

# Healthy and Safe Schools Plan 2016-17

Hillsboro School District  
3083 NE 49th Place  
Hillsboro, OR 97124



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## I. INTRODUCTION

In 2016, the Oregon Legislature passed Oregon Administrative Rule (OAR) 581-022-2223 which requires school districts to develop a Healthy and Safe Schools Plan to address environmental safety concerns including: a plan for testing district-owned buildings for radon as required under ORS 332.167; a plan to test and reduce exposure to lead in water used for drinking or food preparation; a plan to reduce exposure to lead paint that includes the following compliance with the United States Environmental Protection Agency’s Renovation, Repair, and Painting Program Rule; a plan to implement integrated pest management practices as required under ORS 634.700 through 634.750; and a plan to communicate results for all tests required under the Healthy and Safe Schools Plan.

Hillsboro School District is committed to providing a safe environment for all students and staff.

## II. ADMINISTRATOR RESPONSIBLE

Casey Waletich  
Executive Director of Facilities, Safety, and Operations  
waleticc@hsd.k12.or.us

## III. DISTRICT FACILITIES

### Elementary Schools

Brookwood	Imlay	Minter Bridge	Rosedale
Butternut Creek	Indian Hills	Mooberry	Tobias
Eastwood	Jackson	North Plains	West Union
Farmington View	Ladd Acres	Orengo	Witch Hazel
Free Orchards	Lenox	Patterson	
Groner	Lincoln Street	Quatama	
WL Henry	McKinney	Reedville	

### Middle Schools

Brown	Evergreen	Poynter	South Meadows
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### High Schools

Century	Glencoe	Hillsboro	Liberty
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### Alternative Education

Hillsboro Online Academy	Miller Education West	Miller Education East
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### Support Services Facilities

Administration Center	Hare Field	Transportation	Surplus Warehouse
Facilities	Peter Boscow Center		

#### **IV. RADON TESTING PLAN**

##### **Plan Summary**

Background

Regulatory Requirements

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##### **Testing Plan**

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## **Background**

The Hillsboro School District (District), located in Hillsboro, Oregon, comprises 36 separate school campuses. Along with administrative, maintenance, transportation, and special program sites, the district maintains approximately 44 buildings that are regularly occupied by students or staff. Hillsboro School District is committed to completing initial radon testing, in accordance with ORS 332.166-167, in district-owned schools and sites prior to January 1, 2021. It is estimated that approximately 1,850 rooms will need to be tested for radon based on the guidance outlined in the Oregon Health Authority (OHA) *Testing for Elevated Radon in Oregon Schools: A Protocol and Plan (Version 1.0), 2016 (Plan)*.

## **Regulatory Requirements**

In 2015, the Oregon Legislature passed House Bill (HB) 2931 to bring awareness to elevated radon levels in Oregon schools. HB 2931 later became Oregon Revised Statute (ORS) 332.166-167.

This Radon Testing and Reporting Plan is designed to help school districts fulfill the requirements of ORS 332.166-167 of submitting a plan to OHA by September 1, 2016.

Per ORS 332.166-167, actual testing of each school for radon will be completed before January 1, 2021, and testing results will be sent to OHA and posted on the school's or school district's website.

## **About Radon**

Radon is a naturally occurring, colorless, odorless, and tasteless radioactive gas that comes from natural deposits of uranium in the soil, and is found everywhere in the world. Deposits of uranium naturally decay into radium, which further breaks down into radon gas. Because radon is a gas, it can move up through soil and enter buildings that are in contact with the soil. Radon is typically at its highest concentration in the lower portion of a building. Once radon enters a building, it is easily dispersed through the air. It then begins a radioactive decay process that leads to the creation of radon decay products. If inhaled, these radioactive particles (decay products) can be trapped in the lungs. As these particles decay further, they release small bursts of radiation, which can damage lung tissue and lead to lung cancer over the course of a lifetime.

According to Environmental Protection Agency (EPA) estimates, radon is the number one cause of lung cancer among non-smokers. No amount of radon is safe, but steps can be taken to reduce its potential for harm.

