccine must be administered on or after the first birthday.</p>
<p style="text-align: center;"><b>MCV4</b></p> <p>Meningococcal</p>	<p><b><u>Grades 7-11</u></b>  One (1) dose of meningococcal (serogroup A, C, W, and Y) vaccine must be administered prior to entry.</p> <p><b><u>Grade 12</u></b>  Two (2) doses of meningococcal (serogroup A, C, W, and Y) vaccine must be administered prior to entry. ****</p>



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### NOTES:

- A. Vaccine should be administered according to the most recent version of the *Recommended Immunization Schedule for Children and Adolescents Aged 18 Years or Younger* or the *Catch-up Immunization Schedule for Persons Aged 4 Months Through 18 Years Who Start Late or Who Are More Than 1 Month Behind*, as published by the Advisory Committee on Immunization Practices. Schedules are available for print or download at <https://www.cdc.gov/vaccines/schedules/index.html>.
- B. Vaccine doses administered  $\leq 4$  days before the minimum interval or age are valid (grace period). Doses administered  $\geq 5$  days earlier than the minimum interval or age are not valid doses and should be repeated as age-appropriate. If MMR and Varicella are not given on the same day, the doses must be separated by at least 28 days with no grace period.
1. For additional information please refer to the Ohio Revised Code 3313.67 and 3313.671 for School Attendance and the ODH Director's Journal Entry (available at <https://odh.ohio.gov/wps/portal/gov/odh/know-our-programs/Immunization/Required-Vaccines-Child-Care-School/>).

These documents list required and recommended immunizations and indicate exemptions to immunizations.

- C. Please contact the Ohio Department of Health Immunization Program at (800) 282-0546 or (614) 466-4643 with questions or concerns.

- \* Recommended DTaP or DT minimum intervals for kindergarten students four (4) weeks between doses 1-2 and 2-3; six (6) month minimum intervals between doses 3-4 and 4-5. If a fifth dose is administered prior to the 4<sup>th</sup> birthday, a sixth dose is recommended but not required.
- \*\* Pupils who received one dose of Tdap as part of the initial series are not required to receive another dose. Tdap can be given regardless of the interval since the last Tetanus or diphtheria-toxoid containing vaccine. DTaP given to patients age 7 or older can be counted as valid for the one-time Tdap dose.
- \*\*\* The final polio dose in the IPV series must be administered at age 4 or older with at least six months between the final and previous dose.
- \*\*\*\* Recommended MCV4 minimum interval of at least eight (8) weeks between dose one (1) and dose two (2). If the first (1<sup>st</sup>) dose of MCV4 was administered on or after the 16<sup>th</sup> birthday, a second (2<sup>nd</sup>) dose is not required. If a pupil is in 12<sup>th</sup> grade and is 15 years of age or younger, only 1 dose is required. Currently there are no school entry requirements for meningococcal B vaccine.



### 5.1170 Administration of Medication

#### 5.1170.1 General Policy

The School shall not be responsible for the diagnosis and treatment of student illness. The administration of prescribed medication and/or medically prescribed treatments to a student during school hours will be permitted only when failure to do so would jeopardize the health of the student, or the student would not be able to attend school if the medication or treatment were not made available during school hours, only if a physician's request is completed. See Physician's Request for Medication Form.

In the case of an emergency, only the custodial parent can authorize treatment or designate alternative individuals to make those decisions in his or her absence. However, if all reasonable measures to contact the custodial parent and his/her designees have failed, the School may seek authorization from an involved non-custodial parent (i.e. a parent who has rights of unsupervised visitation with the child).

For purposes of this policy, "medication" shall include all medicines including those prescribed by a physician or other licensed health professional authorized to prescribe medicine and any nonprescribed (over-the-counter) drugs, preparations, and/or remedies. "Treatment" refers both to the manner in which a medication is administered and to health-care procedures which require special training, such as catheterization.

The total responsibility for dispensing or administering any medication or treatment shall rest solely with the parent(s) and their child. Before any medication or treatment may be administered to any student during school hours, the School shall require the written prescription from the child's physician with detailed instructions, written promises of the physician and the parent to forward any changes in the prescription or instructions to the school immediately upon change and to ensure delivery to the appropriate staff. This must be accompanied by the written authorization and waiver of the parent. This document shall be kept on file in the office of the School with the secured medical files.

Only medication in its original prescription bottle labeled with the date of prescription, student's name, and exact dosage will be administered and only in the presence of another adult. Parents, or students authorized in writing by physician and parents, may administer medication or treatment but only in the presence of an adult staff member assigned for that purpose.

Only Staff Members who are licensed health professionals or who have completed a Board-approved drug administration program conducted by a licensed health professional, may administer to a student a drug prescribed for the student. They may also assist a student with self-administration of medications by doing the following (1) remind the student when it is time to take a medication and observe to ensure that the student follows the directions on the container; (2) assist the student in the self-administration of medication by taking the medication in its container from the area where it is stored and handing the container with the medication in it to the student; (3) assist upon request by or with the consent of, a physically impaired but mentally alert student, in removing oral or topical medication from the container and in taking or applying the medication.

A licensed health professional, or a Staff Member who has completed a Board-approved drug administration program conducted by a licensed health professional, may administer any medication requiring intravenous or intramuscular injection or the insertion of a device into the body when both the



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medication and the procedure are prescribed by a licensed health professional authorized to prescribe drugs, and the nurse/Staff Member has completed any and all necessary training.

Students who may require administration of an emergency medication may have such medication, identified as stated above, stored in or by the Principal's office and administered in accord with this policy. The Principal or his/her designee may prepare and distribute administrative guidelines to ensure the proper implementation of this policy.

As long as the School or any person administering medication (a) is authorized by the Board to administer medication; (b) has the prescriber's signed statement; (c) has the parents signed authorization, which includes a promise to submit any changes to the prescription; and (d) the person has not acted in a grossly negligent or wonton or reckless manner, then that person shall not be liable for civil damages for administering or failing to administer medication.

Notwithstanding the above, written parental authorization or instructions from a healthcare provider are required for the possession, use or application of nonprescription topical ointments designed to prevent sunburn, and the School shall require express written parental authorization for overseeing the application of sunscreen to a student by a School employee where application is not required pursuant to a student's Section 504 Plan or Individual Education program. Sunscreen shall only be applied in areas of exposed skin not otherwise covered by articles of clothing.

*R.C. 3313.711; 3313.712; 3313.713.*

See Appendix 5.1170.1-A Physician's Request for Medication Form, Appendix 5.1170.1-B Administration of Medication Parent Information and 5.1170.1-C Sunscreen Authorization Form.

A parent or guardian should administer all medications at home whenever possible. When a student is required to take medication at school, because no reasonable alternative is available, it will be done so in accordance with Ohio law and school policy. The Principal shall designate personnel authorized to administer medications and ensure these individuals receive appropriate training. No prescription or over-the-counter medication will be administered by the school unless the parent or guardian has submitted all necessary documentation and the medication is delivered to the school, by the parent or guardian, in its original container. In instances where the school agrees to administer medication, students are responsible for coming to the school office at the scheduled time(s) without reminders by school staff. The School will dispose of all medication that is not promptly picked up by the parent or guardian.

**Adopted: January 18, 2018**

### **5.1170.2 Field Trips**

Medication will be administered during school-sponsored field trip only if the parent or guardian complies with all school policies regarding documentation, medical authorization and other safety precautions.

### **5.1170.3 Medication Record**

A medication record will be kept for each student and will become part of the student's confidential school health record.



### 5.1170.4 Asthma Inhaler

As required by Section 3313.716 Ohio Revised Code, students may possess and use a metered dose inhaler or a dry powder inhaler to alleviate asthmatic symptoms, or before exercise to prevent the onset of asthmatic symptoms, if the “Medication Request Form” is completed by the physician and parent the following condition is satisfied:

- (1) The Student has the written approval of the Student’s physician and, if the Student is a minor, the written approval of the Parent, guardian, or other person having care or charge of the Student. The physician’s written approval shall include at least all of the following information:
  - the Student’s name and address;
  - the names and dose of the medication contained in the inhaler;
  - the date the administration of the medication is to begin;
  - the date, if known, that the administration of the medication is to cease;
  - written instructions that outline procedures School personnel should follow in the event that the asthma medication does not produce the expected relief from the Student’s asthma attack;
  - any severe adverse reactions that may occur to the Student using the inhaler and that should be reported to the physician;
  - any severe adverse reactions that may occur to another Student, for whom the inhaler is not prescribed, should such a Student receive a dose of the medication;
  - at least one (1) emergency telephone number for contacting the physician in an emergency;
  - at least one (1) emergency telephone number for contacting the parent, guardian, or other person having care or charge of the Student in an emergency;
  - any other special instructions from the physician.
- (2) The written approval is on file with the principal of the Student’s School, and if one is assigned, the School’s nurse
- (3) The principal or school nurse has received a backup dose of the medication from the Parent or Student

If these conditions are satisfied, the Student may possess and use the inhaler at School or at any activity, event, or program sponsored by or in which the Student’s School is a participant.

The School, a member of the Board or the Board’s representatives, or any staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from a school employee’s prohibiting a Student from using an inhaler if the employee has a good faith belief that the conditions for carrying and using the medication have not been satisfied. The School, a member of the Board or the Board’s representatives, or any staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from a school employee’s permitting a Student to carry and use an inhaler because of the good faith belief that the conditions have been satisfied. Furthermore, the School, a member of the Board or the Board’s representatives, or any



staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from the use of the medication by a Student for whom it was not prescribed.

This Section does not eliminate, limit, or reduce any other immunity or defense that a school, member of a School Board (Governing Board, Governing Authority or Board of Directors), or staff or employee may be entitled to under Chapter 2744, or any other provision of the Revised Code or under the common law of this state.

R.C. 3314.14

### **5.1170.5 Epinephrine Autoinjector**

As required by Section 3313.718 and 3314.03 Ohio Revised Code, students may possess and use an epinephrine autoinjector to treat anaphylaxis (an intense allergic reaction), if the “Medication Request Form” is completed by the physician and parent and the following conditions are satisfied:

- (1) The Student has written permission of the Student’s physician and, if the Student is a minor, the written approval of the Parent, guardian, or other person having care or charge of the Student. The physician’s written approval shall include at least all of the following information:
  - the Student’s name and address;
  - the names and dose of the medication contained in the autoinjector;
  - the date the administration of the medication is to begin;
  - the date, if known, that the administration of the medication is to cease;
  - acknowledgement that the prescriber has determined the Student is capable of possessing and using the autoinjector appropriately and has provided the Student with training in the proper use of the autoinjector;
  - circumstances in which the autoinjector should be used;
  - written instructions that outline procedures School personnel should follow if the Student is unable to administer the medication or the medication does not produce the expected relief from the Student’s anaphylaxis;
  - any severe adverse reaction that the Student, for whom the epinephrine autoinjector is prescribed, may experience that should be reported to the prescriber;
  - any severe adverse reactions that may occur to another Student, for whom the autoinjector is not prescribed, should the Student receive a dose of the medication;
  - at least one (1) emergency telephone number for contacting the physician in an emergency;
  - at least one (1) emergency telephone number for contacting the Parent, guardian, or other person having care or charge of the Student in an emergency;
  - any other special instructions from the Physician
- (2) The written approval is on file with the principal of the Student’s School, and if one is assigned, the School’s nurse.
- (3) The principal or school nurse has received a backup dose of the medication from the Parent or Student.



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If these conditions are satisfied, the Student may possess and use the epinephrine autoinjector at School or at any activity, event, or program sponsored by or in which the Student's School is a participant.

Whenever a student is administered epinephrine at School or at any activity, event or program sponsored by the school or in which the School is a participant, a school employee must immediately request assistance from an emergency medical service provider (911). This request for medical assistance applies whether the Student self-administers the medication or a school employee administers it to the Student.

School, a member of the Board or the Board's representatives, or any staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from a school employee's prohibiting a Student from using an epinephrine autoinjector if the employee has a good faith belief that the conditions for carrying and using the medication have not been satisfied. The School, a member of the

Board or the Board's representatives, or any staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from a school employee's permitting a Student to carry and use an epinephrine autoinjector because of the good faith belief that the conditions have been satisfied.

Furthermore, the School, a member of the Board or the Board's representatives, or any staff or employee is not liable in damages in a civil action from injury, death, or loss to person or property allegedly arising from the use of the medication by a Student for whom it was not prescribed.

This Section does not eliminate, limit, or reduce any other immunity or defense that a school, member of a School Board (Governing Board, Governing Authority or Board of Directors), or staff or employee may be entitled to under Chapter 2744, or any other provision of the Revised Code or under the common law of this state.

R.C. 3314.14





### 5.1180 Special Medical Needs

The parent or guardian of a student with special medical needs must notify School officials at the time the child is enrolled. Personnel of the School will not address any medical needs requiring the services of a trained professional. In most instances, the special medical needs will result in limited participation in certain activities and classes rather than any treatment being administered. In all instances the Principal, in consultation with the Executive Director, will make the final decision as to how the school will handle any special medical needs requests.

The school nurse must be informed whenever a child with a health concern enters the school or when a current student develops a health condition, and should be included in all IAT, MFE and IEP meetings for students with physical or emotional health concerns whenever possible. The school nurse will complete a health assessment for all students undergoing a Multi-Factored Evaluation.

#### 5.1180.1 Care of Students with Diabetes

The School shall ensure that each Student with diabetes enrolled in the School receives appropriate care in accordance with orders signed by the Student's treating physician. Appropriate care may include any of the following:

1. Checking and recording, or assisting the Student with checking and recording, Student's blood glucose levels and ketone levels;
2. Responding to blood glucose levels that are outside of the Student's target range;
3. Administering glucagon and/or other emergency treatments, as prescribed, in the event that Student experiences severe hypoglycemia;
4. Administering, or assisting the Student in self-administering, insulin through whatever insulin delivery method the Student uses;
5. Providing oral diabetes medications as needed and prescribed;
6. Understanding recommended schedules and food intake for meals and snacks so that dosages may be calculated pursuant to physician's orders;
7. Following any instructions regarding meals, snacks and physical activity provided by the Student's treating physician; and
8. Administering diabetes medication by the School nurse or by a School employee trained in diabetes care.

Diabetes medication shall be kept in a location that is easily accessible.

No Student shall be restricted from attending the School on the basis that the Student has diabetes, that the School does not employ a full-time school nurse, or that the School does not have an employee trained in diabetes care. Parents of a Student with diabetes shall not be required or otherwise pressured to provide diabetes care at the School or during School-related activities.



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### Parental Notice of Rights under Section 504

The Principal or his/her designee shall inform the Student's Parent that the Student may be entitled to a Section 504 plan regarding the Student's diabetes no later than fourteen (14) days after receiving an order signed by a Student's treating physician indicating that a Student has diabetes. See **Appendix 5.1180.1-A** Sample Letter to Parents About 504 Plans.

Once notice has been given to the Parent, the School shall comply with all other policies and procedures for the development of a Section 504 plan as if the Student was any other Student with a qualifying disability.

### School Administration of Diabetes Medication

Diabetes medication prescribed for a Student may be administered so long as all of the following conditions are met:

1. The Principal or his/her designee has a signed, written request from the Parent that the diabetes medication is to be administered, which includes a promise to submit any changes to the prescription;
2. The Principal or his/her designee receives a statement, signed by the prescriber of the medication that includes:
  - a. the name and address of the Student,
  - b. identifies the School and class in which the Student is enrolled,
  - c. states the name and dosage of the diabetes medication and the times or intervals at which the medication is to be administered,
  - d. the date administration of the diabetes medication should begin and end,
  - e. any severe adverse reactions that should be reported to the prescriber and one or more phone numbers at which the prescriber can be reached in the event of an emergency, and
  - f. any other special instructions for administration of the diabetes medication, including sterile conditions and storage; and
3. The Parent provides the diabetes medication in the original container in which it was dispensed by the prescriber or a licensed pharmacist and the container indicates that the Student is the proper recipient of any dosage of the medication.

### Student Self-Administration of Diabetes Medication

On the written request of the Student's Parent or treating physician, the School shall permit a Student to provide for his/her own diabetes care in accordance with the orders of the Student's treating physician during regular school-hours in his/her classroom, in any area of the School or school grounds, and at any school-related activity. At the request of the Student or his/her Parent, the School shall provide the Student with access to a private area for performing diabetes care tasks.

The Student shall be permitted to possess on his/her person all necessary supplies and equipment to perform such tasks at all times. If the Principal or his/her designee determines that the Student has performed any



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diabetes care tasks or used medical equipment for purposes other than the Student's own care, the Board or its designee may revoke the Student's permission to provide for his/her own care.

### Training

The Board may approve training that complies with the nationally recognized guidelines adopted by the Ohio Department of Education in order to instruct employees of the School who wish to be able to attend to Students with diabetes. Participation in training is voluntary. Training shall be coordinated by the School's nurse, or if the School does not employ a nurse, by a licensed health care professional with expertise in diabetes. Upon completion of the training, the Principal or his/her designee shall have the discretion to determine which employees are competent to provide diabetes care to Students.

Training shall take place prior to the beginning of each school year or as needed but not later than fourteen (14) days after the School receives an order signed a treating physician indicating that a Student has diabetes.

The Principal or his/her designee may distribute written notice to each employee of the School in search of employees to be trained. The notice must contain a description of the tasks to be performed, that training will be provided by a licensed health care professional, and the method of indicating interest in participating in such training. Any notice must state that participation in training is voluntary, that the employee will not be adversely affected should he/she choose not to participate in training, and that a trained employee will be immune from liability for their actions in providing for the care of a Student with diabetes.

The Board may approve training in the recognition of hypoglycemia and hyperglycemia and emergency response procedures for any School employee who has the primary responsibility of supervising a Student with diabetes during some portion of the school day or to any bus driver that the School employs or contracts with who is responsible for providing transportation to a Student with diabetes.

The Board shall not discourage employees from agreeing to provide diabetes care nor will employee be subject to a penalty or discipline for refusing to volunteer to be trained in diabetes care or for providing care or performing duties required to provide care for a Student with diabetes.

### Reporting

The Board shall report to the Department of Education by December 31 of each year: (1) the number of Students with diabetes enrolled in the School during the previous school year, and (2) the number of errors in the administration of diabetes medication to Students with diabetes during the previous school year.

### Immunity

Neither the School nor any member of the Board or employee of the School shall be held liable in damages in a civil action for injury, death, or loss to person or property allegedly arising from providing care or performing duties pursuant to R.C. 3313.7112, unless the act or omission constitutes willful or wanton conduct. Nothing in R.C. 3313.7112 serves to eliminate, limit, or reduce any other immunity or defense that a School, member of the Board, or employee of the School may be entitled to under Chapter 2744 or any other provision of the Ohio Revised Code or under common law of the State of Ohio.

A school nurse or other licensed health care professional shall be immune from disciplinary action by the Board of Nursing or any other regulatory board for providing care or performing duties under R.C. 3313.7112 if the care provided or duties performed are consistent with applicable professional standards.



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*R.C. 3313.7112; R.C. 3313.713*

See Policy 5.1170 Use of Medications, Policy 2.1160 Section 504 of the Rehabilitation Act of 1973, and Appendix 5.1180.1-A Sample Section 504 Notice Letter.

**Adopted: June 22, 2017**



### 5.1190 Parental Consultation Regarding Physical Exams

The School shall notify parents, or students who are at least eighteen (18) years of age or emancipated minors ("eligible students"), at least annually of the projected or approximate dates of any non-emergency, invasive physical exam that is required as a condition of attendance, administered by the school and scheduled in advance and not necessary to protect the immediate health and safety of the student, or of other students. "Invasive physical exam" means any medical examination that involves exposure of private body parts, or any act during such examination that includes incision, insertion, or injection into the body, but does not include a hearing, vision, or scoliosis screening. This section does not apply to any physical exam or screening that is permitted or required by State law. Parents or eligible students shall have the right to opt out of participation in any physical exams covered by this section.

Parents who believe their rights have been violated may file a complaint with:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-5920

*20 U.S.C. §1232h.*



### **5.1200 Materials Regarding Sexual Activity**

The School shall not develop or distribute materials or operate programs or courses of instruction that are designed to promote or encourage sexual activity, whether homosexual or heterosexual.

*20 U.S.C. 7906(3)*



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.1210 Sex Education

Any sex education or HIV prevention program provided by the School shall be appropriate for the age of the Students receiving such instruction and shall include instruction on the health benefits of abstinence.

*20 U.S.C. 7906(5)*



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### 5.1220 Contraceptives

The School shall not distribute contraceptives to its Students.

*20 U.S.C. §7906(6)*





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### **5.1230 Tuberculin Testing (Rescinded on November 30, 2017)**

**5.1230.1** New Employees (Rescinded on November 30, 2017)

**5.1230.2** Returning Employees (Rescinded on November 30, 2017)

**5.1230.3** Students (Rescinded on November 30, 2017)



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.1240 Automated External Defibrillators

The School shall maintain an Automated External Defibrillator (AED) on the premises. Any person using a School-provided AED shall be entitled to the immunities established pursuant to R.C. §§ 2305.235 and 3313.717.

**Acknowledged: August 19, 2021**  
**Acknowledged: October 15, 2020**

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### 5.1240.1 AED and CPR Training

Beginning with the 2017-2018 school year, the School shall provide training in the use of an Automated External Defibrillator (“AED”) and offer Cardiopulmonary Resuscitation (“CPR”) training to all employees, including coaches and athletic supervisors, except that the School shall not be required to provide training to substitutes; persons employed on an as needed, intermittent or seasonal basis; or adult education instructors who are scheduled to work the full-time equivalent of less than 120 days per school year.

All employees shall complete the required AED training no later than July 1, 2018 and at least once every five (5) year period thereafter. Employees may voluntarily elect to complete CPR and AED training at their own expense through an independent provider, so long as the training is consistent with those provided by the School and the employee presents a certificate of completion to the Principal. The School may elect to include AED training in its in-service training required under Ohio law.

Instruction shall also be offered to students in grades nine (9) to twelve (12), including instruction on the hands-on skills necessary to perform CPR and use an AED. Students who are incapable of performing the psychomotor skills necessary to perform CPR or use an AED shall be excused from CPR and AED instruction.

The School shall utilize either (a) an instructional program developed by the American Heart Association or the American Red Cross, that includes instruction in CPR and the use of an AED: or (b) any other nationally recognized instructional program that is based on the most current, evidence-based emergency cardiovascular care guidelines for CPR and AEDs.

Notwithstanding the above, the School shall not be required to provide AED or CPR instruction or training if the School is an internet- or computer-based community school, or is a community school in which the majority of enrolled students are children with disabilities.

*R.C. 3313.6023; R.C.D. 3313.6021*

**Acknowledged: August 19 2021**  
**Acknowledged: October 15, 2020**  
**Adopted: January 18, 2018**



### 5.1250 Positive Behavioral Interventions and Supports, Seclusion, and Restraint

This policy governs the use of positive behavioral methods and emergency safety interventions including seclusion and restraint. Any use of emergency safety interventions that does not meet the requirements set forth below is prohibited.

#### I. Definitions

Aversive behavioral interventions: an intervention that is intended to induce pain or discomfort to a student for the purpose of eliminating or reducing maladaptive behaviors, including interventions such as: application of noxious, painful and/or intrusive stimuli, including any form of noxious, painful or intrusive spray, inhalants or tastes, or other sensory stimuli such as climate control, lighting and sound.

Behavior Intervention Plan: a comprehensive plan for managing problem behavior by changing or removing contextual factors that trigger or maintain the behavior, by strengthening replacement skills, teaching new skills, and providing positive behavior intervention and supports and services to address the behavior.

Chemical Restraint: a drug or medication used to control a student's behavior or restrict freedom of movement that is not (A) prescribed by a licensed physician, or other qualified health professional acting under the scope of the professional's authority under State law, for the standard treatment of a student's medical or psychiatric condition; and (B) administered as prescribed by the licensed physician or other qualified health professional acting under the scope of the professional's authority under State law.

De-escalation techniques: are strategically employed verbal and non-verbal interventions used to reduce the intensity of threatening behavior before a crisis situation occurs.

Functional Behavior Assessment (FBA): is a collaborative problem-solving process that is used to describe the function or purpose that is served by a student's behavior. Understanding the function that an impeding behavior serves for the student assists directly in designing educational programs and developing behavior plans with a high likelihood of success.

Mechanical Restraint: (A) any method of restricting a student's freedom of movement, physical activity, or normal use of the student's body, using an appliance or device manufactured for this purpose; and (B) does not mean devices used by trained school personnel, or used by a student, for the specific and approved therapeutic or safety purposes for which such devices were designed and, if applicable, prescribed, including: (1) restraints for medical immobilization; (2) adaptive devices or mechanical supports used to allow greater freedom of mobility than would be possible without the use of such devices or mechanical supports; or (3) vehicle safety restraints when used as intended during the transport of a student in a moving vehicle.

Parent: (A) a biological or adoptive parent; (B) a guardian generally authorized to act as the child's parent, or authorized to make decisions for the child (but not the State if the child is a



ward of the State); (C) an individual acting in the place of a biological or adoptive parent (including a grandparent, stepparent, or other relative) with whom the child lives, or an individual who is legally responsible for the child's welfare; (D) a surrogate parent who has been appointed in accordance with O.A.C. 3301-51-05(E); and (E) any person identified in a judicial decree or order as the parent of the child or the person with authority to make educational decisions on behalf of the child.

Physical Escort: the temporary touching or holding of the hand, wrist, arm, shoulder, waist, hip, or back for the purpose of inducing a student to move to a safe location.

Physical Restraint: the use of physical contact that immobilizes or reduces the ability of a student to move his/her arms, legs, body, or head freely. This does not include a physical escort, mechanical restraint, or chemical restraint, or brief, but necessary, physical contact for the following purposes: (A) to break up a fight; (B) to knock a weapon away from student's possession; (C) to calm or comfort; (D) to assist a student in completing a task if the student does not resist the contact; or (E) to prevent an impulsive behavior that threatens the student's immediate safety.

Positive Behavior Interventions and Supports ("PBIS"): (A) a school-wide systematic approach to embed evidence-based practices and data driven decision making to improve school climate and culture in order to achieve improved academic and social outcomes and increase learning for all students, and (B) that encompasses a wide range of systemic and individualized positive strategies to reinforce desired behaviors, diminishes reoccurrences of challenging behaviors, and teaches appropriate behavior to students.

Positive Behavior Interventions and Supports Leadership Team: the team at the School that plans, coaches and monitors implementation on PBIS. The team may include the School administrator, teacher representatives across grade levels, and staff able to provide behavioral expertise, and other representatives identified by the district or school such as bus drivers, food service staff, custodial staff, and paraprofessionals.

Prone Restraint: physical or mechanical restraint while the student is in a face down position.

Seclusion: involuntary isolation of a student in a room, enclosure, or space from which the student is prevented from leaving by physical restraint or by a closed door or other physical barrier.

Student personnel: teachers, principals, counselors, social workers, school resource officers, teachers' aides, psychologists, bus driver or other School staff who interact directly with students.

Timeout: a behavioral intervention in which a student, for a limited and specified time, is separated from the class within the classroom or in a non-locked setting for the purpose of self-regulating and controlling his or her behavior. In a timeout, the student is not physically restrained or prevented from leaving the area by physical barriers.



### II. Creation of Positive Behavioral Intervention and Supports (PBIS)

The School shall establish an evidence-based school wide system of positive behavioral interventions and supports that will apply in all settings to all students and staff. The system shall include family involvement. The School's PBIS framework includes all of the following:

- A. A decision-making framework that guides selection, integration, and implementation of evidence-based academic and behavior practices for improving academic and behavior outcomes for all students;
- B. Data-based decision making to select, monitor, and evaluate outcomes, practices, and systems;
- C. Evidence-based practices along a multi-tiered continuum of supports;
- D. Systems that enable accurate and sustainable implementation of practices; and
- E. Progress monitoring for fidelity and target outcomes.

The School's implementation of its PBIS framework includes:

- A. Explicit instruction of school-wide behavior expectations;
- B. A consistent systems of acknowledging and correcting behaviors;
- C. Teaching environments designed to eliminate behavior triggers; and
- D. Family and community involvement.

### III. Prohibited Practices

The following are **prohibited under all circumstances**, including emergency safety situations:

- (A) Prone restraint;
- (B) Any form of physical restraint that involves the intentional, knowing, or reckless use of any technique that:
  - i. Involves the use of pinning down a student by placing knees to the student's torso, head or neck;
  - ii. Uses pressure point, pain compliance, or joint manipulation techniques; or
  - iii. Otherwise involves techniques that are used to unnecessarily cause pain.
- (C) Corporal punishment;
- (D) Child endangerment as defined in R.C. 2919.22;
- (E) Deprivation of basic needs;
- (F) Seclusion or restraint of preschool students (if any);



- (G) Mechanical or chemical restraints;
- (H) Aversive behavioral interventions;
- (I) Seclusion of students in a locked room or area; or
- (J) Any physical restraint that obstructs the student's airway or impacts the student's primary mode of communication.

Staff must:

- (A) Be appropriately trained to protect the care, welfare, dignity, and safety of the student;
- (B) Continually observe the student in restraint for indications of physical or mental distress and seek immediate medical assistance if there is a concern;
- (C) Use verbal and non-verbal communication strategies and research based de-escalation techniques in an effort to help the student regain control;
- (D) Remove the student from physical restraint and/or seclusion immediately when the immediate risk of physical harm to self or others has dissipated;
- (E) Conduct a de-briefing including all involved staff to evaluate the trigger for the incident, staff response, and methods to address the student's behavioral needs; and
- (F) Complete all required reports and document staff observations of the students.

#### IV. **Restraint**

Restraint may be used only in a manner that is age and developmentally appropriate, when there is an immediate risk of physical harm to the student or to others and no other safe and effective intervention is possible. Physical restraint must be performed by trained staff, except in the case of an unavoidable emergency situation.

Physical restraint may not be used for punishment, discipline, or as a substitute for other less restrictive means of assisting a student in regaining control, and should be used only as a last resort.

#### V. **Seclusion**

Seclusion may be used as a last resort for the student to regain control; it is age and developmentally appropriate; there is an immediate risk of physical harm to the student or others; and there is no other safe and effective intervention.

Seclusion shall not be used for punishment or discipline; as a substitute for an education program; as a substitute for inadequate staffing, or for staff training in PBIS frameworks and crisis management; for the convenience of staff; as a means to coerce or retaliate; in a manner that endangers the students or, as a substitute for other less restrictive means of assisting the student in regaining control reflective of the cognitive, social, and emotional levels of the student.

The room or area used for seclusion cannot be locked, and must allow for the student to exit the area should the staff become incapacitated or leave the area. The room or area must provide for adequate space, lighting, ventilation, and the ability to observe the student. The student must be under constant supervision by staff trained to detect indications of physical or mental distress that



require removal and/or immediate medical assistance and who document their observations of the student.

### **VI. Multiple Incidents and Functional Behavioral Assessment**

For students eligible for special education per the Individuals with Disabilities Education Act (“IDEA”) or who have a Section 504 Plan, the School shall convene the IEP team or Section 504 team within ten (10) school days after the third incident of seclusion or physical restraining in a school year. The IEP team or Section 504 team will consider the need to conduct a Functional Behavioral Assessment (“FBA”). If necessary, this FBA should be followed by a Behavioral Intervention Plan (“BIP”), or an amendment to an existing BIP, that incorporates appropriate positive behavioral interventions.

### **VII. Training and Professional Development**

The School PBIS Leadership Team or other qualified training shall train all staff working with students at least every three (3) years on the requirements of this policy and shall keep written or electronic documentation of the type of training and the participants. Professional Development will include:

- A. An overview of PBIS;
- B. The process for teaching behavioral expectations;
- C. Data collection;
- D. Implementation of PBIS with fidelity;
- E. Consistent systems of feedback to students for appropriate behavior and corrections; and
- F. Consistency in discipline and disciplinary referrals.

The School shall also ensure that an adequate number of personnel in each building are trained annually in crisis management and de-escalation techniques, as well as the safe use of physical restraint and seclusion, and that their training is kept current. The minimum training requirements include:

- A. Proactive measures to prevent the use of seclusion or restrain;
- B. Crisis management;
- C. Documentation and communication about the restraint or seclusion with appropriate parties;
- D. The safe use of restraint and seclusion;
- E. Instruction and accommodation for age and body size diversity;
- F. Directions for monitoring signs of distress during and following physical control; and
- G. Debriefing practices and procedures.





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Training must include face-to-face training and allow for a simulated experience of administering and receiving physical restraint. The School shall maintain documentation that includes the following:

- A. The name and position of each person who completed training;
- B. The name, position, and credentials of each person who provided the training;
- C. When the training was completed; and
- D. What protocols, techniques, and materials were included in training.

Student personnel will be trained to perform the following: functions.

- A. Identify conditions such as: where, under what conditions, with whom and why specific inappropriate behavior may occur; and
- B. Use preventative assessments that include at least the following:
  - i. A review of existing data;
  - ii. Input from parents, family members, and students, and
  - iii. Examination of previous and existing behavior intervention plans.

The School shall ensure that there is a support plan in place for substitute teachers if the individual needs assistance with PBIS or crisis management and de-escalation.

### **VIII. Required Data and Reporting**

Staff must document each use of seclusion or restraint and report it to the building administration and the parent immediately. A written report of the incident must be created, given to the parent within 24 hours of the incident, and placed in the student's file. This report is subject to the Family Educational Rights and Privacy Act.

The School shall report information concerning its use of seclusion and restraint annually to, and as requested by, the Ohio Department of Education.

The School shall make this policy available to parents annually, and shall post this policy on its website.

### **IX. Monitoring and Complaint Procedures**

The School shall review this policy on an annual basis.

A parent may submit written complaints regarding an incident of seclusion or restraint to the School and the Principal or his/her designee will investigate every complaint and make a reasonable effort to have an in-person follow-up meeting with the parent in writing within thirty (30) days of filing the complaint's filing.

Parent(s) may choose to file a complaint with the Ohio Department of Education, Office of Integrated Student Supports, in accordance with the complaint procedures established by the Department.



# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

O.A.C. 3301-35-15; R.C. 3319.46.

**Adopted: May 19, 2022**  
**Adopted: July 15, 2015**



### 5.1260 Return to Play

No students may participate in any interscholastic athletic activity (contest, practice, try-out, etc.) unless they have provided a completed form stating that the student and his/her parent, guardian, or person in care or charge of the student has received (a) the concussion and head injury information sheet required by R.C. 3707.52 (see Appendix 5.1260-A) and (b) the sudden cardiac arrest information sheet required by R.C. 3707.59. (see Appendix 5.1260-C and 5.1260-D). These forms are required to be provided for each athletic activity, each school year.

#### Concussions and Head Injuries

Any student who exhibits signs, symptoms, or behaviors consistent with having sustain a concussion or head injury (such as loss of consciousness, headache, dizziness, confusion or balance problems) while practicing for or during an interscholastic competition shall be immediately removed from the practice or contest by either (a) the individual who is serving as the student's coach during that practice or competition or (b) an individual who is serving as a contest official or referee during the practice or competition.

Upon removing a student from a practice or contest under this policy, the removing coach or referee shall not permit the student to return to that practice or competition or to participate in any other practice or competition for which the coach or contest official is responsible **for the rest of that day**.

Following this mandatory removal for the rest of the day, the coach or contest officials shall not permit the student to return to practice and/or competition until both of the following conditions are satisfied:

- 1) The student's condition is assessed by a physician authorized under Chapter 4731 of the Ohio Revised Code to practice medicine and surgery or osteopathic medicine or surgery (M.D. or D.O.) or any other licensed health care provider that the Board authorizes under this policy to assess the student who has been removed from practice or competition.
- 2) The student receives written authorization from a physician or other licensed health care provider authorized by the Board under this policy confirming that it is safe for the student to return to practice or competition.

For OHSAA interscholastic athletic teams, students must submit a complete OHSAA Medical Authorization to Return to Play Form to his/her coach in order to resume participation in any school athletic practice or competition. See **Appendix 5.1260-B**. See also, the Ohio High School Athletic Association website (<http://ohsaa.org/medicine/AuthorizationToReenter.pdf>).

The Board may authorize a School employee or volunteer who is a licensed health care provider but who is not a physician to make the concussion assessment and grant authorization for a student to return to participation. Any individual authorized to assess a student under this policy shall act in accordance with one of the following as applicable to the provider's authority to practice in Ohio:

- In consultation with a physician;
- Pursuant to the referral of a physician;
- In collaboration with a physician; or
- Under the supervision of a physician.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Sudden Cardiac Arrest

A student may not participate in an athletic activity if the student's biological parent, sibling, or child has previously experienced sudden cardiac arrest and the student has not been evaluated and cleared for participation in an athletic activity by a physician authorized to practice medicine and surgery or osteopathic medicine and surgery under R.C. Chapter 4731.

Any student who exhibits syncope or fainting at any time prior to, during, or following an athletic activity shall be removed from participation in an athletic activity by the individual serving as the student's coach during that practice or competition. Following this mandatory removal, the coach shall not permit the student to return to practice and/or competition until the student is evaluated and cleared for return in writing by an authorized individual listed in R.C. 3313.5310(E)(3). Any coach who violates this requirement may be subject to discipline.

Prior to the start of each athletic season, the School may hold an informational meeting for students, parents, guardians, persons having care or charge of a student, physicians, cardiologists, athletic trainers, or other relevant individuals regarding the symptoms and warning signs of sudden cardiac arrest for all ages of students.

The School, Management Company, if any, Board members, and School or Management Company employees or volunteers, including coaches, are not liable in damages in a civil action for injury, death, or loss to person or property allegedly arising from providing services or performing duties under this policy, unless the act or omission constitutes willful or wanton misconduct. This policy does not eliminate, limit or reduce any other immunity or defense that the above individuals may be entitled to under Chapter 2744 of the Revised Code or any other provision of law.

### Requirements for School Coaches

All individuals who serve as School coaches must possess a current Department of Education-issued Pupil Activity Program/Coaching Permit. When renewing this permit, all individuals must complete a concussion education course that has been approved by the Ohio Department of Health every three years, or as otherwise required by the Ohio Department of Education to retain the permit. All individuals who serve as School coaches must complete, on an annual basis, the sudden cardiac arrest training course approved by the Ohio Department of Health under R.C. 3707.59(C).

### Requirement for Contest Officials and Referees

The Board shall not permit an individual to serve as a contest official or referee in any interscholastic athletic competition unless the official/referee:

- Holds a pupil-activity program permit issued by the Department of Education; or
- Presents evidence that the individual has successfully completed an online training program to recognize symptoms of concussions and head injuries offered by the Department of Health, or a comparable training program authorized and required by an organization that regulates interscholastic conferences or events.



# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

See Appendix 5.1260-A Concussion Information Sheet for Interscholastic Athletics; Appendix 5.1260-B OHSAA Medical Authorization to Return to Play; Appendix 5.1260-C Sudden Cardiac Arrest Information Sheet; and Appendix 5.1260-D Sudden Cardiac Arrest Parent/Athlete Signature Form.

**Adopted: November 30, 2017**



### 2000 SAFETY

#### 5.2010 General Safety Rules

Fire, tornado and emergency safety procedures are reviewed with students and staff on a regular basis and posted in each classroom.

Students shall not be left unattended. When a teacher leaves the classroom, another staff person must be left in charge.

In-class projects, experiments and similar activities, which could have some measure of potential danger, must first be approved by the Principal. If approved, the teacher must provide intensive supervision of the project.

Chemicals and chemical products shall be secured and placed in locked storage units.

Staff must monitor student activities on outdoor playgrounds at all times and ensure safety rules and regulations are strictly enforced.



### 5.2020 Identification Badges

To ensure the safety of students, staff and visitors, and the security of the building, school doors are locked, and all visitors are required to report to the office and register upon entering the premises, and sign out upon leaving. Visitors are required wear an identification badge prescribed by the School at all times, and the Principal is authorized to exclude anyone from the premises if, in the Principal's sole discretion, a person is deemed to be disruptive or to be a threat to the safety or well-being of a student or students. The staff is instructed to maintain a high level of awareness regarding visitors entering the building and is encouraged to approach visitors and offer assistance whenever they observe an unknown person in the building. The Principal should be notified immediately of any unauthorized visitors.

School employees are issued identification badges that must be worn at all times. The I.D. badge shall be kept free of attachments so not to detract from the professionalism of the badge. Name badges must reflect the employee's current name, location/school and job title, and be worn with the picture showing. Information is not to be hand written on the badge. If the badge becomes outdated and/or the employee's picture no longer accurately represents the current appearance of the employee, he/she is expected to have an updated picture taken. Employee I.D. badges must be returned to Human Resources on the last day of work.



### 5.2030 Public Conduct on School Property

No person shall assault, strike, threaten, or menace a teacher, instructor, or person in charge of a class of Students, or any employee while in the performance of their duties, or disrupt, disturb, or interfere with any activity conducted in or on the School premises, or unlawfully assault, strike, threaten, menace, follow, pursue, or lay hands upon a Student or other person in or on the School premises, or on the way to or from School or School-sponsored activity.

School officials have the authority to call a law enforcement officer if any individual violates this policy or other posted regulations, or does not leave School property when requested to do so.





### 5.2040 Criminal Records Check for Volunteers

All prospective volunteers will be required to complete a fingerprint card and submit to a criminal background check prior to volunteering. Alternatively, prospective volunteers may utilize an electronic fingerprint submission from an authorized provider. Reports provided by the Bureau of Criminal Investigation and Identification (BCI&I) in response to a request for a criminal records check for a prospective volunteer are highly confidential and must be handled with utmost care. These records will be handled solely by the Principal, except in unusual and exigent circumstances. The Board may review these reports as necessary to carry out its official duties.

All prospective volunteers are required to complete a criminal background check. The Principal may waive this requirement, in his/her sole discretion, if the volunteer activity of the prospective volunteer will not bring that individual into unsupervised contact with students. If requested by the Parent, the School will pay the fee or reimburse the individual, provided the fee is usual and customary. In addition, the school will pay the charges imposed by the BCI&I.

The information contained in the report from the BCI&I will be used by the Board to determine whether an individual is an appropriate volunteer. The Board may decide, in its sole discretion, whether a conviction disqualifies an individual from volunteering at the school, however, except in unusual circumstances, an individual who has been convicted of or pleaded guilty to the Revised Code sections cited in **O.R.C. §3319.39(B)(1)(a)** or **O.R.C. §2950.01(D)** will be prohibited from becoming a volunteer.

The Principal will store all criminal background reports in a locked file cabinet over which the Principal will maintain custody and control. Records will be maintained until the children of the subject no longer attend the school, at which time the records will be properly destroyed (i.e., shredded, burned, etc.).

The reports obtained from the BCI are not considered public records and will not be disclosed pursuant to a records request under **O.R.C. §149.43**, or for any other purpose, without the written consent of the subject, except where the school is required by law or judicial order to do so. The report submitted to the school by the BCI&I will be made available to the subject within a reasonable time, upon the subject's written request

The Principal and the Board will rely upon the information contained in the report from the BCI&I. If the subject believes that the information contained in the report is erroneous or inaccurate, the subject is responsible for correcting the information and must work with the BCI&I to do so.



### 5.2050 Reporting Violations of Law

Staff should notify the Principal/Supervisor, orally and in writing, of illegal activity occurring on school property or committed by school employees, if the illegal activity is a felony; is likely to cause an imminent risk of physical harm; or, may be a hazard to public health or safety. If the violation is not corrected, or there is not a reasonable, good faith, effort to correct the violation within 24 hours, the employee may file a written report of the violation with the prosecuting attorney of the county or municipal corporation where the violation occurred, with a peace officer, with the inspector general if it within his jurisdiction, or with any other public official or agency that has regulatory authority over the employer. The employer may not take any disciplinary or retaliatory action against an employee who makes a report pursuant to this section, provided the employee makes a reasonable and good faith effort to determine the accuracy of the information so reported.

*R.C.§4113.52*



### 5.2060 Facility Security

It is in the best interest of the School to protect the School's facility adequately. The areas, buildings and equipment owned or leased by the School must be protected from theft and vandalism in order to maintain the optimum conditions for carrying out the educational programs.

The Principal shall develop and supervise a program for the security of the School facility and equipment. Such a program may include video surveillance equipment in appropriate public areas in and around the School.

Every effort shall be made to apprehend those who knowingly cause serious physical harm to the School facility and to require such persons to rectify the damage or pay a fee to cover repairs. A reward may be offered for apprehending such persons.

Appropriate authorities may be contacted in the case of serious offenses.

The Principal or his/her designee shall report to the Board each major case of vandalism at the School and the extent of the damage.

See also Policy 5.2090 Emergency Preparedness and Evacuation; Policy 5.2110 Bomb Threat Policy; and Policy 5.2290 School Emergency Management Plan.