For most schoolchildren and school staff, the second largest contributor to radon exposure, next to their home is their school. As a result, both the EPA and OHA recommend that school buildings and homes be tested for radon. For schools in Oregon, this recommendation became law in the 2015 Legislature with ORS 332.166-167.

## **Action Level**

In the US, radioactivity is measured in curies. A curie is an approximate amount of radioactivity that is produced by one gram of radium. A picocurie is one trillionth of a curie. Radiation from radon is expressed in picocuries per liters of air (pCi/L).

The EPA has set the action level for radon at 4.0 pCi/L and recommends reducing the concentration of radon in indoor environments to below this action level.

### **Testing Locations**

The District will develop a detailed list of rooms for each site to be tested for radon in accordance with recommendations in the OHA Plan. The District will utilize each facility's floor plan to determine testing locations in frequently occupied rooms that are in contact with the ground or located above a crawlspace or basement, as required per ORS 332.166-167. Locations to be tested will be identified on drawings to be included in final reports and future radon testing plans.

Once testing locations are identified for each site, the District will calculate the number of test kits needed for each site. One test kit or device will be used per room for rooms that are less than 2,000 square feet. For rooms greater than 2,000 square feet, one kit or detector will be placed for every 2,000 square feet.

For quality assurance purposes, the District will also calculate the number of kits or devices needed to allow for blanks, duplicates, and spikes. At each site, blanks will be deployed in five percent of the rooms to be tested, and duplicates will be deployed in ten percent of rooms to be tested. Blanks and duplicates will be deployed following the same methodology as the actual test kits. Spike samples are used for laboratory quality control and are not deployed on site. Test kits from the same batch as the kits used for on-site testing are sent to a third-party laboratory and "spiked" with a known concentration of radon. These test kits are then returned to the user and submitted to the testing laboratory along with the test kits from each school. Spikes will be submitted at a rate of three percent of the rooms to be tested at each site. Delivery of spike samples will coincide with the collection of test kits, duplicates, and blanks. A minimum of one blank, one duplicate, and one spike will be deployed per site.

For specific details and guidance, see sections "What rooms should be tested?" "Quality Assurance Procedures for a School Radon Measurement Program," and "APPENDIX D: STEP-BY-STEP GUIDE FOR PLANNING RADON TESTING" in the attached OHA plan.

### **Initial Short-Term Testing:**

All locations identified will be tested using short term activated charcoal adsorption test kits. Test kit, duplicate, and blank locations will be plotted on a building floor plan and tracked in a placement log or electronic database. Ideally, initial short-term testing will occur in October to allow time for follow-up long term testing beginning in November, if needed. Testing will occur during normal school days or days when the HVAC system is functioning in the same manner as normal school days.

Specific details and guidance outlining best practices for placing test kits and when to deploy test kits is not included in the scope of this plan. See “APPENDIX A: RADON TEST PLACEMENT PROTOCOL CHECKLIST” in the attached OHA Plan for details and guidance.

Results of initial short-term tests that are equal to or greater than 4.0 pCi/L will be evaluated using the quality assurance calculations listed in the “INTERPRETATION OF RESULTS” section of the attached OHA Plan.

Hillsboro School District will schedule a second short-term test, or long-term follow-up test, based on the initial short-term test results as indicated below:

- If the result is less than 2.0 pCi/L, the District will test again every 10 years (as required by Oregon Revised Statute 332.166-167).
- If the result is between 2.0 pCi/L and 4.0 pCi/L, the District will investigate options for fixing (lowering) the radon in that room (e.g., adjustments to HVAC, sealing entry routes, etc.).
- If the result is between 4.0 pCi/L and 8.0 pCi/L, the District will perform a follow-up measurement of that room using a long-term test. This will be conducted over as much of a nine-month school year as possible, when rooms are likely to be occupied. If that result is equal to or greater than 4.0 pCi/L, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation, etc.).
- If the initial test result is equal to or greater than 8.0 pCi/L, the District will conduct a second short-term test within a month. The follow up result is then averaged with the result of the initial short-term test (see follow-up testing below).
- If the average result of the two short-term tests is equal to or greater than 4.0 pCi/L, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation, etc.).
- If the follow-up test is long-term, and the result is 4.0 pCi/L or above, the District will investigate options for lowering the radon in that room (e.g., adjustments to HVAC, soil depressurization, sealing entry routes, building pressurization, zone-specific ventilation etc.).