### 5.2070 Weapons on School Property, in a School Vehicle or at a School-sponsored Event

#### Objective

To create a safe working environment for our employees and students by prohibiting the possession and/or use of weapons in the workplace. The School will not tolerate any weapon possession or use.

#### Scope

Persons subject to the terms of this policy are as follows:

- A. All employees of the School.
- B. All substitute teachers working in the School.
- C. All employees of contractors providing services on behalf of the School.
- D. All applicants for employment with the School.
- E. All other persons, including visitors, vendors, subcontractors, students, etc.
- F. All persons, except
  - law enforcement personnel or state or federal officers, agents, or employees who are authorized to carry deadly weapons or dangerous ordnance and are acting within the official duties of such position;
  - security officers employed by the Governing Authority who are on duty and authorized to convey or possess deadly weapons or dangerous ordnance in(to) the school safety zone;
  - any other person with written authorization from the Governing Authority to convey or possess deadly weapons or dangerous ordnance in(to) the school safety zone.

#### Policy

This policy prohibits possession and/or use of prohibited weapons at any time on School grounds, a School vehicle, or at a School sponsored event. However, an individual with a valid concealed-carry license or temporary emergency license who is either a driver or passenger in a motor vehicle and who is immediately in the process of dropping off or picking up a child in a school safety zone may convey, attempt to convey, or possess an unloaded handgun in(to) the school safety zone if one of the following applies:

- (1) the handgun is in a closed case, bag, box or other container that is in plain sight and that has a lid, cover or closing mechanism with a zipper, snap or buckle, which lid, cover or closing mechanism must be opened for a person to gain access to the handgun;
- (2) the handgun is located in a compartment that can be reached only by leaving the vehicle; or
- (3) the handgun is located in plain sight and secured in a holder for the purpose.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Prohibited weapons include any form of weapon and any form of explosive restricted under local, state or federal law or regulation. This includes all firearms, illegal knives or other weapons restricted by the law. The terms “deadly weapon” and “dangerous ordnance” are defined in R.C. 2923.11. If you have a question about whether an item is covered by this policy, please contact the Superintendent or his/her designee. You will be held responsible for making sure beforehand that any potentially covered item you possess is not prohibited by this policy.

### Prohibitions

The School's policy prohibits:

- A. Use or possession of weapons on School grounds, on a School vehicle, or at a School sponsored event.
- B. Use or possession of weapons while performing any task on the School’s behalf.
- C. Refusing to sign a statement agreeing to abide by the School’s Weapons in the Workplace Policy.
- D. Failing or refusing to report a known violation of this policy.
- E. Failing or refusing to cooperate with any investigation relating to a possible violation of this policy.

### Consequences for Violation of This Policy

- A. Violation of the School's Weapons Policy may result in severe disciplinary action, including discharge, at the School's sole discretion.
- B. Using or possessing a weapon on School grounds in violation of this policy will be considered an act of criminal trespass and will be grounds for immediate removal from School grounds and may result in criminal prosecution.

If you become aware of anyone violating this policy, take no action and immediately report it to your supervisor or to the Superintendent or his/her designee.

*Gun Free School Zones Act, 18 USC 922(q); Gun Free Schools Act, 20 USC 7151; R.C. 2923.11; R.C. 2923.122; R.C. 2923.126; R.C. 2923.16.*



### 5.2080 Use of Tobacco or Other Stimulants on School Premises

The use of tobacco and some oral, stimulants, including betel nuts, presents a health hazard that can have serious consequences both for the user and the nonuser and is, therefore, of concern to the School.

For purposes of this policy, "use of tobacco" shall mean, all uses of tobacco, including cigars, cigarettes, pipes, snuff, or any other matter or substances that contain tobacco, as well as electronic, "vapor," or other substitute forms of cigarettes. Additionally, "use of betel nuts" shall mean any and all use, possession, consumption or chewing of the areca nut (commonly known as the betel nut) or substances containing the areca nut.

The School cannot, even by indirection, condone the use of tobacco or the use of betel nuts. As such, the School prohibits the use of tobacco or betel nuts on School Property.

See Appendix 5.2080 for a "No Smoking" symbol sign which should be posted in areas where smoking is prohibited, including at each entrance. Each sign must also include a telephone number for reporting violations.

*20 U.S.C. 6081-6084; R.C. 3313.751; R.C. Chapter 3794.*



### 5.2090 Emergency Preparedness and Evacuation

The safety of Staff and Students includes preparedness and planning for possible natural and manmade disasters.

The Board authorizes a system of emergency preparedness which shall safeguard the health and safety of Students and Staff.

All threats to safety shall be identified by appropriate personnel and responded to promptly in accordance with the plan for emergency preparedness.

All bomb threats shall require the immediate evacuation of the school building or location threatened. (See Policy No. 5.2110 Bomb Threat Policy).

The Principal or his/her designee shall develop procedures for the handling of school emergencies which include:

1. A schedule that allows for the routine practice of school safety procedures that will occur at least monthly while the school is in session through a combination of safety drills and fire drills;
2. An annual training session for employees of the School regarding the procedures for conducting safety drills and fire drills;
3. An annual test of the School's emergency management plan and procedures for reporting results of the test to the Department of Education.
4. A plan for the prompt and safe evacuation of any School building that shall be practiced at least 6 times in fire drills conducted in accordance with law, if the School has smoke detectors or a sprinkler system in all classrooms of the School. If the School does not have smoke detectors or a sprinkler system in all classrooms, then fire drills must be conducted at least nine (9) times per year in accordance with the law. (See Appendix 5.2090-A);
5. A plan for the safe dispersal of students from School property and for the sequestration of students in the School, in response to a threat involving an act of terrorism, a person in possession of a dangerous ordinance, or other violent situation, which shall be practiced at least three (3) times in safety drills, with at least one (1) drill requiring pupils to practice securing in the School rather than evacuating. All safety drills shall be conducted in a manner consistent with the School's Emergency Management Plan and shall be made in conjunction with the police chief or other similar chief law enforcement officer in the jurisdiction in which the School resides;
6. A plan to conduct one (1) theoretical safety drill to provide instruction to faculty and staff regarding procedures. The theoretical drill does not require student participation and may be conducted during annual training sessions on safety procedures;
7. The designation of appropriate locations to shelter students in case of a tornado;



### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

8. Instructions in safety precautions to be taken in case of a tornado alert or warning and a plan for the prompt and safe procedure to shelter students in case of a tornado which shall be practiced at least one (1) time per month during the “tornado season” of April 1 to July 31 conducted in accordance with law;
9. Design of a communications system;
10. Procedures to follow whenever any employee becomes aware of an emergency or impending emergency;
11. Cooperation with such local officials and agencies such as the fire marshal and law enforcement, including a procedure for providing at least 72 hours written notice to local law enforcement prior to conducting each school safety drill; and
12. Procedures for the Principal or his/her designee to provide a written record to the police chief or similar law enforcement officer of the jurisdiction in which the School is located certifying the date and time each safety drill was conducted in the prior year, no later than December 5 of each school year.

See **Appendix 5.2090-A** Safety and Health Plan Emergency Drills, **Appendix 5.2090-B** Emergency Drill Log, **Appendix 5.2090-C** Sample Emergency Drill Calendar, and Policy No. 5.2110 Bomb Threat Policy.

R.C. 3737.73; R.C. 3313.536; OAC 3301-5-01; OAC 1301: 7-7-04.

**Adopted: February 15, 2018**





**CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES**

**5.2100 Emergency Drills – Rescinded on July 15, 2015**



### 5.2110 Bomb Threat Procedures

A bomb threat may be received by phone, mail or a personal message.

Any Staff receiving a bomb threat by phone should ask the caller to give the message to the Principal or his/her designee. If the caller refuses, then the Staff person who received the call should attempt to engage the caller in conversation on the phone. The Staff member should obtain as much information as possible as suggested on the Bomb Threat Form and obtain the nearest person's attention so that the Principal can be notified. Staff should make an effort to contact the Police on another outside line and have a tracer place on the caller if time permits.

If the Principal determines, the building should be evacuated and Staff should notify all building occupants of the decision to evacuate.

Staff should account for all building occupants at the determined evacuation point. And report any missing individuals to the Principal and the emergency responders.

Staff should note unusual or unfamiliar objects as they evacuate and report such objects to the Principal.  
**NO STAFF SHOULD TOUCH OR MOVE SUCH OBJECTS.**

To the extent practicable without causing delay, and only if the School is not in lock-down procedure, all interior doors should remain open to minimize possible structural and compression damage.

See the Bomb Threat Form and Call Checklist.



### 5.2120 Emergency School Closing

When the School is closed for a weather related condition or an emergency, Teaching and Non-teaching staff will not be required to report. Notification will be through the local media, Ohio Alerts, Constellation Schools Facebook Page and Twitter.

#### 1. Weather Related

a. The School will close when the local public school district in which it is located closes due to hazardous weather conditions.

b. If the local public school district closes an individual school building, but not the entire district, due to hazardous weather conditions, then the Principal, in consultation with the Executive Director, will determine whether the School will be closed.

#### 2. Non Weather Related Emergency Closing

a. If the local public school district in which the School is located is closed for a reason other than severe weather or generally hazardous conditions created by the weather, then the Principal, in consultation with the Executive Director, will determine whether the School will be closed.

b. If, prior to the school day beginning, a health and/or safety condition develops in the School building, (i.e. no water, no electricity, no heat, etc.) then the Principal, in consultation with the Executive Director, will determine whether the School will be closed.



### 5.2130 Crisis Media Situations

Any school crisis such as injury, school bus accident or suicide should be reported to the Principal immediately, along with as many details, names, etc. as possible. The Principal will immediately notify the Executive Director.

In a crisis situation, it is important to have one person providing facts to the media, and only after parents have been notified. No one is to report the nature or extent of injury at any time.

Depending on the situation, the Principal will go immediately to the site. A specific location with a phone should be designated as a media center. Ideally, this should be the main office. A building employee should be there also for parental contact and incoming inquiries.

No reporter should be allowed to roam freely in a crisis situation. He/she should be personally escorted to the media center, and never allowed to video and interview students who are injured or in an otherwise crisis situation. Control is the key. Give media the necessary facts but we do not tell all, especially if the situation has not been fully assessed.

Everyone should remain calm in order to manage the situation to the best of our abilities.

For example, in a bus accident situation, we can say how many children were on the bus, but not that some were cut up pretty badly and didn't look like they had a chance. We can tell where the children were taken for treatment but not why. We cannot say who was at fault or why. That is police work.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.2140 Non-Solicitation Policy

Non-employees are prohibited from soliciting and distributing literature at all times anywhere on property of the School, including parking lots. Non-employees have no right of access to non-public areas and only to the public areas of the school in connection with its public educational purposes. Non-employees must check-in with the receptionist upon entering the premises and state the purpose of his or her business. Employees must immediately report any prohibited conduct, and non-authorized, non-employees to the Principal or other management official.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.2150 Building Appearance and Cleanliness

It is important that all areas of the School, including classrooms, office, lobby and other common areas present a neat and clean appearance. To accomplish this, Teachers are responsible for sweeping, dusting, and washing appropriate items in the classrooms daily. The Principal may delegate the daily responsibility for maintaining the School common areas.



### **5.2160 Facilities Use Policy**

School facilities or property owned, leased, occupied or operated by the School, shall not be made available to the community, general public, individuals or organizations for social, civic, religious, recreational or similar meetings, gatherings and/or events that are not directly related to the operation, mission and purpose of the School. For purposes of this section, groups or organizations sponsored by the school, or which are under the direct supervision and guidance of a faculty advisor or facilitator, shall be deemed “directly related to the operation, mission and purpose of the School.” Where such a group or organization wishes to use School facilities, the faculty advisor or facilitator must obtain the prior written approval of the Principal, and, must be present for the duration of the meeting and ensure that the building is secure after all participants have exited.



### 5.2170 Recess Safety

Play areas must be adequately supervised by teachers, teacher assistants, and/or parent volunteers during recess time and the lunch hour. Playground rules will be distributed during orientation meetings and should be posted in all classrooms. These rules must be reviewed yearly with the children stressing safety and must be enforced rigorously by the supervising teachers. Some points to keep in mind while supervising children during playground time:

- Maintain awareness of all children and all activity by walking about and watching the children and all areas of the playground;
- Encourage children to play and accept one another as playmates;
- Suggest games and activities for children;
- All staff members should feel comfortable approaching children of any class about behavior when carrying out playground supervision;
- During an emergency, one staff member stays with the group while the other staff member handles the situation;
- Older classes need special vigilance due to their size, speed, enthusiasm and competitiveness.





### 5.2180 Child Abuse and Neglect

Because of their sustained contact with school-age children, teachers and other employees are in a position to identify abused or neglected children. The School requires that every elementary, middle and high school teacher, counselor, psychiatrist, nurse or administrator complete at least four hours of in-service training in child abuse prevention, school safety, violence prevention, human trafficking, substance abuse prevention, the promotion of positive youth development and suicide awareness within two years of commencing employment in the School, and every five years thereafter. The School may develop its own curriculum or adopt the curriculum developed by the Ohio Department of Education for the in-service training. The School shall maintain records of staff participation in in-service child abuse detection.

Every School official, School employee, or employee assigned to the School who knows or has reasonable cause to suspect based on facts that would cause a person in a similar position to suspect, that a student under eighteen years (18) of age or under twenty-one (21) years of age, with a developmentally disabled, or physically impairment has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably indicates abuse or neglect of the student, shall immediately report that knowledge or suspicion, by telephone or in person, to the public Children's Services Agency or local law enforcement agency. S/He shall also notify the Principal or his/her designee.

All suspected cases are to be reported even if documentation is not available. The law provides protection for the reporting person who acts in good faith.

If the agency or officer receiving the report requests a written report, the Principal or his/her designee shall provide a written report containing the following information:

1. The names and addresses of the student and the student's parents or the person or persons having custody of the student, if known;
2. The student's age and current condition;
3. The nature and extent of the student's known or reasonably suspected or believed injuries, abuse or neglect, or of the known or reasonably suspected or believed threat of injury, abuse, or neglect, including any evidence of previous injuries, abuse, or neglect; and
4. Any other information that might be helpful in establishing the cause of the known or reasonably suspected or believed injury, abuse, or neglect, or of the reasonably suspected or believed threat of injury, abuse, or neglect.

In addition, the Principal or his/her designee may take color photographs of areas of trauma visible on the student and include them with the written report.



### 5.2180 Child Abuse and Neglect (continued)

“Sexting” is a term applied to creating, receiving, exchanging, sending or possessing a photograph or other material showing a minor in a state of nudity, and sexting is prohibited, regardless of whether any child pornography laws are violated. Students, parents and/or the police may be contacted and sexting may be reported as suspected child abuse or neglect.

If the School has notified Student’s parents or guardian of a potential threat of Student suicide, and the School has reasonable cause to suspect based on facts that the Student’s parents or guardians have disregarded the reported threat, the School shall immediately report that knowledge or suspicion, by telephone or in person, to the public Children’s Services Agency or local law enforcement agency.

The identity of the reporting person shall be confidential, subject only to disclosure by consent or court order. Information concerning alleged child abuse of a student is confidential information and is not to be shared with any unauthorized person. A staff member who violates this policy may be subject to disciplinary action and/or civil and/or criminal penalties.

The Principal or his/her designee should be mindful of the possibility of physical or mental abuse being inflicted on a student by an employee. Any such instances, whether real or alleged, should be reported to the Principal or his/her designee who will investigate and take appropriate action in accordance with Board directives.

A report made under this policy is confidential under Ohio law. No person may disclose the contents of any report made under this policy except as provided above.

*Failure to make a report required by this section, or unauthorized disclosure of the contents of a report made under this section, may result in disciplinary action against the employee.*

*R.C. 2151.421; R.C. 3319.073; OAC 3301-57-01.*

See also Policy No. 4.2130, Electronic Communication Devices; Policy No. 4.2010, Student Code of Conduct and Policy 5.2320 Student Suicide.



### 5.2190 Obscene Materials

The School shall not distribute or aid in the distribution of legally obscene materials.

*20 U.S.C. 7906(4)*



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.2200 Student Transportation by Private Vehicle

Employees are prohibited from transporting students in employees' private vehicles.



### **5.2210 Parent Permission for Field Trips and Other Activities Off School Property**

Teachers are required to get pre-approval from the Principal for all field trips and other activities off school property and obtain parent permission slips for each student. Teachers are required to take all students' emergency information including, parent's name, phone numbers, address, allergies, medications or other health concerns. Teachers must account for students before they leave school property, at least once during the field trip, and, before they leave to come back to school. Instructions and emergency information should be provided to any volunteer taking a small group of students. If a problem occurs, teachers are responsible for contacting the Principal.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.2220 Fingerprinting Students

The School recognizes the advantage to both Parents and law enforcement agencies of a means of identifying children who have become lost or have been abducted. Accordingly, the School will cooperate with legal law enforcement agencies in the voluntary fingerprinting of Students enrolled at the School.



### 5.2230 Missing and Absent Children

The Board believes in the importance of trying to decrease the number of missing children. Therefore, efforts will be made to identify possible missing children and notify the proper adults or agencies.

At the time of his/her initial entry to school, a student, or if the student is a minor, a parent, shall present to the person in charge of admission (1) any records given to him/her by the elementary or secondary school she/he most recently attended (2) a certified copy of an order or decree, or modification of such an order or decree allocating parental rights and responsibilities for the care of the pupil and designating a residential parent and legal custodian of the pupil, if applicable; and (3) a certification of birth\* issued pursuant to Section 3705.05 of the Ohio Revised Code or a comparable certificate or certification issued pursuant to the statutes of another state, territory, possession, or nation. Within twenty-four (24) hours of the Student's entry into the school, a school official shall request the Student's official records from the elementary or secondary school the student most recently attended. If the school the Student claims to have most recently attended indicates that it has no records of the Student's attendance or the records are not received within fourteen (14) days of the date of request, or the Student does not present a certification of birth or comparable certificate or certification from another state, territory, possession, or nation, the Principal or his/her designee shall notify the law enforcement agency having jurisdiction in the area where the Student resides of this fact and of the possibility that the Student may, be a missing child, as this term is defined in Section 2901.30 of the Ohio Revised Code.

If the School receives notification from a law enforcement agency that it has made a missing child report for a current or a former student, then the School must mark the Student's records so that whenever a copy of, or information regarding the records is requested, any School official responding to the request is alerted that the records are those of a reported missing child. In addition, when a request for records or information is received, the person in charge of admission must immediately report the request to the law enforcement agency that notified the School that the Student might be a missing child. When forwarding a copy of, or information from the Student's records in response to a request, the School must do so in a way that the receiving school is not able to discern that the Student's records are marked. The School must retain the mark in the records until notified that the Student is no longer a missing child, at which time, the School must remove the mark from the Student's records in such a way that it would be impossible to tell that the records were ever marked. See **Appendix 5.2230-A** for the Missing Child Reporting and Marking Form.

The School will also immediately give notice to the Ohio Attorney General's missing children clearinghouse and the law enforcement agency where the missing child resides if the School becomes aware that any missing child might be in attendance at the School. To the extent that it can, the School will also assist parents in the case of a missing student by coordinating with local law enforcement and the missing children clearinghouse.

The School has established Informational programs for students, parents, and community members' relative to missing children issues which is available from the School upon request, including information regarding fingerprinting programs, if applicable. The School's informational programs are based on assistance and materials provided by the Ohio Attorney General's missing child education program and resources available from the National Center for Missing and Exploited Children.

The primary responsibility for a Student's attendance at School rests with his/her Parent(s) or guardian(s). Parent(s)/guardian(s) must notify the School on the day a Student is absent unless previous



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notification has been given in accordance with school procedure for excused absences. The person in charge of admissions is also required to notify a Student's Parents, custodial Parent, guardian, legal custodian, or other person responsible for him/her when the Student is absent from school. The Parent or other responsible person shall be notified by telephone or written notice shall be mailed on the same day that the Student is absent. Parents or other responsible persons shall provide the School with their current home and/or work telephone numbers and home addresses, as well as emergency telephone numbers.

The procedure for absences is as follows:

1. A parent must call the School to inform the School that his/her child or children will be absent from School. This phone call should take place within the first hour that School is in session or as soon as practicable.
2. If a parent fails to call or email the School, the school's attendance officer or his/her designee will contact the parent or other person having care of the student to inform him/her of the student's absence. This contact shall occur within one hundred twenty minutes (120) after the beginning of each school day. Attempted contact shall be made one of the following ways:
  - (a) A telephone call placed in person;
  - (b) An automated telephone call via a system that includes verification that each call was actually place, and either the call was answered by its intended recipient or a voice mail message was left by the automated system relaying the required information;
  - (c) A notification sent through the school's automated student information system;
  - (d) A text-based communication sent to the parent's or other emergency contact's electronic wireless communications device;
  - (e) A notification sent to the email address of the parent or other emergency contact; or
  - (f) A visit, in person, to the student's residence of record.

A community school, community school governing authority, or community school employee is not liable for damages in a civil action for injury, death, or loss to person or property allegedly arising from a community school employee's good faith efforts to comply with parental notification procedures.

Parents or other responsible persons shall provide the School with their current home and/or work telephone numbers and home addresses, as well as emergency telephone numbers for such purposes.

Parental notification is not necessary when students are absent with legitimate excuse, to students who are in home-based, online, or internet or computer-based instruction, or to students who were not expected to be in attendance at a particular school building due to the student's participation in off-campus activities, including participation in a college credit plus program.





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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

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\* May substitute any of the following documents for a birth certificate: 1) a passport or attested transcript showing the date and place of birth of the child; 2) an attested transcript of a birth certificate; 3) an attested transcript of a baptism certificate or other religious record showing the date and place of birth of the child; 4) an attested transcript of a hospital record showing the date and place of birth; or 5) a birth affidavit.

*R.C. 109.65; R.C. 3313.96; R.C. 3313.672; R.C. 3321.141.*

**Appendix 5.2230-A Missing Child Reporting and Marking Form and Appendix 5.2230-B Missing Child Educational Program.**

**Adopted: April 18, 2019**



### 5.2240 Drug Prevention

The School recognizes that the misuse of drugs is a serious problem with legal, physical, and social implications for the whole community. For purposes of this policy, "drugs" shall mean:

1. all controlled substances as so designated and prohibited by applicable Federal and Ohio law;
2. all chemicals which release toxic vapors;
3. all alcoholic beverages;
4. any prescription, patent, or over-the-counter drug, except those for which permission to use in school has been granted pursuant to Board policy;
5. anabolic steroids; and
6. any substance that is a "look-alike" to any of the above.

The School prohibits the use, possession, concealment, or distribution of any drug or any drug-related paraphernalia, as the term is defined by law, on School grounds, on School vehicles and vehicles used for School-sponsored events, and at any School-sponsored event.

The School's drug prevention program:

1. emphasizes the prevention of drug use;
2. provides for a comprehensive, age-appropriate, developmentally-based drug and alcohol education and prevention program which:
  - a. addresses the legal, social, psychological, and health consequences of drug and alcohol use;
  - b. provides information about effective techniques for resisting peer pressure to use illicit drugs and alcohol;
  - c. assists Students to develop skills to make responsible decisions about substance abuse and other important health issues;
  - d. promotes positive emotional health, self-esteem, and respect for one's body;
  - e. advises Students that the use of illicit drugs and the unlawful possession and use of alcohol is wrong and harmful; and
  - f. meets the minimal objectives as stated in the essential performance objectives for health education as established by the State Department of Education.

Disciplinary sanctions, up to and including expulsion and referral for prosecution, will be imposed on Students who violate this Policy.

The sanctions may include, together with punitive action, voluntary referral to appropriate persons or agencies for screening and assessment. Such referral may only be made to qualified and properly licensed individuals or programs.

The School will provide information about any drug and alcohol counseling and rehabilitation and re-entry programs available to Students and will direct Students and their Parents to the appropriate programs.

All Parents and Students will receive a copy of this policy regarding the unlawful possession, use, or distribution of illicit, prescription, patent or over-the-counter drugs and alcohol by Students. This policy serves as notification to Parents and Students that compliance with this policy and other standards of conduct is mandatory.



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The Principal will conduct a biennial review of the School's program to determine its effectiveness and implement changes as needed and to ensure that disciplinary sanctions are consistently enforced.

The School will provide a Student assistance program which includes guidelines for prevention, intervention, referral, treatment, and after-care. Such a program must be comprehensive in nature addressing all issues affecting Students' academic, social, and emotional well being in the educational setting which may negatively affect behavior and interfere with their ability to learn.

The School will establish means for dealing with Students suspected of drug use or suspected of possessing or distributing drugs in school and ensure that the School's policies and procedures on Search and Seizure, Suspension and Expulsion, and Permanent Exclusion, among others, are complied with fully.

The School shall develop a curriculum for instruction in the harmful effects of and legal restrictions against the use of drugs of abuse, alcoholic beverages, and tobacco for Students at each grade level and conduct such in-service training programs for staff members necessary to ensure effective teaching about drugs and assistance to Students with drug problems.

The Principal shall take such steps as may be necessary to notify all Students likely to be affected and their Parents and appropriate law enforcement agency of the Board policy on the use of drugs.

The School shall establish administrative guidelines necessary to implement this policy. Such guidelines shall ensure that the proper notice regarding the use of anabolic steroids is posted in all School locker rooms used by Students in grades 7- 12.



### 5.2250 Schools and Law Enforcement Agencies

It is desirable and advisable that the School maintain a good relationship with police, the Court, parole officers, Children's Services Board, and other agencies that deal with the public welfare, insofar as it benefits and protects the Student, the School, personnel, School property, and the home.

Whenever a law enforcement officer (including police, parole, children's services, Board or other agency representative) calls at the School in the performance of duty, the officer shall, upon arrival, be required to:

1. contact the proper school official;
2. produce satisfactory personal identification indicating the source of authority; and
3. state the purpose of business with the School.

In cases where the officer requests permission to question a Student during School hours, the Principal shall first contact the Parent or guardian for permission to question the Student, and the Parent or guardian shall be given the opportunity to be present during the questioning. Except in cases of alleged abuse, dependency or neglect, where a parent, guardian, family member or member of the household is suspected of being the perpetrator. In such a situation the student may be interviewed without notification to, or consent of, the Parent or guardian. The Student shall then be called to the office for the interview.

The Principal, or designee, shall remain present during the questioning, to represent the best interests of the School, and may facilitate the interview or otherwise assist the Student and Parent or guardian if it seems advisable.

If the Parent or guardian gives permission for the interview to take place, but cannot be present, or waives that right, then the Principal, or designee, must be present to facilitate the interview or otherwise assist the Student to the best of their ability. The Student may specifically request another counselor or teacher to be present also.

If the Parent or guardian refuses permission to question the Student during School hours, or cannot be contacted, the officer shall be informed of this, and the Student shall not be called to the office for the interview, except in cases of alleged abuse, dependency or neglect where consent shall not be required.

In any case in which the officer wishes to take the Student from School premises for questioning, permission from the Parent or guardian to release the Student to the officer shall be secured by the Principal, or designee. However, if the officer actually arrests the Student for the commission of a crime, the Student is to be released, even though the Parents or guardians cannot be reached for notification; or having been reached, refuse consent.

Statutory regulations concerning the rights of Students as citizens shall be observed at all times and complied with by both law enforcement and school officials. Students are entitled to full protection under the law.

Notwithstanding anything to the contrary in this policy, if a student is being questioned as a potential victim, and the officer states that law enforcement feels it inadvisable or inappropriate to contact a parent or guardian, or have a parent or guardian present, the school will comply with the law enforcement



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officer and allow questioning of the student at the direction of the officer, provided the Principal or his/her designee is present to the fullest extent allowed by the officer.

Statutory regulations concerning the rights of students as citizens shall be observed at all times and complied with by both law enforcement and school officials. Students are entitled to full protection under the law.

All types of officers and agency representatives shall be required to follow the procedures described in this Policy.



### 5.2260 Eye and Face Protection

The School will ensure that all staff and Students wear appropriate eye and face protection which complies with all Federal and State standards when working in areas that expose them to hazards such as flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical oases or vapors, or potentially injurious light radiation. Staff shall obtain appropriate eye protection (safety glasses, goggles, etc.) and will also provide information on the proper use and care of the eye and face protection device.

The teacher will provide the devices to the Students.

Staff regularly working in potential eye-hazard areas who need prescription glasses may submit a request for prescription safety glasses. The School will assume the cost of the glasses.



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### 5.2270 Ear Protection

Staff working in areas where the noise level is 80 decibels or more may obtain ear protection. Staff in 80-decibel-or-more areas are given a yearly hearing test.



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### 5.2280 Foot Protection

All staff working at tasks in which feet are at risk shall wear substantial and/or steel-toed shoes to protect their feet and toes and/or slip-resistant shoes to protect their footing.





### 5.2290 School Emergency Management Plan

The Principal or his/her designee with supervisory authority shall examine the environmental conditions and operations of each School building under his or her supervision to determine potential hazards to student and staff safety, and shall propose operating changes to prevent dangerous circumstances and develop and adopt a comprehensive school emergency management plan to respond to such hazards (“EMP”). The EMP shall consist of four parts: (i) the emergency operations plan; (ii) a floor plan that is unique to each floor of the School’s building; (iii) a site plan that includes all building property and surrounding property, and (iv) an emergency contact information sheet. The Principal shall consult with community law enforcement and safety officials, parents, and School employees when developing the EMP, and shall list the name, title (if applicable), contact information and signature of all participating parties in the final EMP.

#### Emergency Operations Plan

The emergency operations plan shall be contained in a single document designed to address and respond to all-hazards that may negatively impact the School, at minimum including the following events: an active shooter event; a hostage situation; a bomb threat; an act of terrorism; bullying; and any other natural or manmade hazards that the Principal or his/her designee knows of or should reasonably anticipate occurring that could compromise the health or safety of students, employees, administrators or property based on the results of a hazard identification and risk analysis for the School. The hazard and risk analysis shall also be included with the emergency operation plan.

The emergency operations plan shall be an all-hazards plan in compliance with the National Incident Management System (“NIMS”) and plan operations shall be organized around five mission areas. These include:

1. Prevention: meaning the capabilities needed to deter, stop or avoid an imminent crime, threat or actual mass casualty event;
2. Protection: defined as the capabilities to secure the School against manmade and natural disasters, acts of violence, or other ongoing hazards;
3. Mitigation: meaning the capabilities needed to eliminate or reduce property damage, injury or loss of life by minimizing the impact of an emergency event and decreasing the likelihood of hazardous events;
4. Response: means the capabilities necessary to stabilize an emergency once it has already happened or is certain to occur in an unpreventable way by establishing a safe and secure environment in order to save lives and property; and
5. Recovery: meaning the capabilities necessary to restore a learning environment after an emergency situation.

Each protocol shall include procedures deemed appropriate by the Principal or his/her designee with supervisory authority for responding to threats and emergency events, respectively, including procedures for the notification of appropriate law enforcement personnel, calling upon specified emergency response personnel for assistance, and informing parents of affected students. When approved by the Ohio Building Code and noted in the School’s certificate of occupancy, the emergency operations plan may also include the use of temporary door locking devices to prevent ingress and egress in emergency situations or during active shooter drills.



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The emergency operations plan shall incorporate education procedures, including procedures that involve the use of training drills, to instruct students, staff and administrators on methods to avoid, deter, or stop an imminent crime or safety issue.

Prior to the opening day of each School year or upon initial enrollment, whichever is later, the Principal or his/her designee with supervisory authority shall inform each student enrolled in the School and the student's parent of the parental notification procedures included in the EMP.

### EMP Test

The Principal or his/her designee with supervisory authority shall prepare and conduct at least one annual emergency management test, defined as a regularly scheduled drill, exercise, or activity that is designed to assess and evaluate an emergency management plan. The emergency management test shall be either:

1. A tabletop exercise held in an informal setting to discuss of various issues regarding a hypothetical, simulated emergency;
2. A functional exercise conducted in a realistic, real-time environment designed to validate and evaluate the School's emergency capabilities by exercising plans, policies, and procedures through a projected exercise scenario with event updates that drive activity at the management level; or
3. A full-scale exercise involving multiple agencies, organizations, and jurisdictions in order to test and validate the School's many facets of preparedness.

Each exercise type shall be used at least once every 3 years, and shall assess at least one hazard identified in the School's hazard and risk analysis. At least one representative from the local law enforcement agency, fire department, emergency medical services agency or behavioral health entities shall be invited to participate in or observe the emergency management test; however, actual observation or participation by any outside entities shall not be required. Students shall not be included in emergency management tests unless the School has received parental consent, and it is determined by the Principal or his/her designee that the student's participation would be beneficial to the School and would be appropriate given the student's age and understanding of the test's purpose.

The Principal or his/her designee with supervisory authority shall submit an after action report documenting the emergency management test to the Ohio Department of Education no later than thirty (30) days after the test is completed. See **Appendix 5.2290-A**.

The School shall also conduct routine safety drills, including at least one (1) theoretical drill, to provide students and staff with instruction on securing in the building or rapidly evacuating in response to a threat to the School involving an act of terrorism a person possessing a deadly weapon, or another act of violence requiring an immediate response.

The EMP shall be submitted electronically using the standardized forms developed by the Department of Education. The Principal or his/her designee with supervisory authority shall review the EMP annually by July 1 and certify to the Department of Education that the plan is current and accurate. The EMP shall be updated and revised at least every three (3) years from the previous date of compliance. The Principal or his/her designee with supervisory authority must also submit an updated electronic copy of the EMP to the Department of Education whenever a major modification to the School building necessitates changes in the EMP's procedures or whenever the emergency contact information changes. Updated copies are due to the Department within ten



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(10) days of the adoption of any changes to the EMP. A copy of the EMP shall also be filed with each law enforcement agency having jurisdiction over the School building(s). Upon request, the EMP will be filed with the fire department and emergency medical service organization serving the political subdivision or county, respectively, in which the building is located.

The Principal or his/her designee with supervisory authority shall keep copies of this EMP in a secure place. Copies of the EMP and information pertaining to the School's safety protocols are not public records and shall be exempt from public disclosure or release in accordance with the Ohio Public Records Act.

The School will grant access to School buildings so that law enforcement personnel, the fire department for the political subdivision, emergency medical service organizations for the political subdivision, and emergency management agencies for the county in which the building is situated may hold emergency response training sessions. The training sessions must occur outside of student instructional hours, and the Principal or a designee of the School must be present during the sessions.

### Threat Assessment

Beginning with 2022-2023 school year, if the School serves any of the grades 6-12, the School shall establish a multidisciplinary Threat Assessment Team ("TAT"), comprised of a School administrator, and when possible, mental health professionals, school resource officers, and other necessary personnel. Upon appointment, and every three (3) years thereafter, each member of the TAT shall complete a threat assessment training approved by the Department of Public Safety, which shall include instruction on the following:

- Identifying behaviors, signs and threats that may lead to a violent act;
- Determine the seriousness of a threat; and
- Developing intervention plans that protect potential victims and address underlying problems or conflicts that initiated the behavior and assessment results.

Proof of training shall be uploaded with the EMP.

The TAT shall conduct a threat assessment to minimize the risk of targeted violence at the School. The TAT shall utilize an evidence-based threat assessment process or best practices threat assessment guidelines created by the National Threat Assessment Center (including the joint U.S. Secret Service and U.S. Department of Education publication, *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates* for identifying, assessing, and managing students who may pose a threat). The results of the threat assessment shall be used to develop a Threat Assessment Plan ("TAP"), which shall be incorporated into the EMP and shall do at least the following:

- Identify the types of threatening behavior that may represent a physical threat to the School community.
- Identify individuals to whom threatening behavior should be reported and steps to be taken by those individuals;
- Establish threat assessment guidelines, including identifications, evaluation of the seriousness of a threat or danger, intervention to reduce potential violence, and follow-up to assess intervention results; and



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- Establish guidelines for coordinating with local law enforcement agencies and reports collected through the School's anonymous reporting tip-line, including identification of a point of contact.

Board employees, volunteers, and other school community members, including students and parents, shall immediately report to the Principal any expression of intent to harm another person or other statements or behaviors that suggest a student may intend to commit an act of violence. Nothing in this policy overrides or replaces an individual's responsibility to contact 911 in an emergency. In the event that the Principal or his or her designee learns of a threat of violence or concerning communications or behaviors that indicate the likelihood of a threatening situation, the TAT will be directed to meet to gather information, evaluate facts, and make a determination as to whether a threat of violence exists. If the TAT determines that there is a specific risk of violence, the TAT may collaborate with interested parties to develop and implement a written plan to manage or reduce the threat posed by the student in that situation. Regardless of threat assessment activities or protocols, disciplinary action and referral to law enforcement shall occur as required by State law and Board policy.

The TAT shall maintain student confidentiality as required by the Family Educational Rights and Privacy Act ("FERPA"), including in conformity with the health or safety emergency exception to FERPA permitting disclosure of student information to appropriate parties to address a health and safety emergency.

Notwithstanding any other immunity or defense available, the School, Board, and employee, including the members of the TAT shall not be liable for damages in a civil action for injury, death, or loss to person or property allegedly arising from a TAT member's execution of duties related to school safety unless the team member's act or omission constitutes willful or wanton misconduct.

### Anonymous Reporting Tip-Line

The School shall register with the Safer Ohio school tip line operated by the Ohio Department of Public Safety or enter into an agreement with an anonymous reporting program that is capable of the following:

- Operates 24 hours a day, seven days per week; and
- Forwards all reported information to and coordinates with the appropriate school Principal, threat assessment teams (once established) and law enforcement.

The School shall promote the availability of the anonymous reporting tip-line.

The School will maintain a log of reported tips, including demographic information about the student subject to the report, and any disciplinary or mental health actions and/or referrals made for the subject student.

*R.C. 3737.73(D); 3314.03(A)(11)(d); R.C. 3313.669; R.C. 3313.6610; R.C. 5502.6262; R.C. 5502.263; OAC 3301-5-01.*

See also Policy 5.2060 Facility Security, Policy 5.2090 Emergency Preparedness and Evacuation; **Appendix 5.2090-A** Emergency Management and Health Plan Emergency Drills, Policy 5.2110 Bomb Threat Procedures, No. 5.2130 Crisis Media Situations, and Appendix 5.2290-A Data Collection Worksheet: Information for EMT (Emergency Management Test) Entry into SAFE Account.



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### 5.2300 Use of Student Labor

Students shall not be used to perform any physical labor or manual task that is not part of a current course of study in which the Student is engaged, which may pose a risk to the health and welfare of the Student. Students are prohibited from moving equipment such as televisions or AV carts, furniture, or other items that may place the Student in danger of physical harm.



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#### 5.2310 Use of Drones

Use of model aircraft, small unmanned aircraft systems (“UAS”), or drones (“Drones”) are prohibited from being operated on school property, by school staff or students.

Exceptions to this policy may be considered on a case by case basis, following the completion of an Executive Request with School Principal sign off. This will be submitted for consideration and must receive Board approval prior to any use.

If approved, the following will be met:

Use of model aircraft, small unmanned aircraft system (“UAS”), or drones (“Drones”) must comply with Federal Aviation Administration (“FAA”) laws, rules, and regulations, and may only occur in accordance with this policy.

Drones must be in a condition safe for operation prior to use. Drones must weigh no more than 55 pounds, including the weight of the fuel and anything else attached to the aircraft, and must be operated within the safety guidelines provided by the Academy of Model Aeronautics. See Appendix 5.2310-A. Before flying, if a drone will be used for any commercial purpose, the Drone must be registered with the FAA (<https://registermyuas.faa.gov/>) and labeled with the registration number in permanent ink. Under such circumstances, the Drone operator must keep the FAA registration certificate in his or her possession during operation. Drones may only be operated during daylight hours. During operation, Drones must be kept in the operator’s eyesight at all times, may not be flown from a moving vehicle. Drone use should be limited in populated areas or around spectators. Drones may not be flown over people or used to photograph any person in an area where there is an expectation of privacy, without that individual’s permission. Drones shall not be flown over stadiums or sporting events, and shall not fly in a manner that could inhibit emergency response efforts. Drones must not interfere with and must give way to any manned aircraft. The School or any drone operator must notify the airport operator and control tower in advance if it intends to operate the Drone within five miles of the airport.

Drones may be operated by (a) a staff member, student or volunteer who holds a current Remote Pilot Certificate issued by the FAA, or (b) an individual under direct supervision of a person with a Remote Pilot Certificate, provided that the Remote Pilot has the ability to immediately take direct control of the flight of the Drone. Any Drone accident that results in serious injury, loss of consciousness, or damage to property in excess of \$500.00 must be reported to the FAA by the supervising pilot within 10 days.

Drones may be operated for hobby or recreational purposes by the School – or Student Sponsored clubs. Any photographs or films taken using a drone for hobby or recreational purposes may not be sold, and the School and any Drone operator may not receive any other compensation or profit from its use. Staff may assist students operating Drones, provided however that any compensation received by Staff Member from the School is neither directly nor incidentally related to Drone operation. Drones flown for hobby or recreational purposes are not required to be registered with the FAA, but must comply with all other terms stated in this policy.

14 C.F.R. Par 107; FAA Modernization or Reform Act of 2012 (FMRA), P.L. 112-95, 336; FAA Advisory Circular 91-57A; Taylor v. Huerta, No. 15.1495 (D.C. Cir. 2017).

See **Appendix 5.2310-A** Model Aircraft Safety Code.

**Adopted: December 21, 2017**



### 5.2320 Student Suicide

The School recognizes that a Student with self-destructive and suicidal thoughts poses a danger both to himself/herself and to other students and School faculty and staff. The School shall incorporate training in youth suicide awareness and prevention into in-service training required under Ohio law. Each person employed as a nurse, teacher, counselor, school psychologist, or administrator must undergo training at least once every two years.

The School may provide appropriate instruction on personal safety and assault prevention to all students in grades kindergarten through 6. Beginning with the 2023-2024 school year, the School may provide at least one hour or one standard class period per school year of evidence-based instruction for students in grades 6-12 in each of the following topics:

- Suicide awareness and prevention;
- Safety training and violence prevention; and
- Social inclusion.

Students may be excused from instruction in these areas upon written request from the parent.

All School personnel, including teachers and School staff, should be watchful of a Student who exhibits signs of unusual depression or threatens or attempts suicide. Any such signs or the report of such signs from another student or persons' familiar with the Student outside of the School, should be taken seriously.

Where any teacher or School staff member reasonably suspects that a Student may be self-destructive or exhibiting signs of unusual depression, the teacher or staff member should report all concerns to the Principal or his/her designee and/or School counseling services, including a School Guidance Counselor. The School should also take all reasonable steps to alert a Student's parent or legal guardian of any concerns related to threats or attempts to commit suicide.

The School shall immediately notify the public Children's Services Agency or local law enforcement agency if, in the course of contact, the parent or guardian refuses to acknowledge the Student's suicidal intent and indicates no plan to act for the safety of the Student, or if the parent is unavailable to be consulted.

If it is believed that a Student poses immediate risk to himself/herself or others, the Principal or his/her designee or a School counselor should immediately contact necessary local emergency medical and law enforcement agencies and the Student's parent or legal guardian. The School shall ensure that all emergency protocols are followed when the Principal or his/her designee determines that it is necessary to initiate such procedures.

Throughout any intervention, it is essential that Board policies and School guidelines regarding confidentiality be observed at all times.

The School should take all reasonable steps to provide a Student with information related to suicide prevention including twenty-four-hour suicide prevention hotlines available via telephone at 1-800-273-8255.



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## Constellation Schools

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### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

See Appendix 5.2320-A Student Suicide Questionnaire and Appendix 4.2070-B Request and Consent for Release of Records. See also Policy 5.2180 Child Abuse and Neglect, Policy 4.2070 Student Records, Policy 3.4070 Confidentiality of Records, and Policy 5.2090 Emergency Preparedness and Evacuation.

**Adopted: May 19, 2022**

**Acknowledged: August 19, 2021**

**Acknowledged: October 15, 2020**

**Adopted: July 25, 2019**





### 5.2330 Cyber Threats

#### Types of Information

Information is everywhere and constantly going from one person to another, from one device to another, etc. By law, some information is protected from disclosure, and, while some information is not technically legally-protected information, it nonetheless has value.

#### Types of Threats

The most common types of threats are:

- Data Breach. A leak or spill of sensitive, protected, or confidential data from a secure environment to an insecure environment, where the data may then be copied, transmitted, viewed, stolen, or used in an unauthorized manner. Data breaches often occur with confidential information.
- Denial of Service. Also known as a Distributed Denial of Service (“DDoS”) attack, occurs when a server is deliberately overloaded with requests such that the Website shuts down. Users are then unable to access the Website.
- Spoofing/Phishing. Both spoofing and phishing involve the use of fake electronic documents. Spoofing refers to the dissemination of an email that is forged to appear as though it was sent by someone other than the actual source. Phishing is the act of sending an email falsely claiming to be a legitimate organization in an attempt to deceive the recipient into divulging sensitive information (e.g., passwords, credit card numbers, or bank account information) after directing the user to visit a fake website.
  - Spear phishing is a more targeted form of phishing and typically involves sending an email that appears to come from a colleague or acquaintance.
- Malware/Scareware. Illicit software that damages or disables computers or computer systems. Similar to malware is scareware, which uses social engineering to cause fear or anxiety so that a user buys unwanted and unneeded software, such as antivirus software. Computers can become infected through downloading a piece of malware or scareware disguised as legitimate software from peer-to-peer file sharing or email attachments or links. To help prevent malware or scareware, users should keep their software up to date so that any critical software patches are received. Users should also install antivirus software.
  - Ransomware is form of malware in which perpetrators encrypt users’ files, then demand the payment of a ransom—typically in virtual currency such as Bitcoin—for the users to regain access to their data. Ransomware can also include an element of extortion, in which the perpetrator threatens to publish data or images if the victim does not pay. The ransomware is frequently delivered through phishing/spoofing scams.
- Unpatched or Outdated Software Vulnerabilities. Vulnerabilities occur when unpatched or outdated software has not been updated to include the latest software updates allowing unauthorized users to gain access to information networks and systems.



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- **Removable Media.** Media devices that can be connected to computers (e.g. thumb drives, CDs, DVDs, and external hard drives) can be easily stolen, exposing private data. Corrupted devices can be intentionally or unwittingly connected to computers allowing the device to infect the computer with malware.

### **Types of Security and Preparing for Threats**

The School takes a holistic approach to security. There are several security “layers”, and each one has its own security strategy as outlined below:

- **Physical Security**      The security of brick and mortar buildings, as well as the students, faculty, and staff that learn, teach, and work in them.
- **Network Security**      Focused on ensuring there is not any unauthorized traffic flowing across the network that no one is abusing or gaining illegitimate access to network-connected resources and that sensitive information is security while it is traversing the network (data in motions). DDoS attacks are a form of network resource abuse, and mitigating those attacks is a critical component of network security.
- **Application Security**      Eliminating software vulnerabilities that could lead to security breaches.
- **Content Security**      Focused on protecting data at rest (e.g., in a database) and on complying with various local, state, and federal requirements for data security and privacy.
- **End Point Security**      Traditionally concerned with keeping malicious or otherwise unwanted and unauthorized software and users of endpoint devices. This includes asset location tracking and processes for eliminating sensitive data from and reporting lost or stolen devices.
- **Cloud/Data Center Security**      Focused on ensuring the School's core computing resources are appropriately patched and segmented to prevent unauthorized access and contain any unauthorized access if it does occur.

### **Identifying an Incident**

When a security incident occurs, the School’s Incident Response Plan will enable the School to focus on containment, rather than identifying the people and processes that need to occur. A successful incident management program combines people, processes, and technology.

### **Reporting and Incident**

In the event of a suspect incident, the School’s Principal of his or her designee and the School’s IT Director should be immediately notified with details regarding the reasons underlying the suspicion. The Incident Response Team (“IRT”), which shall include the Technology Director, Network Security personnel and others



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as designated, will work to limit the damage and preserve the protected/sensitive information, and determine the amount of outside external assistance required to assist with addressing the threat.

Any individual whose personal information may have been compromised may make a report to any of the following:

- FBI, via a Field Office Cyber Task Force;
- Internet Crime Complaint Center;
- National Cyber Investigative Joint Task Force ([cywatch@ic.fbi.gov](mailto:cywatch@ic.fbi.gov));
- National Cybersecurity and Communications Integration Center ([NCCIC@hq.dhs.gov](mailto:NCCIC@hq.dhs.gov)); or
- U.S. Computer Emergency Readiness Team (“US-CERT”).

Once the incident has been contained, recovery may be needed for people, policies, and technology—all of which are interconnected. The IRT will need to identify the technology and people impacted by the incident, and address any known causes or existing vulnerabilities.

Appendix 5.2330-A Cyber Threat Response Plan.



### 5.2340 Website Privacy Policy

This Website Privacy Policy applies to the information Constellation Schools LLC (“Constellation”, “it(s)”, “our”, “us”, and “we”) collects through its website (“Site”). We do this to provide education information and to register individuals for receiving our educational services (“Services”). This Website Privacy Policy describes our information collection practices, such as the types of information we collect regarding visitors to the Site, how we may use, share, or disclose that information. By using this Site, you consent to this Website Privacy Policy.

Because Constellation manages public institutions, some information collected from the Site, including information from our server logs, e-mail delivered to our Site, and information collected from Web-based forms, may be subject to the Ohio Public Records Act. This means that we do not actively share information, but in some cases may be compelled by law to release information gathered from our Site servers.

### Information We Collect About You and How We Collect It

#### 1. Information You Provide To Us

We collect information you provide directly to us, which can be personal in nature. For example, we collect information when you complete a registration or enrollment form; complete an employment or other application; participate in any interactive features; subscribe to a newsletter or email list; participate in an event, survey, contest or promotion; communicate with us via third-party social media sites; request support or otherwise communicate with us; communicate with us; or otherwise provide us information or interact with our Site. We may gather personal information, which is information that alone or in combination, is linked or linkable to allow a reasonable person to identify you as a specific natural person. This information includes, but is not limited to, your first and last names, home addresses, e-mail addresses, phone numbers (“Personal Information”). If the Site offers you the ability to set up an account or personal profile, we may require that you supply us with Personal Information to set up such an account or profile, though you would not have to in order to access the Site for general purposes. In addition, we may collect other information about you, such as demographic information (e.g., your age or gender), or other information you choose to provide. If we combine demographic or other non-Personal Information with Personal Information, we will treat the combined information as Personal Information under this Privacy Policy.

#### 2. Information We Collect Automatically

We and our third-party service providers (including any third-party content, advertising, and analytics providers) may use a variety of technologies, including cookies, flash cookies, and web beacons, that automatically or passively collect certain information about your use of the Site whenever you visit or interact with the Site. This information (“Usage Information”) may include:

- a. Information about your use of the Site, including your Internet Protocol (“IP”) address, web request, access times, pages viewed, web browser, media access control address (MAC address), links clicked and the page you visited before navigating to the Site;
- b. Information about the mobile device you use to access our Site, including the hardware model, operating system and version, unique device identifiers, mobile network information, browser type, and information about your use of our mobile applications; and



c. Information collected by cookies and other tracking technologies: Cookies are small data files stored on your hard drive or in device memory that may help us improve our Site and your experience, see which areas and features of our Site are popular, and count visits. Web beacons are electronic images that may be used in our Site or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. You can find more information about cookies and how they work at [AllAboutCookies.org](http://AllAboutCookies.org). A Flash cookie is a data file placed on a device via the Adobe Flash plug-in that may be built into or downloaded by you onto your device. Flash cookies may be used for various purposes, including, without limitation, enabling a Flash feature and remembering your preferences. Flash cookies are not managed by the same browser settings as are used for browser cookies. For more information about Flash and the privacy choices Adobe offers, [visit the Adobe's Flash Player Settings Manager page](#). Use the options in your Internet browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. If you disable all cookies or adjust your Flash privacy settings on your device, some features of the Site may not function properly, and you may not be able to take advantage of all the features of the Site.

We may use Usage Information for a variety of purposes, including enhancing or otherwise improving the Site and our Services, and to target content or offers to users. The Usage Information we collect is generally non-identifying, and is not linked to any Personal Information while on our Site; however, if we associate it with you as a specific and identifiable person, we will treat it as Personal Information.

### **3. Information Third Parties Provide About You**

We may receive information about you from third parties and we may supplement the information we collect with outside records in order to provide you with information, activities or Services you have requested, to tailor content, to offer you opportunities to become involved in activities that we believe may interest you, and for other purposes. For example, we may collect information about you when you post content to our pages/feeds on third-party social media sites. We may combine the information we receive from those other sources with information we collect through the Site. In those cases, we will apply this Privacy Policy to the combined information.

We do not control these third parties' tracking technologies, how they may be used, or third-party sites you may visit via a link on our Site. Please review the privacy policies of any third-party site you visit as we are not responsible for how their practices concerning your personal or other information. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **Advertising and Analytics Services Provided by Others**

We may allow third parties to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, flash cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information is anonymous and cannot be directly linked to individual users. This information may be used by Constellation and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our services and other Sites and better understand your online activity.

For example, we may use Google services, such as Google Analytics, to collect data about traffic across our Site, to deliver advertisements when you visit other websites, and to share data about traffic to our website with



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Google and other Google Analytics program participants. For more information about how Google Analytics collects and processes data, visit [To opt out of: \(i\) Google Analytics install the\\_ and \(ii\). You may also want to visit \(“NAI”\) which provides information regarding targeted advertising and the “opt-out” procedures of NAI members, and the \(“DAA”\) which provides information regarding targeted advertising and offers an “opt-out” by participating companies in the DAA Self-Regulatory Program.](#)

### **How We Use Your Information**

We may use the information we collect about you or that you provide to us, including Personal Information and Usage Information:

- to enable you to use our Site, and to provide related Services and care, including responding to your questions, complaints or comments;
- to process student enrollment or an employee application if requested;
- to provide you with information, opportunities, or Services that you have requested or that we otherwise believe will interest you, including special opportunities from us and our third-party partners;
- to personalize your experience by tailoring content, recommendations, and opportunities we display to you, both on the Site and elsewhere online;
- for internal business purposes such as to improve our Site and services;
- to process information you provide via our Site, including verifying that your email address is active and valid;
- to provide and deliver the information, products and services you request, process transactions and send you related information, including confirmations and receipts;
- to process your registration;
- to otherwise support students, parents, legal guardians, and/or staff;
- to monitor and analyze trends, usage and activities in connection with our services;
- to contact you with administrative communications and, in our discretion, changes to our Privacy Policy, or any of our other policies;
- to comply with regulatory and legal obligations;
- for any purpose that you provide consent;
- to enforce our policies, including this Privacy Policy;
- to support functions of our human resource management, including the coordination of third-party service providers that provide insurance and personal financial services, such as retirement planning and savings and investment services;
- to comply with governmental regulations or to response to a subpoena, records act request, or other governmental or administration order/legal requirement;
- during the due diligence process for purposes of a sale, merger, or acquisition of Constellation;



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- to carry out our Services as described above;
- to determine your level of engagement with email, the Site or promotional marketing materials that are sent to you, including whether you opened an email or promotional marketing material;
- to improve our Services, for example by reviewing information associated with stalled or crashed pages' experience by users allowing us to identify and fix problems and given you a better experience;
- for security purposes, including to prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities and/or attempts to harass our users;
- to monitor and improve the information security of the Site and our Services; and
- for purposes as disclosed at the time you provide your information, with your consent, and as further described in this Privacy Policy.

**This Privacy Policy constitutes notice that, via a secure link on the Site, we collect student and staff information to allow staff of Constellation to monitor information necessary to ensure proper protocols, procedures, and policies are being followed and to ensure overall efficiency. If Constellation learns of unauthorized access of this secure link, Constellation will comply with all legal obligations, including notification to affected persons, and law enforcement if necessary, and take reasonable measures to assist to contain and remedy the unauthorized accident.**

### **Data Security**

We have implemented technical, physical and organizational measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, disclosure or access against all other unlawful forms of processing.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information via linked sites, such as Facebook, YouTube, Twitter, Instagram, etc. The information you share in public areas may be viewed by any user of the Site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

Each employee who has any responsibility for the operation or maintenance of the Site, or the use of Personal Information maintained in the system, shall be provided a copy of this policy and shall be trained in how to comply with it.

### **Third Party Content / Links**

From time to time, we may link content from third parties, which may include information to events that may include registration and/or payment links. By posting third-party content or allowing third parties to post content on the Site, we are not responsible for the linked or third-party accessible content or for any liability for any



event. Constellation has no control over information posted by any third party or of any event marketed on the Site.

### **Information Sharing**

We may share non-Personal Information, such as Usage Information and aggregated user statistics, with third parties in our discretion; for example, to target advertisements, to serve our advertisements elsewhere online, and to provide us with information regarding the use of the Site and the effectiveness of our advertisements. Constellation does not sell or share Personal Information with unaffiliated third parties for their direct marketing purposes. We may share the information we have collected about you (including Personal Information): (i) as disclosed at the time you provide your information, (ii) with your consent, (iii) as described elsewhere in this Privacy Policy, or (iv) in the following circumstances:

#### **1. Third Parties Providing Services on Our Behalf**

We engage third-party service providers to perform a variety of functions, such as providing technical services for our Site, sending email communications, providing administrative services to our employees, etc. Such third-party service providers may have access to Personal Information if needed to perform certain functions pursuant to the contracts we have in place with those third-party service providers. However, these companies may use such Personal Information only for the purpose of performing that function and may not use it for any other purpose.

#### **2. Administrative and Legal Reasons**

We reserve the right to use or disclose any information (including Personal Information) as needed to satisfy any law, regulation or legal request, to protect the integrity of the Site, to fulfill your requests, or to cooperate in any law enforcement investigation or an investigation on a public safety matter, to protect and defend the legal rights or our property rights, our Site or its users, or any other party, or in an emergency, to protect the health and safety of our users or the general public. We also reserve the right to share registration and enrollment information that is collected to school districts or other third parties as may be required by state law, federal law, and/or school operating procedures.

#### **3. Social Networking Features**

Functionality on the Site may permit interactions that you initiate between the Site and a third-party website or service such as Twitter or Facebook (“Social Networking Features”). For example, our Site may offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take on our Site with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the third party that provides the social sharing feature. The information we collect in connection with Social Networking Features is subject to this Website Privacy Policy. The information collected and stored by the third party remains subject to the third party’s privacy practices. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features. We are not responsible for the republishing of the content found on our site on other Web sites or media without our permission.





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### 4. Business Transfers & Transitions

In the event Constellation goes through a transition (such as a merger, acquisition, bankruptcy or sale of all or a portion of its assets, including, without limitation, during the course of any due diligence process), your Personal Information will likely be among the assets transferred. By providing your Personal Information, you agree that we may transfer such information to the acquiring entity without your further consent.

### 5. Internally with our Employees/Agents

We will share your information, including Personal Information, with our employees/agents who are responsible for providing you the Services in line with the scope of their employment/agency with us.

### Family Educational Rights and Privacy Act (“FERPA”)

We will production your children’s education records as required by the Family Educational Rights and Privacy Act (“FERPA”) and all applicable state laws regarding the privacy of student records or personally identifiable information (as defined under FERPA). We will only disclose education records or provide access to them in compliance with FERPA and applicable state laws, and we will require third parties that contract with us and have access to education records to do the same. We will not use personal identifiable information to target a student for advertising, sell personal identifiable information or use personal identifiable information to create profiles about a student (other than for purposes of the student’s education at Constellation) when those activities are prohibited by law. We will require any third party vendors to destroy all personally identifiable information when no longer necessary for the purpose behind the access as required by law. If any provision of this Privacy Policy conflicts with FERPA or other federal or state law, Constellation will comply with the more protective standard for the education records.

### Your California Privacy Rights

#### Shine the Light Law

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal Information that we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: Constellation Schools LLC, 5730 Broadview Road, Parma, Ohio 44134 will respond to one request per California customer each year, and we do not respond to requests made by means other than as set forth above.

#### California Do Not Track Disclosure

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Web browser “do not track” settings or signals. We deploy cookies and other technologies on our Service to collect information about you and your browsing activity, even if you have turned on the Do Not Track signal.

#### California Consumer Privacy Act

We are not subject to the eligibility requirements of the California Consumer Privacy Act.



### **Children Under the Age of 18**

Visitors under the age of 18 must obtain permission from their parents or guardians before sending any personal identifying information to any page within the Constellation website.

### **Children Under the Age of 13**

We take reasonable efforts to be in compliance with the requirements of the Children's Online Privacy Protection Act ("COPPA"). Our Site is not intended for children under 13 years of age, we do not solicit information of any kind from children under the age of 13, and we do not and will not knowingly contact or collect Personal Information from children under 13.

The only Personal Information we may receive through this Site about children under the age of 13 is information provided by the parent or legal guardian or information provided by the child as part of that child's participation in our education program with consent of their parent or legal guardian. For example, we may collect personal information from children under the age of 13 when our students under the age of 13 use their Constellation account to communicate with us. Constellation student accounts may allow for students to share work, send files from home to Constellation, write to their teachers and turn in class work, among other uses. Constellation requires all parents and legal guardians of students under the age of 13 to review and sign our Technology and Internet Acceptable Use Policy, otherwise such student will not receive or will be denied access to her Constellation account. If a Constellation student chooses to correspond with us through their account or email, we may store, process and/or use the personal information contained therein to communicate with the student and/or her parent or legal guardian, to address technical issues with the student's account or access to the network, to update our records and perform other administrative functions. We may retain the content of the student's messages together with their email address and our responses. We may provide the collected information to employees, agents or service providers acting on Constellation's behalf in connection with the activities described above, but we will only provide those employees, agents and service providers the personal information they need to perform their functions for us. By enrolling a child at Constellation, a parent is consenting to the collection of that information.

If you are a parent or legal guardian and are concerned about the disclosure of personal information about your child that we may obtain via this Site, you may review your child's personal information, ask to have it deleted and refuse to allow any further collection or use of the child's information. You can contact us at the contact information listed below.

Our Site, products and Services are all directed to people who are at least 13 years old or older. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, once verified, we will promptly obtain parental or guardian consent, and in the absence of such consent, will delete the information.

### **Accessing and Correcting Your Information and Opting Out of Communications**

If at any time, you would like to review, correct, erase, object to, and/or dispute the information we have about you or if you would like to change your preferences for contacts from us, you can let us know by contacting us at the address below. Constellation will make good faith efforts to implement requested changes in our active databases subject to the applicable laws. Note, however, that we may continue to store information about you as



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required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time. We will endeavor to deal with all requests for access and modifications in a timely manner.

If you would like to opt-out of promotional information from us or unsubscribe from our email list, please use the unsubscribe link at the bottom of our newsletter emails, or contact us through the email or postal address listed below. However, please note that even if you opt-out of receiving marketing communications or donor requests, we reserve the right to send you certain communications relating to notices of changes to this Website Privacy Policy, or similar administrative or transactional messages. These transactional messages may be unaffected if you choose to opt-out from marketing communications.

With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

### **‘Do Not Track’ Notifications**

**Some browsers allow you to automatically notify websites you visit not to track you using a “Do Not Track” signal. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” please visit [All About Do Not Track \(DNT\)](#).**

### **Use Within the United States**

The Site is operated in the United States and is for United States users only. Users outside of the United States are prohibited from using the Site. As such, we are not responsible for any potential violations of privacy laws outside the jurisdiction of the United States.

### **Where We Store Your Information**

Information we collected is stored in the United States.

### **Changes to Our Privacy Policy**

From time to time, we may change this Privacy Policy and will notify you of material changes by posting the changed or modified Privacy Policy on our Site. We may also provide notice to you in other ways in our discretion, such as through contact information you have provided. Any changes will be effective immediately upon the posting of the revised Privacy Policy on our Site unless otherwise specified and your continued use of the Site after the effective date of the revised Privacy Policy (or such other act as specified in the revised Privacy Policy) will constitute your consent to those changes. Rest assured, however, that unless we obtain your consent, any changes will not alter how we handle previously collected information, unless otherwise required by law. The date the policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Website Privacy Policy to check for any changes.

### **How to Contact Us**

If you have any questions about the Constellation Website Privacy Policy, or wish to review your information or



## Constellation Schools

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be removed from our database for mailings, please contact us at: Constellation Schools LLC 5730 Broadview Road, Parma, Ohio 44134; [webmaster@constellationschools.com](mailto:webmaster@constellationschools.com); 216-712-7600

Other Policies: Please also see our public records, security, social media and networking, use of electronic equipment, software and copyright, technology and internet use, and personal information systems policies.

*[R.C. 1347; 20 U.S.C. 1232g; R.C. 3319.321; R.C. 3301.0716; 15 U.S.C. 6501–6505; Cal. Bus. & Prof. Code §§ 22575-22579 (2004); R.C. 149.43; 15 U.S.C. § 4]*

4829-4348-7451 v1 [56663-1]

**Adopted: February 18, 2021**



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### 5.2350 Child Sexual Abuse and Violence Prevention

The School shall incorporate into its curriculum annual, developmentally appropriate instruction on the following topics:

- a. for students in grades kindergarten through six, instruction regarding child sexual abuse prevention, including information regarding available counseling and resources for victims of abuse; and
- b. for students in grades seven through twelve, instruction regarding sexual violence prevention.

Developmentally appropriate instruction shall not include instruction or information connected in any way to any individual, entity, or organization that provides, promotes, counsels, or makes referrals for abortion or abortion-related services.

Upon written request of a student's parent, a student shall be excused from taking part in instruction in child sexual abuse prevention or sexual violence prevention.

The School will notify parents of students who receive instruction related to child sexual abuse and sexual violence prevention of the following:

- a. That instruction on such topics is required by law as a part of the School's curriculum;
- b. That parents of minor children may examine the sexual violence prevention instructional materials upon written request; and
- c. That students will be excused from instruction on child sexual violence and sexual violence prevention upon written request.

Upon written request to the Principal, Parents of children under age eighteen shall be allowed to examine the sexual violence education instruction materials within 48 hours of said request.

The School shall incorporate training on child sexual abuse into its in-service training, which shall count toward the satisfaction of requirements for professional development required by the School. In-service training on child sexual abuse shall be presented by either law enforcement officers or prosecutors who have experience in handling cases involving child sexual abuse or child sexual violence.

R.C. 3314.0310; R.C. 3319.073.

See also Policy 5.2180 Child Abuse and Neglect: Appendix 5.2350-A Parental Notice of Instruction on Child Sexual Abuse or Child Sexual Violence Prevention.



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### 3000 ENVIRONMENTAL HEALTH

#### 5.3010 OSHA/PERRP Compliance/Risk Reduction Program

The School believes that the employees and students of the School, as well as visitors, are entitled to function in an environment as free from hazards as can reasonably be provided. In this regard and in accordance with law, the School will provide reasonable and adequate protection to the lives, safety, and health of its employees and students, in compliance with all applicable federal and state laws and regulations.

#### Public Employment Risk Reduction Program (PERRP) Compliance\*\*\*

The Principal or his/her designee shall be responsible for the maintenance of standards in the facilities to prevent accidents and to modernize their consequences. She/he shall designate an employee who shall conduct periodic audits of health and safety conditions within the facilities of the School and take appropriate action on any violations thereof to the Principal or his/her designee.

The Principal or his/her designee shall ascertain that the employees and students of the School are aware of their rights to an environment free of recognized hazards, that they are properly trained in safety methods, that protective devices and equipment are available to meet safety standards, and that proper rules and records are maintained to meet the requirements of the law and the regulations of PERRP.

The Principal or his/her designee shall post and keep posted a notice informing employees of the protections and obligations provided under PERRP. The Principal or his/her designee shall annually post on February 1 and keep posted until April 30 a copy of the summary of all work-related incidents from the following year. Postings shall be in a conspicuous place where notices to employees are customarily posted.

The Principal or his/her designee shall comply with any mandatory recordkeeping requirements. Such records shall include the following:

1. An incident report for all work-related injuries and illnesses, which shall be completed no later than six working days after receiving information that a recordable incident has occurred (**Appendix 5.3010-A**);
2. An incident report for any employee death or the in-patient hospitalization of three (3) or more employees due to a work-related incident, which shall be completed within ten (10) days of orally reporting the death or in-patient hospitalization to PERRP (**Appendix 5.3010-A**);
3. A log and summary of all work-related injuries and illnesses, which shall be updated as early as practicable following the injury or illness, but no later than six (6) working days after receiving information that a recordable injury or illness has occurred (Log available at **Appendix 5.3010-B**, Summary available at **Appendix 5.3010-C**);
4. A record of public employee exposure to potentially toxic and/or carcinogenic materials and/or harmful physical agents that are required to be monitored under any Ohio Public Employment Risk Reduction Standard (**Appendix 5.3010-D**); and
5. A record of all incidents where a public health care worker employed by the School is exposed to blood or other material potentially containing bloodborne pathogens through a needlestick or other sharp (**Appendix 5.3010-E**).

Records shall be maintained on a calendar year basis and shall be retained for at least five years following the end of the year to which the records relate. All records required to be maintained shall be made available for



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inspection by the Ohio Bureau of Workers Compensation and any employee, former employee, or employee representative for examination and copying at reasonable times.

The following mandatory reporting requirements shall be complied with by the Principal or his/her designee:

1. The School shall submit the annual summary of all work-related injuries and illnesses no later than February 1 of the following year to which the records relate;
2. The School shall orally report the incident within eight (8) hours after the death of any employee or the in-patient hospitalization of three or more employees as a result from a work-related incident, or within eight (8) hours of learning of the death or in-patient hospitalization; and
3. The School shall submit the sharps injury form within ten (10) business days of any incident where a public health care worker employed by the School is exposed to blood or other material potentially containing bloodborne pathogens through a needlestick or other sharp.

All reports shall be made to:

Public Employment Risk Reduction Program  
Division of Safety and Hygiene  
13430 Yarmouth Drive  
Pickerington, OH 43147  
Fax: 614-621-5754

Phone: 614-644-2246 or 800-671-6858

Website: <https://www.bwc.ohio.gov/employer/programs/safety/sandhperrp.asp>

In the event an inspection is made by a representative of the State, the Principal or his/her designee shall report the results thereof to the Board at the meeting following the receipt of the State report.

### Occupational Safety and Health Administration (OSHA) Compliance

The School believes that the employees and students of the School, as well as visitors, are entitled to function in an environment as free from hazards as can reasonably be provided. In this regard and in accordance with law, the School will provide reasonable and adequate protection to the lives, safety, and health of its employees and students, in compliance with Federal and State laws and regulations.

The Principal or his/her designee shall be responsible for the maintenance of standards in the facilities to prevent accidents and to modernize their consequences. She/he shall designate an employee who shall conduct periodic audits of health and safety conditions within the facilities of the School and take appropriate action on any violations thereof to the Principal or his/her designee.

The Principal or his/her designee shall comply with any mandatory reporting requirements. Such reporting shall include reporting to OSHA (a) within eight hours, the death of an employee as a result of a work-related accident, and (b) within 24 hours, the in-patient hospitalization, amputation, or loss of an eye of an employee as a result of a work-related accident. The School shall maintain any injury or illness records that may be required by OSHA and shall provide access to employees, former employees, or appropriate representatives consistent with OSHA regulations.

All staff members have the right and obligation to report work-related injuries or illnesses. Employers, including the School or Management Company, are prohibited from discharging or in any manner discriminating against employees for reporting work-related injuries or illnesses.



### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Staff members shall complete an incident report (**Appendix 5.3010-A**) for all work-related injuries and illnesses within six working days after receiving information about a recordable incident, injury, or illness. If an injury or illness has latent symptoms and is not immediately apparent, the staff member shall complete an incident report within six working days of identification of the injury or illness.

The Principal or his/her designee shall post and keep posted a notice informing employees of the protections and obligations provided under OSHA as required by law (see **Appendix 45.3010-F**). **Postings shall be in a conspicuous place where notices to employees are customarily posted and all copies of the posting shall be at least 8.5 inches by 14 inches in size with at least 10-point type.**

The Principal or his/her designee shall ascertain that the employees and students of the School are aware of their rights to an environment free of recognized hazards, that they are properly trained in safety methods, that protective devices and equipment are available to meet safety standards, and that proper rules and records are maintained to meet the requirements of the law and the regulations of OSHA. In the event an inspection is made by a representative of OSHA, the Principal or his/her designee shall report the results thereof to the Board at the meeting following the receipt of the State report.

\*\*\*Note regarding this policy the Board shall comply with the Public Employment Risk Reduction Program and Occupational Safety and Health Administration requirements for all Board employees. However, School staff members employed by a management company are subject only to OSHA requirements and are not subject to PERRP requirements provided above.

*R.C. 4167 et seq.; OAC Chapter 4167; 29 CFR 1903.2; 29 CFR 1904.2; 29 CFR 1904.35; 29 CFR 1904.39*

See Appendices 5.3010-A – 5.3010-F.





### 5.3020 Property, Equipment and Supplies

It is necessary for everyone to utilize property, supplies, and equipment in the course of doing their jobs. Staff should take care of these items and should know how to use them properly. Damaged equipment should be reported to the Principal immediately so that it can be repaired.

Portable electric equipment must be handled carefully to avoid damage. Flexible electric cords connected to equipment should not be used for raising or lowering the equipment. Flexible cords must not be stapled or hung in a fashion that could damage the outer jacket or insulation. Portable cord- and plug-connected equipment, as well as extension cords, must be visually inspected for external defects and internal defects before use. Extension cords must be plugged directly into a wall outlet and may not be attached to structures or extended through walls, ceiling, floors, or under doors or floor coverings.

Electrical appliances shall be installed and maintained in compliance with the Ohio Fire Code. All appliances must be approved by the Principal or his/her designee. Small electrical appliances, including but not limited to refrigerators, microwaves, and coffeemakers, may only be used in centralized locations supplied with properly rated GFCI outlets and pre-approved by Constellation Facilities management

The Board urges all staff, Students and administration to be economical. A small amount of waste by each employee or Student equals a large amount of waste overall. The ability to save time and materials can contribute to the overall success of the School.

*OAC 1301:7-7-06*



### 5.3030 Energy Conservation

Energy use and conservation are very important to all of us. Everyone can help by conserving energy in every way possible, including but not limited to the following:

1. Turn off unnecessary lighting.
2. Turn off appliances and other equipment not in use.
3. Close doors and windows that are allowing cool or warm air to escape.
4. Do not run water needlessly.
5. Look for and report to the Principal any unnecessary use of water, gas or electrical power that you cannot correct.



### 5.3040 Hazard Communication Program

The Principal will provide information about chemical hazards and other hazardous substances and how to control those hazards in the Hazard Communication Program.

The Program includes the following objectives:

1. Container labeling;
2. Material Safety Data Sheets; and
3. Employee Training.

The following program outlines how the School will accomplish these objectives.

#### Container Labeling

It is the policy of the School that no container of hazardous substances will be released for use until the following label information is verified:

- Containers are clearly labeled as to the contents
- Appropriate hazard warnings are noted
- The name and address of the manufacturer is listed

The responsibility for label verification has been assigned to the Principal. To further ensure that employees are aware of the hazards of material used it is the School's policy to label all secondary containers.

The responsible staff shall ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels which have a block for identity and blocks for the hazard warning.

#### Material Safety Data Sheets (MSDS)

Copies of MSDS for all hazardous substances to which employees and Students may be exposed are kept in each area where the substances are used as well as in a book in the School office. The Principal will be responsible for obtaining and maintaining the data sheet system.

The Principal will review incoming material safety data sheets for new and significant health/safety information. She/he will see that any new information is passed on to the employees.



### 5.3040 Hazard Communication Program (continued)

MSDS will be reviewed for completeness by the Principal. If an MSDS is missing or obviously incomplete, a new MSDS will be requested from the manufacturer. MSDS will be available to all employees in their work area for review. If MSDS are not available or new hazardous substance(s) in use do not have MSDS, please contact the Principal immediately.

#### Staff Information and Training

Staff will attend a health and safety orientation set up by the Director, for information and training on the following:

- An overview of the requirements contained in the Hazard Communication Regulation, including their rights under the Regulation.
- How to lessen or prevent exposure to these hazardous substances through usage of control plans, work practices and personal protection equipment.
- Steps the School has taken to lessen or prevent exposure to these substances.
- How to read labels and review MSDS to obtain appropriate hazard information.

When new hazardous substances are introduced, the Principal will call a meeting and distribute information related to the new material.

#### Hazardous Substances

Information on all hazardous substances within the School can be found in the MSDS book located in the School office.

#### Hazardous Non-Routine Tasks

Periodically, staff is required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by the Principal, or the affected employee shall request such information, about hazards to which they may be exposed during such an activity.

This information will include:

- Specific hazards;
- Protective/safety measures which must be utilized;
- Measures the School has taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.



### 5.3050 Toxic Hazards and Asbestos Hazards

The School is concerned for the safety of the students and staff members and will comply with applicable Federal and State statutes and regulations to protect them from hazards that may result from industrial accidents beyond the control of School officials or from the presence of asbestos materials used in previous construction.

#### Toxic Hazards

These hazards exist in chemicals and other substances used in the school setting such as in laboratories, science classrooms, kitchens, and in the cleaning of rooms and equipment.

The Board appoints the Principal or his/her designee to serve as Toxic Hazard Preparedness (THP) Officer. The THP Officer will conduct a training program for all School employees to include such topics as detection of hazards, explanation of the health hazards to which they could be exposed in their work environment, and the School's plan for communication, labeling, etc.

In fulfilling these responsibilities, the THP Officer may enlist the aid of county and municipal authorities and, if possible, the owners or operators of identified potential sources of toxic hazard.

#### Asbestos Hazards

In its efforts to comply with Asbestos Hazard Emergency Response Act (AHERA), the School recognizes its responsibility to:

1. inspect School buildings owned by the School for the existence of asbestos or asbestos-containing materials;
2. take appropriate actions based on the inspections;
3. maintain a program of periodic surveillance and inspection of facilities or equipment containing asbestos; and
4. comply with EPA and State regulations governing the transportation and disposal of asbestos and asbestos-containing materials.

The Principal or his/her designee shall appoint a person to develop and implement the School's Asbestos-Management Program which will ensure proper compliance with Federal and State laws and the appropriate instruction of staff and students.

The School shall also ensure that, when conducting asbestos abatement projects, each contractor employed by the School agrees to comply with all applicable laws and regulations.

Nothing in this policy should be construed in any way as an assumption of liability by the School or by the Board for any death, injury, or illness that is the consequence of an accident or equipment failure or negligent or deliberate act beyond the control of the School, the Board or its officers and staff or employees.



**CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES**

*42 U.S.C. 9601 et seq.*

*ORC 4167.01 et seq.*



### 5.3060 Guidelines for Compliance with OSHA Regulations on Bloodborne Pathogens

These guidelines suggest procedures designed to help employees comply with OSHA Regulations. Personnel within each job category should be trained in and will be responsible for practicing these procedures in the event of exposure to blood and/or to bloody body fluids spills.

#### Custodians

1. List of equipment to include:
  - Appropriate cleaning supplies and equipment
  - Equipment for handling broken glass and other sharps
  - Personal protective equipment to be worn when bloody body fluid spills are handled.
  
2. Procedures for area clean up which includes:
  - Assessment of spill problem
  - Utilization of appropriate personal protective equipment
  - Method of disposal of bloody waste in Biohazard labeled bag
  - Degloving procedure and hand washing
  - Disposal of Biohazard bagged waste
  - Written report of exposure to bloody body fluids to supervisor\*
  - Medical evaluation of personal exposure to bloody body fluids to begin within two (2) hours of actual exposure

\*Personal Exposure to Bloody Body Fluids includes splash of blood or bloody body fluid into the eye (5) or mouth, or, exposure to blood or bloody body fluid or bloodied cleaning products through broken skin (i.e. cut, abrasion, puncture).

#### Van, Bus Driver and Bus Aides

1. List of equipment to include:
  - Appropriate cleaning materials (may be a specific spill kit so designed)
  - Personal protective equipment available for handling bloody body fluid spills (may be included in the spill kit so designed for this purpose)
  
2. Procedure for bloody body fluid spill clean up includes:
  - Assessment of injury/body fluid spill
  - Utilization of appropriate personal protective equipment
  - Procedure for cleaning with appropriate materials
  - Method of disposal of bloody waste in Biohazard labeled bag
  - Degloving and hand washing
  - Disposal of Biohazard bagged waste when bus routings completed



### 5.3060 Guidelines for Compliance with OSHA Regulations on Bloodborne Pathogens (continued)

- Written report of bloody body fluid spill on the bus to supervisor
- Routine check of Bloody Body Fluid Spill Kit by driver prior to each bus route
- Written report to supervisor if personally exposed to bloody body fluid
- Medical evaluation of personal exposure to bloody body fluids to begin within two (2) hours of actual exposure

\* Personal Exposure to Bloody Body Fluids includes splash of blood or bloody body fluid into the eye(s) or mouth, or, exposure to blood or bloody body fluid or bloodied cleaning products through broken skin (i. e. cut, abrasion, puncture).

#### Food Service Workers

1. List of equipment includes:
  - Appropriate First Aid supplies and their location(s)
  - Appropriate cleaning materials
  - Personal protective equipment available for handling bloody body fluid spills (i. e. gloves, gauze squares, absorbent materials, etc.)
2. Procedure for handling bloody body fluid spill(s) include(s):
  - Assessment of injury/body fluid spill
  - Utilization of appropriate personal protective equipment
  - Procedure for First Aid in handling the injury/body fluid spill
  - Procedure for cleaning with appropriate materials if authorized
  - Method of disposal of bloody waste in a Biohazard labeled bag
  - Degloving and hand washing
  - Disposal of Biohazard bagged waste materials
  - Procedure for written injury/accident report to supervisor
  - Report to supervisor if personally exposed to bloody body fluids
  - Medical evaluation of personal exposure to bloody body fluid to begin within two (2) hours of actual exposure.

\* Personal Exposure to Bloody Body Fluids includes splash of blood or bloody body fluid into the eye(s) or mouth, or, exposure to blood or bloody body fluid or bloodied cleaning products through broken skin (i. e. cut, abrasion, puncture).

#### Health Care: First Responders

This category of personnel includes those designated in the School's policies, procedures, administrative guidelines, etc.





## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

1. List of equipment includes:
  - Appropriate First Aid supplies and their location(s)
  - Appropriate cleaning materials
  - Personal protective equipment available for handling bloody body fluid spills (i.e. gloves, gauze squares, absorbent materials, etc.)
  - Sharps container
  
2. Procedure for handling bloody body fluid spill(s) include(s):
  - Assessment of injury/body fluid spill
  - Utilization of appropriate personal protective equipment
  - Procedure for First Aid in handling the injury/body fluid spill
  - Procedure for safe transfer of injured person to First Aid station
  - Procedure for cleaning with appropriate materials if so authorized to perform
  - Method of disposal of bloody waste in a Biohazard labeled bag
  - Procedure for storage and disposal of sharps
  - Procedure for sanitizing equipment and sharps containment utilized
  - Degloving and hand washing
  - Disposal of Biohazard bagged waste materials
  - Procedure for written injury/accident report to supervisor
  - Report to supervisor if personally exposed to blood fluids\*
  - Medical evaluation of personal exposure to bloody body fluids to begin within two (2) hours of actual exposure.

\* Personal Exposure to Bloody Body Fluids includes splash of blood or bloody body fluid into the eye (s) or mouth, or, exposure to blood or bloody body fluid or bloodied cleaning products through broken skin (i. e. cut, abrasion, puncture).

### Directions When Using to Disinfect:

Intact disposable latex or vinyl gloves must be worn during all cleaning and disinfecting procedures involving blood and other bodily fluids.

Use 1/2 ounce of MATAR Germicidal Detergent per 1 gallon of water. Apply to soiled surfaces for a minimum of ten (10) minutes at room temperature of 20 degrees Centigrade (68 degrees F). Such applications will inactivate HIV-1, Tuberculocidal and other viruses. Blood, urine and other bodily fluids plus gross filthy and heavy soil deposits must be removed prior to applying MATAR with a mop, sponge, cloth or by soaking

When cleaning and decontamination procedures have been completed, all blood and other bodily fluids as well as soiled cloths, sponges and mops which cannot be sanitized for reuse must be autoclaved and properly disposed by double bagging and placing in an appropriate waste disposal dumpster or incinerated.

Avoid contamination of food products with MATAR solutions. In case of skin contact, wash thoroughly with soap and water. In case of eye contact, immediately flush with water for fifteen (15) minutes and obtain prompt medical attention. If swallowed, drink promptly large quantities of water (avoid beverages containing any amount of alcohol) - Call a physician immediately.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Store MATAR solutions only in containers intended for such use and properly label the storage vessel. Dispose of containers (after triple rinsing) in sanitary landfills or incinerate. If container(s) is/are incinerated, avoid standing in smoke or breathing fumes during burning process.



### 5.3070 Radon Testing, Mitigation and Notification

The U.S. EPA ranks indoor radon among the most serious environmental health problems. To mitigate this health risk, and ensure compliance with state and federal law, the Facilities Manager, or other person appointed by the Executive Director, shall develop, coordinate and implement the School's Radon Management Program and provide appropriate instruction to faculty, staff and students. As a part of this Radon Management Program, the School will:

1. Employ, or use only trained school personnel or a company or individual licensed by the Ohio Department of Health (ODH), to inspect and test buildings owned or occupied by it for the existence of radon or radon-containing materials;
2. Take appropriate action based on the inspections;
3. Maintain a program of periodic surveillance, inspection and testing of facilities, or equipment containing radon;
4. Construct new buildings using radon-resistant new construction (RRNC) techniques as defined by U.S. EPA publication Radon Prevention in the Design and Construction of Schools and Other Large Buildings [EPA 625-R-92-016, June 1994];
5. Test buildings as follows:
  - a. If the building was built radon resistant (and initial tests are within acceptable limits) or after an initial test of an existing building that indicates radon levels are within acceptable limits, re-test every five years;
  - b. If a test is performed on an existing building and radon levels are found to be at or above 4.0 pCi/L, the School will develop a mitigation plan to reduce radon to acceptable levels. The School will utilize only ODH-licensed radon-mitigation contractors to design and install a mitigation system if such action is required due to test results;
  - c. If a building undergoes major renovation of the HVAC system or the building structure, the building will be tested prior to the renovation and immediately upon completion of the renovation and thereafter at a frequency of every five years, if there are no elevated radon levels, or, every two years after mitigation for elevated radon levels.
6. Comply with federal, state and local laws and regulations governing the removal, transportation and disposal of radon and radon-containing materials;
7. Upon completion of testing (and mitigation, if necessary), report radon levels and specifics of the mitigation to the ODH, Bureau of Radiation Protection, 246 N. High Street, Columbus, Ohio 43215;
8. Maintain records pertaining to testing and mitigation on file at Constellation Schools, 5983 West 54<sup>th</sup> Street, Parma, Ohio 44129 for a minimum of five years, and then archived for another five years. Subsequently, the School's record retention schedule shall be followed.



**CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES**

**5.3080 Repeal March 23, 2017 Water Flushing Protocol**



### 5.3090 Motor Vehicle Idling

This policy is intended eliminate unnecessary bus idling to reduce health risks posed by school bus exhaust emissions, and shall apply to all buses use to transport the School's students.

1. Bus idling on school grounds shall not exceed five (5) minutes, except as noted below:
2. Bus drivers should turn off their buses as soon as practicable after arriving at loading or unloading areas and should not re-start the school bus until it is ready to depart and there is a clear path to exit;
3. Buses should be turned off and not idle while waiting for students during field trips, extracurricular activities or other events where students are transported off school grounds;
4. During cold weather, bus drivers who arrive early may wait inside the School;
5. If interior bus warmth is an issue during cold weather, idling should be kept to a minimum and should occur outside the school zone and the bus should enter the loading area as close as possible to pick-up time;
6. All service delivery vehicles should turn off engines while making deliveries to the School;
7. The School will work with the Home District Transportation personnel to create bus schedules that reduce caravanning and ensure the cleanest running buses are assigned to the longest routes;
8. During morning start-up, buses should idle only long enough to bring the engines up to proper operating temperature, defrost all windows and operate all heaters, air conditioners or other equipment to ensure the safety and health of the students and driver;
9. The School shall conspicuously post signs on school grounds reminding all operators of motor vehicles of this idling policy and that vehicles should be turned off while waiting for students.



### 5.3100 Integrated Pest Management

To ensure a safe, clean and healthful school environment, while protecting students, staff, School property and the environment, the Board adopts a least-hazardous integrated pest management (IPM) policy. When selecting pest-prevention methods, the School will consider the full range of alternatives, giving preference to non-chemical methods and then chemicals that pose the least hazard to people and the environment. The School will utilize non-chemical pest-prevention methods whenever possible.

To minimize the need for chemical pest prevention, the School shall be regularly cleaned and kept in good repair, to prevent infestations.

The School's least-hazardous IPM program shall:

- Identify and monitor pests and determine their population levels
- Identify practices that may affect pest populations
- Determine when a pest population exceeds an acceptable level
- Modify and/or eliminate pest habitats
- Consider a full range of potential treatments for pest problems including physical, horticultural and biological methods of pest control
- Use chemical pest controls only as a last resort and give preference to those chemicals that pose the least hazard to people and the environment

The Facilities Manager shall coordinate the IPM program, shall be educated in the principles and practices of least-hazardous IPM, and shall be responsible for:

- The successful implementation of the IPM program
- Ongoing program management, including necessary inspections and monitoring
- Determining action levels that trigger treatment
- Posting warning signs for pesticide applications
- Documenting actions taken and maintaining required record keeping for chemical pesticide applications
- Education and training of other personnel requiring knowledge of the IPM program

Except in situations requiring immediate action to protect the health and safety of students, staff and property, at least 72 hours before application of a pesticide other than a least toxic pesticide, the School will post a sign that provides notice of the application of the pesticide: (A) in a prominent place that is in or adjacent to the location to be treated; and (B) at each entrance to the building or school ground to be treated. The sign will remain posted for at least 72 hours after the end of the treatment, and be of a uniform design and utilize a symbol that can be easily understood for people who cannot read.

This policy applies to School personnel and pest control contractors.



### 5.3100.1 Prior Notification of Pesticide Application

Faculty, staff, and parents of students may request and receive prior notifications of scheduled pesticide applications that occur on or in the classroom buildings of the School when School is in session that involve one or more of the following products:

- Manufactured paste or gel baits;
- Paraffin-based rodent control products placed in industry-identified tamper-resistant bait stations;
- Termite-baiting stations;
- Rodenticides which are placed in wall voids or other areas that are inaccessible to humans and domestic animals; or
- Dusts used in unoccupied areas of the structure.

The method of notification may include regular mail, email, or listserv, as determined by the Principal.

If special circumstances arise that prevent prior notification from being provided as required, such as emergency application of pesticides to control organisms that pose an immediate health threat, the School shall provide notice as soon as possible. The notice shall explain the reasons why advance notice was not provided.

The School Principal shall serve as contact person for pesticide applications made at the School. The School shall maintain the following records for inspection during normal school hours by parents or guardians of minor children, adult students, faculty and staff who are enrolled or employed at the School, or the Department of Agriculture:

1. For a pesticide application described in this policy or any other application for either the longer of four hours or the minimum time specified by the label of the pesticide applied prior to the beginning of the school day; at a time after the school day has concluded; or when school is not in session under the calendar established by the local school board:
  - Date and time that the pesticide was applied;
  - Treatment area;
  - Target pests;
  - Brand name and EPA registration number of the pesticide applied; and
  - The time or conditions for re-entering the treatment area as specified by the label of the pesticide applied, if any is specified.

The School will retain such records for a period of one year following the date of application.

2. Documentation that the School provided notifications requested by faculty, staff, and parents of students under this policy.



### 5.3200 Health and Safety Inspections

School inspections, designed to identify conditions within the School and School building that may be injurious to the safety or health of building occupants, will be conducted at least semiannually by the local board of health, according to standards set by the local board of health.

If the local board of health serves an order upon the School to abate nuisances or correct conditions detrimental to health or well-being which are found upon School property, the person responsible for upkeep of the property shall abate the nuisance or condition within such reasonable fixed time as is set by the local board of health.

The School shall periodically review its policies and procedures to ensure the safety of students, employees, and other persons using the School building from any known hazards in the building or on building grounds that, in the judgment of the School, pose an immediate risk to health or safety. The School shall further ensure that its policies comply with all federal laws and regulations regarding health and safety applicable to school buildings.

The School shall at all times have in place a Chemical Hygiene Plan and an Asbestos Management Plan in accordance with federal law.

*R.C. §§ 3313.86, 3707.03, 3707.26, 29 CFR 1910.1450, 15 USC § 2651 et seq.*

See Appendix Chemical Hygiene Plan; Policy No. 5.3050 Toxic Hazards and Asbestos Hazards; Appendix Asbestos Management Plan; Appendix No Smoking Sign; Policy Crisis Media Situation; Policy No. 5.1120 Control of Blood Borne Pathogens; Policy No. 5.1170.1 Use of Medication; Policy Comprehensive Safety Plan.





## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.3300 Prevention of Lead Poisoning

Exposures to lead in doses much smaller than previously thought represent a definable risk to children's health and their ability to learn.

The School will attempt to control the use and maintenance of lead-bearing building products and avoid the use of any educational or maintenance procedures or products which may create lead exposures.

The School assures that a parent or guardian outreach program will be implemented to properly communicate information regarding risks from lead and other heavy metals in an attempt to help prevent exposures, by including an informational packet similar to that in **Appendix 5.3300-A**.

See **Appendix 5.3300-A - Protect Your Family from Lead in Your Home**

*R.C. Chapter 3742.*

**Acknowledged: August 19, 2021**  
**Acknowledged: October 15, 2020**  
**Adopted March 23, 2017**

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### 4000 FOOD PROGRAM

#### 5.4010 Food Services

All students will remain at school for lunch and will not be allowed to leave the School or any recreation areas or common areas without permission, or, if the School authorizes leaving the School for lunch, all students shall follow the School's procedures and rules. Supervision of student activity in the lunchroom, recreation or common areas shall be the responsibility of the teacher or staff member in charge who may delegate this authority to others.

Any food service program provided or contracted for by the Board shall comply with Federal and State regulations pertaining to the counting, menus, selection, preparation, consumption, and disposal of food and beverages as well as to the fiscal management of the program. The contract food service program shall be responsible for the planning as well as for the dietary and nutritional requirements of the meals served.

If the School engages a Food Service Management Company ("FSMC") to manage its food service operations, the School shall:

1. Retain signature authority and control of the quality, extent, and general nature of the food service and prices to charge children for meals, by monitoring the FSMC's compliance with any contract;
2. Ensure that all federally donated foods received by the School and made available to the FSMC accrue only to the benefit of the School and fully utilized therein;
3. Establish an advisory board or committee composed of parents, teachers, and students to assist in menu planning, which the FSMC shall participate on;
4. Conduct periodic on-site monitoring of the FSMC;
5. Document monitoring activities of the FSMC and retain records of monitoring efforts;
6. Ensure that the FSMC complies with all relevant health inspection regulations, including health inspection requirements in the School's contract with the FSMC, and
7. Conduct an annual reconciliation to verify that the full value of credits for USDA foods is received by the School and retain records of such reconciliation.

No person shall be excluded from participation in, be denied the benefits of, or otherwise be subject to physical segregation or other discrimination under any program or activity for which the School receives federal financial assistance for food and nutrition services on the basis of race, color, national origin, age, disability, sex, gender identity, or income. No student shall be denied access to meals or milk as a disciplinary action, either directly or indirectly.

Student eligible for free or reduced-price meals shall not be identified by the School through the use of separate cafeteria entrances, separate meal service lines, or use of any other method likely to result in the identification of such students. The names of students eligible to receive free or reduced-price meals or free milk shall not be published, posted, or announced under any circumstances. Meals served to students eligible to receive free or reduced-price meals shall be the same meals as those served to students paying full price. Under no circumstance shall an eligible student be required to work for his or her meal.

Governmental regulations do not permit the serving of meals at the student price to Staff or other adults.



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If the School is a food service operator, then it is required to post a sign at all hand washing sinks used by food employees notifying them to wash their hands. See Appendix 5.1130-A Hand Washing Poster.

The Principal or his/her designee shall submit a public release each school year informing the general public that the School participates in federal food service programs and providing information about fee and reduced price meals. The School is not obligated to pay to publish the release, but the Principal or his/her designee must submit the release for publication to the media and to organizations in the School's geographic area that reach minority or under-represented groups, such as libraries, food pantries, and community action program agencies. The School must document the dates and locations of all media release submissions, including unsuccessful publication attempts. See Appendix 5.1130-B Sample Public Release.

Any school publication, including the School's website that refers to any federal food service program or to the United States Department of Agriculture (USDA) must include the following statement:

"In accordance with Federal civil rights law and the U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.) should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. The request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

1. Mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250-9410;
2. Fax: (202) 690-7742; or
3. Email: program, [intake@usda.gov](mailto:intake@usda.gov).

This institution is an equal opportunity provider."

If the publication material is too small to permit the full statement to be included, the material will, at a minimum, include the following condensed statement, in print size no smaller than the text: "USDA is an equal opportunity provider and employer."



### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

The School shall prominently display the USDA “And Justice for All” poster in a location accessible to food service program participants. The poster must be 11” by 17.” The Principal or his/her designee may obtain copies of the poster by contacting the UDA Midwest Regional Office at 77 West Jackson Boulevard, 20<sup>th</sup> Floor, Chicago, Illinois 60604-3057, or by calling (312) 353-6557.

*R.C. 3717.42; OAC 3717-1-06.2(E); 7 C.F.R. 210.16.*

See Appendix 5.1130-A Hand Washing Poster and Appendix 5.1130-B Sample Public Release

**Adopted: May 19, 2022**



### 5.4020 Wellness Policy

The School believes that healthy students are more likely to successfully complete their formal education. The School recognizes that it plays an important role in the development of students' health and nutrition habits by providing nutritious meals and snacks, supporting the development of good eating habits, and promoting increased physical activity.

The Board sets forth the following goals in an effort to enable students to establish good health and nutrition habits:

#### Nutrition Promotion and Education Goals

1. The School will teach, model, encourage, and support healthy eating by all students. The School will provide nutrition education and engage in nutrition promotion that:
  - a. Is designed to provide students with the knowledge and skills necessary to promote and protect their health;
  - b. Is interactive and teaches the skills they need to adopt healthy eating behaviors;
  - c. Promotes fruits, vegetables, whole-grain products, low-fat and fat-free dairy products, and healthy food preparation methods;
  - d. Emphasizes caloric balance between food intake and energy expenditure (promotes physical activity/exercise);
  - e. Is offered and promoted in the School cafeteria as well as in the classroom with coordination between the foodservice staff and teachers; and
  - f. Is part of not only health education classes, but also integrated into other classroom instruction through subjects such as math, science, language arts, social sciences, and elective subjects.
  
2. The School will follow the state standards and include a variety of essential topics on healthy eating in the health education curriculum, which may include:
  - a. Relationship between healthy eating and personal health and disease prevention
  - b. Reading and using FDA's nutrition fact labels
  - c. Eating a variety of foods every day
  - d. Balancing food intake and physical activity
  - e. Making healthy food choices, including eating more fruits, vegetables, and whole grain products, and choosing foods that are low in fat, cholesterol,
  - f. and added sugar
  - g. Risks of unhealthy weight control practices
  - h. Accepting body size differences
  - i. Importance of eating breakfast
  - j. How to find valid information or services related to nutrition and dietary behavior  
How to develop a plan and track progress toward achieving a personal goal to eat healthfully



### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

3. The School will promote healthy food and beverage choices for all students throughout the school campus, as well as encourage participation in school meal programs. This promotion will occur through at least:
  - a. Implementing evidence-based healthy food promotion techniques through the school meal programs using Smarter Lunchroom techniques, which may include:
    - i. Staff members, especially those serving, are trained to politely prompt students to select and consume the daily vegetable option with their meal;
    - ii. White milk is placed in front of other beverages;
    - iii. Student artwork is displayed in the service and/or dining area;
    - iv. School announcements are used to promote and market healthy eating and physical activities;
    - v. Signs and verbal prompts are used to draw attention to fruits and encourage students to select them;
    - vi. Menu items are given creative names which are displayed on signs and menus; and
    - vii. Marketing nutritious foods to encourage students to select fruits, vegetables, and other healthy items.
  - b. Ensuring 100% of foods and beverages marketed or promoted to students meet the USDA School Meal nutrition standards and the Smart Snacks in School nutrition standards.

#### Physical Education Activities and Goals

1. The School will provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The physical education curriculum will promote the benefits of a physically active lifestyle and will help students develop skills to engage in lifelong healthy habits, as well as incorporate essential health education concepts. The curriculum will support the essential components of physical education.
2. All students will be provided equal opportunity to participate in physical education classes. The School will make appropriate accommodations to allow for equitable participation for all students and will adapt physical education classes as necessary.
3. The School physical education program will promote student physical fitness through individualized fitness and activity assessments and will use criterion-based reporting for each student.
4. The School will include a variety of essential topics on physical activity in the health education curriculum, which may include:
  - a. The physical, psychological, or social benefits of physical activity
  - b. How physical activity can contribute to a healthy weight
  - c. How physical activity can contribute to the academic learning process
  - d. How an inactive lifestyle contributes to chronic disease
  - e. Health-related fitness, that is, cardiovascular endurance, muscular endurance, muscular strength, flexibility, and body composition



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- f. Phases of an exercise session, that is, warm up, workout, and cool down
  - g. Overcoming barriers to physical activity
  - h. Preventing injury during physical activity
  - i. How much physical activity is enough, that is, determining frequency, intensity, time and type of physical activity
  - j. Developing an individualized physical activity and fitness plan
  - k. Monitoring progress toward reaching goals in an individualized physical activity plan
  - l. How to find valid information or services related to physical activity and fitness
5. All elementary schools will offer recess on all days during the school year (This policy may be waived on early dismissal or late arrival days). Outdoor recess will be offered when weather is feasible for outdoor play. In the event that the school must conduct indoor recess, teachers and staff will encourage activities that promote physical activity for students, to the extent practicable. Recess will complement, not substitute, for physical education class.
6. The School recognizes that students are more attentive and ready to learn if provided with periodic breaks when they can be physically active or stretch. Thus, students will be offered periodic opportunities to be active or to stretch throughout the day on all or most days during a typical school week. The School recommends teachers provide short (3-5 minute) physical activity breaks to students during the school day. These physical activity breaks will complement, not substitute, for physical education class or recess.

### Other School-Based Activities

1. The School will integrate wellness activities across the entire school setting, not just in the cafeteria, other food and beverage venues, and physical activity facilities. The School will coordinate and integrate other initiatives related to physical activity, physical education, nutrition, and other wellness components so all efforts are complementary, and work towards the same set of goals and objectives promoting student well-being, optimal development, and strong educational outcomes.
2. All efforts related to obtaining federal, state or association recognition for efforts, or grants/funding opportunities for healthy school environments will be coordinated with and complementary of the wellness policy.
3. All school-sponsored events will adhere to the wellness policy guidelines. All school-sponsored wellness events will include physical activity and healthy eating opportunities when appropriate.
4. The School will develop relationships with community partners (e.g., hospitals, universities/colleges, local businesses, etc.) in support of this wellness policy's implementation. Existing and new community partnerships and sponsorships will be evaluated to ensure that they are consistent with the wellness policy and its goals.
5. The School will promote to parents/caregivers, families, and the general community the benefits of and approaches for healthy eating and physical activity throughout the school year. Families will be informed and invited to participate in school-sponsored activities and will receive information about health promotion efforts.



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6. Nutrition shall be considered when planning school-based activities such as classroom snacks, parties, or fundraisers. School staff and families will be encouraged to provide healthy foods and beverages or non-food items as treats, rewards, etc.

### Nutrition Guidelines

1. The School is committed to offering school meals through the National School Lunch Program, School Breakfast Program, and other applicable Federal child nutrition programs, that:
  - a. Are accessible to all students;
  - b. Are served in clean and pleasant settings; and
  - c. Meet or exceed current nutrition, preparation, consumption, and disposal requirements established by state and federal regulations and stated in the School's Food Sale Standards policy.
2. Participation in Federal child nutrition programs will be promoted among students and families to help ensure that families know what programs are available in their children's school.
3. To support healthy food choices and improve student health and well-being, all foods and beverages sold to students outside of the school meal programs will meet or exceed the USDA Smart Snacks in School nutrition standards. Any food provided outside of the school meal programs, but not sold during the school day on School premises, will align with the goals and standards stated in this Policy.
4. Marketing of foods and beverages at the School during the school day will be limited to those foods and beverages that meet the standards set forth in the School's Food Sales Standards policy. The Board reserves the right to further limit marketing of food and beverages.
5. To promote hydration, the School will make drinking water available where school meals are served during mealtime.

### Implementation and Evaluation

1. The School Principal or designee, as the Wellness Committee representative, shall ensure that the School implements, complies with, and annually evaluates this Policy.
2. The School will collaborate with the Wellness Committee, which may include administrators, board members, teachers, parents, students, school health professionals, physical education teachers, if applicable, representatives of the school food authority, food service staff, or community members. The Wellness Committee representative(s) will participate in the annual review of the Policy and will make recommendations of changes. In developing or updating goals, the Committee will review and consider evidence-based strategies and techniques.
3. The School and Wellness Committee representative(s) will measure the implementation of this Policy at least triennially, focusing specifically on the extent to which the School has complied with the Policy, the extent to which the Policy compares to the Food and Nutrition Service's model local wellness policies, and the extent to which the School has progressed toward achieving its stated goals in the Policy. The School and Wellness Committee representative(s) will create a written assessment based on the measurements that they will disseminate to students, their families, and other members of the community or post on the school's website. The School will make appropriate modifications to this Policy, if necessary, based on this assessment.





## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

4. The School will disseminate this Policy to families of school children and other members of the community or post it on its website at the start of each school year, and it will notify such individuals of changes to the Policy in the same manner.

### Recordkeeping

The School shall retain documentation demonstrating compliance with this Policy, including requirements related to community involvement, triennial assessments of this Policy, and public dissemination of this Policy and any updates thereto.

*42 U.S.C. 1758b; 42 U.S.C. 1771; 7 CFR 210.31; R.C. 3313.814; R.C. 3313.816; R.C. 3313.817*

See also Policy 5.4050 Food Sales Standards and Appendix 5.4050-A Nutrition Standards for Beverages



### 5.4030 Free and Reduced-Price Meals

The School recognizes the importance of good nutrition to each student's educational performance.

The School shall provide eligible needy students with breakfast and/or lunch at a reduced rate or no charge to the student. Children eligible for free and reduced-price meals shall be determined by the criteria established by the Child Nutrition Program and National School Lunch Act. These criteria are issued annually by the Federal government through the State Department of Education.

The Board designates the Principal or his/her designee as the responsible party to determine the eligibility of students for free and reduced rate meals. Eligibility determinations may be appealed to the Principal or his/her designee at a formal hearing held pursuant to any applicable federal and state hearing procedures.

The School shall not overtly identify children receiving free and reduced price meals. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subject to physical segregation or other discrimination under any program or activity for which the School receives federal financial assistance for food and nutrition services on the bases of race, color, national origin, age, disability, sex, gender identity, or income. **See Policy 5.4010 Food Services.**

The School shall annually notify all interested persons of the availability, eligibility requirements, and application procedure for free and reduced rate meals by distributing an application to the family of each student enrolled in the School.

The Principal or his/her designee shall prepare and implement the necessary arrangements and guidelines to ensure proper operation of this program. She/he shall ensure that the appropriate policy attachments for Free and Reduced-Price Meals or Free Milk are properly completed and submitted for approval to the School Food Service Division of the Ohio Department of Education by the beginning of each School year.

*42 USC 1751; 7 C.F.R. 245.*

See also Policy 5.4010 Food Services; Appendix 5.4030-A Appeal Hearing Procedures; Appendix 5.4030-B Application to Receive Free and Reduced-Price Meals; and Appendix 5.4030-C Parental Notice of Availability of Free and Reduced-Price Meals.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.4040 Peanut or Other Food Allergies

The School recognizes that food allergies, in some instances, may be severe and even life-threatening. The School has adopted this policy to create a framework for accommodating students with peanut and other food allergies and to reduce the likelihood of severe allergic reactions of students with known food allergies while at School. This food allergy policy shall be developed based on input from a committee made up of community members such as parents, school nurses, and other school employees, school volunteers, students, and community members.

#### Parent/Student Responsibility

1. Parents of students, or students age eighteen (18) or older, with food allergies must provide written notification to the Principal of such allergies at the beginning of each School year.
2. Parents of students with life threatening food allergies must provide the School with emergency medications, execute an Emergency Medical Authorization Form, found in **Appendix 5.1060-D**, and cooperate with the School to formulate a Food Allergy Action Plan as described below.
3. Parents are responsible for educating their child on managing his/her food allergy at School, including, but not limited to, identifying “safe foods,” by reviewing the weekly lunch menu together, and discussing the vigilance required to self-monitor food products sold at athletic events or special student sales, foods brought for potlucks or classroom celebrations, or foods served on School-sponsored trips.

#### School Responsibility

1. The School must cooperate in the development of a Food Allergy Action Plan for students with life threatening allergies. The Food Allergy Action Plan must address what actions will be taken to avoid exposure at School and what actions will be taken in the event of exposure. The Plan shall be developed through consultation between the School nurse (if any) (or other School staff or person if none), the student’s parents, and the student’s physician or allergist. Once created, this Plan should be reviewed and updated annually by the School, the student’s parents, and the student’s physician or allergist.
2. The School will share the Food Allergy Action Plan developed with appropriate School staff.
3. With the consent of the student’s parents, a Food Allergy Action Plan may provide a mechanism for the School to notify the student’s classmates and/or a student’s classmates’ parents of a life threatening food allergy in the classroom.

*R.C. 3313.719*

See Appendix 5.4040-A Food Allergy Notification Form. See also Policy 5.1170.5 Use of Inhaler/Epinephrine Autoinjector; Policy 5.1060 Emergency Medical Authorization; Policy 5.4020 Wellness Policy.

**Acknowledged: August 19, 2021**  
**Acknowledged: October 15, 2020**  
**Adopted: December 15, 2016**



### 5.4050 Food Sales Standards

The Board shall create standards for the types of food and beverages sold or provided in the School and the time and place each type of food and beverage is sold or provided, in accordance with state law and based on the following guidelines:

- A. The types of food and beverages sold in the School will
  1. promote student health and reduce childhood obesity,
  2. significantly benefit the daily nutritional needs of students (per U.S. Department of Agriculture guidelines),
  3. align with School Wellness Policy (Policy 5.4020) requirements, and
  4. follow requirements provided under state and federal law.
- B. The Board or its designee shall consult with a licensed dietician, a registered dietetic technician or a certified/credentialed school nutrition specialist to assist in drafting a plan:
  1. for complying with and enforcing the nutritional standards governing the types of food and beverages that may be sold on the School premises in compliance with State law; and
  2. specifying the time and place each type of food or beverage may be sold.

*See Appendix 5.4050-A Nutrition Standards for Food and Beverages.*
- C. The times and locations of food and beverage sales to students on school grounds will be assigned based on nutrient intake needs and eating patterns of students and align with class schedules. With regard to non-breakfast/lunch food and beverage sales:
  1. The School will not operate vending machines offering foods or beverages that do not meet the nutritional standards established by the School during the school lunch period. The Board reserves the right to totally restrict the sale of non-nutritional foods and beverages in vending machines.
  2. Bake sales and other school fundraising activities involving food and/or beverage items may not be held during the regular school day unless they meet the USDA Smart Snacks in School nutrition guidelines. The “regular school day” includes any “extended school day” programs, including periods before or after school during which students participate in school-sponsored extracurricular activities, latchkey programs, or other academic or enrichment programs. The School will limit the frequency of bake sales and other food based fundraisers where non-nutritional foods and beverages will be sold based on the standards established by the Department of Health.
- D. The types of food and beverages provided, but not sold, to students will align with the School Wellness Program and any applicable requirements provided under state law. The Board may provide parents with a list of acceptable snacks that may be provided in the School.
- E. Annually, the food services supervisor shall review and report the School’s compliance with these standards to the Board and to the Ohio Department of Education. The Board may establish separate standards regulating the types of food and beverages to be sold to Staff Members and for special or extracurricular events.



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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

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This policy applies to the sale or provision of foods from the midnight before the school day until 30 minutes after the end of the regular school day on school premises. School premises, for the purpose of this policy, include any areas of property under the School's jurisdiction that is accessible to students during the regular school day.

*7 C.F.R. 210.10-210.11; 7 C.F.R. 210.31(c)(2)-(3); 7 C.F.R. 220.8; R.C. 3313.814; R.C. 3313.816; R.C. 3313.817; OAC 3301-91-09; USDA Smart Snacks in School nutrition guidelines.*



### 5.4060 Unpaid Meal Charges

The School believes that all students should have access to healthy school lunches and wishes to minimize identification of students with insufficient funds, but recognizes the need to protect the financial stability of the school nutrition program. The School, as a school food authority, has established the following procedures, which will be implemented beginning in the 2017-2018 school year, (a) to handle situations in which a student eligible for reduced-price or full-price meal benefits has insufficient funds to pay for school meals, and (b) to collect unpaid meal charges and delinquent account debt.

Parents and students shall continue to comply with any and all School requests and procedures regarding pre-selection of meals, if applicable.

#### Unpaid Meal Charge

Students who qualify for free meals will not be denied a reimbursable meal even if they have previously accrued a negative balance. However, in these circumstances, students may be prohibited from purchasing a la carte or extra items. Students with unpaid meal charge debt who attend School with money to pay for a reduced-price or full-price meal at the time of that meal's service must be provided a meal, even if that student has accrued a negative balance. The School will not use the money intended to purchase a day's meal for repayment of a negative balance or other unpaid meal charge debt.

If a student does not have funds to pay for a reduced-price or full price meal at the time of that meal's service, the student may receive an alternative meal from the School at no cost to the student, if alternative meals are available. This meal does not need to meet Smart Snacks requirements, but must accommodate special dietary needs. The meal cost must be funded from a non-federal source.

The School will notify the parent in writing if a student's account has a negative balance. This notification will include the amount of any low or negative balance, expected payment date, consequences of non-payment, and information regarding where families can find assistance with applying for free and reduced-priced meals.

#### Collection of Delinquent or Bad Debt

The School shall consider debt delinquent and shall request payment ten (10) school days after the date in which the School provides parental notice of a student's negative account balance. The Principal or his/her designee will work directly with households to collect any delinquent meal charge debt and shall be responsible for managing charges and delinquent debt owed to the School. At the Principal's or his/her designee's discretion, the School may establish repayment plans for the collection of debt. Delinquent debt and repayment plans may carry over to the next school year.

If the Principal or his/her designee determines that delinquent debt is uncollectible at the end of the school year, the debt will be considered "bad debt." Bad debt may not be carried over to the next school year. Bad debt must be restored to the School and Nutrition Program from the general fund prior to the end of the same fiscal year. Bad debt may not be recovered using federal funds.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Notification

The School will communicate this policy in writing to all students and households at the beginning of each school year and upon a change in a student's eligibility for meal benefits. Forms and information regarding free or reduced price lunch shall be available at the School office, and the Principal or his/her designee shall be available to answer questions regarding the meal program and any unpaid meal charge debt. The School shall not disclose the identities of students eligible for free or reduced-priced meals except to those individuals who require that information to carry out an activity authorized by the National School Lunch Act, 42 U.S.C. 1751.

### Community Eligibility Provision

Notwithstanding the above, if the Schools is a Community Eligibility Provision (CEP) provider, the School shall provide reimbursable meals for breakfast and lunch to all students free of charge.

*Richard B. Russell National School Lunch Act, 42 U.S.C. 1751.*



### 5.4070 Return of Unused Food Service Funds

At the end of each academic year, or upon the withdrawal of any student, the School will reconcile the amount of money paid by parents for food services with the actual number of meals purchased by students. If, at that time, it is determined that a parent has paid for more meals than were actually purchased by the student, the School will attempt to contact parents to determine the return of funds. Parents must elect in writing to do one of the following upon notice that unused funds remain in a student's account:

1. Carry over remaining funds to be credited towards student's account for the purchase of meals during the next school year;
2. Request reimbursement of any remaining funds; or
3. Donate the remaining funds to the School to cover the unpaid meal charges of other students that were uncollectable.

Parents must make this election within 90 days of the date of notice from the School, after which time the School will first attempt to credit the funds to the student's account for the purchase of meals during the next school year, or, if this is not possible, the School will assume the remaining funds to have been donated to the School. If the School is a tax exempt entity, the School will issue a receipt acknowledging the parent's donation and will treat the funds in the same manner as all other donations.

Notwithstanding the above, households approved for free- or reduced-price meals shall be reimbursed for any unused funds remaining in a student account at the end of the academic year or at such time as the student is no longer enrolled in the School.

Richard B. Russell National School Lunch Act, 42 U.S.C. 1751.





## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### 5.4080 Illness Exposure Management of Food Service Employees

All current food service employee, or potential employee to whom a job offer has been made, shall report any known or suspected illnesses that are transmissible through food. Reports must be made to the food service supervisor or the Principal or his or her designee prior to beginning the preparation or service of food.

Employees and potential employees shall be temporarily restricted from food service duties or excluded from the School if the individual experiences any of the following:

#### **Reporting: Symptoms of Illnesses**

I agree to report to the manager or person in charge when I have:

1. Vomiting, diarrhea, jaundice (yellowing of the eyes and/or skin), sore throat with fever, or open and draining lesions containing pus such as a boil or infected wound.

**\*With any of the above systems, the food employee shall be restricted from food handling duties until 24 hours after symptoms have ceased.**

#### **Reporting: Diagnosed Illnesses**

I agree to report to the manager or person in charge when I have:

1. Been diagnosed by a health care provider with an illness due to campylobacter, cryptosporidium, cyclospora, entamoeba histolytica, enterohemorrhagic or shiga toxin producing E. Coli, giardia, hepatitis A, norovirus, salmonella spp., salmonella typhi, shigella, vibrio cholerae, or yersinia (“Reportable Illnesses”); or
2. Been exposed to an outbreak of any of the Reportable Illnesses, or work or reside in the same household as an individual who is known to have been exposed to or diagnosed with a Reportable Illness.

**\*The manager or person in charge must report to the local health department when an employee has one of the confirmed illnesses listed above.**

**\*The employee shall be excluded from work until approval by the local health department.**

#### **Reporting: Exposure of Illness**

I agree to report to the manager or person in charge when I have been exposed to any of the illnesses listed above through:

1. Previously having been diagnosed with a foodborne illness due to Salmonella Typhi by a health care provider within the past three months.
2. Consumed or prepared food implicated in a confirmed outbreak.
3. Attended or work in a setting confirmed with a disease outbreak.
4. Live in the same household and has knowledge about an individual who works or have attended a setting where there is a confirmed disease outbreak.

#### **Exclusion and Restriction from Work**

If you are **excluded** from work you are not allowed to come to work. If you are restricted from work you are allowed to come to work, however, duties will be limited to tasks that do not include handling of food and food contact surfaces.



# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

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### Agreement

I understand that I must:

1. Report when I have or have been exposed to any of the symptoms or illnesses listed above; and
2. Comply with work restrictions and/or exclusions that are given to me.

*O.A.C. 3717-1-02.1.*

I understand that if I do not comply with this agreement, it may put my job at risk.

Food Employee Name (Please Print) \_\_\_\_\_

Signature of Employee & Date: \_\_\_\_\_

Manager (Person in charge) Name (Please Print): \_\_\_\_\_

Signature of Manager (Person in Charge) & Date: \_\_\_\_\_

**Adopted: September 20, 2018**



### Appendix 5.1070-A

#### Covid-19 Specific Procedures

The health and safety of the School community is paramount to the School. As such, individuals may be asked to self-quarantine or otherwise be restricted from access to the School in order to prevent the spread of illness. School closures will be addressed on a case by case basis in consultation with local, state and federal officials.

All students, and their parents or guardians, staff, and volunteers must conduct daily health checks prior to going to the school building. At minimum, daily health checks should include taking an individual's temperature and assessing for any symptoms of Covid-19 infection. Per the current Centers for Disease Control and Prevention ("CDC") guidance, COVID-19 symptoms including the following\*:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Persistent pain or pressure in chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Repeated shaking with chills

\*The list of possible symptoms may be updated as more is learned about COVID-19.

The School may also take student, staff, volunteer, and/or visitor, temperatures as they enter the building. **Anyone with one or more COVID-19 symptoms or a temperature equal to or above one hundred degrees Fahrenheit (100°F) must stay home and should notify the School immediately.**

If a student, staff, or volunteer begins to show symptoms or has a temperature above 100°F while at the school building, they must immediately be separated, given a face covering, and monitored by a staff member wearing appropriate personal protective equipment ("PPE") and maintaining physical distance when possible. The space where an individual waits before he or she goes home should be separate from the nurse's office and other areas students are likely to visit, and have its own bathroom, if possible. Areas of the building that were occupied by the person exhibiting symptoms should be thoroughly sanitized. If the infected individual is a student, the student's parent will be informed of the suspected infection and of the immediate isolation from classes. If other members of the student's household attend School, the Principal or his/her designee or school nurse shall also isolate these students to question for symptoms. Infected individuals and other members of the individual's household in the School will be required to leave the building with a parent or guardian as soon as possible.



### CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

School personnel will refer those displaying symptoms of COVID-19 to an appropriate health care professional or testing site. Local health departments will be contacted in the case of positive or suspected COVID-19 cases in the School building. Local health professionals can help the School to identify potentially infected or exposed individuals and assist with appropriate notifications.

Students, staff, or volunteers who have been exposed to an individual who tested positive for COVID-19 must stay home and follow quarantine and other recommendations from local public health officials and their medical provider. If the individual who has been exposed does not have symptoms, they should nonetheless remain home for fourteen (14) days from the date of exposure due to the possibility of asymptomatic transmission of COVID-19.

Staff, volunteers, support workers, and students who have suspected or confirmed COVID-19 cannot return to the school building until they meet CDC criteria for return to school. Individuals who test positive for or are suspected to have COVID-19 must experience an improvement in symptoms and isolate for a period of time before returning to school per CDC criteria.

The School should be alert for signs and symptoms of COVID-19 in students, staff, support workers, and volunteers. Those who travel may be asked to self-quarantine pursuant to federal, state and local guidance and directives. The School shall not discriminate on the basis of race or national origin when identifying suspected instances of COVID-19.

The School will follow all orders regarding the reporting of known or suspected COVID-19 infections, including reports to the local department of public health, to specific individuals who may have been exposed to infection, and school-wide notices of infections.

The School shall contact and follow the advice or guidelines of the health department, hospital emergency department, and Center for Disease Control when faced with dealing disposal of waste materials used by the infected person. Absent guidance from health authorities, waste items shall be placed in a lined container before disposing of them. Anyone who handles waste items shall wear appropriate PPE and immediately wash hands or use an alcohol based hand sanitizer after touching the items.

The School shall follow the advice of federal, state and local officials regarding cleaning of surfaces and materials in order to kill any virus. The School will clean surfaces frequently, paying close attention to high touch areas and shared materials, and make sanitation wipes or disinfectants labeled for use against COVID-19 (also known as SARS-CoV-2) available in each room and common space.

Students, staff and volunteers should practice frequent handwashing for at least twenty (20) seconds, at minimum when hands are dirty, before and after eating, and after using the restroom. Opportunities throughout the day will also be provided for handwashing. To supplement handwashing, the School will provide hand sanitizer (60% to 95% alcohol based) in high traffic areas including entrances to buildings and classrooms and instruct students and staff to use the sanitizer. Additionally, staff, students, and volunteers should avoid touching their mouths, noses, and eyes since the virus easily enters the body through these membranes.

Regular cleaning of the School facilities, including disinfecting of “high-touch” surfaces (e.g., counters, tables, desk tops, doorknobs, bathroom fixtures, toilets, phones, computers, light switches, etc.), will be observed. The School will use cleaning products usually used in these areas and follow the directions on the product’s label, unless notified otherwise by a qualified local, state or federal authority.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

The School shall follow any directions provided by emergency medical or other healthcare provider, law enforcement, or fire department, or local, state, and federal public health officials. The School will also monitor the guidance issued by the Ohio Department of Health, the Ohio Department of Education, local health authorities, and the CDC, and will update its protocols as necessary.

This appendix shall only be applicable to the extent that these procedures do not differ from the School's existing emergency management plan or any directives given by local, state or federal officials.

See also Policy 5.1070 Control of Communicable Disease and Policy 5.1090 Infectious Disease Policy.



**Appendix 5.1170.1-C**



**Constellation Schools LLC**

*The Right Choice for Parents and a Real Chance for Children!*

Dear Parent /Guardian:

If you would like your student to use sunscreen at school and school sponsored events, please fill out the form below and return it to the school office. For their safety, students who do not have a permission slip on file will not be permitted to apply sunscreen.

I give permission for my child \_\_\_\_\_, to use sunscreen that I have supplied.

Name of Product	Expiration Date

My child has used this product in the past and has not had any type of allergic reaction. I understand that my child may not share this product with another child.

\*The product must be clearly marked with the child’s first and last name.

I give permission for my child to be assisted by his/her teacher when applying sunscreen.

Parent Signature: \_\_\_\_\_ Date: \_\_\_\_\_





## Constellation Schools LLC

*The Right Choice for Parents and a Real Chance for Children!*

Date: \_\_\_\_\_

Dear Parent/Guardian of [Student Name]:

We recently received an order signed by your child's physician stating that [Name of Student] has diabetes. Please contact the school at your earliest convenience so we might begin the discussion of how best to provide for your student's diabetes care needs at school.

Under Section 504 of the Rehabilitation Act of 1973 and Ohio House Bill 264 your student is entitled to a 504 Plan through (*school district*) to ensure your student's safe participation in our schools programs – both academic and extracurricular.

A Section 504 Plan enables the (*school district*) to offer health accommodations and other support to assist your child while at school and during school related activities. This plan also can be used to make sure that the student, the parents/guardians, and school personnel understand each of their responsibilities to ensure your child's safety. A 504 Plan is an option for parents and their child, not mandatory.

If you feel a 504 plan would be appropriate for your student please contact the school 504 coordinator \_\_\_\_\_ at your earliest convenience.

Thank you.

Sincerely,



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.1250-A

#### Form for Reporting Incidents of Restraint or Seclusion

**Time of Incident:** \_\_\_\_\_ **Date of Incident:** \_\_\_\_\_

**Incident Reporter:** \_\_\_\_\_

**Student Name:** \_\_\_\_\_

**Incident Location:** \_\_\_\_\_

**Incident Type (please check):**

- **Physical Restraint:** the use of physical contact that immobilizes or reduces the ability of a student to move his/her arms, legs, body, or head freely. This does not include a physical escort, mechanical restraint, or chemical restraint, or brief, but necessary, physical contact for the following purposes: (A) to break up a fight; (B) to knock a weapon away from student's possession; (C) to calm or comfort; (D) to assist a student in completing a task if the student does not resist the contact; or (E) to prevent an impulsive behavior that threatens the student's immediate safety.
- **Seclusion:** involuntary isolation of a student in a room, enclosure, or space from which the student is prevented from leaving by physical restraint or by a closed door or other physical barrier.

**Description of Incident:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Incident Witness(es):** \_\_\_\_\_

*Parents may submit a written complaint to the Board of Directors, or the Board's appointed designee, regarding an incident of restraint or seclusion involving their child(ren). All complaints must be in writing and received by the Board of Directors within 5 days after receiving this notice. Complaints will be investigated by the Board of Directors or its designee within 30 days of filing your complaint.*

**Signature of Reporting Person:** \_\_\_\_\_ **Date:** \_\_\_\_\_

#### Immediate Report Information

**Administrator Receiving Report:** \_\_\_\_\_

**Report Date:** \_\_\_\_\_ **Report Time:** \_\_\_\_\_

**Parent Receiving Report:** \_\_\_\_\_

**Report Date:** \_\_\_\_\_ **Report Time:** \_\_\_\_\_







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# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES


\*Student initials will be redacted prior to the release of this log to ODE or any third parties.



### Appendix 5.1260-A

#### Ohio's Return-to-Play Law

1. Starting April 26, 2013, coaches or referees must remove an athlete exhibiting the signs and symptoms of a concussion during practice or a game. These include:
  - Appears dazed or stunned.
  - Is confused about assignment or position.
  - Forgets plays.
  - Is unsure of game, score or opponent.
  - Moves clumsily.
  - Answers questions slowly.
  - Loses consciousness (even briefly).
  - Shows behavior or personality changes (irritability, sadness, nervousness, feeling more emotional).
  - Can't recall events before or after hit or fall.
  - Any headache or "pressure" in head. (How badly it hurts does not matter)
  - Nausea or vomiting.
  - Balance problems or dizziness.
  - Double or blurry vision.
  - Sensitivity to light and/or noise.
  - Feeling sluggish, hazy, foggy or groggy.
  - Concentration or memory problems.
  - Confusion
  - Does not "feel right."
  - Trouble falling asleep.
  - Sleeping more or less than usual.
2. The athlete **cannot** return to play on the same day that he or she is removed.
3. The athlete **is not permitted** to return to play until they have been assessed and receive written clearance by a physician (MD or DO) or by any other licensed health care provider approved by the school district. It is important to review your school's policy regarding which health care providers are authorized to clear an athlete to return-to-play



Appendix 5.1260-B

### Ohio Department of Health Concussion Information Sheet For Interscholastic Athletics

Dear Parent/Guardian and Athletes,

This information sheet is provided to assist you and your child in recognizing the signs and symptoms of a concussion. Every athlete is different and responds to a brain injury differently, so seek medical attention if you suspect your child has a concussion. Once a concussion occurs, it is very important your athlete return to normal activities slowly, so he/she does not do more damage to his/her brain.

What is a Concussion? A concussion is an injury to the brain that may be caused by a blow, bump, or jolt to the head. Concussions may also happen after a fall or hit that jars the brain. A blow elsewhere on the body can cause a concussion even if an athlete does not hit his/her head directly. Concussions can range from mild to severe, and athletes can get a concussion even if they are wearing a helmet.

Signs and Symptoms of a Concussion Athletes do not have to be “knocked out” to have a concussion. In fact, less than 1 out of 10 concussions result in loss of consciousness. Concussion symptoms can develop right away or up to 48 hours after the injury. Ignoring any signs or symptoms of a concussion puts your child’s health at risk!

#### **Signs Observed by Parents of Guardians**

- ◆ Appears dazed or stunned. ◆ Is confused about assignment or position.
- ◆ Forgets plays.
- ◆ Is unsure of game, score or opponent.
- ◆ Moves clumsily.
- ◆ Answers questions slowly.
- ◆ Loses consciousness (even briefly).
- ◆ Shows behavior or personality changes (irritability, sadness, nervousness, feeling more emotional).
- ◆ Can’t recall events before or after hit or fall.

#### **Symptoms Reported by Athlete**

- ◆ Any headache or “pressure” in head. (How badly it hurts does not matter.) ◆ Nausea or vomiting.
- ◆ Balance problems or dizziness.
- ◆ Double or blurry vision.
- ◆ Sensitivity to light and/or noise
- ◆ Feeling sluggish, hazy, foggy or groggy.
- ◆ Concentration or memory problems.
- ◆ Confusion.
- ◆ Does not “feel right.”



- ◆ Trouble falling asleep.
- ◆ Sleeping more or less than usual.

Be Honest Encourage your athlete to be honest with you, his/her coach and your health care provider about his/her symptoms. Many young athletes get caught up in the moment and/or feel pressured to return to sports before they are ready. It is better to miss one game than the entire season... or risk permanent damage!

Seek Medical Attention Right Away Seeking medical attention is an important first step if you suspect or are told your child has a concussion. A qualified health care professional will be able to determine how serious the concussion is and when it is safe for your child to return to sports and other daily activities.

- ◆ No athlete should return to activity on the same day he/she gets a concussion.
- ◆ Athletes should NEVER return to practices/games if they still have ANY symptoms.
- ◆ Parents and coaches should never pressure any athlete to return to play.

### **The Dangers of Returning Too Soon**

Returning to play too early may cause Second Impact Syndrome (SIS) or Post-Concussion Syndrome (PCS). SIS occurs when a second blow to the head happens before an athlete has completely recovered from a concussion. This second impact causes the brain to swell, possibly resulting in brain damage, paralysis, and even death. PCS can occur after a second impact. PCS can result in permanent, long-term concussion symptoms. The risk of SIS and PCS is the reason why no athlete should be allowed to participate in any physical activity before they are cleared by a qualified healthcare professional.

### **Recovery**

A concussion can affect school, work, and sports. Along with coaches and teachers, the school nurse, athletic trainer, employer, and other school administrators should be aware of the athlete's injury and their roles in helping the child recover.

During the recovery time after a concussion, physical and mental rest are required. A concussion upsets the way the brain normally works and causes it to work longer and harder to complete even simple tasks. Activities that require concentration and focus may make symptoms worse and cause the brain to heal slower. Studies show that children's brains take several weeks to heal following a concussion.

<http://www.healthy.ohio.gov/vipp/child/returntoplay/concussion>

### **Returning to Daily Activities**

1. Be sure your child gets plenty of rest and enough sleep at night – no late nights. Keep the same bedtime weekdays and weekends.
2. Encourage daytime naps or rest breaks when your child feels tired or worn-out.



3. Limit your child's activities that require a lot of thinking or concentration (including social activities, homework, video games, texting, computer, driving, job-related activities, movies, parties). These activities can slow the brain's recovery.
4. Limit your child's physical activity, especially those activities where another injury or blow to the head may occur.
5. Have your qualified health care professional check your child's symptoms at different times to help guide recovery.

#### **Returning to Learn (School)**

1. Your athlete may need to initially return to school on a limited basis, for example for only half-days, at first. This should be done under the supervision of a qualified health care professional.
2. Inform teacher(s), school counselor or administrator(s) about the injury and symptoms. School personnel should be instructed to watch for:
  - a. Increased problems paying attention.
  - b. Increased problems remembering or learning new information.
  - c. Longer time needed to complete tasks or assignments.
  - d. Greater irritability and decreased ability to cope with stress.
  - e. Symptoms worsen (headache, tiredness) when doing schoolwork.
3. Be sure your child takes multiple breaks during study time and watch for worsening of symptoms.
4. If your child is still having concussion symptoms, he/ she may need extra help with school-related activities. As the symptoms decrease during recovery, the extra help or supports can be removed gradually.
5. For more information, please refer to Return to Learn on the ODH website.

#### **Returning to Play**

1. Returning to play is specific for each person, depending on the sport. Starting 4/26/13, Ohio law requires written permission from a health care provider before an athlete can return to play. Follow instructions and guidance provided by a health care professional. It is important that you, your child and your child's coach follow these instructions carefully.
2. Your child should NEVER return to play if he/she still has ANY symptoms. (Be sure that your child does not have any symptoms at rest and while doing any physical activity and/or activities that require a lot of thinking or concentration).
3. Ohio law prohibits your child from returning to a game or practice on the same day he/she was removed.
4. Be sure that the athletic trainer, coach and physical education teacher are aware of your child's injury and symptoms.



## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

5. Your athlete should complete a step-by-step exercise -based progression, under the direction of a qualified healthcare professional.

6. A sample activity progression is listed below. Generally, each step should take no less than 24 hours so that your child’s full recovery would take about one week once they have no symptoms at rest and with moderate exercise.\*

### Sample Activity Progression\*

Step 1: Low levels of non-contact physical activity, provided NO SYMPTOMS return during or after activity. (Examples: walking, light jogging, and easy stationary biking for 20-30 minutes).

Step 2: Moderate, non-contact physical activity, provided NO SYMPTOMS return during or after activity. (Examples: moderate jogging, brief sprint running, moderate stationary biking, light calisthenics, and sport- specific drills without contact or collisions for 30-45 minutes).

Step 3: Heavy, non-contact physical activity, provided NO SYMPTOMS return during or after activity. (Examples: extensive sprint running, high intensity stationary biking, resistance exercise with machines and free weights, more intense non-contact sports specific drills, agility training and jumping drills for 45-60 minutes).

Step 4: Full contact in controlled practice or scrimmage.

Step 5: Full contact in game play.

\*If any symptoms occur, the athlete should drop back to the previous step and try to progress again after a 24 hour rest period.

<http://www.healthy.ohio.gov/vipp/child/returntoplay/concussion>

I have read the Ohio Department of Health’s Concussion Information Sheet and understand that I have a responsibility to report my/my child’s symptoms to coaches, administrators and healthcare provider.

I also understand that I/my child must have no symptoms before return to play can occur.

\_\_\_\_\_  
Athlete

\_\_\_\_\_  
Date

\_\_\_\_\_  
Athlete Please Print Name

\_\_\_\_\_  
Parent/Guardian

\_\_\_\_\_  
Date



### Appendix 5.1260-C

### Sudden Cardiac Arrest and Lindsay's Law

## Information for the Youth Athlete and Parent/Guardian

- **Lindsay's Law** is about Sudden Cardiac Arrest (SCA) in youth athletes. This law went into effect in 2017. SCA is the leading cause of death in student athletes 19 years of age or younger. SCA occurs when the heart suddenly and unexpectedly stops beating. This cuts off blood flow to the brain and other vital organs. SCA is fatal if not treated immediately.
- "Youth" covered under Lindsay's Law are all athletes 19 years of age or younger that wish to practice for or compete in athletic activities organized by a school or youth sports organization.
- Lindsay's Law applies to all public and private schools and all youth sports organizations for athletes aged 19 years or younger whether or not they pay a fee to participate or are sponsored by a business or nonprofit. This includes:
  - 1) All athletic activities including interscholastic athletics, any athletic contest or competition sponsored by or associated with a school
  - 2) All cheerleading, club sports and school affiliated organizations including noncompetitive cheerleading
  - 3) All practices, interschool practices and scrimmages
- Any of these things may cause SCA:
  - 1) Structural heart disease. This may or may not be present from birth
  - 2) Electrical heart disease. This is a problem with the heart's electrical system that controls the heartbeat
  - 3) Situational causes. These may be people with completely normal hearts who are either are hit in the chest or develop a heart infection
- **Warning signs** in your family that you or your youth athlete may be at high risk of SCA:
  - o A blood relative who suddenly and unexpectedly dies before age 50
  - o Any of the following conditions: cardiomyopathy, long QT syndrome, Marfan syndrome, or other rhythm problems of the heart
- **Warning signs** of SCA. If any of these things happen with exercise, see your health care professional:
  - Chest pain/discomfort
  - Unexplained fainting/near fainting or dizziness
  - Unexplained tiredness, shortness of breath or difficulty breathing
- Unusually fast or racing heart beats
- The youth athlete who faints or passes out before, during, or after an athletic activity **MUST** be removed from the activity. Before returning to the activity, the youth athlete must be seen by a health care professional and cleared in writing.
- If the youth athlete's biological parent, sibling or child has had a SCA, then the youth athlete must be removed from activity. Before returning to the activity, the youth athlete must be seen by a health care professional and cleared in writing.





- Any young athlete with any of these warning signs cannot participate in practices, interschool practices, scrimmages or competition until cleared by a health care professional.



- Other reasons to be seen by a healthcare professional would be a heart murmur, high blood pressure, or prior heart evaluation by a physician.
- Lindsay's Law lists the health care professionals who may evaluate and clear youth athletes. They are a physician (MD or DO), a certified nurse practitioner, a clinical nurse specialist or certified nurse midwife. For school athletes, a physician's assistant or licensed athletic trainer may also clear a student. That person may refer the youth and family to another health care provider for further evaluation. Clearance must be provided in writing to the school or sports official before the athlete can return to the activity.
- Despite everyone's best efforts, sometimes a young athlete will experience SCA. If you have had CPR training, you may know the term "Chain of Survival." The Chain of Survival helps anyone survive SCA.
- Using an Automated External Defibrillator (AED) can save the life of a child with SCA. Depending on where a young athlete is during an activity, there may or may not be an AED close by. Many, but not all, schools have AEDs. The AEDs may be near the athletic facilities, or they may be close to the school office. Look around at a sporting event to see if you see one. If you are involved in community sports, look around to see if there is an AED nearby.
- If you witness a person experiencing a SCA: First, remain calm. Follow the links in the **Chain of Survival**:
  - Link 1: Early recognition
    - Assess child for responsiveness. Does the child answer if you call his/her name?
    - If no, then attempt to assess pulse. If no pulse is felt or if you are unsure, call for help "someone dial 911"
  - Link 2: Early CPR
    - Begin CPR immediately
  - Link 3: Early defibrillation (which is the use of an AED)
    - If an AED is available, send someone to get it immediately. Turn it on, attach it to the child and follow the instructions
    - If an AED is not available, continue CPR until EMS arrives
  - Link 4: Early advanced life support and cardiovascular care
    - Continue CPR until EMS arrives
- Lindsay's Law requires both the youth athlete and parent/guardian to acknowledge receipt of information about Sudden Cardiac Arrest by signing a form.

Appendix 5.1260-D

## Sudden Cardiac Arrest and Lindsay's Law Parent/Athlete Signature Form





## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

**What is Lindsay's Law?** Lindsay's Law is about Sudden Cardiac Arrest (SCA) in youth athletes. It covers all athletes 19 years or younger who practice for or compete in athletic activities. Activities may be organized by a school or youth sports organization.

**Which youth athletic activities are included in Lindsay's law?**

- Athletics at all schools in Ohio (public and non-public)
- Any athletic contest or competition sponsored by or associated with a school
- All interscholastic athletics, including all practices, interschool practices and scrimmages
- All youth sports organizations
- All cheerleading and club sports, including noncompetitive cheerleading

**What is SCA?** SCA is when the heart stops beating suddenly and unexpectedly. This cuts off blood flow to the brain and other vital organs. People with SCA will die if not treated immediately. SCA can be caused by 1) a structural issue with the heart, OR 2) a heart electrical problem which controls the heartbeat, OR 3) a situation such as a person who is hit in the chest or gets a heart infection.

**What is a warning sign for SCA?** If a family member died suddenly before age 50, or a family member has cardiomyopathy, long QT syndrome, Marfan syndrome or other rhythm problems of the heart.

**What symptoms are a warning sign of SCA?** A young athlete may have these things with exercise:

- Chest pain/discomfort
- Unexplained fainting/near fainting or dizziness
- Unexplained tiredness, shortness of breath or difficulty breathing
- Unusually fast or racing heart beats

**What happens if an athlete experiences syncope or fainting before, during or after a practice, scrimmage, or competitive play?** The coach MUST remove the youth athlete from activity immediately. The youth athlete MUST be seen and cleared by a health care provider before returning to activity. This written clearance must be shared with a school or sports official.

**What happens if an athlete experiences any other warning signs of SCA?** The youth athlete should be seen by a health care professional.

**Who can evaluate and clear youth athletes?** A physician (MD or DO), a certified nurse practitioner, a clinical nurse specialist, certified nurse midwife. For school athletes, a physician's assistant or licensed athletic trainer may also clear a student. That person may refer the youth to another health care provider for further evaluation.

**What is needed for the youth athlete to return to the activity?** There must be clearance from the health care provider in writing. This must be given to the coach and school or sports official before return to activity.

**All youth athletes and their parents/guardians must view the Ohio Department of Health (ODH) video about Sudden Cardiac Arrest, review the ODH SCA handout and then sign and return this form.**

Parent/Guardian Signature

Student Signature

Parent/Guardian Name (Print)

Student Name (Print)



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Date \_\_\_\_\_

Date \_\_\_\_\_



Department of Health





# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.2090-A

#### Emergency Management Test and Health Plan Emergency Drills

The School institutes these guidelines to enable employees at a facility to act logical and controlled manner in the event of an emergency. Emergency procedures are for fire drills, tornado drills, safety drills, emergency management tests, and procedures to address other such life-threatening emergencies (i.e. noxious fumes and/or odors, chemical spills, etc.). Regardless of the number or type of drill the School is required to have, the School shall conduct at least one (1) drill or rapid dismissal or one (1) safety drill during each month where the School's average daily attendance is twenty (20) or more students.

The following guidelines must be implemented at each facility. A Principal's failure to comply with the below stated requirements may result in a referral to the Ohio Department of Education's Office of Professional Conduct.

**Fire Drills.** Fire drills will be practiced at least six (6) times during the school year in each facility as required by R.C. 3737.73, so long as the School has smoke detectors or a sprinkler system in all classrooms. If the School does not have smoke detectors or a sprinkler system in each classroom, fire drills will be practiced at least nine (9) times during the school year in each facility. During the first ten (10) days that School is in session each year, there shall be one (1) fire drill. The Principal or his/her designee shall have primary responsibility to plan, organize, and implement these fire drills and to report the results of each drill to the Principal or his/her designee. Fire drills will be conducted at various periods throughout the school day.

The initial fire drill of each school year may be an announced drill so as to alert the students and employees in that facility to the alarm and to enable each to be able to distinguish the fire alarm from other alarms which may be used at that facility. Every student, visitor, and employee present in the facility when a fire alarm is sounded will leave the facility and go to the location which the Principal or his/her designee shall assign outside that facility. Fire drill guidelines and rules (i.e. appropriate and expected fire drill behaviors, opening egress doors, closing work area and exit doors and windows, marking and posting of egress routes, assigning and informing of the outside fire drill destinations for each group of students and employees, etc.) shall be planned and developed by the Principal or his/her designee and will be discussed with all students and each employee at the facility prior to the first fire drill. Student attendance will be taken by the teacher or person responsible for students once outside the facility and at the assigned designation. Attendance will again be taken once any students and/or staff have arrived back in its usual assigned work area(s). Students and employees may reenter the facility only after the Principal or his/her designee gives the "all clear" indication. All fire alarms, including false alarms, will be treated with the same seriousness as if a real fire was in progress in that facility. The Principal or his/her designee will indicate the date, time of day, length of time required to totally clear the entire facility of both students and employees, and of any other usual or unusual data associated with that particular fire drill in the report to Principal or his/her designee. The Principal or his/her designee shall annually conduct a full inspection of each fire extinguisher in the facility, noting its readiness for use or a malfunction. He/she will during that inspection date initial the card attached to that fire extinguisher. The Principal or his/her designee shall conduct a monthly visual inspection of each fire extinguisher in the facility.



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

**Tornado Drills.** Tornado drills will be practiced once each month during the tornado season of April through July when school is in session.

The initial practice tornado drill may be announced so as to alert the students and employees assigned to that facility to the tornado alarm and to enable each to be able to distinguish the tornado alarm from other alarms used at that facility. Every student and employee present in the facility at the time of the tornado drill will participate by leaving the assigned work area and reporting immediately to the assigned tornado drill area within the facility. The tornado drill rules (i.e. appropriate behaviors, assumed drill body positions/postures, marking of assigned tornado drill areas for each group, posting of egress routes from the assigned work areas, etc.) shall be planned, organized, and implemented by the Principal or his/her designee and will be discussed with all students and employees prior to the first practice tornado drill. Student attendance will be taken once the class or group has reached the assigned tornado drill area and taken once again after the class and/or staff arrive back in the usual and assigned work area. Students and employees may return to their assigned work areas only after the Principal or his/her designee issues an “all clear” indication. All tornado alarms will be treated with the same seriousness as if a tornado was in progress in the immediate area of the facility. Students will be released to parents during a tornado drill providing the custodial parent has appeared in person and has in writing requested that their child(ren) be released to them.

The Principal or his/her designee will indicate the date, time of day, and the length of time required to perform the practice tornado drill, as well as any usual or unusual data associated with that tornado drill in his/her report to the Principal or his/her designee.

**Safety Drills.** Safety drills will be practiced at least three (3) times during the school year in each facility as required by R.C. 3737.73. Safety drills shall include practice of procedures to secure inside or evacuate the School building in the event of a threat involving an act of terrorism, a person in possession of a dangerous ordinance (including a bomb or threat of a bomb), or any other violent situation. At least one (1) of the three (3) practiced drills shall require pupils to be secured inside the School building. The Principal or his/her designee shall provide seventy-two (72) hours advanced written notice of the date, time and place of the safety drill to the police chief or similar local law enforcement official. The School shall also conduct one (1) theoretical safety drill per school year to provide staff instruction. Theoretical safety drills may be conducted during annual in-service trainings.

The initial safety drill of each school year may be an announced drill so as to alert the students and employees in that facility to the alarm and to enable each to be able to distinguish the safety alarm from other alarms which may be used at that facility. Every student, visitor, and employee present in the facility when a safety alarm is sounded will follow the announced procedure to either leave the facility to go to the location which the Principal or his/her designee shall assign outside that facility or immediately secure-in-place. Safety drill guidelines and rules (i.e. appropriate and expected safety drill behaviors, opening/closing egress doors, closing and locking work area and exit doors and windows, marking and posting of egress routes, assigning and informing of the outside safety drill destinations for each group of students and employees, etc.) shall be planned and developed by the Principal or his/her designee and will be discussed with all students and each employee at the facility prior to the first safety drill.



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

If the safety drill calls for an evacuation of the School building, student attendance will be taken by the teacher or person responsible for students once outside the facility and at the assigned evacuation location. Attendance will again be taken once any students and/or staff have arrived back in its usual assigned work area(s). If the safety drill requires students to secure inside the building, student attendance will be taken by the teacher or person responsible for students once the designated location has been secured. Attendance will again be taken upon release from the secured position when students and/or staff have arrived back in its usual assigned work area.

Students and employees may reenter the facility or release from their secured positions only after the Principal or his/her designee gives the “all clear” indication. All safety alarms, including false alarms, will be treated with the same seriousness as if a real emergency event was in progress in that facility. The Principal or his/her designee will indicate the date, time of day, and length of time required to totally clear or secure the entire facility, and of any other usual or unusual data associated with that particular safety drill in the report to Principal or his/her designee.

**Noxious Fumes.** Noxious fumes and/or odors, chemical spills, and other life threatening emergencies require that the Principal or his/her designee plan, organize, and implement a reasonable evacuation procedure for the facility given any of the above circumstances. The Principal or his/her designee will discuss these guidelines with the responsible employees at the beginning of each new school year.

Such emergencies will be immediately reported to the proper public protection authorities and to the Principal or his/her designee. A written summary of the emergency will follow which will give the date of the emergency, time of day that it occurred, type of emergency, and the resulting action(s) taken to secure the safety and health of students and employees affected by the emergency.

**Emergency Management Test.** The Principal or his/her designee shall conduct an emergency management test at least once each calendar year consistent with rules adopted by the State Board of Education. An emergency management test is defined as a regularly scheduled drill, exercise, or activity that is designed to assess and evaluate an emergency management plan. Emergency management tests must be one of three (3) types: (i) a tabletop exercise; (ii) a functional exercise; or (iii) a full-scale exercise. Each type of exercise must be conducted at least once every three (3) years.

An emergency management test shall assess at least one (1) hazard and one (1) functional content area outlined in the School’s emergency management plan. The Principal or his/her designee shall have primary responsibility to plan, organize, and implement these emergency management tests, including inviting appropriate local law enforcement, fire or other emergency officials to participate. The Principal or his/her designee is also responsible to report the results of each drill within thirty (30) days to the Ohio Department of Education.

*R.C. 3313.536; 3737.73; OAC 3301-5-01; OAC 1301:7-7-04 (Ohio Fire Code).*



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.2090-B Emergency Drill Log

School Name \_\_\_\_\_ Principal \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip Code \_\_\_\_\_

Police Jurisdiction \_\_\_\_\_ Fire Dept. \_\_\_\_\_

First Day of School \_\_\_\_\_ Last Day of School \_\_\_\_\_

#### School Safety Drills

Month	Person Conducting Drill	Date	Time	Length	Secured in Building? (Y/N)	Notes
						Theoretical Drill

#### Tornado Drills

Month	Person Conducting Drill	Weather	Date	Time	Length	Notes
April						
May						
June						If in Session



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

July									If in Session
------	--	--	--	--	--	--	--	--	---------------

### Fire Drills

Month	Person Conducting Drill	Date	Time	Number of Staff Members	Number of Occupants	Time to Complete Drill	Problems Encountered	Weather Conditions	Notes
July									
August									
September									
October									
November									
December									
January									
February									
March									
April									
May									
June									

**NOTE:** At least one fire drill must be conducted within 10 days of the start of the school year.





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# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Principal Signature \_\_\_\_\_ Date \_\_\_\_\_

### 5.2090-C Sample Emergency Drill Calendar

#### For Schools with Sprinklers and/or Smoke Detectors in Each Classroom

**July:** Tornado Drill (if school is in session); Fire Drill (if school is in session).

**August:** Annual Faculty and Staff Training Session; Theoretical Safety Drill; Emergency Management Test (tabletop, functional, or full-scale, depending on year in sequence).

**September:** Fire Drill *within 10 Days of the Start of the School Year.*

**October:** Safety Drill.

**November:** Fire Drill.

**December:** Fire Drill.

**January:** Safety Drill *with Students Secured in Building.*

**February:** Fire Drill.

**March:** Fire Drill.

**April:** Tornado Drill; Safety Drill.

**May:** Tornado Drill; Fire Drill.

**June:** Tornado Drill (if school is in session); Fire Drill (if school is in session).

#### For Schools without Sprinklers or Smoke Detectors in Each Classroom

**July:** Tornado Drill (if school is in session); Fire Drill (if school is in session).

**August:** Annual Faculty and Staff Training Session; Theoretical Safety Drill; Emergency Management Test (tabletop, functional, or full-scale, depending on year in sequence).

**September:** Fire Drill *within 10 Days of the Start of the School Year.*

**October:** Safety Drill *combined with Fire Drill.*

**November:** Fire Drill.

**December:** Fire Drill.

**January:** Safety Drill *with Students Secured in Building*; Fire Drill.

**February:** Fire Drill.

**March:** Fire Drill.

**April:** Tornado Drill; Safety Drill *combined with Fire Drill.*

**May:** Tornado Drill; Fire Drill.

**June:** Tornado Drill (if school is in session); Fire Drill (if school is in session).

**\*\*Pursuant to O.A.C. 1301:7-7-04 (Ohio Building Code), school is considered to be “in session” when the average daily attendance comprises twenty (20) or more students.\*\***

*R.C. 3737.73; O.A.C. 1301:7-7-04.*

#### Appendix 5.2230-A

#### MISSING CHILD REPORTING AND MARKING FORM



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Student Name: \_\_\_\_\_ (“Student”)

On \_\_\_\_\_ (date), the School received notification from \_\_\_\_\_  
(law enforcement agency) that Student is a reported missing child.

On \_\_\_\_\_ (date), \_\_\_\_\_ (requestor) requested a copy of  
Student’s records.

Because the School has been notified by the law enforcement agency, the request by  
\_\_\_\_\_ (requestor) must be immediately reported to the law enforcement  
agency listed above by the school administrator responsible for admission. On \_\_\_\_\_ (date),  
\_\_\_\_\_ (school administrator) reported the request for Student’s records by  
\_\_\_\_\_ (requestor) to \_\_\_\_\_ (law enforcement  
agency) via \_\_\_\_\_ (telephone, letter, email, etc.). \_\_\_\_\_ (initials)

**\*When forwarding a copy of Student’s records in response to a request, this form must remain in Student’s file and not be sent to the requestor. (The receiving school or other requestor must not be able to discern that Student’s records are marked as a reported missing child.)**

\_\_\_\_\_

On \_\_\_\_\_ (date), the School received notification from \_\_\_\_\_  
(law enforcement agency) that Student is no longer a missing child. \_\_\_\_\_ (initials)

**Accordingly, this form must be destroyed so as to make it impossible to tell that Student’s records ever indicated that Student was a reported missing child.**



### Appendix 5.2230-B

#### Missing Child Educational Program

The School incorporates materials from the Ohio Attorney General Missing Children Clearinghouse, including the most recent Annual Report generated by the Clearinghouse, and resources from the National Center for Missing and Exploited Children into its informational program about missing children available to students, parents and community members.

For more information regarding child safety, please visit <http://www.missingkids.com/Resources> or <http://www.ohioattorneygeneral.gov/missing-children>.

*R.C. 3313.96 (B)*

**See also Policy 5.2220 Fingerprinting Students**

### Appendix 5.2290-A

#### DATA COLLECTION WORKSHEET: Information for EMT (Emergency Management Test) entry into SAFE

Is the information to be entered for the EMT from an actual emergency?

<b>NO</b> (continue to enter data)	<b>YES (STOP)</b> -an actual emergency cannot be used to fulfill the EMT requirement]
---------------------------------------	---

**EMT Summary**

1a- What type of exercise was performed? (choose one) 

Table Top	Functional	Full Scale
-----------	------------	------------

1b- Date the exercise began: \_\_\_\_\_

1c- Date the exercise concluded: \_\_\_\_\_

1d- IIRN: \_\_\_\_\_

**Part 1 - Emergency Management Test Information**

1- Was the exercise 

Discussion Based (Table Top)
Operations Based (Functional or Full Scale)

2- How long was the exercise? (.5 to 168 hours) \_\_\_\_\_

**Part 2 - Scenario Information**

1a- What is the start time of the scenario? \_\_\_\_\_

1b- What is the end time of the scenario? \_\_\_\_\_

2- What type of precipitation was included in the scenario? (choose all that apply)

Drizzle	Freezing Rain	Hail
Rain	Rain/Snow Mix	None
Fog	Snow	Other (describe)
Freezing Drizzle	Sleet	

3- What was the temperature (Fahrenheit) in the scenario? \_\_\_\_\_ (-20 - 115 degrees F)

4- Describe the Scenario. In 4,000 characters or less (and attach a .pdf file if scenario is too long):

**Part 3 - Hazards Utilized**

1- What hazard or hazards were part of the exercise?

Active Shooter	Natural - Severe Weather/ Tornado	Fire
Hostage	Tech - Chemical	Contagious Disease
Bomb Threat	Tech - Explosion	Other (describe)
Terrorism	Tech - Bus Accident	
Natural - Flood	Biological/Blood Borne Pathogens	

**Part 4 - Functional Content Areas Utilized**

1- What functional content areas were part of the exercise?

Evacuation	Communication/Notification
Deny Entry/Lockdown	Medical and Mental Health
Shelter-in-Place	Family Reunification
Reverse Evacuation	Drop, Cover, Hold
Security	School Incident Command
Rapid Assessment	Other (describe)

**Part 5 - Strengths and Improvement Areas**

1- Enter three (3) strengths:

1- \_\_\_\_\_

2- \_\_\_\_\_

3- \_\_\_\_\_

2- Enter three (3) areas for improvement:

1- \_\_\_\_\_

2- \_\_\_\_\_

3- \_\_\_\_\_

**Part 6 - Participant List (Optional)**

1- Identify all that participated in the exercise (do not include observers/evaluators)

Students	EMA	Other Districts
Staff	Mental Health	Hospital/clinic
Parents	Public Utilities	Public Works
EMS	PTO	Private Sector
Law Enforcement	Elected Officials	Other (describe)
	Other Schools	





**Appendix 5.2290-B**

**Ohio School Behavioral Threat Assessment Model  
Policy and Protocol**

**A Guide for School Personnel and Law Enforcement  
Officers**

**Ohio School Safety Center  
Ohio Department of Public Safety**



### **DISCLAIMER**

This document does not constitute either an informal or formal opinion of the Ohio Attorney General, Ohio Department of Education, or Ohio Department of Public Safety. It does not constitute legal advice or counsel. It does not create an attorney-client relationship. It creates no rights beyond those established under the constitutions, statutes, regulations and administrative rules of the United States and the State of Ohio. It does not attempt to provide answers to every question that may arise regarding school safety.

This document reflects the law as of the date of its publication. It may be superseded or affected by other versions or changes in the law.

## **Acknowledgements**

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**Ohio School Safety Center, Ohio Department of Public Safety**



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This guide includes a basic introduction to behavioral threat assessment, model protocols, as well as charts to assist in determining the risk levels of behaviors and actions. Additional resources are available through the Ohio School Safety Center, Ohio Department of Education, and Ohio Department of Mental Health and Addiction Services.

## Introduction

On August 21, 2019, Governor Mike DeWine signed Executive Order 2019-21D creating the Ohio School Safety Center within the Ohio Department of Public Safety. The Ohio School Safety Center is responsible for assisting local schools and law enforcement with preventing, preparing for, and responding to threats and acts of violence, including self-harm, through a holistic, solutions-based approach to improving school safety.

The Ohio 133<sup>rd</sup> General Assembly passed House Bill 123 titled “Safety and Violence Education Students Act,” or the “SAVE Students Act” with an effective date of March 24, 2021. The SAVE Students Act requires the Ohio Department of Public Safety, in consultation with the Ohio Department of Education and the Ohio Attorney General, to develop a model school behavioral threat assessment plan to provide best practice guidance to schools around the state. The Ohio School Behavioral Threat Assessment is a significant part of that guidance. This protocol was developed to assist school safety professionals in identifying students of concern so that their behaviors can be mitigated to the point that they no longer pose a threat.

This guide focuses on one of the most important school violence prevention tools, the school-based threat assessment. School Behavioral Threat Assessment should be applied as an early intervention tool. A well-designed threat assessment protocol should help improve school safety and identify students that need additional resources.

***Any documents mentioned in this guide may be requested from an OSSC regional liaison or directly from the OSSC by emailing [ohioschoolsafetycenter@dps.ohio.gov](mailto:ohioschoolsafetycenter@dps.ohio.gov).***

## Overview

### **Background**

House Bill (HB) 123 (Ohio), the Safety and Violence Education Students (SAVE Students) Act, was enacted on March 24, 2021. HB 123 calls for a comprehensive approach to school safety involving the Ohio departments of Education, Public Safety, Mental Health and Addiction Services, and Attorney General's Office. Section 3313.669 (A) requires each local, city, exempted village, and joint vocational school district to create a threat assessment team for each school building in the district serving grades six through 12. It also requires each member of the threat assessment team to complete an approved threat assessment training program, from the list maintained by the Ohio School Safety Center, upon appointment and once every three years thereafter.

### **Scope**

In Ohio schools, behavioral threat assessment teams function to conduct assessments and interventions for individuals whose behavior indicates they may pose a risk of harm to the school community and/or themselves.

### **Multidisciplinary Decision Making**

There should not be any attempt to complete the threat assessment process in isolation. At least two team members representing different disciplines (e.g., administrators, school psychologists, teachers, counselors, school resource officers). need to be involved in the decision-making process. Team members should be well versed in the threat assessment process, applicable policy, and law. When a threat assessment team is uncertain how to proceed in a situation, they are encouraged to consult with nearby schools, local law enforcement or the Ohio School Safety Center Regional Liaisons. Any consultation with outside resources should be documented.

Individuals potentially subject to a behavioral threat assessment include:

- Students: current, former, and prospective
- Employees: current, former, and prospective
- Parents/guardians of students/non-custodial parents or relatives
- Persons who are (or have been) in a relationship with faculty, staff, or students
- Contractors, vendors, or other visitors
- Unaffiliated persons

Ohio schools will utilize a behavioral threat assessment model and Behavioral Threat Assessment Management Team to assist in the proactive prevention of targeted violence by identifying areas of concern, gathering information, assessing the likelihood of violence, initiating appropriate interventions and violence mitigation strategies and provide ongoing evaluation to increase positive outcomes for individuals and enhance overall school safety. Individuals who plan to commit violent acts against schools often share their plans with someone. This is an important realization when discussing intervention points.

Ohio schools will utilize a behavior-based approach to identify and assess individuals who demonstrate concerning communications or behavior and does not tolerate profiling of any kind based on race, ethnicity, age, physical or mental health conditions, learning abilities, socioeconomic status, gender, sexual orientation or religion.

## Definitions

- **Behavioral Threat Assessment:** In K-12 schools, a *behavioral threat assessment* is a proactive approach to identify, assess, and provide appropriate interventions and resources for students who display a behavior that elicits concern for the safety of themselves or others.

A behavioral threat assessment:

✓ Focuses on behaviors, not traits or profiles	✗ <i>Is not</i> a criminal investigation
✓ Involves multidisciplinary school staff	✗ <i>Is not</i> a disciplinary process
✓ Identifies threatening and other concerning behaviors, and assesses them in context	✗ <i>Does not</i> involve zero tolerance
✓ Provides students with additional supports	✗ <i>Does not</i> replace student support programs
✓ Utilizes existing school resources	✗ <i>Is not</i> a physical security measure
✓ Promotes a safe school climate	

- **Bullying:** The Ohio Revised Code defines, harassment, intimidation or bullying as follows<sup>1</sup>:
  - Any intentional written, verbal, graphic, or physical act that a student or group of students exhibited toward other particular student more than once and the behavior both:
    - Causes mental or physical harm to the other student; and
    - Is sufficiently severe, persistent or pervasive that it creates an intimidating, threatening or abusive educational environment for the other student
  - Violence within a dating relationship.
- **Electronic act:** An act committed through the use of a cellular telephone, computer, pager,

<sup>1</sup> Section 3313.666 - Ohio Revised Code | Ohio Laws

personal communication device, or other electronic communication device.<sup>2</sup>

- **Concerning Behavior:** An observable behavior that elicits concerns in bystanders regarding the safety of an individual or those around them. Some concerning behaviors may be defined as *prohibited behaviors* and should trigger an immediate response. Prohibited behaviors can include threats, weapons violations, and other aggressive or violent behavior. Other behaviors that may elicit concern can include unusual interests in violent topics, conflicts between classmates, increased anger, increased substance use, or other noteworthy changes in behavior (e.g., depression or withdrawal from social activities). *Note: Concerning behavior does not necessarily imply or predict that an individual or group will become violent. Instead, it serves as an indicator that the student may be in need of intervention or increased supports. Proactive intervention and de-escalation are key and should be part of any approach to violence prevention.*
- **Concerning Communication:** Unusual, bizarre, threatening, or violent communications made by an individual or group. Concerning communications may allude to violent intentions, violence to solve a problem, justifying violent acts, unusual interest in weapons, personal grievances, or other inappropriate interests. Concerning communications may also allude to hopelessness or suicide. Concerning communications may be made in the form of written, oral, or visual media. *Note: Concerning communication does not necessarily imply or predict that an individual or group will become violent. Instead, it serves as an indicator that the student may be in need of intervention or increased supports. Proactive intervention and de-escalation are key and should be part of any approach to violence prevention.*
- **Multidisciplinary Behavioral Threat Assessment Team:** A team composed of highly trained school personnel with diverse positions, backgrounds, and experience (e.g., administrators, school psychologists, teachers, counselors, school resource officers). The team will receive reports about concerning student behavior and situations, gather additional information, assess the risk posed to the community, and develop and implement intervention and management strategies to mitigate any risk of harm.<sup>3</sup>
- **Targeted violence:** A premeditated act of violence directed at an individual, group, or location for a specific reason.

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<sup>2</sup> Definition adapted from the Centers for Disease Control and Prevention

<sup>3</sup> National Threat Assessment Center, 2018, p. 7

## ***Information Sharing/Consent***

Although the law gives schools<sup>4</sup>, law enforcement, and child welfare professionals the ability to interview a child without parental consent, it is considered best practice to have the consent and cooperation of the parents. ***A positive and communicative relationship with the parents can be a mitigating factor and make a child's reintegration back into the school community after a significant incident easier to manage.***

When investigating a safety issue, schools do not need to request consent from parents prior to interviewing their child. However, it is possible that parents might later refuse the school permission to complete the behavioral threat assessment with their child, to speak to administration, or allow access to their child. It is certainly the parent's right to refuse, but (depending on the seriousness of the prohibited/concerning behavior) could significantly increase the risk level associated with the threat. The reason behind this concern is that it could indicate that the parent doesn't recognize serious pathological behavior.

Schools may search school provided property such as lockers, iPads, and laptops without permission. Schools may also be able to search the personal belongings of a student, such as a jacket or backpack but must first have reasonable suspicion to do so. This reasonable suspicion may include information that has been shared about but not limited to illegal drugs, paraphernalia, and weapons.

If a school is unable to complete a threat assessment because of consent issues or limited access to a student, law enforcement can detain the student and question them (complete the assessment). Child welfare workers can also interview a child without parental consent, based on allegations of child abuse or neglect.

In addition to considerations surrounding consent to interview, members of the behavioral threat assessment team should identify instances where a release of information is needed to access student records during the information gathering stage of a behavioral threat assessment and work to obtain signed releases. Having signed release of information forms can also be helpful in the management phase of a behavioral threat assessment for monitoring student progress with

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<sup>4</sup> State law does not provide a specific statute that authorizes schools, law enforcement, and child welfare professionals to interview students without parental consent. However, several statutes generally provide this authority. Revised Code 3313.20(A) permits a school district to make any rules that are necessary governing the employees, pupils of its schools, and all other persons entering upon its school grounds. Revised Code Sections 3313.669 and 5502.262(B)(2)(d) require schools to establish threat assessment teams and establish a protocol for addressing potential threats. Section 3313.951(D) permits a school resource officer to carry out duties that may include threat investigations. In addition, several court decisions have held that questioning of a juvenile is not a violation of the Fifth Amendment right against self-incrimination merely because it occurs in a school and the presence of a police officer. In re Haubeil, 2002 Ohio 4095 (4<sup>th</sup> Dist. 2002); In re Bucy, 1996 Ohio App. LEXIS 4842 (9<sup>th</sup> Dist. 1996); In re Johnson, 1996 Ohio App. LEXIS 2972 (5<sup>th</sup> Dist. 1996). However, if there is evidence that the student was under arrest or told he was not free to leave, then any discussions may be suppressed from a resulting criminal case. In re L.G., 2017 Ohio 2781 (2<sup>nd</sup> Dist. 2017)

intervention programming. Examples may include attendance records, personal identifying information, discipline history, and previous schools attended.<sup>5</sup>

In the past, schools and law enforcement did not commonly share information about students due to concerns about federal regulations on confidentiality<sup>6</sup>. However, the Family Educational Rights and Privacy Act (FERPA) already provides some guidance as to when schools can share student information with law enforcement.

FERPA 34 CFR 99.36 informs us of what conditions apply to disclosure of information in health or safety emergencies:

- (a) An educational agency or institution may disclose personally identifiable information from an education record to appropriate parties, including parents of an eligible student, in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals.
- (b) Nothing in this Act or this part shall prevent an educational agency or institution from -
  - (1) Including in the education records of a student appropriate information concerning disciplinary action taken against the student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the school community;
  - (2) Disclosing appropriate information maintained under paragraph (b)(1) of this section to teachers and school officials within the agency or institution who the agency or institution has determined have legitimate educational interests in the behavior of the student; or
  - (3) Disclosing appropriate information maintained under paragraph (b)(1) of this section to teachers and school officials in other schools who have been determined to have legitimate educational interests in the behavior of the student.
- (c) In making a determination under paragraph (a) of this section, an educational agency or institution may take into account the totality of the circumstances pertaining to a threat to the health or safety of a student or other individuals. If the educational agency or institution determines that there is an articulable and significant threat to the health or safety of a student or other individuals, it may disclose information from education records to any person whose knowledge of the information is necessary to protect the health or safety of the student or other individuals. If, based on the information available at the time of the determination, there is a rational basis for the determination, the Department will not substitute its judgment for that of the educational agency or institution in evaluating the circumstances and making its determination.

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<sup>5</sup> More information on privacy rights can be found in the National Association of School Psychologists' Report on Protecting Students' Rights in Behavioral Threat Assessment Management.

<sup>6</sup> Columbine Review Commission, 2001, p.108

Schools can disclose information that is considered “directory” information without consent. According to FERPA, directory information includes a student’s name, address, telephone number, date and place of birth, honors and awards, and dates of attendance.

According to FERPA, schools must have consent to release student records. Records may be released in certain circumstances without the consent of parents or students. One of those circumstances is to, “appropriate officials in cases of health and safety emergencies.” Another circumstance where the disclosure of student information is allowed without consent is under FERPA 34 CFR 99.31 “State and local authorities, within a juvenile justice system, pursuant to specific State law.” This information is specifically cited on the U.S. Department of Education, Family Policy Compliance Office website.<sup>7</sup>

FERPA *does not apply* to several communications regarding students. Information reported about a student to school staff by another student, either verbally or in writing, is not protected under FERPA. Personal observations of a student or their behavior by school staff are not protected under FERPA. Social media posts made by a student and discovered by school personnel are not protected under FERPA.

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<sup>7</sup> <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>



## ***How to Establish a Behavioral Threat Assessment Model***

### **History: Research and Guidance on School Violence Prevention: The U.S. Secret Service**

For over 20 years, the U.S. Secret Service National Threat Assessment Center (NTAC) has produced operationally relevant, behavior-based research on the prevention of targeted violence in various contexts, including attacks targeting public officials and public figures, government facilities, workplaces, public spaces, K-12 schools, and institutes of higher education.

Following the tragedy at Columbine High School in 1999, the Secret Service partnered with the U.S. Department of Education on a study that examined 37 incidents of targeted school violence that occurred from 1974-2000. The ***Safe School Initiative*** focused on gathering and analyzing information about the thinking and behavior displayed by the students who committed these violent acts. The publication of the final report and accompanying guide provided schools and law enforcement with a framework for how to identify, assess, and manage students who display threatening or concerning behavior, with efforts focusing on determining what could be known prior to a violent school attack.

In response to the Feb. 14, 2018, attack at Marjory Stoneman Douglas High School in Parkland, Fla., the Secret Service published an updated operational guide on school threat assessment, intended to provide K-12 schools with actionable steps on creating a targeted violence prevention plan. ***Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*** is an 8-step “how to” that outlines the process of establishing a multidisciplinary threat assessment team, protocols for gathering information, and management strategies for reducing a student’s risk of harm to self or others.

## 8 Steps to Establishing a Behavioral Threat Assessment Model:<sup>8</sup>

In 2019, the Secret Service published *Protecting America's Schools: A U.S. Secret Service Analysis of Targeted School Violence*. This study examined 41 incidents of targeted school violence that occurred at K-12 schools in the United States from 2008 to 2017. This report offers an in-depth analysis of the motives, behaviors, circumstances, and situational factors of the attackers, as well as an analysis of the tactics, resolutions, and other operationally relevant details of the attacks. This report was produced to inform the best practices of multidisciplinary school threat assessment programs nationwide.

Key Findings and Implications from <i>Protecting America's Schools</i>
1. There is no profile of a student attacker, nor is there a profile for the type of school that has been targeted.
2. Attackers usually had multiple motives, the most common involving a grievance with classmates.
3. Most attackers used firearms, and firearms were most often acquired from the home.
4. Most attackers had experienced psychological, behavioral, or developmental symptoms.
5. Half of the attackers had interests in violent topics.
6. All attackers experienced social stressors involving their relationships with peers and/or romantic partners.
7. Nearly every attacker experienced negative home life factors.
8. Most attackers were victims of bullying, which was often observed by others.
9. Most attackers had a history of school disciplinary actions, and many had prior contact with law enforcement.
10. All attackers exhibited concerning behaviors. Most elicited concern from others, and most communicated their intent to attack.

<sup>8</sup> National Threat Assessment Center, 2018

In 2021, the Secret Service published *Averting Targeted School Violence: A U.S. Secret Service Analysis of Plots Against Schools*. This study built upon the existing research around targeted violence in schools by examining thwarted attack plots against K-12 schools from 2006-2018. A comparison between these plotters and individuals who perpetrated attacks in K-12 schools found that the behavioral backgrounds were very similar.

Key Findings and Implications from <i>Averting Targeted School Violence</i>
1. Targeted school violence is preventable when communities identify warning signs and intervene.
2. Schools should seek to intervene with students before their behavior warrants legal consequence.
3. Students were most often motivated to plan a school attack because of a grievance with classmates.
4. Students are best positioned to identify and report concerning behaviors displayed by their classmates.
5. The role of parents and families in recognizing concerning behavior is critical to prevention.
6. School resource officers (SROs) play an important role in school violence prevention.
7. Removing a student from school does not eliminate the risk they might pose to themselves or others.
8. Students displaying an interest in violent or hate-filled topics should elicit immediate assessment and intervention.
9. Many school attack plots were associated with certain dates, particularly in the month of April. More information can be found in the report.
10. Many of the students had access to weapons, including unimpeded access to firearms.

Secret Service research findings and implications demonstrate that *school violence is preventable, if communities can identify the warning signs and appropriately intervene.*

### Ohio School Behavioral Threat Assessment Model Protocols

The following is a guide for how to complete the Ohio School Behavioral Threat Assessment Model Protocol. It is important to note that all documentation of actions taken should be completed on the *Ohio School Threat Assessment Form*. Schools may request this form from their OSSC regional liaison or directly from the OSSC by emailing [ohioschoolsafetycenter@dps.ohio.gov](mailto:ohioschoolsafetycenter@dps.ohio.gov).

A behavioral threat assessment is predicated on bystanders reporting their concerns when they observe concerning behavior. As such, schools should actively encourage bystander reporting. School staff, students, parents, and other community members should be trained on identifying

concerning behaviors and communications, and how to report those concerns using the Safer Ohio School Tip Line anonymous reporting system, or through other avenues as appropriate.

***The Ohio School Behavioral Threat Assessment Model Protocol involves 3 Phases. Each phase will be described briefly here.***

When the threat assessment team at a school receives a report, ***Phase 1*** of the Threat Assessment Model Protocol is initiated.

#### ***Phase 1:***

***Initial response and Information Gathering.*** Phase 1 of the behavioral threat assessment process includes initiating emergency protocols when appropriate and moving through the initial information gathering stage. Initial information is gathered through interviews with relevant parties, and an initial Classification Level is determined.

If the result of Phase 1 is a Classification Level of moderate, high, or imminent, the team should proceed to ***Phase 2*** of the Threat Assessment Model Protocol for additional information gathering (a Classification Level of low will progress directly to Phase 3).

#### ***Phase 2:***

***Additional Information Gathering and Risk Classification.*** Phase 2 of the behavioral threat assessment process includes opportunities for additional information gathering for individuals with an initial Classification Level of moderate, high, or imminent. Additional information gathering includes identification of other factors of concern, protective factors, as well as additional sources of information. At this stage, the team will review and adjust the Classification Level as appropriate based on the findings from the additional information gathering process.

All behavioral threat assessments will proceed to ***Phase 3*** of the Threat Assessment Model Protocol, where the team develops a plan to intervene and manage the concern.

#### ***Phase 3:***

***Intervention and Case Management.*** Phase 3 of the behavioral threat assessment process includes identifying and implementing intervention and risk mitigation strategies. This should include a *Case Plan* to assist with case management strategies.

***The following sections describe Phase 1, Phase 2, and Phase 3 in greater detail.***

### ***Phase I: Initial Response and Information Gathering***

Once the school receives information regarding a prohibited or concerning behavior, the likelihood that the behavior could result in harm must be determined. In Phase I of the

Behavioral Threat Assessment Model Protocol, the threat assessment team will make a determination that will guide their actions in the following phases. The first step in Phase I is to document the staff members who are completing the required tasks for Phase I. The first page of the threat assessment form is where this information should be documented.

The next step in Phase I is to interview the reporting person. If the reporting person perceives the concerning behavior to indicate a serious and imminent threat, the reporting person should call law enforcement immediately. Keep in mind that if there is a school resource officer (SRO) in the building they should be a part of the threat assessment team. The staff member may report the concerning information to the SRO instead of calling 911. If the reporting person is unknown or not available the interview may not be able to be completed, but the rest of Phase I should continue as outlined.

Depending on the information that the staff member provides to the threat assessment team or law enforcement, immediate action may be required to prevent serious injury or death. If this is the case, the threat assessment process should be postponed until the environment has been made safe.

Documentation should be completed regarding the information gathered from the reporting person on the *Threat or Concerning Behavior Report*. The information required on this report is the minimum information that should be gathered. If the team determines that additional information is needed, they should add more.

The next section in Phase I is the *Emergency Operations/Notifications* section. This is where contact with the parents of the involved students will be documented. Documenting who made these contacts, who was spoken to, and the time these contacts occurred can prove to be very helpful in protecting against liability.

The next section outlines interviews that should be completed to collect information about the concerning incident. At this time, the teacher interview should be completed by all teachers that have regular or noteworthy contact with the concerning student. A specific deadline for the completion of these interviews should be set. Staff members should be informed that the request for the information (and the information itself) contained in these documents is confidential and should not be shared with others.

The questions listed on the interview sheets for the staff members, subject of concern, potential targets, parents/guardians, and witnesses are not exhaustive. If the team determines that there are additional questions that need to be asked, they can be documented on a separate sheet and attached to the documented interview.

## Considerations for Information Gathering

When the threat assessment team is investigating a report, the team should be sure to examine the following behavioral themes.<sup>9</sup> These behavioral themes are not an exhaustive list and should not serve as a checklist, but rather as a starting point for the information gathering process.

- The student's motives and goals.
- Concerning, unusual, or threatening communications.
- Inappropriate interest in weapons, school shooters, mass attacks, or other types of violence.
- Access to weapons.
- Stressful events, such as setbacks, challenges, or losses.
- Home-life factors (e.g., domestic violence, abuse, instability).
- Impact of emotional or developmental issues.
- Evidence of desperation, hopelessness, or suicidal thoughts/gestures.
- Whether the student views violence as an option to solve problems.
- Whether others are concerned about the student's statements or behaviors.
- Capacity to carry out an attack.
- Evidence of planning for an attack.
- Consistency between the student's statements and actions.
- Protective factors such as positive or prosocial influences or events.

## The Importance of Rapport Building

Teams should establish rapport with those that they are interviewing. Some of the information that will be discussed can be considered sensitive and some may be reluctant to share it with someone they do not trust. Reassuring them that the goal of this process is to determine how to best help the person of concern can help develop that trust. One approach to build trust while gathering information is to clarify roles at the onset of the interview. Role clarification includes providing a context to the behavioral threat assessment process, explaining expectations of the interviewee and the interviewer, and outlining the process moving forward while addressing questions surrounding confidentiality. Role clarification should include the following steps:

### *Step 1*

*Provide an overview of the goals of the behavioral threat assessment program.*

### *Step 2*

*Provide an overview of your role on the behavioral threat assessment team, and what you hope to accomplish during the interview.*

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<sup>9</sup> National Threat Assessment Center, 2018, p. 8

### Step 3

- *Discuss the steps of the behavioral threat assessment and interview process,*
- *Explain what is requested of the interviewee, and*
- *Identify the roles of other individuals involved in the behavioral threat assessment process.*

Classification Level

Suggested Response Guide

### Step 4

- *Discuss expectations of confidentiality,*
- *Explain what information can be shared in accordance with FERPA, and*
- *Who has access to the responses from this interview?*

In addition to role clarification, paying close attention to the interviewee and using active listening skills can assist in building trust.

### Risk Classification Level

As information is gathered from interviews and other sources, the team will use the information to assess a level of risk posed by the individual of concern. When determining the level of risk associated with a threat, the central question is not whether a person *made a threat*, but whether a person *poses a threat*.

Classification Level		Suggested Response Guide
LOW	<p>The reported concerning behavior has been investigated and assessed as benign. The individual or situation does not appear to pose a risk of violence or serious harm to self or others, and any <b>exhibited issues or concerns can be addressed using existing support structures.</b></p>	<ul style="list-style-type: none"> <li>• Communicate information to school leadership</li> <li>• Notify appropriate school staff, to include the SRO</li> <li>• Contact parents/guardians of student of concern</li> <li>• Determine if school and/or community-based referrals are needed</li> <li>• Continue to monitor behavior through school counselor follow-up</li> <li>• Determine if a release of information is needed, and obtain signatures when appropriate</li> <li>• Develop a management plan (Phase 3)</li> </ul>
MODERATE	<p>The individual or situation does not appear to pose a risk of violence or serious harm to self or others, at this time; however, the <b>behaviors exhibited indicate a need for intervention.</b> Examples of interventions that may be required include increased academic or behavioral supports, services intended to address the impact of stressors, mental health or drug abuse treatment, and mediation for student conflicts or bullying.</p>	<ul style="list-style-type: none"> <li>• Communicate information to school leadership</li> <li>• Notify appropriate school staff, to include the SRO</li> <li>• Contact parents/guardians of student of concern</li> <li>• Determine if school and/or community-based referrals are needed, and initiate appropriate referrals for the student of concern</li> <li>• Determine if a release of information is needed, and obtain signatures when appropriate</li> <li>• Assign a team member to monitor behavior and student response to interventions</li> <li>• Incidents at this level may require law enforcement notification if prohibited behaviors are present</li> <li>• Continue gathering more information (Phase 2) and develop a management plan (Phase 3)</li> </ul>
HIGH	<p>The individual or situation appears to <b>pose a risk of violence or serious harm to self or others.</b> The behaviors exhibited may indicate the student is considering a planned act of violence, has planned to harm self or others, or other concerning behaviors or communications that indicate an interest and/or intention to commit violence.</p>	<ul style="list-style-type: none"> <li>• Incidents at this level may require immediate law enforcement intervention or hospitalization</li> <li>• Communicate information to school leadership</li> <li>• Notify appropriate school staff, to include the SRO</li> <li>• Contact parents/guardians of student of concern</li> <li>• Provide direct supervision of the student until any immediate concerns are addressed</li> <li>• Follow district policies for notifying parents/guardians and potential victims</li> <li>• Initiate interventions to stabilize the situation as needed</li> <li>• Determine if a release of information is needed, and obtain signatures when appropriate</li> <li>• Assign a team member to monitor behavior and student response to interventions</li> <li>• Continue gathering more information (Phase 2) and develop a management plan (Phase 3)</li> </ul>



Classification Level	Suggested Response Guide
<p data-bbox="180 982 212 1125" style="writing-mode: vertical-rl; transform: rotate(180deg);">IMMINENT</p> <p data-bbox="220 247 833 478">The individual or situation appears to pose an <i>immediate risk of violence</i> toward self or others that <b>requires <i>immediate containment and action to prevent violence from occurring.</i></b> The individual is known to have the present desire and capacity to conduct a violent act.</p>	<ul data-bbox="849 247 1539 1125" style="list-style-type: none"> <li>• Incidents at this level require immediate law enforcement intervention or hospitalization</li> <li>• Notify the SRO/law enforcement to address imminent risk</li> <li>• Initiate lock-down procedures, per policy, if appropriate</li> <li>• Communicate information to school leadership</li> <li>• Notify appropriate school staff</li> <li>• Contact parents/guardians of student of concern</li> <li>• Provide direct supervision of the student until parents/guardians assume custody and/or the student is removed from campus</li> <li>• Follow district policies for notifying parents/guardians and potential victims</li> <li>• Initiate interventions to stabilize the situation as needed</li> <li>• Determine if a release of information is needed, and obtain signatures when appropriate</li> <li>• Assign a team member to monitor behavior and student response to the safety and intervention plan</li> <li>• Gather more information (Phase 2) and develop a management plan (Phase 3)</li> </ul>

Based on the information collected, one of the following four Classification Levels will be assigned to the behavior: low, medium, high, or imminent. An initial *Suggested Response Guide* for each level outlines actionable steps staff can take to address the potential risk of harm.

Those evaluating the risk associated with a concerning behavior should keep in mind that a student demonstrating a pattern of concerning behavior over time may warrant an elevated Classification Level. If you observe an escalating pattern of low-level concerning behavior, all three phases of the threat assessment process should be completed to determine if the student requires additional resources.

The Classification Level assigned to a concerning behavior will determine the next steps to be taken in the threat assessment process. If the behavior is determined to be low risk, and it is not connected to an escalating pattern of behavior, you may decide as a team to proceed to Phase III and document the outcomes associated with this behavior. However, if you determine that the behavior should be assessed at medium, high, or imminent risk, you should proceed to Phase II of the threat assessment process before moving to Phase III.

The team will need to document the Classification Level at which the behavior is assessed and the justification for that decision. If the team is made aware of additional information, the Classification Level could change. Any change in Classification Level should be documented and the date/time of the change should be noted as well.

## ***Phase II: Additional Information Gathering and Risk Classification***

If it is determined that Phase II of the threat assessment process will need to be completed, documentation should continue regarding any interviews or investigation that has been completed thus far. Each member of the behavioral threat assessment team taking part in the assessment should be listed, along with their position, phone number, and email address. The same team members may take part in Phase II as in Phase I, but their information should still be entered on the Phase II documentation.

In Phase II, all additional sources of information should be noted. Additional documents gathered should be attached to the behavioral threat assessment paperwork. The team may discover that more information is needed. These tasks should be assigned by the leader of the team and expectations about when the information is needed should be clear. Care should be taken to document each task being completed, when and by whom. If information is required from outside sources, be certain to document who was contacted to provide the information. Additionally, if any consent to release information, Memorandum of Understanding (MOU) or court orders exist between entities (in regard to this student), they should be referenced/attached as well.

***It is the responsibility of the team leader to make sure all of the assigned tasks are completed within the time limits set by the team.***

Once all the necessary information has been collected, the team will reconvene and complete the *Key Observations, Factors of Concern, and Protective Factors Checklists*. This document can be requested from your OSSC liaisons or the OSSC directly. Once the checklists have been completed, the team may determine that more information is needed. If the team determines that all the necessary information has been gathered and evaluated, they will assess and revise the Classification Level, as needed. The team will then determine an appropriate response to the concerning behavior.

Going forward, a Classification Level can be amended based upon new information, mitigating circumstances, aggravating circumstances, or upon successful compliance with interventions. ***It is important to remember that removing a student from school does not mean that student no longer poses a risk of harm to themselves or others. If the student's behavior indicates that they still pose such a risk, the Classification Level should not be lowered.***

### ***Phase III: Intervention and Case Management***

Once a Classification Level has been assigned, a determination regarding the response to that behavior must be made. The behavioral threat assessment team will be a part of that decision in order to examine and consider all possible outcomes. However, each school will need to evaluate potential outcomes based on their policy and code of conduct. Additionally, law enforcement, social services, and other stakeholders will need to determine if there are actions that they will need to take in this situation, as well.

There may be additional stakeholders outside of the behavioral threat assessment team that may be of value to the team in determining the appropriate outcomes or interventions. Teams should consider including community case managers, special education case managers, teachers, counselors/therapists, social workers, parents/guardians, MTSS or student assistant program teams, and mentors. Any person taking part in Phase III decisions should be documented on the Phase III fact sheet.

Once the most appropriate response is determined, documentation will need to be completed regarding the outcome. The team will complete the *Response to Threat or Concerning Behavior Checklist*. If you determine that a different resource is needed than what can be found on the checklist, document what that resource is and how it will be monitored. Once the checklist has been completed a *Case Plan* will need to be completed as well.

A *Case Plan* will help the team determine if the concerning person is complying with the interventions designed to mitigate their concerning behavior and promote successful outcomes. A staff member should be assigned to each requirement listed in the plan to ensure that requirement is being complied with. This should include the duration and frequency of assigned tasks, as well as a specific date set for the team to review progress.

***Teams should ensure consistency between behavioral threat assessment and case management strategies.*** Based on an individualized assessment of the risk posed by the individual, teams will employ case management strategies that are appropriate, fair, and reasonable to address the concerns identified. For each Classification Level, there is a minimal level of response or intervention that should guide the initial development of a case management strategy (see *Risk Classification*). ***A given case may have a fact pattern that necessitates deviation from the general guidelines. When that is the case, teams should deliberate, reach consensus upon action steps, and document the facts or circumstances that factored into their case management planning.***

When developing individualized case management plans for the individual, teams should attempt to identify interventions that align with best practices, for example, evidence-based interventions for bullying, suicidal ideation, and drug use. Informal strategies can also be utilized to provide the student of concern with additional support, for example, assigning a teacher mentor to routinely check in with the student and support their case management plan. In addition, ***case management plans should consider the student's Classification Level and match the level of services,***

*interventions applied, and monitoring to the student's needs* identified during the behavioral threat assessment process. *Case Plans/Plans of Support* should consider the student's learning style, cognitive level, social connections, emotional development, disabilities and personality characteristics.

A *Case Plan* can include a variety of actions that guide a student's emotional development or reduces risk of harm to self and others. The following is a list of possible interventions, but a school may take any other actions that are deemed advisable and/or necessary:

- Rapport-building
- Enhancing skill deficits, such as problem-solving skills, coping skills, communication skills, advocacy skills, and anger management skills.
- Check-in/Check-out
- Mentoring
- Bag/Locker searches
- Assessments by counselor/therapist
- Change of schedule/placement
- Cognitive-behavioral interventions
- Referring for behavioral health treatment

The behavioral threat assessment team should be meeting regularly to review *Case Plans/Plans of Support* completed on previous threat assessments. The teams should be reviewing information and reports regarding the concerning person's compliance/progress in order to assess intervention results and modify the case plan. At that time, the team will determine if it is appropriate to decrease or elevate the Classification Level assigned to the concerning person. The team may also decide that the person's progress has been successful enough to discontinue the *Case Plan*.

***Again, it is the responsibility of the team leader to make sure all the assigned tasks in the Case Plan are being completed successfully. If the student requires an extended period of monitoring, regular meetings of the threat assessment team will be scheduled and documented.***

As best practice dictates in the treatment of juveniles, interventions should be implemented in the least restrictive environment. School administrators and law enforcement should provide a supportive environment for the individual and the safest situation possible for the school community.

### **Additional Considerations**

Schools should review their code of conduct, policies/procedures, and any memoranda of understanding with outside agencies to ensure that they are aligned with recommended best practices and current state and federal law.

## **Complying with the Individuals with Disabilities Education Act and the Americans with Disabilities Act**

It should be noted that the completion of a threat assessment does not excuse a school from following all Individuals with Disabilities Education Act (IDEA) or Americans with Disabilities Act (ADA) requirements for students with disabilities. Instead, the threat assessment process should be completed concurrent to any IDEA or ADA required process, to determine if the student's needs are being met by their current services. Conversely, the presence of an Individualized Education Plan (IEP) does not excuse a school from completing a behavioral threat assessment, which should be a collaborative process in conjunction with any IEP requirements. For example, an IEP for a child who has difficulty expressing himself may have accommodations in place so that in times of crisis he goes to talk to a trusted person such as a counselor, not the SRO. If instead of the counselor the SRO interviews the child during that time of crisis, the IEP may have been violated, and the child's behavior may escalate.<sup>10</sup>

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<sup>10</sup> Additional information can be found in the National Association of School Psychologists' Report on Protecting Students' Rights in Behavioral Threat Assessment Management.

## **Records Retention and Sharing**

The completed behavioral threat assessment form and associated corroborating documents should be maintained as a part of the student of concern's education record. Should a student transfer to another school district, there is no legal requirement to prevent the receiving school district from viewing these records. For example, if a student transfers to another school district to avoid expulsion, it does not mean that this student no longer poses a risk. Information regarding the student's threatening/concerning behavior and actions taken to mitigate such behaviors should be shared with the receiving school district as soon as possible. ***If an expulsion process has been initiated as a result of prohibited/concerning behavior, regardless of whether a student transfers to another school district, the expulsion process should be completed.***

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**Adopted: March 16, 2023 and March 30, 2023**



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## Appendix 5.2310-A

### **Academy of Model Aeronautics National Model Aircraft Safety Code**

Effective January 1, 2014

- D. **GENERAL:** A model aircraft is a non-human-carrying aircraft capable of sustained flight in the atmosphere. It may not exceed limitations of this code and is intended exclusively for sport, recreation, education and/or competition. All model flights must be conducted in accordance with this safety code and any additional rules specific to the flying site.
1. Model aircraft will not be flown:
    - (a) In a careless or reckless manner.
    - (b) At a location where model aircraft activities are prohibited.
  2. Model aircraft pilots will:
    - (a) Yield the right of way to all human-carrying aircraft.
    - (b) See and avoid all aircraft and a spotter must be used when appropriate. (AMA Document #540-D.)
    - (c) Not fly higher than approximately 400 feet above ground level within three (3) miles of an airport without notifying the airport operator.
    - (d) Not interfere with operations and traffic patterns at any airport, heliport or seaplane base except where there is a mixed use agreement.
    - (e) Not exceed a takeoff weight, including fuel, of 55 pounds unless in compliance with the AMA Large Model Airplane program. (AMA Document 520-A.)
    - (f) Ensure the aircraft is identified with the name and address or AMA number of the owner on the inside or affixed to the outside of the model aircraft. (This does not apply to model aircraft flown indoors.)
    - (g) Not operate aircraft with metal-blade propellers or with gaseous boosts except for helicopters operated under the provisions of AMA Document #555.
    - (h) Not operate model aircraft while under the influence of alcohol or while using any drug that could adversely affect the pilot's ability to safely control the model.
    - (i) Not operate model aircraft carrying pyrotechnic devices that explode or burn, or any device which propels a projectile or drops any object that creates a hazard to persons or property.
      - Exceptions:
        - Free Flight fuses or devices that burn producing smoke and are securely attached to the model aircraft during flight.
        - Rocket motors (using solid propellant) up to a G-series size may be used provided they remain attached to the model during flight. Model rockets may be flown in accordance with the National Model Rocketry Safety Code but may not be launched from model aircraft.
        - Officially designated AMA Air Show Teams (AST) are authorized to use devices and practices as defined within the Team AMA Program Document. (AMA Document #718.)
    - (j) Not operate a turbine-powered aircraft, unless in compliance with the AMA turbine regulations. (AMA Document #510-A.)
  3. Model aircraft will not be flown in AMA sanctioned events, air shows or model demonstrations unless:
    - (a) The aircraft, control system and pilot skills have successfully demonstrated all maneuvers intended or anticipated prior to the specific event.
    - (b) An inexperienced pilot is assisted by an experienced pilot.
  4. When and where required by rule, helmets must be properly worn and fastened. They must be OSHA, DOT, ANSI, SNELL or NOCSAE approved or comply with comparable standards.
- B. **RADIO CONTROL (RC)**
1. All pilots shall avoid flying directly over unprotected people, vessels, vehicles or structures and shall avoid endangerment of life and property of others.
  2. A successful radio equipment ground-range check in accordance with manufacturer's recommendations will be completed before the first flight of a new or repaired model aircraft.
  3. At all flying sites a safety line(s) must be established in front of which all flying takes place. (AMA Document #706.)
    - (a) Only personnel associated with flying the model aircraft are allowed at or in front of the safety line.
    - (b) At air shows or demonstrations, a straight safety line must be established.
    - (c) An area away from the safety line must be maintained for spectators.
    - (d) Intentional flying behind the safety line is prohibited.
  4. RC model aircraft must use the radio-control frequencies currently allowed by the Federal Communications Commission (FCC). Only individuals properly licensed by the FCC are authorized to operate equipment on Amateur Band frequencies.
  5. RC model aircraft will not knowingly operate within three (3) miles of any pre-existing flying site without a frequency-management agreement. (AMA Documents #922 and #923.)
  6. With the exception of events flown under official AMA Competition Regulations, excluding takeoff and landing, no powered model may be flown outdoors closer than 25 feet to any individual, except for the pilot and the pilot's helper(s) located at the flightline.
  7. Under no circumstances may a pilot or other person touch an outdoor model aircraft in flight while it is still under power, except to divert it from striking an individual.
  8. RC night flying requires a lighting system providing the pilot with a clear view of the model's attitude and orientation at all times.

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Hand-held illumination

systems are inadequate for night flying operations.

9. The pilot of an RC model aircraft shall:

(a) Maintain control during the entire flight, maintaining visual contact without enhancement other than by corrective lenses prescribed for the pilot.

(b) Fly using the assistance of a camera or First-Person View (FPV) only in accordance with the procedures outlined in AMA Document #550.

(c) Fly using the assistance of autopilot or stabilization system only in accordance with the procedures outlined in AMA Document #560.

C. **FREE FLIGHT**

1. Must be at least 100 feet downwind of spectators and automobile parking when the model aircraft is launched.

2. Launch area must be clear of all individuals except mechanics, officials, and other fliers.

3. An effective device will be used to extinguish any fuse on the model aircraft after the fuse has completed its function.

D. **CONTROL LINE**

1. The complete control system (including the safety thong where applicable) must have an inspection and pull test prior to flying.

2. The pull test will be in accordance with the current Competition Regulations for the applicable model aircraft category.

3. Model aircraft not fitting a specific category shall use those pull-test requirements as indicated for Control Line Precision

Aerobatics.

4. The flying area must be clear of all utility wires or poles and a model aircraft will not be flown closer than 50 feet to any above-ground electric utility lines.

5. The flying area must be clear of all nonessential participants and spectators before the engine is started.

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Appendix 5.2320-A

**Student Suicide Questionnaire**

**Current Suicide Plan**

**A. Details**

Have you thought about how you might make yourself die? Y/N

Do you have a plan? Y/N

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**\*Low (Vague)**

**\*Medium (Some Specifics)**

**\*High (Well Thought Out)**

**B. How prepared**

Do you have the means with you now, at school, or at home? Y/N

Have you written a note? Y/N

Have you put things in order/prepared? Y/N

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**\*Low (Means not available)  
(Has means in hand)**

**\* Medium (Has means close by)**

**\*High**

**C. How Soon**

When are you planning to or when do you think you will do this?

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On a scale of 1 to 10, how likely is it that you will kill yourself?

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**\*Low (No Specific Time)  
(Immediately)**

**\*Medium (Within a few days or hours)**

**\*High**

**D. Lethality of Method**

How are you planning to kill yourself?

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Where are you planning to kill yourself?

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**\*Low (Pills, slash wrists)  
jumping)**

**\*Medium (Drugs/alcohol, car wreck)**

**\*High (Gun, hanging,**

---

**E. Chance of Intervention**

Are you often alone at home? Y/N

Is there anyone or anything that would stop you? Y/N

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**\*Low (Others present most of time)**

**\*Medium (Others available if called upon)**

**\*High (No one nearby)**

**Pain:**

On a scale of 1 to 10, how much pain are you in?

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How do you try to get the pain to go away? What do you do to cope?

---

---

**\*Low (Pain is bearable)**

**\*Medium (Pain is almost unbearable)**

**\*High (Pain is unbearable)**

**Resources:**

Is there someone whom you can talk to about these feelings? Y/N

Who? \_\_\_\_\_

Have you or can you talk to your family about suicide? Y/N Who? \_\_\_\_\_

Have you or can you talk to your friends about suicide? Y/N  
Who? \_\_\_\_\_

**\*Low (Help available; student acknowledges that significant others are concerned and available to help)**

**\*Medium (Family and friends available, but are not perceived to be willing to help)**

**\*High (Family and friends are not available and/or are hostile, injurious, exhausted)**

**Prior Suicidal Behavior:**

**A. Self**

Have you ever threatened to kill yourself before? Y/N

When? \_\_\_\_\_ What \_\_\_\_\_ stopped  
you? \_\_\_\_\_

---

---

Have you ever tried to kill yourself before? Y/N

How \_\_\_\_\_ did \_\_\_\_\_ you \_\_\_\_\_ attempt \_\_\_\_\_ to \_\_\_\_\_ do  
so? \_\_\_\_\_

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---

**\*Low (No prior suicidal behavior)**

**\*Medium (One previous low lethality attempt; history of threats)**

**\*High (One of high lethality or multiple attempts of moderate lethality)**

**B. Significant Others**

Has anyone that you know of killed or attempted to kill themselves? Y/N  
Who? \_\_\_\_\_

Do \_\_\_\_\_ you know  
why? \_\_\_\_\_

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**\*Low (No significant other engaged in suicidal behavior)**

**\*Medium (Significant others have recently attempted suicidal behavior)**

**\*High (Significant others have recently committed suicide)**

---

**Mental Health:**

**\*Low (History of mental illness, but not currently considered mentally ill)**

**\*Medium (Mentally ill, but currently receiving treatment)**

**\*High (Mentally ill and not currently receiving treatment)**

**A. Coping Behaviors**

Do you see a counselor? Does anyone in your family see a counselor? \_\_\_\_\_

\_\_\_\_\_

Have you been sleeping well?

Have you been eating well?

Are you able to complete schoolwork?

\_\_\_\_\_

**\*Low (Daily activities continue as usual with little change)**

**\*Medium (Some daily activities disrupted; disturbance in eating, sleeping, and schoolwork)**

**\*High (Gross disturbances in daily functioning)**

**B. Depression**

Are you feeling unhappy most of the time? \_\_\_\_\_

Is the feeling of unhappiness so strong that sometimes you wish you were dead?

Are you easily irritated?

Do you feel like things can get better, or are you worried (afraid, concerned) that things will just stay the same or get worse?

\_\_\_\_\_

What do you look forward to?

\_\_\_\_\_

**\* Low (Mild; feels slightly down)**

**\*Medium (Moderate; some moodiness, sadness, irritability, loneliness, and decrease of energy)**

**\*High (Overwhelmed with hopelessness, sadness and feelings of helplessness)**

**C. Medical Status**

Do you have any medical problems at this time?

\_\_\_\_\_

**\*Low (No significant medical problems)**

**\*Medium (Acute, but short-term, or psychosomatic illness)**

---

**\*High (Chronic debilitating, or acute catastrophic, illness)**

**D. Other Psychopathology**

How do you get along with others (peers, family, teachers)? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

How do you feel about school?

Who can you trust at home? \_\_\_\_\_ At school?

Do you use any drugs or alcohol? Y/N If so, what?

\_\_\_\_\_

**\*Low (Stable relationships, personality, and school performance)**

**\*Medium (Recent acting-out behavior and substance abuse; acute suicidal behavior in stable personality)**

**\*High (Suicidal behavior in unstable personality; emotional disturbance; repeated difficulty with peers/family/teacher)**

**E. Stress**

What \_\_\_\_\_ makes you stressed? \_\_\_\_\_

Have there been any changes at home, school, or in your personal life? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**\*Low (No significant stress)**

**\*Medium (Moderate reaction to loss and environmental changes)**

**\*High (Severe reaction to loss or environmental changes)**

---

## Appendix 5.2320-A

### Contract for Safety

**Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_

*Today, I have said some things about death or about hurting myself that have made others concerned about my safety. There are people who care about me. Below I will outline who I can rely on for help and how I can help myself.*

I will not hurt myself. I will do one or more of the following instead of hurting myself:

- 1) I can talk to a trusted adult about my feelings. These are people who care about me that I can call when I feel overwhelmed:

Name	Relationship	Contact Information

- 2) I can do or tell myself some of these things to make myself feel better:

- 3) I can call one of the numbers listed on the back of this form, or 911.

**By signing this safety contract, I agree to take positive actions whenever I feel like hurting myself. I will not hurt myself or try to kill myself. I will be near people who can help me or will be able to make a phone call if I need to contact people who can help me.** \_\_\_\_\_

Student: \_\_\_\_\_ Date: \_\_\_\_\_

Parent: \_\_\_\_\_ Date: \_\_\_\_\_

School Representative: \_\_\_\_\_ Date: \_\_\_\_\_



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## Appendix 5.2320-A

### Tips for Keeping Your Child Safe

There are many things parents can do to help their child who is experiencing suicidal thoughts.

\* **ASK.** Talking about suicide does not make a student suicidal. Asking if someone is having suicidal thoughts gives him/her permission to talk about it. Asking sends the message that you are concerned and want to help.

\* **TAKE SIGNS SERIOUSLY.** Studies have found that more than 75% of people who die by suicide showed some of the warning signs in the weeks or months prior to their death. Warning signs may include: appearing sad or hopeless, engaging in reckless behavior, self-inflicted injuries, giving away possessions, making suicidal threats, significant changes in behavior such as changes in appearance, changes in grades, withdrawing from friends or changes in eating or sleeping habits.

\* **GET HELP.** If you have concerns that your child is suicidal, seek immediate help from a mental health practitioner. Suicidal students need to be evaluated by an expert in assessing risk and developing treatment plans. Parents can contact school counselors, social workers, or psychologists for a listing of resources. Parents may also want to consult with their insurance company to obtain a list of mental health providers covered by their policy. When you call to make an appointment, tell the person on the phone that your child is suicidal and needs to be seen as soon as possible.

\* **LIMIT ACCESS TO WEAPONS, PRESCRIPTION DRUGS, MEDICATIONS AND OTHER MEANS.**

\* **DO NOT LEAVE HIM OR HER ALONE.** It is important that parents surround themselves with a team of supportive friends or family members who can step in and help as needed.

\* **REASSURE YOUR CHILD THAT LIFE CAN GET BETTER.** Many suicidal people have lost all hope that life can improve. They may have difficulty problem solving even simple issues. Remind your child that no matter how bad things are the problem can be worked out. Offer your help.

\* **LISTEN.** Avoid making statements such as “I know what it’s like” or “I understand.” Instead, make statements such as, “Help me understand what life is like for you right now.” Although you may not be able to “fix” the problem, your presence and willingness to listen is supportive to your child. \_\_\_\_\_

Resources		
<b>National</b>	<b>Cuyahoga County</b>	<b>Lorain County</b>
* <b>National Suicide Prevention</b> 1-800-273-TALK 24 hours/7 days per week	* <b>Crisis Hotline</b> 216-623-6888 24 hours/7 days per week	* <b>Crisis Hotline</b> 800-888-6161 24 hours/7 days per week
* <b>Lifeline</b> 1-800-273-8255 (www.suicidepreventionlifeline.org)	<b>FrontLine Service</b> <b>Local Crisis Support</b> <b>Non-emergency Number</b> 216-623-6555	* <b>Nord Center</b> 440-233-7232 866-888-NORD 24 hours/7 days per week
	<b>Applewood Centers Inc</b> 216-521-6511	<b>Applewood Centers Inc</b> 216-521-6511

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	<b>BeechBrook</b> 216-831-2255	<b>Guidestone</b> 440-260-8550  <b>BeechBrook</b> 440-324-4980  <b>Pathways Counseling and Growth Center</b> 440-323-5707
--	-----------------------------------	--

\*Denotes emergency resources that may be contact any time

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Appendix 5.2320-A

**Suicide Threat Incident Report**

**Student Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Date of Birth:** \_\_\_\_\_ **Grade:** \_\_\_\_\_ **Gender:** M F

**Team Members:** \_\_\_\_\_

**Referred by:** \_\_\_\_\_

**Reason for Assessment:** \_\_\_\_\_

**Required Actions:**

- Student supervised until release
  - Building administrator/designee is contacted about threat
  - Administrator assembles Suicide Assessment Team (Primary/Secondary)
  - Assessment Team completes "Suicide Risk Assessment" form
  - "Suicide Risk Assessment Summary Sheet" found student's risk:
    - Low
    - Medium
    - High
  - Follow "Suicide Threat Procedures"
  - Parent notified **Time:** \_\_\_\_\_ **Spoke to:** \_\_\_\_\_
    - Emergency Contact notified if parent is unavailable and low risk
    - Emergency Contact notified **Time:** \_\_\_\_\_ **Spoke to:** \_\_\_\_\_
  - Student completes "Contract for Safety" form
  - Student released to
    - Returned to class (low risk only)
    - Parent - Time Released: \_\_\_\_\_
    - Crisis Hotline - Outcome: \_\_\_\_\_
  - "Contract for Safety" and "Tips for Keeping Your Child Safe" provided to and signed by parent
  - File all Suicide Threat Documentation in separate, secure cabinet in purple folder
  - Verbally inform (in person) any essential team members that were not present about the incident (Psychologist, Counselor, Nurse)
  
  - Designated follow up coordinator: \_\_\_\_\_
  - Follow up plan/outcome: \_\_\_\_\_
-



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## Appendix 5.2330-A

### Cyber Threat Incident Response Plan

In the event of a cyber-threat incident, the School shall comply with the following procedures:

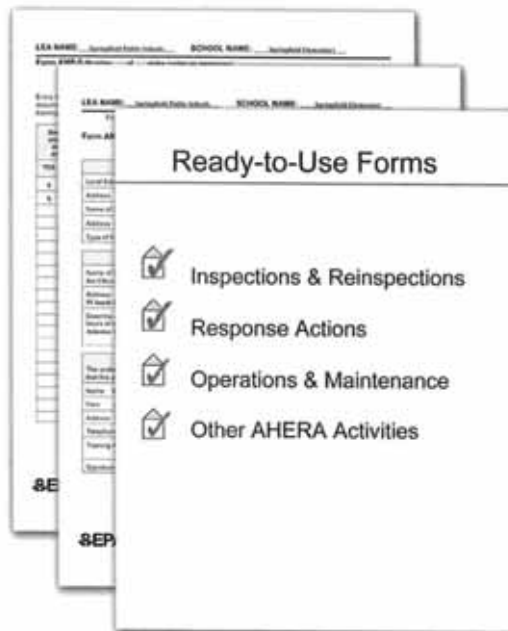
1. Validate and Contain the Cyber Threat.
  - a. When a cyber threat is identified, the individual who first becomes aware of the compromise (“Incident Reporter”) shall immediately notify the Principal or his or her designee. The Incident Reporter shall, to the greatest extent possible, provide the Principal or his or her designee with all relevant information and underlying suspicions, and if necessary, access to the device in which the cyber threat occurred.
  - b. The Principal or his or her designee shall notify the members of the Incident Response Team (“IRT”), and the team shall meet as soon as possible to respond to the cyber threat. The IRT will determine if a data breach has occurred, and to the extent possible, determine the type of information that has been disclosed.
  - c. The IRT must determine the immediate steps necessary to contain the threat. If necessary, the IRT shall contact an appropriate cyber security response provider to limit damage caused by the cyber threat.
  - d. The IRT shall attempt to identify any protected or sensitive information that may have been compromised. If it is determined that the education records of any student has been compromised, the Principal or his or her designee shall document the disclosure in each respective student’s education file.
  - e. The IRT shall document mitigating efforts for later analysis.
2. Notify Authorities and Affected Parties.
  - a. The IRT shall determine if the incident warrants notification to law enforcement and/or the Safety and Business Manager.
  - b. The Principal shall notify all parties whose sensitive information was determined to have been compromised if the compromised data included information that could lead to identity theft.
3. Collect and Review Cyber Threat Response Documentation.
  - a. The IRT shall assess the cyber threat and determine steps necessary to minimize re-occurrence, and perform necessary mitigation steps.
  - b. This plan shall be modified as needed to address future cyber threats.

United States  
Environmental Protection  
Agency

February 2009  
Region 2



## Model AHERA Asbestos Management Plan for Local Education Agencies



  
Healthy School Environments

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# Model AHERA Asbestos Management Plan for Local Education Agencies

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## Introduction

Under the Asbestos Hazard Emergency Response Act (AHERA) of 1986, EPA published on October 30, 1987, the Asbestos-Containing Materials in Schools rule (hereinafter referred to as the AHERA rule), 40 CFR Part 763, Subpart E. The AHERA rule became effective on December 14, 1987 and applies to all non-profit elementary and secondary schools nationwide, both public and private. Local Education Agencies (LEAs) are responsible for ensuring compliance with the AHERA rule and are required, among other things, to develop and maintain an up-to-date Asbestos Management Plan (AMP), conduct training, inspections, and sampling related to asbestos, manage asbestos properly and provide yearly notification to parents, teachers and employee organizations about the AMP and any asbestos-related activities.

LEAs are also responsible for designating a contact person known as the Designated Person (DP) to oversee asbestos-related activities in the school and ensure that the AHERA responsibilities of the LEA are met. The quality of a school's asbestos program depends heavily upon the dedication and work of the DP with the support of the LEA. The LEA and the DP work together to ensure that each school is in compliance with federal, state and local asbestos regulations and that there are no uncontrolled releases of asbestos fibers in the school which could pose a health threat to children and school workers.

Even though the AHERA rule has been in place for years, EPA and the states have found that compliance issues remain, particularly in the area of schools maintaining and updating their AMPs to reflect current reinspection information, operation and maintenance activities, periodic surveillance and response/post-response actions. An up-to-date compliant AMP is key to the success of a school's asbestos program and the protection of children's and school workers' health. In order to enhance compliance, EPA Region 2 has developed an "AHERA Asbestos Management Plan Self-Audit Checklist for Designated Person's" and this companion guidance document, a "**Model AHERA Asbestos Management Plan for Local Education Agencies.**" It is recommended that the Checklist be reviewed first in order to quickly identify any potential deficiencies in the school's AMP.

The AHERA Asbestos Management Plan Self-Audit Checklist for Designated Person's is designed to help the DP determine whether or not the school has an up-to-date compliant AMP. The Checklist is divided into six sections: General Information, Inspections and Reinspections, Response Actions, Operations and Maintenance, Periodic Surveillance and Notification. Each section of the Checklist contains questions to guide the DP through a detailed compliance assessment of the school's AMP with check boxes for Yes, No or Not Applicable. Supporting regulatory citations are provided on the Checklist along with spaces for the DP to make notes. Following the Checklist is a Glossary and a list of Acronyms.

This companion guidance document a "Model AHERA Asbestos Management Plan for Local Education Agencies" provides step-by-step instructions for developing an AMP utilizing a suggested standard format. This document contains suggested forms for including in the school's

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AMP and tracks the format of the Checklist: General Information, Inspections and Reinspections, Response Actions, Operations and Maintenance, Periodic Surveillance and Notification. Following the forms is a Glossary and a list of Acronyms. For convenience, tips are included in the Checklist which note the corresponding suggested forms that should be completed in the Model AHERA AMP.

Please note that the EPA Region 2 Model AMP forms and Checklist are not a substitute for the applicable legal requirements, are not regulations themselves, and are not required to be used/completed under AHERA. Rather, they are provided by EPA as guidance to enhance schools' compliance with EPA AHERA regulations regarding the required documentation that must be included in the AMP. These documents do not impose legally binding requirements on any party, including EPA, states, or the regulated community, and are not intended and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. Please contact your state asbestos coordinator for information on any applicable state regulations/AMP forms.

If you have any questions on these guidance documents, please call Deborah Craig, EPA Region 2 Asbestos Outreach Coordinator, at (212) 637-3521 or e-mail her at [craig.deborah@epa.gov](mailto:craig.deborah@epa.gov). These guidance documents are available on the EPA website at [http://www.epa.gov/asbestos/pubs/asbestos\\_in\\_schools.html](http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html). For additional asbestos information, please contact the EPA Region 2 Asbestos Coordinator Gaetano LaVigna by phone at (212) 637-4069 or by e-mail at [lavigna.gaetano@epa.gov](mailto:lavigna.gaetano@epa.gov). The EPA Region 2 Caribbean Asbestos Contact, Carlos M. Rivera, can be reached by phone at (787) 977-5846 or by e-mail at [rivera.carlos@epa.gov](mailto:rivera.carlos@epa.gov).

For any additional asbestos information, please contact your state/EPA asbestos coordinator or call EPA's Toxic Substances Control Act (TSCA) Hotline at (202) 554-1404 or the EPA Asbestos Ombudsman at (800) 368-5888, or visit EPA's website at [http://www.epa.gov/asbestos/pubs/asbestos\\_in\\_schools.html](http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html). A list of state/EPA asbestos coordinators is provided on the EPA website.

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## **Asbestos Management Plan Preparation Instructions**

The following information provides step-by-step instructions for developing a school's Asbestos Management Plan (AMP) utilizing a suggested standardized format. The Model AMP forms are not a substitute for the applicable legal requirements, are not regulations themselves, and are not required to be used/completed under AHERA. Rather, they are provided by EPA Region 2 as guidance to enhance schools' compliance with EPA AHERA regulations regarding the required documentation that must be included in the AMP. These Model AMP forms do not impose legally binding requirements on any party, including EPA, states, or the regulated community, and are not intended and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States.

Please contact your state Asbestos Coordinator for any applicable state regulations/AMP forms. Under 40 CFR § 763.93(a)-(b) of EPA's Asbestos-Containing Materials in Schools regulations, the initial AMPs were required to be submitted to the state for review and your state may require you to submit subsequent changes to your AMP.

Please be sure to read the instructions for each of the Model AMP forms. The information requested on the Model AMP forms is generally self-explanatory, however explanations have been provided in the instructions below for those items which may require further clarification. You may also wish to refer to the AHERA definitions provided in the Glossary, Appendix A, or the list of Acronyms provided in Appendix B.

### **AMP FORM 1 - CONTACT INFORMATION**

Provide the requested contact information for the Local Education Agency (LEA) and the school.

Provide the Designated Person's (DP) name, address, telephone number and the course names, dates, and hours of asbestos-related training courses taken by the DP to carry out his or her duties. This information is required under 40 CFR § 763.93(e)(4) to be included in the AMP. Although not required, EPA suggests that the name of the training agency be provided on this form and that copies of the DP's training certificates be attached to this form.

Provide the requested contact and accreditation information for each Management Planner who contributed to the AMP. Under 40 CFR § 763.93(e)(12)(i)-(ii), the consultant's name and a statement that he/she is accredited under the state accreditation program or another state's accreditation program or an EPA-approved course must be included in the AMP. Although not required, EPA suggests that the name of the training agency and the course name and date be provided on this form and that a copy of the accreditation certificate for each Management Planner be attached to this form.

### **AMP FORM 2 - SCHOOL BUILDING LIST**

Provide the name and address of each building used as a school building for this school (e.g., on-site administration building, maintenance building, storage building and any off-site building used for classrooms). Place an "X" in the appropriate column to note whether the building has friable

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asbestos-containing material (ACBM), non-friable ACBM, friable and non-friable suspected ACBM assumed to be asbestos-containing material (ACM), or no ACBM (i.e., no ACBM at the time of construction). If there is no ACBM in the building as a result of a removal action, note "removal" and insert the date (e.g., removal - 2/10/04) in the no ACBM column.

All of the aforementioned information is required to be included in the AMP under 40 CFR § 763.93(e)(1) except for the "no ACBM" related information which EPA suggests including in the AMP for clarification. Although not required, EPA also suggests that the following information be included on this form: original date of the building construction and the date of any new additions. The suggested additions to the School Building List will provide an enhanced "snapshot" overview of the status changes that have occurred in the school buildings over time.

Note, as required under 40 CFR § 763.93(a)(1)-(2), the AMP developed for each school must include all of the buildings that are owned, leased or otherwise used by the LEA as school buildings for that school. Therefore, the School Building List must include all of these buildings even if they are located off-site from the main school campus.

#### **AMP FORM 3 - DESIGNATED PERSON ASSURANCES**

Provide the name of the DP and have the DP sign and date this form which lists the LEA's general responsibilities under 40 CFR § 763.84. Under 40 CFR § 763.93(i), the AMP must contain a true and correct statement signed by the DP which certifies that the LEA's general responsibilities under 40 CFR § 763.84 have been or will be met.

#### **AMP FORM 4 - EVALUATION OF RESOURCES**

Describe the resources needed (e.g., financial, personnel and equipment) to complete response actions successfully and carry out reinspection, operations and maintenance activities, periodic surveillance, and training. This evaluation of resources is required to be included in the AMP under 40 CFR § 763.93(e)(11).

#### **AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE & CUSTODIAL STAFF**

Provide the following training information for maintenance and custodial staff required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c): person's name and job title, date training was completed, location of training and number of hours completed. Although not required, EPA suggests that the name of the training agency and the course name be provided on this form and that a copy of the training certificate be attached to this form.

Under 40 CFR § 763.92(a)(1), every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Under 40 CFR § 763.92(a)(2), maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training.

#### **AMP FORM 6 - INSPECTION COVER SHEET**

If your school is comprised of more than one building, each building inspection or reinspection

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should be summarized on a separate form. (Note, under 40 CFR § 763.85(b)(1), a reinspection must be conducted at least once every three years after a management plan is in effect.) Provide the requested cover sheet information about the accredited inspector(s) and the inspection or reinspection of each school building. Although not required by EPA, it is suggested that the name of the training agency and the course name and date be provided on this form and that a copy of the accreditation certificate for each inspector be attached to this form.

If this inspection report cover sheet is not used for the AMP, ensure that the inspection report for each inspection or reinspection includes the following information as required under 40 CFR § 763.93(e)(3)(i): date of the inspection, and the name, signature, state of accreditation, and, if applicable, the accreditation number of each accredited inspector performing the inspection. Attach a copy of the signed inspection report.

A copy of the signed inspection report, along with other related documentation, must be provided to the DP and included as a record in the AMP within 30 days of the inspection under 40 CFR § 763.85(a)(4)(vi) or reinspection under 40 CFR § 763.85(b)(3)(vii). See these cites and 40 CFR § 763.93(e)(3) for details on required AMP documentation. For inspections conducted before December 14, 1987 (i.e., the effective date of the October 30, 1987 EPA Asbestos-Containing Materials in Schools rule), see also 40 CFR § 763.93(e)(2)(i)-(v).

The AMP instructions/forms for inspections and reinspections are as follows: Form 6 - Inspection Cover Sheet, Form 7 - Room/Functional Space Assessment, Form 8 - Homogeneous Area/Bulk Sample Summary and Form 9 - Homogeneous Area/Bulk Sample Diagram.

#### **AMP FORM 7 - ROOM/FUNCTIONAL SPACE ASSESSMENT**

Written assessments are required to be made for each inspection and reinspection under 40 CFR § 763.88 of all ACBM and suspected ACBM assumed to be ACM in a building by an accredited inspector. This form may be used to provide the assessment information for an inspection or reinspection. The inspector must sign and date the written assessment, provide his or her state of accreditation, and, if applicable, accreditation number, and provide a copy of the assessment to the DP for inclusion in the AMP within 30 days of the assessment (40 CFR §§ 763.88(a)(2) and 763.93(e)(3)(v)). Although not required, EPA suggests that the name of the training agency and the course name and date be provided on this form and that a copy of the accreditation certificate for the inspector be attached to this form.

Fill out a separate form for each specific type of ACBM or suspected ACBM assumed to be ACM for each room/functional space. For example, if a room/functional space contains two types of thermal system insulation, one type of surfacing material, and one miscellaneous material (requiring four unique homogeneous area numbers), then four separate forms should be completed for that particular room/functional space. Homogeneous area (HA) numbers should be assigned to each specific homogeneous material identified as ACBM or suspected ACBM assumed to be ACM within a building. These HA numbers can be used to identify homogeneous materials on a blueprint or diagram.

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Identify the type of material as thermal, surfacing, or miscellaneous by checking the appropriate box and then describe the material in the space provided. Be sure to include such factors as color, texture, thickness, and method of application, if applicable (e.g., sprayed on or trowelled on). The amount of each material should be recorded, both in total quantity and as a percentage of the functional space (40 CFR § 763.88(c)(1)). For example, if there are 200 linear feet of various pipe runs in a room with 50 linear feet covered by air cell insulation, it should be noted that there are 50 linear feet of that particular homogeneous material in a room and that it covers 25% of the area (50/200).

Complete the "Damage Assessment" section for all friable materials. The amount of each specific type of damage should be noted. Information regarding the causes and severity of damage should be recorded in the comment section (40 CFR § 763.88(c)(2)(i)-(ii) and (c)(5)).

Note if there is an accumulation of powder/dust/debris similar in appearance to the material being assessed and its location (e.g., beneath the pipe, boiler, or duct). This information can be used as evidence to confirm damage.

Note if the material is in a supply or a return air plenum. If asbestos fibers are released from the ACBM into the ventilation air stream they have the potential to be transported to locations where people are present. The location of any asbestos fibers in a supply air plenum is usually more significant than in a return plenum since the distance of transport to the occupied room/functional space is typically shorter and the dilution by makeup air is less significant.

Note the extent or spread of damage over large areas or large percentages of the homogeneous area (40 CFR § 763.88(c)(2)(iii)).

Complete the "Potential for Contact with the Material" section and note whether or not the material is accessible (40 CFR § 763.88(c)(3)).

Note the potential for disturbance of this material (40 CFR § 763.88(c)(4)). The potential for disturbance can be directly related to accessibility or other factors such as proposed renovations, vibrations, air erosion, etc.

Circle the appropriate classification from the "Assessment Category" and give the reason for the classification (40 CFR § 763.88(b)).

Note the preventative measures which might eliminate the reasonable likelihood of undamaged ACM from becoming significantly damaged (40 CFR § 763.88(c)(6)).

#### **AMP FORM 8 - HOMOGENEOUS AREA/BULK SAMPLE SUMMARY**

Provide the requested homogeneous area/bulk sample summary information for each inspection or reinspection and fill out a separate form for each school building.

For each inspection and reinspection conducted under 40 CFR § 763.85 the AMP must include a

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blueprint, diagram, or written description of each school building that identifies clearly each location and approximate square or linear footage of homogeneous areas where material was sampled for ACM, the exact location where each bulk sample was collected, date of collection, homogeneous areas where friable suspected ACBM is assumed to be ACM, and where nonfriable suspected ACBM is assumed to be ACM. In addition, a description of the manner used to determine sampling locations must be included in the AMP. See 40 CFR § 763.93(e)(3)(ii)-(iii) for these inspection/reinspection requirements and for inspections conducted before December 14, 1987 (i.e., the effective date of the October 30, 1987 EPA Asbestos-Containing Materials in Schools rule), see also 40 CFR § 763.93(e)(2)(ii). For details on how to collect bulk samples, see 40 CFR § 763.86.

For each inspection and reinspection conducted under 40 CFR § 763.85 the AMP must also include the following information about the accredited inspector that collected the samples: name, signature, state of accreditation and, if applicable, the accreditation number of the inspector, as required under 40 CFR § 763.93(e)(3)(iii). Although not required, EPA suggests that the name of the training agency and the course name and date be provided on this form and that a copy of the accreditation certificate for the inspector be attached to this form.

To provide a blueprint or diagram in lieu of the aforementioned written description, see Form 9 - Homogeneous Area/Bulk Sample Diagram. Note, a written description and a blueprint or diagram may be provided, but is not required by EPA.

#### **AMP FORM 9 - HOMOGENEOUS AREA/BULK SAMPLE DIAGRAM**

For each inspection and reinspection conducted under 40 CFR § 763.85 provide one blueprint or diagram for each HA that identifies clearly each location and approximate square or linear footage of homogeneous areas where material was sampled for ACM. See also the instructions for Form 8 - Homogeneous Area/Bulk Sample Summary for further details regarding the required documentation of homogeneous areas/bulk samples in the AMP and the supporting regulatory cites for inspections/reinspections.

As also discussed in the instructions for Form 8, a blueprint or diagram may be included in the AMP in lieu of a written description of the homogeneous areas where material was sampled for ACM. Note, a written description and a blueprint or diagram may be provided, but is not required by EPA.

#### **AMP FORM 10 - PLAN FOR REINSPECTION**

Under 40 CFR § 763.93(e)(9), a plan for reinspection under 40 CFR § 763.85 must be included in the AMP. Use this form to provide the plan. Note, at least once every three years after a management plan has been in effect, a reinspection must be made by an accredited inspector of all friable and nonfriable known or assumed ACBM in each school building that the LEA leases, owns, or otherwise uses as a school building (40 CFR § 763.85(b)(1)-(2)).

#### **AMP FORM 11 - RECOMMENDED RESPONSE ACTIONS**

Provide the requested information about the recommendations made by the accredited Management Planner to the LEA regarding response actions.

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Under 40 CFR § 763.93(e)(5), the AMP must include the recommendations made by the accredited Management Planner to the LEA regarding response actions under 40 CFR § 763.88(d) along with the following information about the Management Planner: name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited Management Planner making the recommendations. Under 40 CFR § 763.88(d), the Management Planner(s) must sign and date the recommendation, provide the aforementioned accreditation information and submit a copy of the recommendation to the DP for inclusion in the AMP. Although not required, EPA suggests that the name of the training agency and the course name and date be provided on this form and that a copy of the accreditation certificate for each Management Planner be attached to this form.

In addition, under 40 CFR § 763.93(e)(6), the AMP must include a detailed description of preventive measures and response actions to be taken, including methods to be used, for any friable ACBM, the locations where such measures and action will be taken, reasons for selecting the response action or preventive measure, and a schedule for beginning and completing each preventive measure and response action.

#### **AMP FORM 12 - IMPLEMENTATION OF RESPONSE ACTIONS**

Provide the requested information regarding the response actions taken that were approved by the LEA.

Under 40 CFR § 763.94(b)(1), the AMP must include a detailed written description of each preventive measure and response action taken for friable and nonfriable ACBM and friable and nonfriable suspected ACBM assumed to be ACM, including: methods used, location where the measure or action was taken, reasons for selecting the measure or action, start and completion dates of the work, names and addresses of all contractors involved and, if applicable, their state of accreditation and accreditation numbers, and if ACBM is removed, the name and location of the storage or disposal site of the ACM. Although not required, EPA suggests that copies of accreditations for personnel conducting any abatement activities be attached to this form.

#### **AMP FORM 13 - DESCRIPTION/DIAGRAM OF ACBM TO REMAIN**

Provide the requested information regarding ACBM to remain.

Under 40 CFR § 763.93(e)(8), the AMP must include a detailed description in the form of a blueprint, diagram, or written description of any ACBM or suspected ACBM assumed to be ACM that remains in the school once response actions are undertaken under 40 CFR § 763.90 and the description must be updated as response actions are completed. Note, a written description and a blueprint or diagram may be provided, but is not required by EPA.

#### **AMP FORM 14 - PLAN FOR OPERATIONS AND MAINTENANCE ACTIVITIES**

Under 40 CFR § 763.93(e)(9), the plan for operations and maintenance activities required under 40 CFR § 763.91 must be included in the AMP. Use this form to provide the plan and include the following elements: worker protection under 40 CFR § 763.91(b) (e.g., training, respiratory protection, and medical surveillance program), cleaning procedures/equipment/accreditation under 40 CFR § 763.91(c), operations and maintenance procedures, work practices and equipment under



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40 CFR § 763.91(d), use of accredited personnel to design and conduct response actions for any maintenance activities disturbing friable ACBM (other than small-scale, short duration maintenance activities) under 40 CFR § 763.91(e), procedures for minor and major fiber release episodes under 40 CFR § 763.91(f), and use of accredited personnel to design and conduct response actions for any major fiber release episodes under 40 CFR § 763.91(f)(2)(iii).

**AMP FORM 15 - OPERATIONS AND MAINTENANCE ACTIVITIES**

Provide the requested information on operations and maintenance activities conducted under 40 CFR § 763.91(d) and, under 40 CFR § 763.94(g), any major asbestos activity conducted under 40 CFR § 763.91(e).

Under 40 CFR § 763.94(f) and (g), a record of the following information must be provided in the AMP regarding the aforementioned activities: name of each person performing the activity, for a major activity, the name, signature, state of accreditation and, if applicable, the accreditation number of each person performing the activity; the start and completion dates of the activity, the locations where such activity occurred, a description of the activity including preventive measures used, and if ACBM is removed, the name and location of the storage or disposal site of the ACM. Although not required, EPA suggests that copies of accreditations for personnel be attached to this form.

**AMP FORM 16 - CLEANING RECORD**

Provide the requested information regarding the initial cleaning after an inspection (i.e., before the initiation of a response action other than operation and maintenance activities or repair) and any additional cleaning recommended by the Management Planner. Complete one form for each activity.

Under 40 CFR § 763.94(e), the AMP must include a record of each cleaning conducted under 40 CFR § 763.91(c), including the following information: name of each person performing the cleaning, date of the cleaning, locations cleaned, and the methods used to perform the cleaning.

**AMP FORM 17 - MAJOR/MINOR FIBER RELEASE EPISODE**

Provide the requested information regarding major and minor fiber release episodes.

Under 40 CFR § 763.94(h), for each major and minor fiber release episode occurring as a result of operations and maintenance activities under 40 CFR § 763.91(f), the AMP must include a record of the following information: date and location of the episode, method of repair, preventive measure or response action taken, and if ACBM is removed, the name and location of the storage and disposal site of the ACM.

**AMP FORM 18 - PERIODIC SURVEILLANCE PLAN/REPORT**

Provide the requested information regarding the periodic surveillance plan and report (i.e., the two periodic surveillance inspections per school year).

Under 40 CFR § 763.93(e)(9), a plan for periodic surveillance under 40 CFR § 763.92 must be included in the AMP. At least once every 6 months after the AMP has been in effect, a periodic surveillance must be conducted in each building that the LEA leases, owns, or otherwise uses as a

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school building that contains ACBM or is assumed to contain ACBM. The periodic surveillance report under 40 CFR § 763.92 (b)(2) must include a record of the person's name performing the surveillance, the date of the surveillance and any changes in the condition of the material.

**AMP FORM 19 - PLAN TO INFORM**

Provide the requested notification information about the AMP and any asbestos-related activities.

Under 40 CFR § 763.93(g)(4), at least once each school year, the LEA must notify in writing parent, teacher, and employee organizations of the availability of the AMP and must include in the AMP, a description of the steps taken to notify such organizations, and a dated copy of the notification. In the absence of any such organizations for parents, teachers, or employees, the LEA must provide written notice to that relevant group of the availability of the AMP and must include in the AMP a description of the steps taken to notify such groups, and a dated copy of the notification.

Under 40 CFR § 763.93(e)(10), the AMP must include a description of the steps taken to inform workers and building occupants, or their legal guardians, about inspections, reinspections, response actions, and post-response action activities, including periodic reinspection and surveillance activities that are planned or in progress. Under 40 CFR § 763.84(c), the LEA must inform them about these activities at least once each school year.

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## AHERA Asbestos Management Plan

School Name: \_\_\_\_\_  
\_\_\_\_\_

School Address: \_\_\_\_\_  
\_\_\_\_\_

A complete, up-to-date copy of this Asbestos Management Plan must be maintained in both the Local Education Agency's administrative office and the school's administrative office (40 CFR § 763.93(g)(2)-(3)). For more information, please contact the Designated Person for this school.

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

AMP FORM 1 - CONTACT INFORMATION

Local Education Agency and School Information	
Local Education Agency:	Telephone Number:
Address:	
Name of School:	Telephone Number:
Address:	County:

Designated Person Information			
Name of Designated Person:		Telephone Number:	
Address:			
Course Name:	Training Agency:	Date:	Hours of Training:

Management Planner(s)			
The following management planner(s) has developed/contributed to this plan and is accredited under the state accreditation program or another state's accreditation program or an EPA-approved course.			
Name:		Telephone Number:	
Firm:			
Address:			
State of Accreditation/Accreditation Number:			
Course Name:	Date:	Training Agency:	
Name:		Telephone Number:	
Firm:			
Address:			
State of Accreditation/Accreditation Number:			
Course Name:	Date:	Training Agency:	

ATTACHMENTS	
•	Copy of Designated Person's asbestos-related training certificates suggested, but not required by EPA
•	Copy of accreditation certificate for Management Planner(s) suggested, but not required by EPA

LEA NAME:

SCHOOL NAME:

(Number \_\_\_ of \_\_\_, make copies as necessary)

AMP FORM 2 - SCHOOL BUILDING LIST

List each building used as a school building for this school (e.g., on-site administration building, maintenance building, storage building and any off-site building used for classrooms, etc.). List the date of the original construction and any subsequent additions. Place an "X" in the appropriate column to note whether the building has friable ACBM, non-friable ACBM, friable and non-friable suspected ACBM assumed to be ACM or no ACBM (i.e., no ACBM at the time of construction). If there is no ACBM in the building as a result of a removal action, note "removal" and insert the date (e.g., removal - 2/10/04) in the "No ACBM" column.

Name of Building	Address	Construction Date(s)	Friable ACBM*	Non-Friable ACBM	Friable and Non-Friable Suspected ACBM Assumed to be ACM**	No ACBM

\*ACBM - Asbestos-Containing Building Material  
\*\*ACM - Asbestos-Containing Material

DATE: \_\_\_\_\_

**ATTACHMENT**

- If a new school building was constructed after October 12, 1988 and is asbestos-free, attach a signed statement from an architect or project engineer responsible for the construction of the building, or by an accredited inspector, indicating that no ACBM was specified as a building material in any construction document for the building, or, to the best of his or her knowledge, no ACBM was used as a building material. Provide a copy of this statement to the EPA Regional Office. This information is required under 40 CFR § 763.99 (a)(7). Provide the state/license number for the architect/project engineer or, for the inspector, provide the state of accreditation, and, if applicable, the accreditation number for the inspector. Although not required, EPA suggests attaching to this statement a copy of the licensing document for the architect/project engineer, or for the inspector, a copy of the inspector's accreditation certificate.

LEA NAME:

SCHOOL NAME:

**AMP FORM 3 - DESIGNATED PERSON ASSURANCES**

In accordance with 40 CFR § 763.93(i) of the Environmental Protection Agency Asbestos-Containing Material in Schools regulation, the undersigned Local Education Agency (LEA) Designated Person (DP) hereby certifies that the following general responsibilities of the LEA under 40 CFR § 763.84 have been or will be met:

1. Ensure that the activities of any persons who perform inspections, reinspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out in accordance with Part 763, Subpart E.
2. Ensure that all custodial and maintenance employees are properly trained as required by Part 763, Subpart E and other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).
3. Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic reinspection and surveillance activities that are planned or in progress.
4. Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos in a school are provided information regarding the locations for Asbestos-Containing Building Materials (ACBM) and suspected ACBM assumed to be Asbestos-Containing Materials (ACM).
5. Ensure that warning labels are posted in accordance with § 40 CFR 763.95.
6. Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under § 40 CFR 763.93(g).
7. Designate a person to ensure that requirements under § 763.84 are properly implemented and ensure that the designated person receives adequate training to perform duties assigned under § 763.84. Such training shall provide, as necessary, basic knowledge of: health effects of asbestos; detection, identification, and assessment of ACM; options for controlling ACBM; asbestos management programs; relevant Federal and State regulations concerning asbestos, including those in Part 763, Subpart E and those of the Occupational Safety and Health Administration, U.S. Department of Transportation and the U.S. Environmental Protection Agency.
8. Consider whether any conflict of interest may arise from the inter-relationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under Part 763, Subpart E.

<b>Name of Designated Person:</b>	
<b>Designated Person's Signature:</b>	<b>Date:</b>

*Note*

- The AMP must also include, as required under 40 CFR § 763.93 (e)(7), one of the following statements for the person or persons who inspected for ACBM and who will design or carry out response actions, except for operations and maintenance, with respect to the ACBM: a statement that he/she is accredited under the state accreditation program, or that the LEA has used or will use persons accredited under another state's accreditation program or an EPA-approved course.

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LEA NAME:

SCHOOL NAME:

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(Number \_\_ of \_\_, make copies as necessary)

AMP FORM 4 - EVALUATION OF RESOURCES

DATE: \_\_\_\_\_

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF**

Every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training (total 16 hours of training). A record of the aforementioned training is required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part Subpart E.

Employee Name (Please Print)	Job Title	Course Name	Training Agency	Date	Location of Training	Number of Hours Completed

**ATTACHMENT**

- Copies of training certificates suggested, but not required by EPA



LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary for each building inspected)

**AMP FORM 6 - INSPECTION COVER SHEET**

Type of Inspection: <input type="checkbox"/> Initial Inspection <input type="checkbox"/> Reinspection	
Date of Inspection:	
Building Assessed:	Telephone Number:
Address:	
Date of Original Building Construction:	

Provide the date, description, and location of additions/renovations for this building e.g., new structural additions or application of surfacing material or fireproofing insulation. (Provide all heating system information in next section.)

Type of heating system:
Has any part of the heating system, including boiler(s), hot water pipes, water heater, etc., been renovated or replaced? <input type="checkbox"/> Yes <input type="checkbox"/> No
Provide date, description and location of heating system renovations/replacements for this building:

The following inspector(s) conducted the inspection and is accredited under the state accreditation program, or another state's accreditation program or an EPA-approved course.

1	Name	State of Accreditation/Acc. No.	Signature	Date
	Firm	Address	Telephone Number	
	Course Name	Date	Training Agency	
2	Name	State of Accreditation/Acc. No.	Signature	Date
	Firm	Address	Telephone Number	
	Course Name	Date	Training Agency	

<i>ATTACHMENTS</i>	
<ul style="list-style-type: none"><li>• Copy of inspection report</li><li>• Copy of inspector's accreditation certificate suggested, but not required by EPA</li></ul>	

LEA NAME:

SCHOOL NAME:

(Number \_\_\_ of \_\_\_, make copies as necessary for each room/functional space)

AMP FORM 7- ROOM/FUNCTIONAL SPACE ASSESSMENT\*

Type of Inspection: <input type="checkbox"/> Initial Inspection <input type="checkbox"/> Reinspection	
Date of Inspection:	
Building Assessed/Address:	
Room/Functional Space:	Date of Original Building Construction:
Date and description of additions or renovations for this room/functional space:	

Type of Material (Check only one type of material - fill out additional copies of this form for other types of materials in this room/functional space): <input type="checkbox"/> Surfacing <input type="checkbox"/> Thermal <input type="checkbox"/> Miscellaneous		
Material: <input type="checkbox"/> Friable <input type="checkbox"/> Non-Friable		
Description:		
Amount of Material (Note Linear or Square Feet)	Percent of Area	Homogeneous Area No.

Damage Assessment				
Type of Damage	YES	NO	Amount of Material (Note Linear or Square Feet)	Comments (Severity, Cause)
Deterioration (e.g., crumbled, blistered, or loss of adhesion)				
Physical Damage (e.g., scrape or gouge)				
Water Damage (e.g., water stains)				
Air Erosion (e.g. elevator shaft, fan room, or ventilator air stream)				
Vibration (e.g., music room, motor/engine, or ducts vibrating but no fan in area)				
Other				

Is powder, dust or debris present?	Location:
Is this material in a supply or return air plenum?	
Note the extent or spread of damage over large areas or large percentages of the homogeneous area:	

\*Form 7 continued on next page

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary for each room/functional space)

**AMP FORM 7 CONTINUED - ROOM/FUNCTIONAL SPACE ASSESSMENT**

Potential for Contact with Material	
<p>Accessibility</p> <p><input type="checkbox"/> High - Workers in vicinity more than once/week or material is in a public area accessible to building occupants (e.g., hallway or auditorium)</p> <p><input type="checkbox"/> Moderate - Workers in vicinity once/month - once/week or material is in a room/office accessible to building occupants</p> <p><input type="checkbox"/> Low - Workers in vicinity less than once/month or material is visible but not within reach of building occupants</p>	Comments

Note the potential for disturbance of the material:

Assessment Category (Circle One)	
<p>1. Damaged/Significantly damaged TSI</p> <p>2. Damaged friable SURFACING ACBM</p> <p>3. Significantly damaged friable SURFACING ACBM</p> <p>4. Damaged or significantly damaged friable MISCELLANEOUS ACBM</p>	<p>5. ACBM with potential for damage</p> <p>6. ACBM with potential for significant damage</p> <p>7. Any remaining friable ACBM or friable suspected ACBM</p>
Reason for classification:	

Preventative measures which might eliminate the reasonable likelihood of undamaged ACM from becoming significantly damaged:

The following inspector conducted the assessment and is accredited under the state accreditation program, or another state's accreditation program or an EPA-approved course

Name	State of Accreditation/Acc. No.	Signature	Date
Firm	Address	Telephone Number	
Course Name	Date	Training Agency	

<b>ATTACHMENT</b>
<ul style="list-style-type: none"><li>• Copy of inspector's accreditation certificate suggested, but not required by EPA</li></ul>

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

AMP FORM 8 - HOMOGENEOUS AREA/BULK SAMPLE SUMMARY

Type of Inspection: <input type="checkbox"/> Initial Inspection <input type="checkbox"/> Reinspection
Date of Inspection:
Building Assessed/Address:

Location Homogeneous Area (HA) (HA No. & Room/Functional Space)	HA Linear or Square Ft. (L or S)	Material Type (T, S, M)*	Friable or NonFriable (F or NF)	Sampled or Assumed ACBM (S or A)	Exact Sample Location	Inspector's Sample No.	Date Collected

\*Material Type: T -Thermal System Insulation, S - Surfacing, and M - Miscellaneous

Manner used to determine sampling locations:
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The following inspector conducted the sampling and is accredited under the state accreditation program, or another state's accreditation program or an EPA-approved course.			
Name	State of Accreditation/Acc. No.	Signature	Date
Firm	Address	Telephone Number	
Course Name	Date	Training Agency	

<b>ATTACHMENTS</b>	
<ul style="list-style-type: none"> <li>• Copy of inspector's accreditation certificate suggested, but not required by EPA</li> <li>• Lab report, including a copy of bulk sample analyses (and any other lab report pertaining to the analyses), name and address of lab, date of analysis, name and signature of person performing analysis, and a statement that the lab meets the applicable requirements of 40 CFR § 763.87(a) as required under 40 CFR § 763.93(e)(2)(iii) and (3)(iv)). Copy of the NIST NVLAP lab accreditation certificate for PLM method suggested, but not required by EPA.</li> </ul>	

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LEA NAME:

SCHOOL NAME:

(Number \_\_\_ of \_\_\_, make copies as necessary)

**AMP FORM 9 - HOMOGENEOUS AREA/BULK SAMPLE DIAGRAM**

Type of Inspection: <input type="checkbox"/> Initial Inspection <input type="checkbox"/> Reinspection	
Date of inspection:	
Building Assessed/Address:	
Room/Functional Space:	
Prepared by:	Date:

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**LEA NAME:**

**SCHOOL NAME:**

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(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 10 - PLAN FOR REINSPECTION**

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 11 - RECOMMENDED RESPONSE ACTIONS**

Building Assessed/Address:

Room Functional Space:

Provide a detailed description of the recommended preventive measures and response actions to be taken, including methods to be used for any friable ACBM, and the locations (list all HA's) where measures and actions will be taken:

Provide the reason for selecting the preventive measure or response action:

Provide the projected schedule for beginning and completing each preventive measure and response action:

The following management planner has provided the aforementioned recommended response actions and is accredited under the state accreditation program or another state's accreditation program or an EPA-approved course.

Management Planner			
Name	State of Accreditation/Acc. No.	Signature	Date
Firm	Address	Telephone Number	
Course Name	Date	Training Agency	

**ATTACHMENT**

- Copy of accreditation certificate for Management Planner suggested, but not required by EPA

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

AMP FORM 12 - IMPLEMENTATION OF RESPONSE ACTIONS

Building Assessed/Address:

Room Functional Space:

Provide a detailed description of each preventive measure and response action taken for friable and nonfriable ACBM and friable and nonfriable suspected ACBM assumed to be ACM, including methods used, and the location (list all HA's) where the measure or action was taken:

Provide the reason for selecting the preventative measure or response action:

Provide the actual start and completion dates for each preventative measure and response action:

Provide the names and addresses of all contractors involved and, if applicable, their state of accreditation and accreditation numbers:

If ACBM is removed, provide the name and location of the storage or disposal site of the ACM:

**ATTACHMENTS**

- Copy of accreditation suggested, but not required by EPA
- Air sampling documentation required under 40 CFR § 763.94(b)(2) at the completion of certain response actions specified under 40 CFR § 763.90(i): name and signature of person collecting any air sample required to be collected, locations where samples were collected, date of collection, name and address of the lab analyzing the samples, date of analysis, results of analysis, method of analysis, name and signature of the person performing the analysis, and a statement that the lab meets the applicable requirements of 40 CFR § 763.90(i)(2)(ii). Copy of the NIST NVLAP lab accreditation certificate for the TEM method suggested, but not required by EPA. Where the PCM method is permitted, under 40 CFR § 763.90(i)(2)(ii), a lab enrolled in the American Industrial Hygiene Association Proficiency Analytical Testing Program must be used.



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LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 13 - DESCRIPTION/DIAGRAM OF ACBM TO REMAIN**

Building Assessed/Address:
Room/Functional Space:
Date:

Provide detailed description of any ACBM or suspected ACBM assumed to be ACM that remains in the school once response actions are undertaken and update the description as response actions are completed:

***NOTE***

Blueprint or diagram of any ACBM or suspected ACBM assumed to be ACM that remains in the school once response actions are undertaken under 40 CFR § 763.90 and an updated description as response actions are completed may be provided in the AMP in lieu of the above written description (see instructions for Form 13). A written description and a blueprint or diagram may be included in the AMP, but is not required by EPA.

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LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 14 - PLAN FOR OPERATIONS AND MAINTENANCE ACTIVITIES**

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 15 - OPERATIONS AND MAINTENANCE ACTIVITIES**

Building Assessed/Address:

Room/Functional Space:

Provide the description of the activity, including preventive measures used, and the location where the activity occurred for those operation and maintenance activities specified under 40 CFR § 763.91(d) and, under 40 CFR § 763.94(g), for any major asbestos activity conducted under 40 CFR § 763.91(e):

Provide the start and completion dates of the activity:

Provide the name of each person performing the activity and for a major asbestos activity, provide the name, signature, state of accreditation and, if applicable, the accreditation number of each person performing the activity:

If ACBM is removed, provide the name and location of the storage or disposal site of the ACM:

**ATTACHMENT**

- Copy of accreditation suggested, but not required by EPA

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**LEA NAME:**

**SCHOOL NAME:**

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 16 - CLEANING RECORD**

Cleaning:  Cleaning after initial inspection  Additional cleaning approved by the LEA and conducted as part of an O&M program

Date of Cleaning:

Location Cleaned:

Cleaning methods used:

Names of persons performing the cleaning:

**ATTACHMENT**

- Copy of accredited Management Planner's recommendation for additional cleaning under 40 CFR § 763.91(c)(2), as part of an O&M program, and the response of the LEA to that recommendation. This information is required to be included in the AMP under 40 CFR § 763.93(c)(9).

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**LEA NAME:**

**SCHOOL NAME:**

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 17 - MAJOR/MINOR FIBER RELEASE EPISODE**

Type of episode:     Major Fiber Release     Minor Fiber Release

Date of episode:

Describe the fiber release episode, including the location, type of ACBM, method of repair, and preventive measure or response action taken:

Provide the names of each person performing the work:

If ACBM is removed, the name and location of the storage and disposal site for the ACM:

LEA NAME:

SCHOOL NAME:

(Number \_\_ of \_\_, make copies as necessary)

**AMP FORM 18 - PERIODIC SURVEILLANCE PLAN/REPORT**

Periodic Surveillance Plan: At least once every six months after the AMP is in effect, periodic surveillance will be conducted in each building that the LEA leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM. At a minimum, surveillance is planned to be conducted during the fall and spring (insert alternate time frames and other details, as needed). Each person performing periodic surveillance must: visually inspect all areas that are identified in the AMP as ACBM or assumed ACBM, record the date of the surveillance, his or her name, and any changes in the condition of the materials, and submit a copy of the record to the DP for inclusion in the AMP.

			1 <sup>st</sup> six months Date _____	2 <sup>nd</sup> six months Date _____	
HA No.	Description of ACBM	Area Inspected	ACBM Condition*	ACBM Condition*	Date ACBM Removed

\* If no change in condition, write N/C

Surveillance Inspector's Name	Surveillance Inspector's Signature	Date
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LEA NAME:

SCHOOL NAME:

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(Number \_\_\_ of \_\_\_, make copies as necessary)

AMP FORM 19 - PLAN TO INFORM

**ATTACHMENT**

- Dated copies of all management plan availability notifications distributed to parents, teachers and employee organizations (e.g., letter, newsletter). This information is required under 40 CFR § 763.93(e)(10).

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## Appendix A - Glossary

Unless otherwise noted with an asterisk (\*), the following definitions contained in this Glossary can be found under 40 CFR § 763.83:

*Act* means the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601, et seq.

*Accessible* when referring to asbestos-containing material (ACM) means that the material is subject to disturbance by school building occupants or custodial or maintenance personnel in the course of their normal activities.

*Accredited* or *accreditation* when referring to a person or laboratory means that such person or laboratory is accredited in accordance with section 206 of Title II of the Act.

*Air erosion* means the passage of air over friable asbestos-containing building material (ACBM) which may result in the release of asbestos fibers.

*Asbestos* means the asbestiform varieties of: Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonitegrunerite); anthophyllite; tremolite; and actinolite.

*Asbestos-containing material (ACM)* when referring to school buildings means any material or product which contains more than 1 percent asbestos.

*Asbestos-containing building material (ACBM)* means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.

*Asbestos debris* means pieces of ACBM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

*Damaged friable miscellaneous ACM* means friable miscellaneous ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

*Damaged friable surfacing ACM* means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.



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*Damaged or significantly damaged thermal system insulation ACM* means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its structural integrity, or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

*Designated Person* means a person appointed by the Local Education Agency (LEA), under 40 CFR § 763.84 (g), who is trained to ensure the proper implementation of AHERA in school buildings. \*

*Encapsulation* means the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

*Enclosure* means an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

*Fiber release episode* means any uncontrolled or unintentional disturbance of ACBM resulting in visible emission.

*Friable* when referring to material in a school building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material after such previously nonfriable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

*Functional space* means a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above), such as classroom(s), a cafeteria, gymnasium, hallway(s), designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

*High-efficiency particulate air (HEPA)* refers to a filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles 0.3 µm in diameter or larger.

*Homogeneous area* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

*Local education agency (LEA)* means: (1) Any local educational agency as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 3381). (2) The owner of any nonpublic, nonprofit elementary, or secondary school building. (3) The governing authority of any school operated under the defense dependent's education system provided for under the Defense Dependents' Education Act of 1978 (20 U.S.C. 921, et seq.).

*Miscellaneous ACM* means miscellaneous material that is ACM in a school building.

*Miscellaneous material* means interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.

*Nonfriable* means material in a school building which when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

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*Operations and maintenance program* means a program of work practices to maintain friable ACBM in good condition, ensure clean up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACBM disturbance or damage.

*Phase contrast microscopy (PCM)* refers to the procedure outlined in NIOSH Method 7400 for the evaluation of fibers in air samples.\*

*Polarized light microscopy (PLM)* refers to the method outlined in 40 CFR § 763, Appendix E to Subpart E, for the identification of asbestos in bulk samples.\*

*Potential damage* means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

*Potential significant damage* means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

*Preventive measures* means actions taken to reduce disturbance of ACBM or otherwise eliminate the reasonable likelihood of the material's becoming damaged or significantly damaged.

*Removal* means the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.

*Repair* means returning damaged ACBM to an undamaged condition or to an intact state so as to prevent fiber release.

*Response action* means a method, including removal, encapsulation, enclosure, repair, operations and maintenance, that protects human health and the environment from friable ACBM.

*Routine maintenance area* means an area, such as a boiler room or mechanical room, that is not normally frequented by students and in which maintenance employees or contract workers regularly conduct maintenance activities.

*School* means any elementary or secondary school as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2854).

*School building* means: (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food. (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education. (3) Any other facility used for the instruction or housing of students or for the administration of educational or research programs. (4) Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described in this definition of "school building" under paragraphs (1), (2), or (3).

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(5) Any portico or covered exterior hallway or walkway. (6) Any exterior portion of a mechanical system used to condition interior space.

*Significantly damaged friable miscellaneous ACM* means damaged friable miscellaneous ACM where the damage is extensive and severe.

*Significantly damaged friable surfacing ACM* means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

*State* means a State, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Northern Marianas, the Trust Territory of the Pacific Islands, and the Virgin Islands.

*Surfacing ACM* means surfacing material that is ACM.

*Surfacing material* means material in a school building that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

*Thermal system insulation (TSI)* means material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

*Thermal system insulation ACM* means thermal system insulation that is ACM.

*Transmission electron microscopy (TEM)* refers to the method outlined in 40 CFR § 763, Appendix A to Subpart E, for the identification of asbestos in air samples.\*

*Vibration* means the periodic motion of friable ACBM which may result in the release of asbestos fibers.

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## Appendix B - Acronyms

ACM - Asbestos-containing material

ACBM - Asbestos-containing building material

AHERA - Asbestos Hazard Emergency Response Act

DOT - Department of Transportation

DP - AHERA Designated Person

EPA - U.S. Environmental Protection Agency

HEPA - High-efficiency particulate air

LEA - Local Education Agency

NIOSH - National Institute for Occupational Safety and Health

NIST - National Institute of Standards and Technology

NVLAP - National Voluntary Laboratory Accreditation Program

O&M - Operations and maintenance

OSHA - Occupational Safety and Health Administration

PCM - Phase contrast microscopy

PLM - Polarized light microscopy

TEM - Transmission electron microscopy

TSI - Thermal system insulation

# Clean Hands Save Lives!

**S** It is best to wash your hands with soap and warm water for 20 seconds.

**S** When water is not available, use alcohol-based products (sanitizers).

**S** Wash hands before preparing or eating food and after going to the bathroom.

**S** Keeping your hands clean helps you avoid getting sick.

## When should you wash your hands?

**S** Before preparing or eating food

**S** After going to the bathroom

**S** After changing diapers or cleaning up a child who has gone to the bathroom

**S** Before and after caring for someone who is sick

**S** After handling uncooked foods, particularly raw meat, poultry, or fish

**S** After blowing your nose, coughing, or sneezing

**S** After handling an animal or animal waste

**S** After handling garbage

**S** Before and after treating a cut or wound

**S** After handling items contaminated by flood water or sewage

**S** When your hands are visible dirty

## Using alcohol-based sanitizers

**S** Apply product to the palm of one hand.



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**S** Rub hands together.

**S** Rub product over all surfaces of hands and fingers until hands are dry.

*Note: the volume needed to reduce the number of germs varies by product.*

## Washing with soap and water

**S** Place your hands together under water (warm if possible).

**S** Rub your hands together for at least 20 seconds (with soap if possible).

**S** Wash your hands thoroughly, including wrists, palms, back of hands, and under the fingernails.

**S** Clean the dirt from under fingernails

**S** Rinse the soap from your hands.

**S** Dry your hands completely with a clean towel if possible (this helps remove the germs), However, if towels are not available it is okay to air dry your hands.

**S** Pat your skin rather than rubbing to avoid chapping and cracking.

**S** If you use a disposable towel, throw it in the trash.

*Remember: If soap and water are not available, use alcohol-based hand sanitizer.*





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# Protect Your Family From Lead in Your Home

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United States  
Environmental  
Protection Agency



United States  
Consumer Product  
Safety Commission



United States  
Department of Housing  
and Urban Development

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## Are You Planning to Buy or Rent a Home Built Before 1978?

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Did you know that many homes built before 1978 have **lead-based paint**? Lead from paint, chips, and dust can pose serious health hazards.

### Read this entire brochure to learn:

- How lead gets into the body
- About health effects of lead
- What you can do to protect your family
- Where to go for more information

### Before renting or buying a pre-1978 home or apartment, federal law requires:

- Sellers must disclose known information on lead-based paint or lead-based paint hazards before selling a house.
- Real estate sales contracts must include a specific warning statement about lead-based paint. Buyers have up to 10 days to check for lead.
- Landlords must disclose known information on lead-based paint and lead-based paint hazards before leases take effect. Leases must include a specific warning statement about lead-based paint.

### If undertaking renovations, repairs, or painting (RRP) projects in your pre-1978 home or apartment:

- Read EPA's pamphlet, *The Lead-Safe Certified Guide to Renovate Right*, to learn about the lead-safe work practices that contractors are required to follow when working in your home (see page 12).





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## Simple Steps to Protect Your Family from Lead Hazards

### **If you think your home has lead-based paint:**

- Don't try to remove lead-based paint yourself.
- Always keep painted surfaces in good condition to minimize deterioration.
- Get your home checked for lead hazards. Find a certified inspector or risk assessor at [epa.gov/lead](http://epa.gov/lead).
- Talk to your landlord about fixing surfaces with peeling or chipping paint.
- Regularly clean floors, window sills, and other surfaces.
- Take precautions to avoid exposure to lead dust when remodeling.
- When renovating, repairing, or painting, hire only EPA- or state-approved Lead-Safe certified renovation firms.
- Before buying, renting, or renovating your home, have it checked for lead-based paint.
- Consult your health care provider about testing your children for lead. Your pediatrician can check for lead with a simple blood test.
- Wash children's hands, bottles, pacifiers, and toys often.
- Make sure children avoid fatty (or high fat) foods and eat nutritious meals high in iron and calcium.
- Remove shoes or wipe soil off shoes before entering your house.

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## **Lead Gets into the Body in Many Ways**

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### **Adults and children can get lead into their bodies if they:**

- Breathe in lead dust (especially during activities such as renovations, repairs, or painting that disturb painted surfaces).
- Swallow lead dust that has settled on food, food preparation surfaces, and other places.
- Eat paint chips or soil that contains lead.

### **Lead is especially dangerous to children under the age of 6.**

- At this age, children's brains and nervous systems are more sensitive to the damaging effects of lead.
- Children's growing bodies absorb more lead.
- Babies and young children often put their hands and other objects in their mouths. These objects can have lead dust on them.



### **Women of childbearing age should know that lead is dangerous to a developing fetus.**

- Women with a high lead level in their system before or during pregnancy risk exposing the fetus to lead through the placenta during fetal development.

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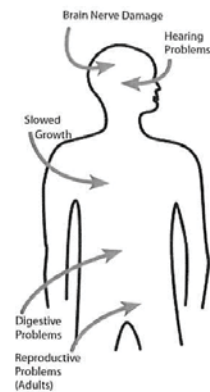
## Health Effects of Lead

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**Lead affects the body in many ways.** It is important to know that even exposure to low levels of lead can severely harm children.

**In children, exposure to lead can cause:**

- Nervous system and kidney damage
- Learning disabilities, attention deficit disorder, and decreased intelligence
- Speech, language, and behavior problems
- Poor muscle coordination
- Decreased muscle and bone growth
- Hearing damage



While low-lead exposure is most common, exposure to high amounts of lead can have devastating effects on children, including seizures, unconsciousness, and, in some cases, death.

Although children are especially susceptible to lead exposure, lead can be dangerous for adults, too.

**In adults, exposure to lead can cause:**

- Harm to a developing fetus
- Increased chance of high blood pressure during pregnancy
- Fertility problems (in men and women)
- High blood pressure
- Digestive problems
- Nerve disorders
- Memory and concentration problems
- Muscle and joint pain

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## **Check Your Family for Lead**

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**Get your children and home tested if you think your home has lead.**

Children's blood lead levels tend to increase rapidly from 6 to 12 months of age, and tend to peak at 18 to 24 months of age.

Consult your doctor for advice on testing your children. A simple blood test can detect lead. Blood lead tests are usually recommended for:

- Children at ages 1 and 2
- Children or other family members who have been exposed to high levels of lead
- Children who should be tested under your state or local health screening plan

**Your doctor can explain what the test results mean and if more testing will be needed.**

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## Where Lead-Based Paint Is Found

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In general, the older your home or childcare facility, the more likely it has lead-based paint.<sup>1</sup>

**Many homes, including private, federally-assisted, federally-owned housing, and childcare facilities built before 1978 have lead-based paint.** In 1978, the federal government banned consumer uses of lead-containing paint.<sup>2</sup>

Learn how to determine if paint is lead-based paint on page 7.

### Lead can be found:

- In homes and childcare facilities in the city, country, or suburbs,
- In private and public single-family homes and apartments,
- On surfaces inside and outside of the house, and
- In soil around a home. (Soil can pick up lead from exterior paint or other sources, such as past use of leaded gas in cars.)

Learn more about where lead is found at [epa.gov/lead](http://epa.gov/lead).

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<sup>1</sup> "Lead-based paint" is currently defined by the federal government as paint with lead levels greater than or equal to 1.0 milligram per square centimeter (mg/cm), or more than 0.5% by weight.

<sup>2</sup> "Lead-containing paint" is currently defined by the federal government as lead in new dried paint in excess of 90 parts per million (ppm) by weight.

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## Identifying Lead-Based Paint and Lead-Based Paint Hazards

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**Deteriorating lead-based paint (peeling, chipping, chalking, cracking, or damaged paint)** is a hazard and needs immediate attention. **Lead-based paint** may also be a hazard when found on surfaces that children can chew or that get a lot of wear and tear, such as:

- On windows and window sills
- Doors and door frames
- Stairs, railings, banisters, and porches

**Lead-based paint is usually not a hazard if it is in good condition** and if it is not on an impact or friction surface like a window.

**Lead dust** can form when lead-based paint is scraped, sanded, or heated. Lead dust also forms when painted surfaces containing lead bump or rub together. Lead paint chips and dust can get on surfaces and objects that people touch. Settled lead dust can reenter the air when the home is vacuumed or swept, or when people walk through it. EPA currently defines the following levels of lead in dust as hazardous:

- 40 micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ ) and higher for floors, including carpeted floors
- 250  $\mu\text{g}/\text{ft}^2$  and higher for interior window sills

**Lead in soil** can be a hazard when children play in bare soil or when people bring soil into the house on their shoes. EPA currently defines the following levels of lead in soil as hazardous:

- 400 parts per million (ppm) and higher in play areas of bare soil
- 1,200 ppm (average) and higher in bare soil in the remainder of the yard

**Remember, lead from paint chips—which you can see—and lead dust—which you may not be able to see—both can be hazards.**

The only way to find out if paint, dust, or soil lead hazards exist is to test for them. The next page describes how to do this.

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## Checking Your Home for Lead

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You can get your home tested for lead in several different ways:

- A lead-based paint **inspection** tells you if your home has lead-based paint and where it is located. It won't tell you whether your home currently has lead hazards. A trained and certified testing professional, called a lead-based paint inspector, will conduct a paint inspection using methods, such as:

- Portable x-ray fluorescence (XRF) machine
- Lab tests of paint samples

- A **risk assessment** tells you if your home currently has any lead hazards from lead in paint, dust, or soil. It also tells you what actions to take to address any hazards. A trained and certified testing professional, called a risk assessor, will:

- Sample paint that is deteriorated on doors, windows, floors, stairs, and walls
- Sample dust near painted surfaces and sample bare soil in the yard
- Get lab tests of paint, dust, and soil samples

- A combination inspection and risk assessment tells you if your home has any lead-based paint and if your home has any lead hazards, and where both are located.

Be sure to read the report provided to you after your inspection or risk assessment is completed, and ask questions about anything you do not understand.



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## Checking Your Home for Lead, continued

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In preparing for renovation, repair, or painting work in a pre-1978 home, Lead-Safe Certified renovators (see page 12) may:

- Take paint chip samples to determine if lead-based paint is present in the area planned for renovation and send them to an EPA-recognized lead lab for analysis. In housing receiving federal assistance, the person collecting these samples must be a certified lead-based paint inspector or risk assessor
- Use EPA-recognized tests kits to determine if lead-based paint is absent (but not in housing receiving federal assistance)
- Presume that lead-based paint is present and use lead-safe work practices

There are state and federal programs in place to ensure that testing is done safely, reliably, and effectively. Contact your state or local agency for more information, visit [epa.gov/lead](http://epa.gov/lead), or call **1-800-424-LEAD (5323)** for a list of contacts in your area.<sup>3</sup>

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<sup>3</sup> Hearing- or speech-challenged individuals may access this number through TTY by calling the Federal Relay Service at 1-800-877-8399.



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## **What You Can Do Now to Protect Your Family**

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**If you suspect that your house has lead-based paint hazards, you can take some immediate steps to reduce your family's risk:**

- If you rent, notify your landlord of peeling or chipping paint.
- Keep painted surfaces clean and free of dust. Clean floors, window frames, window sills, and other surfaces weekly. Use a mop or sponge with warm water and a general all-purpose cleaner. (Remember: never mix ammonia and bleach products together because they can form a dangerous gas.)
- Carefully clean up paint chips immediately without creating dust.
- Thoroughly rinse sponges and mop heads often during cleaning of dirty or dusty areas, and again afterward.
- Wash your hands and your children's hands often, especially before they eat and before nap time and bed time.
- Keep play areas clean. Wash bottles, pacifiers, toys, and stuffed animals regularly.
- Keep children from chewing window sills or other painted surfaces, or eating soil.
- When renovating, repairing, or painting, hire only EPA- or state-approved Lead-Safe Certified renovation firms (see page 12).
- Clean or remove shoes before entering your home to avoid tracking in lead from soil.
- Make sure children avoid fatty (or high fat) foods and eat nutritious meals high in iron and calcium. Children with good diets absorb less lead.

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## Reducing Lead Hazards

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**Disturbing lead-based paint or removing lead improperly can increase the hazard to your family by spreading even more lead dust around the house.**

- In addition to day-to-day cleaning and good nutrition, you can **temporarily** reduce lead-based paint hazards by taking actions, such as repairing damaged painted surfaces and planting grass to cover lead-contaminated soil. These actions are not permanent solutions and will need ongoing attention.
- You can minimize exposure to lead when renovating, repairing, or painting by hiring an EPA- or state-certified renovator who is trained in the use of lead-safe work practices. If you are a do-it-yourselfer, learn how to use lead-safe work practices in your home.
- To remove lead hazards permanently, you should hire a certified lead abatement contractor. Abatement (or permanent hazard elimination) methods include removing, sealing, or enclosing lead-based paint with special materials. Just painting over the hazard with regular paint is not permanent control.



**Always use a certified contractor who is trained to address lead hazards safely.**

- Hire a Lead-Safe Certified firm (see page 12) to perform renovation, repair, or painting (RRP) projects that disturb painted surfaces.
- To correct lead hazards permanently, hire a certified lead abatement professional. This will ensure your contractor knows how to work safely and has the proper equipment to clean up thoroughly.

Certified contractors will employ qualified workers and follow strict safety rules as set by their state or by the federal government.

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## Reducing Lead Hazards, continued

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**If your home has had lead abatement work done** or if the housing is receiving federal assistance, once the work is completed, dust cleanup activities must be conducted until clearance testing indicates that lead dust levels are below the following levels:

- 40 micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ ) for floors, including carpeted floors
- 250  $\mu\text{g}/\text{ft}^2$  for interior windows sills
- 400  $\mu\text{g}/\text{ft}^2$  for window troughs

For help in locating certified lead abatement professionals in your area, call your state or local agency (see pages 14 and 15), or visit [epa.gov/lead](http://epa.gov/lead), or call 1-800-424-LEAD.

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## Renovating, Remodeling, or Repairing (RRP) a Home with Lead-Based Paint

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**If you hire a contractor to conduct renovation, repair, or painting (RRP) projects in your pre-1978 home or childcare facility (such as pre-school and kindergarten), your contractor must:**

- Be a Lead-Safe Certified firm approved by EPA or an EPA-authorized state program
- Use qualified trained individuals (Lead-Safe Certified renovators) who follow specific lead-safe work practices to prevent lead contamination
- Provide a copy of EPA's lead hazard information document, *The Lead-Safe Certified Guide to Renovate Right*



**RRP contractors working in pre-1978 homes and childcare facilities must follow lead-safe work practices that:**

- **Contain the work area.** The area must be contained so that dust and debris do not escape from the work area. Warning signs must be put up, and plastic or other impermeable material and tape must be used.
- **Avoid renovation methods that generate large amounts of lead-contaminated dust.** Some methods generate so much lead-contaminated dust that their use is prohibited. They are:
  - Open-flame burning or torching
  - Sanding, grinding, planing, needle gunning, or blasting with power tools and equipment not equipped with a shroud and HEPA vacuum attachment and
  - Using a heat gun at temperatures greater than 1100°F
- **Clean up thoroughly.** The work area should be cleaned up daily. When all the work is done, the area must be cleaned up using special cleaning methods.
- **Dispose of waste properly.** Collect and seal waste in a heavy duty bag or sheeting. When transported, ensure that waste is contained to prevent release of dust and debris.

To learn more about EPA's requirements for RRP projects visit [epa.gov/getleadsafe](http://epa.gov/getleadsafe), or read *The Lead-Safe Certified Guide to Renovate Right*.

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## Other Sources of Lead

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**While paint, dust, and soil are the most common sources of lead, other lead sources also exist:**

- **Drinking water.** Your home might have plumbing with lead or lead solder. You cannot see, smell, or taste lead, and boiling your water will not get rid of lead. If you think your plumbing might contain lead:

- Use only cold water for drinking and cooking.
- Run water for 15 to 30 seconds before drinking it, especially if you have not used your water for a few hours.

Call your local health department or water supplier to find out about testing your water, or visit [epa.gov/lead](http://epa.gov/lead) for EPA's lead in drinking water information.

- **Lead smelters** or other industries that release lead into the air.
- **Your job.** If you work with lead, you could bring it home on your body or clothes. Shower and change clothes before coming home. Launder your work clothes separately from the rest of your family's clothes.
- **Hobbies** that use lead, such as making pottery or stained glass, or refinishing furniture. Call your local health department for information about hobbies that may use lead.
- Old **toys** and **furniture** may have been painted with lead-containing paint. Older toys and other children's products may have parts that contain lead.<sup>4</sup>
- Food and liquids cooked or stored in **lead crystal** or **lead-glazed pottery or porcelain** may contain lead.
- Folk remedies, such as "**greta**" and "**azarcon**," used to treat an upset stomach.

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<sup>4</sup> In 1978, the federal government banned toys, other children's products, and furniture with lead-containing paint (16 CFR 1303). In 2008, the federal government banned lead in most children's products. The federal government currently bans lead in excess of 100 ppm by weight in most children's products (76 FR 44463).

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## For More Information

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### **The National Lead Information Center**

Learn how to protect children from lead poisoning and get other information about lead hazards on the Web at [epa.gov/lead](http://epa.gov/lead) and [hud.gov/lead](http://hud.gov/lead), or call **1-800-424-LEAD (5323)**.

### **EPA's Safe Drinking Water Hotline**

For information about lead in drinking water, call **1-800-426-4791**, or visit [epa.gov/lead](http://epa.gov/lead) for information about lead in drinking water.

### **Consumer Product Safety Commission (CPSC) Hotline**

For information on lead in toys and other consumer products, or to report an unsafe consumer product or a product-related injury, call **1-800-638-2772**, or visit CPSC's website at [cpsc.gov](http://cpsc.gov) or [saferproducts.gov](http://saferproducts.gov).

### **State and Local Health and Environmental Agencies**

Some states, tribes, and cities have their own rules related to lead-based paint. Check with your local agency to see which laws apply to you. Most agencies can also provide information on finding a lead abatement firm in your area, and on possible sources of financial aid for reducing lead hazards. Receive up-to-date address and phone information for your state or local contacts on the Web at [epa.gov/lead](http://epa.gov/lead), or contact the National Lead Information Center at **1-800-424-LEAD**.

Hearing- or speech-challenged individuals may access any of the phone numbers in this brochure through TTY by calling the toll-free Federal Relay Service at **1-800-877-8339**.

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## U. S. Environmental Protection Agency (EPA) Regional Offices

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The mission of EPA is to protect human health and the environment. Your Regional EPA Office can provide further information regarding regulations and lead protection programs.

**Region 1** (Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, Vermont)

Regional Lead Contact  
U.S. EPA Region 1  
5 Post Office Square, Suite 100, OES 05-4  
Boston, MA 02109-3912  
(888) 372-7341

**Region 2** (New Jersey, New York, Puerto Rico, Virgin Islands)

Regional Lead Contact  
U.S. EPA Region 2  
2890 Woodbridge Avenue  
Building 205, Mail Stop 225  
Edison, NJ 08837-3679  
(732) 321-6671

**Region 3** (Delaware, Maryland, Pennsylvania, Virginia, DC, West Virginia)

Regional Lead Contact  
U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
(215) 814-2088

**Region 4** (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

Regional Lead Contact  
U.S. EPA Region 4  
AFC Tower, 12th Floor, Air, Pesticides & Toxics  
61 Forsyth Street, SW  
Atlanta, GA 30303  
(404) 562-8998

**Region 5** (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

Regional Lead Contact  
U.S. EPA Region 5 (DT-8J)  
77 West Jackson Boulevard  
Chicago, IL 60604-3666  
(312) 886-7836

**Region 6** (Arkansas, Louisiana, New Mexico, Oklahoma, Texas, and 66 Tribes)

Regional Lead Contact  
U.S. EPA Region 6  
1445 Ross Avenue, 12th Floor  
Dallas, TX 75202-2733  
(214) 665-2704

**Region 7** (Iowa, Kansas, Missouri, Nebraska)

Regional Lead Contact  
U.S. EPA Region 7  
11201 Renner Blvd.  
WWPD/TOPE  
Lenexa, KS 66219  
(800) 223-0425

**Region 8** (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)

Regional Lead Contact  
U.S. EPA Region 8  
1595 Wynkoop St.  
Denver, CO 80202  
(303) 312-6966

**Region 9** (Arizona, California, Hawaii, Nevada)

Regional Lead Contact  
U.S. EPA Region 9 (CMD-4-2)  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 947-4280

**Region 10** (Alaska, Idaho, Oregon, Washington)

Regional Lead Contact  
U.S. EPA Region 10  
Solid Waste & Toxics Unit (WCM-128)  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101  
(206) 553-1200

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## **Consumer Product Safety Commission (CPSC)**

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The CPSC protects the public against unreasonable risk of injury from consumer products through education, safety standards activities, and enforcement. Contact CPSC for further information regarding consumer product safety and regulations.

### **CPSC**

4330 East West Highway  
Bethesda, MD 20814-4421  
1-800-638-2772  
[cpsc.gov](http://cpsc.gov) or [saferproducts.gov](http://saferproducts.gov)

## **U. S. Department of Housing and Urban Development (HUD)**

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HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Contact HUD's Office of Healthy Homes and Lead Hazard Control for further information regarding the Lead Safe Housing Rule, which protects families in pre-1978 assisted housing, and for the lead hazard control and research grant programs.

### **HUD**

451 Seventh Street, SW, Room 8236  
Washington, DC 20410-3000  
(202) 402-7698  
[hud.gov/offices/lead/](http://hud.gov/offices/lead/)

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U. S. EPA Washington DC 20460  
U. S. CPSC Bethesda MD 20814  
U. S. HUD Washington DC 20410

EPA-747-K-12-001  
September 2013



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## **IMPORTANT!**

### **Lead From Paint, Dust, and Soil in and Around Your Home Can Be Dangerous if Not Managed Properly**

- Children under 6 years old are most at risk for lead poisoning in your home.
- Lead exposure can harm young children and babies even before they are born.
- Homes, schools, and child care facilities built before 1978 are likely to contain lead-based paint.
- Even children who seem healthy may have dangerous levels of lead in their bodies.
- Disturbing surfaces with lead-based paint or removing lead-based paint improperly can increase the danger to your family.
- People can get lead into their bodies by breathing or swallowing lead dust, or by eating soil or paint chips containing lead.
- People have many options for reducing lead hazards. Generally, lead-based paint that is in good condition is not a hazard (see page 10).

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## Appendix 5.4010-A

### Responding to Bodily Fluids in Food Service Areas

The School Food Authority (“SFA”) will promptly observe the following procedures when responding to a bodily fluid event that involves the discharge of bodily fluids (blood, urine, feces, vomit, etc.) onto surfaces in the food service area.

1. The SFA will discontinue food service operations if bodily fluids spill in the food preparation area and shall block off the area of the spill from extraneous staff and students until the area has been cleaned and disinfected. Only SFA staff and/or custodial staff designated to clean and disinfect bodily fluid spills shall be allowed to handle cleaning and disinfecting procedures.
2. The SFA employees shall observe good hand washing, including before and after all contact with or any exposure to bodily fluids, and before continuing with any food preparations and/or service. If hands are visibly soiled, hands should be washed using soap and water and not alcohol-based hand rubs.
3. SFA Employees exhibiting symptoms of vomiting or diarrhea shall be excluded from food service operations.
4. Waterproof disposable gloves must be worn to protect against possible open lesions on the individual’s hands.
5. If available, personal protective equipment should be worn by the caretaker to protect against possible exposure of mucous membranes where there is a threat of possible exposure to certain highly communicable diseases. Additional personal protective equipment, such as waterproof disposable gloves, fluid resistant or impermeable gowns, eye protection, surgical facemasks, disposable shoe covers, and leg coverings should be worn when entering areas where an individual could be exposed to a potentially infectious materials and/or surfaces or a person suspected of being ill with a highly communicable disease. Individuals should carefully remove all personal protective equipment to avoid contaminating one’s eyes, mucous membranes, clothing or other surfaces with potentially infectious materials and good hand washing should be performed immediately after removal of personally protective equipment.
6. Any pregnant SFA employee should wear a surgical mask when providing care involving exposure to excrement.
7. Surfaces affected by bodily fluids, including those which came in direct contact with fluids and those that may have been contaminated with bodily fluids, must be thoroughly washed with soap and water and then be disinfected with the disinfectant agent provided (an EPA-approved disinfectant appropriate for vomit and diarrhea used per manufacturer’s recommendation or a chlorine bleach solution of 1.5 cups bleach per 1 gallon of water.
8. All potentially contaminated foods and food containers shall be disposed of. Food in intact, sealed containers may be salvaged if the container is adequately cleaned and disinfected.

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9. Individuals cleaning the spill must wear disposable gloves and wash hands thoroughly after removal of contaminated gloves. Individuals cleaning the spill of bodily fluids, or surfaces that may have come into contact with bodily fluids should wear all appropriate personal protective equipment (see number 3 above). Hands and arms should be washed thoroughly after removal of contaminated personal protective equipment. Individuals should follow closely the instructions of any emergency medical or other healthcare provider, law enforcement, or fire department, or local, state, and federal public health official in cleaning a spill, if applicable.
  10. Personal protective equipment and other disposable items used in the cleaning of the food service area shall be double bagged and discarded in a leak proof HAZMAT container. Mops, buckets, and other non-disposable cleaning materials must be thoroughly washed, rinsed and disinfected and properly stored if they are to be reused. If further use will not occur, they must be properly double bagged and disposed with other waste materials.

The SFA shall train all appropriate individuals on these procedures and insure that materials needed for the cleaning and disinfecting of surfaces affected by bodily fluid spills are available for use.

O.A.C. 3717-1-02.4.

See **Policy 5.1070 Control of Communicable Diseases, Policy 5.1090 Infectious Disease Policy, Policy 5.4010 Food Service and Policy 5.1130 Handwashing Policy.** See also **Appendix 5.1130-A Hand Washing Poster.**

COLUMBUS 56948-1 7766V1

**Appendix 5.4030-A**

**Hearing Procedures**

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Student eligibility determinations regarding access to free and reduced-price meals may be appealed to the Principal or his/her designee at a formal hearing. To appeal the School's determination, your intent to appeal must be received by the Principal or his/her designee within fourteen (14) days after receiving the School's eligibility determination. Appeal hearings shall be held with reasonable promptness at a time that is convenient for both parties, and the School shall provide adequate notice to the Parent of the time and place of the hearing. Any appeal decision shall be written and shall include the reasons for the decision.

Parents may request that the appeal hearing be held in executive session and may be assisted or represented in their appeal. Parents shall have an opportunity to examine any documents and records pertinent to the relevant eligibility determination prior to and during the hearing, upon request, and may present oral or documentary evidence without undue interference and given an opportunity to question or refute testimony and to confront and cross-examine witnesses.

The School shall create a written record of the hearing, which shall be maintained for at least three (3) years. A copy of the written record of the hearing will be made available to related parties upon reasonable request.

*7 C.F.R. 245.7.*

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## Appendix 5.4030-B

[Insert Application to Receive Free and Reduced-Price Meals]



# FREE AND REDUCED PRICE SCHOOL MEALS APPLICATION FORMS

SCHOOL YEAR 2018-2019

## INSTRUCTIONS FOR SCHOOL DISTRICTS

This packet contains:

**Required** information that *must* be provided to households:

- Letter to Households
- Free and Reduced Price School Meals Application
- Notice to Households of Approval/Denial of Benefits<sup>11</sup> (notification is required if household is denied; notification is optional if household is approved)

**Optional** application-related materials that *may* be provided to households:

- Sharing Information With Medicaid/*Healthy Start, Healthy Families* – Local Education Agencies (LEAs) may share student meal eligibility information with the Ohio *Healthy Start, Healthy Families* program. If the LEA chooses to do so, this form must be sent to households informing them of the right to decline disclosure of the information.
- Sharing Information With Other Programs – If the LEA wishes to share student meal eligibility information with persons affiliated with programs of which parental consent is required, this form must be provided to households to obtain parental consent. See page 71 of the USDA Eligibility Manual for School Meals, 2017 edition to determine if parental consent is required.

**Optional** application-related materials that *may* be posted at the school:

- *Healthy Start, Healthy Families* flyer informing households of the opportunity to apply for free health care coverage

The pages are designed to be printed on 8½” by 11” paper. Some pages may be printed front and back. You will need to identify the benefits that are offered in your school, such as afterschool snacks. **[Bold bracketed fields]** indicate where you need to insert school district specific information. For example, you must include your district’s homeless liaison’s phone number on the application. If you make additional changes, you must submit your application package to the Ohio Department of Education, Office for Child Nutrition for approval.

This prototype application package includes information regarding the exclusion of housing allowance for those in the Military Housing Privatization Initiative. If this is not pertinent to your school district, please modify as appropriate.

If you have questions, contact:

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<sup>11</sup> All households must be notified of their eligibility status. Households with children who are denied benefits must be given written notification of the denial. The notification must advise the household of the reason for the denial of benefits, the right to appeal, instruction on how to appeal, and a statement that the family may re-apply for free and reduced-price meal benefits at any time during the school year. Households with children who are approved for free or reduced price benefits may be notified in writing or verbally.

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**Ohio Department of Education  
Office for Child Nutrition  
25 South Front Street, Mail Stop 303  
Columbus, Ohio 43215  
(800) 808-6325 Telephone  
(614) 752-7613 Facsimile**

# FREQUENTLY ASKED QUESTIONS ABOUT FREE AND REDUCED PRICE SCHOOL MEALS

Dear Parent/Guardian:

Children need healthy meals to learn. **[Name of School/School District]** offers healthy meals every school day. Breakfast costs **[\$]**; lunch costs **[\$]**. **Your children may qualify for free meals or for reduced price meals.** Reduced price is **[\$]** for breakfast and **[\$]** for lunch. This packet includes an application for free or reduced price meal benefits, and a set of detailed instructions. Below are some common questions and answers to help you with the application process.

1. WHO CAN GET FREE OR REDUCED PRICE MEALS?

- All children in households receiving benefits from supplemental nutrition assistance program (SNAP) or Ohio Works First (OWF) are eligible for free meals.
- **Foster children that are under the legal responsibility of a foster care agency or court are eligible for free meals.**
- **Children participating in their school's Head Start program are eligible for free meals.**
- Children who meet the definition of homeless, runaway, or migrant are eligible for free meals.
- Children may receive free or reduced price meals if your household's income is within the limits on the Federal Income Eligibility Guidelines. Your children may qualify for free or reduced price meals if your household income falls at or below the limits on this chart.

FEDERAL ELIGIBILITY INCOME CHART For School Year 2018-2019			
Household size	Yearly	Monthly	Weekly
1	\$22,459	\$1,872	\$432
2	30,451	2,538	586
3	38,443	3,204	740
4	46,435	3,870	893
5	54,427	4,536	1,047
6	62,419	5,202	1,201
7	70,411	5,868	1,355
8	78,403	6,534	1,508
Each additional person:	7,992	666	154

2. HOW DO I KNOW IF MY CHILDREN QUALIFY AS HOMELESS, MIGRANT, OR RUNAWAY? Do the members of your household lack a permanent address? Are you staying together in a shelter, hotel, or other temporary housing arrangement? Does your family relocate on a seasonal basis? Are any children living with you who have chosen to leave their prior family or household? If you believe children in your household meet these descriptions and haven't been told your children will get free meals, please call or e-mail **[school, homeless liaison or migrant coordinator]**.
3. DO I NEED TO FILL OUT AN APPLICATION FOR EACH CHILD? No. *Use one Free and Reduced Price School Meals Application for all students in your household.* We cannot approve an application that is not complete, so be sure to fill out all required information. Return the completed application to: **[name, address, phone number]**.
4. SHOULD I FILL OUT AN APPLICATION IF I RECEIVED A LETTER THIS SCHOOL YEAR SAYING MY CHILDREN ARE ALREADY APPROVED FOR FREE MEALS? No, but please read the letter you got carefully and follow the instructions. If any children in your household were missing from your eligibility notification, contact **[name, address, phone number, e-mail]** immediately.

- 
5. CAN I APPLY ONLINE? Yes! You are encouraged to complete an online application instead of a paper application if you are able. The online application has the same requirements and will ask you for the same information as the paper application. Visit **[website]** to begin or to learn more about the online application process. Contact **[name, address, phone number, e-mail]** if you have any questions about the **online application**.
  6. MY CHILD'S APPLICATION WAS APPROVED LAST YEAR. DO I NEED TO FILL OUT A NEW ONE? Yes. Your child's application is only good for that school year and for the first few days of this school year, through **[date]**. You must send in a new application unless the school told you that your child is eligible for the new school year. If you do not send in a new application that is approved by the school or you have not been notified that your child is eligible for free meals, your child will be charged the full price for meals.
  7. I GET WIC. CAN MY CHILDREN GET FREE MEALS? Children in households participating in WIC may be eligible for free or reduced price meals. Please send in an application.
  8. WILL THE INFORMATION I GIVE BE CHECKED? Yes. We may also ask you to send written proof of the household income you report.
  9. IF I DON'T QUALIFY NOW, MAY I APPLY LATER? Yes, you may apply at any time during the school year. For example, children with a parent or guardian who becomes unemployed may become eligible for free and reduced price meals if the household income drops below the income limit.
  10. WHAT IF I DISAGREE WITH THE SCHOOL'S DECISION ABOUT MY APPLICATION? You should talk to school officials. You also may ask for a hearing by calling or writing to: **[name, address, phone number, e-mail]**.
  11. MAY I APPLY IF SOMEONE IN MY HOUSEHOLD IS NOT A U.S. CITIZEN? Yes. You, your children, or other household members do not have to be U.S. citizens to apply for free or reduced price meals.
  12. WHAT IF MY INCOME IS NOT ALWAYS THE SAME? List the amount that you normally receive. For example, if you normally make \$1000 each month, but you missed some work last month and only made \$900, put down that you made \$1000 per month. If you normally get overtime, include it, but do not include it if you only work overtime sometimes. If you have lost a job or had your hours or wages reduced, use your current income.
  13. WHAT IF SOME HOUSEHOLD MEMBERS HAVE NO INCOME TO REPORT? Household members may not receive some types of income we ask you to report on the application, or may not receive income at all. Whenever this happens, please write a 0 in the field. However, if any income fields are left empty or blank, those will also be counted as zeroes. Please be careful when leaving income fields blank, as we will assume you meant to do so.
  14. WE ARE IN THE MILITARY. DO WE REPORT OUR INCOME DIFFERENTLY? Your basic pay and cash bonuses must be reported as income. If you get any cash value allowances for off-base housing, food, or clothing, it must also be included as income. However, if your housing is part of the Military Housing Privatization Initiative, do not include your housing allowance as income. Any additional combat pay resulting from deployment is also excluded from income.
  15. WHAT IF THERE ISN'T ENOUGH SPACE ON THE APPLICATION FOR MY FAMILY? List any additional household members on a separate piece of paper, and attach it to your application. Contact **[name, address, phone number, e-mail]** to receive a second application.
  16. MY FAMILY NEEDS MORE HELP. ARE THERE OTHER PROGRAMS WE MIGHT APPLY FOR? To find out how to apply for Ohio SNAP or other assistance benefits, contact your local assistance office or call 877-852-0010.



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If you have other questions or need help, call **[phone number]**.  
Sincerely,  
**[signature]**

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## INSTRUCTIONS FOR APPLYING A HOUSEHOLD MEMBER IS ANY CHILD OR ADULT LIVING WITH YOU

### IF YOUR HOUSEHOLD RECEIVES BENEFITS FROM THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) OR OHIO WORKS FIRST (OWF), FOLLOW THESE INSTRUCTIONS:

- Part 1:** List all household members and the school name and school grade level for each child.
- Part 2:** List the 7 or 10-digit case number for any household member (including adults) receiving SNAP or OWF benefits.
- Part 3:** Skip this part.
- Part 4:** Skip this part.
- Part 5:** Sign the form. The last four digits of a Social Security Number are **not** necessary.
- Part 6:** Answer this question if you choose to.

### IF NO ONE IN YOUR HOUSEHOLD GETS SNAP OR OWF BENEFITS AND IF ANY CHILD IN YOUR HOUSEHOLD IS HOMELESS, A MIGRANT OR RUNAWAY, FOLLOW THESE INSTRUCTIONS:

- Part 1:** List all household members and the school name and school grade level for each child.
- Part 2:** Skip this part.
- Part 3:** If any child you are applying for is homeless, migrant, or a runaway, check the appropriate box and call [\[your school, homeless liaison, migrant coordinator\]](#).
- Part 4:** Complete only if a child in your household isn't eligible under Part 3. See Instruction for All Other Households.
- Part 5:** Sign the form. The last four digits of a Social Security Number are **not** necessary if you didn't need to fill in part 4.
- Part 6:** Answer this question if you choose to.

### IF YOU ARE APPLYING FOR A FOSTER CHILD, FOLLOW THESE INSTRUCTIONS:

#### If all children in the household are foster children:

- Part 1:** List all foster children and the school name and school grade level for each child. Check the box indicating the child is a foster child.
- Part 2:** Skip this part.
- Part 3:** Skip this part.
- Part 4:** Skip this part.
- Part 5:** Sign the form. The last four digits of a Social Security Number are **not** necessary.
- Part 6:** Answer this question if you choose to.

#### If some of the children in the household are foster children:

- Part 1:** List all household members and the name of school and school grade level for each child. For any person, including children, with no income, you must check the "No Income" box. Check the box if the child is a foster child.
- Part 2:** If the household does not have a SNAP or OWF 7 or 10-digit case number, skip this part.
- Part 3:** If any child you are applying for is homeless, migrant, or a runaway check the appropriate box and call [\[your school, homeless liaison, migrant coordinator\]](#). If not, skip this part.
- Part 4:** Follow these instructions to report total household income from this month or last month.
- **Box 1–Name:** List all household members with income.
  - **Box 2 –Gross Income and How Often It Was Received:** For each household member, list each type of income received for the month. Check the box to tell us how often the person receives the income—weekly, every other week, twice a month, or monthly. For earnings, be sure to list the **gross income**, not the take-home pay. Gross income is the amount earned *before* taxes and other deductions. You should be able to find it on your pay stub or your boss can tell you. For other income, list the amount and check the box to tell us how often each person got for the month from welfare, child support, alimony, pensions, retirement, Social Security, Supplemental Security Income (SSI), Veteran's benefits (VA benefits), and disability benefits. Under *All Other Income*, list Worker's Compensation, unemployment or strike benefits, regular contributions from people who do not live in your household, and any other income. Do not include income from SNAP, FDPIR, WIC, Federal education benefits and foster payments received by the family from the placing agency. For **ONLY** the self-employed, under *Earnings from Work*, report income after expenses. This is for your business, farm, or rental property. If you are in the Military Privatized Housing Initiative or get combat pay, do not include these allowances as income.
- Part 5:** Adult household member must sign the form and list the last four digits of their Social Security Number (or mark the box if s/he doesn't have one).
- Part 6:** Answer this question, if you choose.

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**ALL OTHER HOUSEHOLDS, INCLUDING WIC HOUSEHOLDS, FOLLOW THESE INSTRUCTIONS:**

**Part 1:** List all household members and the school name and school grade level for each child. For any person, including children, with no income, you must check the “No Income Box”.

**Part 2:** If the household does not have a SNAP or OWF 7 or 10-digit case number, skip this part.

**Part 3:** If any child you are applying for is homeless, migrant, or a runaway check the appropriate box and call [\[your school, homeless liaison, migrant coordinator\]](#). If not, skip this part.

**Part 4:** Follow these instructions to report total household income from this month or last month.

- **Box 1–Name:** List all household members with income.
- **Box 2 –Gross Income and How Often It Was Received:** For each household member, list each type of income received for the month. Check the box to tell us how often the person receives the income—weekly, every other week, twice a month, or monthly. For earnings, be sure to list the **gross income**, not the take-home pay. Gross income is the amount earned *before* taxes and other deductions. You should be able to find it on your pay stub or your boss can tell you. For other income, list the amount and check the box to tell us how often each person got for the month from welfare, child support, alimony, pensions, retirement, Social Security, Supplemental Security Income (SSI), Veteran’s benefits (VA benefits), and disability benefits. Under *All Other Income*, list Worker’s Compensation, unemployment or strike benefits, regular contributions from people who do not live in your household, and any other income. Do not include income from SNAP, FDPIR, WIC, Federal education benefits and foster payments received by the family from the placing agency. For **ONLY** the self-employed, under *Earnings from Work*, report income after expenses. This is for your business, farm, or rental property. If you are in the Military Privatized Housing Initiative or get combat pay, do not include these allowances as income.

**Part 5:** An adult household member must sign the form and list the last four digits of his or her Social Security Number (or mark the box if s/he doesn’t have one).

**Part 6:** Answer this question if you choose to.



Your children may qualify for free or reduced price meals if your household income falls at or below the limits on this chart:

INCOME ELIGIBILITY GUIDELINES			
Household size	Yearly	Monthly	Weekly
1	\$22,459	\$1,872	\$432
2	30,451	2,538	586
3	38,443	3,204	740
4	46,435	3,870	893
5	54,427	4,536	1,047
6	62,419	5,202	1,201
7	70,411	5,868	1,355
8	78,403	6,534	1,508
Each additional person:	7,992	666	154

**Privacy Act Statement: This explains how we will use the information you give us.**

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the last four digits of the social security number of the adult household member who signs the application. The last four digits of the social security number is not required when you apply on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Ohio Works First (OWF) case number or other identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

mail: U.S. Department of Agriculture  
 Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW  
 Washington, D.C. 20250-9410  
 fax: (202) 690-7442; or  
 email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

**National School Lunch Program/ Prototype Notification Letter**  
(Put on Sponsor Letterhead)

**NOTICE TO HOUSEHOLDS OF APPROVAL/DENIAL OF BENEFITS**  
**For the 2018-2019 Program Year**

Dear Parent/Guardian:

You applied for free or reduced-meals for the following child(ren):


Your application was:

Approved for free meals.

Approved for reduced-price meals at \$\_\_\_\_\_ for lunch, \$\_\_\_\_\_ for breakfast, and \$\_\_\_\_\_ for snacks.

Denied for the following reason(s):

- Income over the allowable amount.
- Incomplete application because \_\_\_\_\_
- Other \_\_\_\_\_

If you do not agree with the decision, you may discuss it with the **[School official's name]** at **[phone number]**.

If you wish to review the decision further, you have a right to a fair hearing. This can be done by calling or writing the following official:

Name **(School Hearing Official's name)**

Address \_\_\_\_\_

Phone \_\_\_\_\_

If you are not eligible now but have a decrease in household income, become unemployed, have an increase in household size or become eligible to receive Food Assistance Program (SNAP) or OWF funds, fill out an application at that time.

Sincerely,  
**[signature]**

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Name	Title	Date
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## SHARING INFORMATION WITH MEDICAID/*Healthy Start, Healthy Families*

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Dear Parent/Guardian:

If your children get free or reduced price school meals, they may also be able to get free or low-cost health insurance through Medicaid or the State of Ohio Healthy Start, Healthy Families Program. Children with health insurance are more likely to get regular health care and are less likely to miss school because of sickness.

Because health insurance is so important to children's well-being, **the law allows us to tell Medicaid and *Healthy Start, Healthy Families* that your children are eligible for free or reduced price meals, unless you tell us not to.** Medicaid and *Healthy Start, Healthy Families* only use the information to identify children who may be eligible for their programs. Program officials may contact you to offer to enroll your children. Filling out the Free and Reduced Price School Meals Application does not automatically enroll your children in health insurance.

If you do not want us to share your information with Medicaid or *Healthy Start, Healthy Families*, fill out the form below and send in (Sending in this form will not change whether your children get free or reduced price meals).

- 
- No! I DO NOT** want information from my Free and Reduced Price School Meals Application shared with Medicaid or the *Healthy Start, Healthy Families*.

**If you checked no, fill out the form below.**

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Signature of Parent/Guardian: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Address: \_\_\_\_\_

For more information, you may call **[name]** at **[phone]**.

**Return this form to: [address] by [date].**

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# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### SHARING INFORMATION WITH OTHER PROGRAMS

Dear Parent/Guardian:

To save you time and effort, the information you gave on your Free and Reduced Price School Meals Application may be shared with other programs for which your children may qualify. **For the following programs, we must have your permission to share your information. Sending in this form will not change whether your children get free or reduced price meals.**

No! I **DO NOT** want information from my Free and Reduced Price School Meals Application shared with any of these programs.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

**If you checked yes to any or all of the boxes above, fill out the form below. Your information will be shared only with the programs you checked.**

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Child's Name: \_\_\_\_\_ School: \_\_\_\_\_

Signature of Parent/Guardian: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Address: \_\_\_\_\_

For more information, you may call **[name]** at **[phone]**.  
**Return this form to: [address] by [date].**

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Healthy Start & Healthy Families

Does your child qualify for the School Meals Program?  
If so, your family may qualify for free health coverage!



Healthy Start & Healthy Families

*Healthy Start* offers free health care coverage for kids (birth to age 19) and pregnant women.

*Healthy Families* offers free health care coverage for the entire family - parents AND kids.

Healthy Start & Healthy Families Covers:

- |                 |                 |
|-----------------|-----------------|
| Doctor Visits   | Prescriptions   |
| Hospital Care   | Vision Services |
| Immunizations   | Dental Care     |
| Substance Abuse | Mental Health   |

And Much More!

For more information or an application, call:

1-800-324-8680 (a free call!)

TDD 1-800-292-3572

Monday - Friday 7 am to 8 pm

Saturday - Sunday 12 pm to 5 pm



*Your family's size and income determines if you and your family are eligible for Healthy Start or Healthy Families. Healthy Start & Healthy Families are Medicaid Programs administered by The Ohio Department of Job & Family Services.*



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.4030-C

#### Media Release for Free and Reduced-Price Meals Community Eligibility Provision (CEP)

Constellation Schools: (School Name) announced today that it will continue its policy to operate the Community Eligibility Provision (CEP) Program under the National School Lunch Program and School Breakfast Program for the 2018-2019 school year. All schools that operate CEP will serve breakfast and lunch to all children at no charge and eliminate the collection of meal applications for free/reduced-price, and paid student meals. This new approach reduces burdens for both families and school administrators and helps ensure that students receive nutritious meals.

**FREE HEALTH CARE:** Families with children eligible for school meals may be eligible for FREE health care coverage through Medicaid and/or Ohio's Healthy Start & Healthy Families programs. These programs include coverage for doctor visits, immunizations, physicals, prescriptions, dental, vision, mental health, substance abuse and more. Please call **1-800-324-8680** for more information or to request an application. Information can also be found on the web at <http://jfs.ohio.gov/ohp/consumers/familychild.stm>. Anyone who has an Ohio Medicaid card is already receiving these services.

For additional information please contact the following:

Constellation Schools: School Name

Street, City, State, Zip

School Phone Number

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:



# Constellation Schools

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## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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*7 C.F.R. 245.10.*



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.4030-C

#### PUBLIC RELEASE

**Constellation Schools:** (School Name) today announced its 2018-2019 program year policy for free and reduced-price meals for students unable to pay the full price of meals or milk served under the National School Lunch and School Breakfast, After School Care Snack or Special Milk Program. Each school office and the central office has a copy of the policy, which may be reviewed by any interested party.

The Federal Income Eligibility Guidelines will be used for determining eligibility. Children from families whose annual income is at or below the Federal Guidelines are eligible for free and reduced price meals or free milk if the school participates in the Special Milk Program.

13. Application forms are being distributed to all homes in a letter to parents or guardians. To apply for free and reduced-price benefits, households should fill out the application and return it to the school. Additional copies are available at the principal's office in each school. A complete application is required. Households which currently receive Special Nutrition Assistance Program Benefits (SNAP, formally known as food stamps) or Ohio Works First (OWF) funds for a child must provide the child's name, the SNAP or OWF case number and signature of an adult household member on the application. Households which do not receive SNAP or OWF funds must provide the names of all household members, the last four digits of the Social Security Number of the adult signing the application or state "none" if the adult does not have a Social Security Number, the amount and source of income received by each household member, (state the monthly income) and the signature of an adult household member. If any of this information is missing, the school cannot process the application.

**FREE HEALTH CARE:** Families with children eligible for school meals may be eligible for FREE health care coverage through Medicaid and/or Ohio's Healthy Start & Healthy Families programs. These programs include coverage for doctor visits, immunizations, physicals, prescriptions, dental, vision, mental health, substance abuse and more. Please call **1-800-324-8680** for more information or to request an application. Information can also be found on the web at <http://jfs.ohio.gov/ohp/consumers/familychild.stm>. Anyone who has an Ohio Medicaid card is already receiving these services.

The information provided on the application is confidential and will be used only for the purpose of determining eligibility and may be verified at any time during the school year by school or other program official. To discourage the possibility of misrepresentation, the application forms contain a statement above the space for signature certifying that all information furnished is true and correct. Applications are being made in connection with the receipt of federal funds. Schools or other officials may check the information on the application at any time during the school year. Deliberate misrepresentation of information may subject the applicant to prosecution under applicable state and federal laws.

Households will be notified of the approval or denial of benefits.



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

Foster children are categorically eligible for free meal benefits regardless of the household's income. If a family has foster children living with them and wishes to apply for such meals or milk for them, contact the school for more information.

Under the provision of the policy, the Administrative Assistant will review applications and determine eligibility. If a parent or guardian disagrees with the decision on the application or the result of verification, the decision may be discussed with the determining official on an informal basis. If a formal appeal is desired, the household has the right to a fair hearing. A fair hearing can be requested either orally or in writing from:

Constellation Schools, 5730 Broadview Road, Parma, Ohio 44134, 216-712-7600.

The policy contains an outline of the hearing procedure.

Households may apply for benefits any time during the school year. If a household is not currently eligible and if the household size increases or income decreases because of unemployment or other reasons, the family should contact the school to file a new application. Such changes may make the children of the family eligible for free or reduced-price benefits if the family income falls at or below the levels shown above.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at:

[http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### Appendix 5.4040-A

### Food Allergy Notification Form

(One child per form)

Parent/Guardian: \_\_\_\_\_

Date: \_\_\_\_\_

Student: \_\_\_\_\_

1. \_\_\_\_\_ (Student) has an allergy to \_\_\_\_\_
2. This allergy is \_\_\_\_\_ or is not \_\_\_\_\_ potentially life threatening. If potentially life threatening:

Action to be taken: \_\_\_\_\_  
\_\_\_\_\_

Medications to be taken: \_\_\_\_\_  
\_\_\_\_\_

I certify that I have completed an Emergency Medical Authorization Form.

I have consulted with the School to make a Food Allergy Action Plan and I have trained my child as to his/her needs and safety. We will review the weekly lunch menu together, and discuss the vigilance required to self monitor food products sold at athletic events or special student sales, foods brought for potlucks or classroom celebrations, and foods served on School-sponsored trips.

I do \_\_\_\_\_ do not \_\_\_\_\_ give consent for the School to notify others of my child's food allergy.

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### APPENDIX 5.4050-A

#### NUTRITION STANDARDS FOR BEVERAGES AND FOOD

##### GRADES K-4

- Water
- 8 oz. 100% juice or fruit juice – water blend with no added sweeteners, not more than 160 calories per 8 oz.
- 8 oz. low fat or fat free milk, not more than 170 calories per 8 oz.

*After January 1, 2014 milk cannot contain more than 150 calories per 8 oz.*

##### GRADES 5-8

- Water
- 10 oz. 100% juice or fruit juice-water blend, no added sweeteners, not more than 160 calories per 8 oz.
- 8 oz. low fat or fat free milk, more than 170 calories per 8 oz.

*After January 1, 2014 milk cannot contain more than 150 calories per 8 oz.*

##### GRADES 9-12

- Water
- 12 oz. 100% juice or fruit juice-water blend, no added sweeteners, not more than 160 calories per 8 oz.
- 16 oz. low fat or fat free milk, not more than 170 calories per 8 oz.
- 12 oz. beverage that contains not more than 66 calories per 8 oz.

*After January 1, 2014 milk cannot contain more than 150 calories per 8 oz.*

Any size beverage that contains not more than 10 calories per 8 oz. may contain sweeteners, flavoring and carbonation (USDA regulation restricts carbonation from being allowed in meal service/consumption areas during serving times)

- At least 50% of an ala carte beverage available on school campus during the regular and extended school day must be water or other beverages that contain not more than 10 calories per 8 oz.
- Milk and juice are included in the 50% calculation unless the vending machine is selling milk only.



# Constellation Schools

## CHAPTER 5: HEALTH AND SAFETY POLICIES, PRACTICES AND PROCEDURES

### FOOD REQUIREMENTS

- Food which could be a component of a reimbursable meal are exempt from ala carte nutrition standards if they are sold ala carte in the same serving size as on the reimbursable meal.

### SERVING SIZE OF COMPONENTS

- If a food item is not served as part of the reimbursable meals program but could qualify as a component of a reimbursable meal the serving size is determined by the school.

Examples – salad bars, large chef salad, large sub sandwiches.

Food choices should follow the dietary guidelines and incorporate the guidelines into the standards.

### FOOD WHICH COULD NOT COUNT AS COMPONENTS OF REIMBURSABLE MEALS...

- Must meet the ala carte nutrition standard.

Example – potato chip served as part of the reimbursable lunch must meet the ala carte nutrition standard to be sold ala carte because potato chips cannot count as a component of a reimbursable meal.

### HOW DO WE MEET THESE ALA CARTE NUTRITION STANDARDS FOR FOOD?

Follow either of these two formats:

- Alliance for Healthier Generation
- Nutrient Density Format