Results of any follow-up tests that are equal to or greater than 4.0 pCi/L will be evaluated using the same quality assurance calculations as the initial short-term tests listed in the “INTERPRETATION OF RESULTS” section of the attached OHA Plan.

### **CRM Use**

The District may use continuous radon monitors (CRM) for follow-up long term and short term testing. The use of CRMs can help determine radon levels in a room during times it’s actually occupied, which may in turn determine if adjustments to the HVAC system are adequate for reducing radon levels.

### **Mitigation**

Mitigation measures are not specifically addressed in this plan but the District is committed to doing everything it can to reduce radon levels and provide a safe environment in every district building.

The EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups recommend that school districts take action to reduce the radon level in those rooms where the average of the initial and follow-up short-term kit results OR the result of the long-term kit used in follow-up is 4.0 pCi/L or more.

Although not required of school districts under ORS 332.166-167, it is recommended that school administration direct appropriate staff members to adjust building HVAC systems and retest. If this doesn't reduce the radon below 4.0 pCi/L, school districts have the option of hiring a radon mitigation professional to reduce elevated radon levels identified through testing.

### **Periodic Retesting**

Following initial short-term radon testing, District sites will be retested every 10 years as required by ORS 332.166-167. Additional testing may be undertaken by the District, in addition to the 10 year retest cycle, should any of the conditions noted in the "When Should Periodic Retesting be Done?" section of the attached OHA Plan apply.

### **Reporting**

All radon testing results will be made available to the District's school board, the Oregon Health Authority, and readily available to parents, guardians, students, school employees, school volunteers, administrators, and community representatives at the school office, district office, or on a website for the school or school district as required by ORS 332.166-167. Follow-up testing results, 10-year retest results, and mitigation implementation will also be made available.



## **V. LEAD WATER TESTING PLAN**

### **PLAN SUMMARY**

Background

Summary of Testing

Regulatory Requirements

Plan to address Elevated Levels

Communication of Results

Remediation

Future Testing

### **Background:**

In April 2016, The Governor directed the Oregon Health Authority (OHA) and the Oregon Department of Education (ODE) to review existing programs and create a plan to address the problem of lead in school water. In response, OHA and ODE will:

- Recommend all school districts and childcare facilities to test for lead in buildings.
- Recommend schools and childcare facilities to use accredited drinking water testing labs to process water samples for lead.
- Develop a database and method for transferring lead test records from accredited labs to OHA as a reportable test result.
- Provide drinking water technical expertise from OHA to schools and childcare facilities as needed to support them as they test water in their buildings.

Actions schools and childcare facilities can take:

1. **Identify sources of lead:** Schools and childcare facilities should test all taps used for drinking or food preparation in the building to identify and lead problems. Testing should follow the Oregon Health Authority (OHA) guidance and the EPA's 3 T's on guidance for schools  
[https://www.epa.gov/sites/production/files/201509/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/201509/documents/toolkit_leadschools_guide_3ts_leadschools.pdf).
2. **Stop access:** Prevent access to water taps that have more than 20 parts per billion (ppb) of lead. This should include shutting off taps, covering water fountains, and providing bottled water to students and staff.
3. **Communicate:** Make results from tests for lead in water available to students, families, and the community as quickly as possible.
4. **Mitigate and correct:** Replace the sources of lead in the building plumbing. Again, EPA 3T's Guidance should be followed.

### **Summary of Testing:**

The Hillsboro School District conducted water testing at all District facilities including all potable water sources during the months of July and August 2016. The testing included approximately 5700 tests. The District contracted with PBS environmental to conduct the sampling. The testing followed the Oregon Health Authority (OHA) guidance and the EPA's 3 T's on guidance for schools  
[https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf) . PBS conducted a first draw sample (the water has sat in the pipe between 8 & 18 hours before the sample is taken) and a follow up 30 second flush test.

### **Regulatory Requirements:**

EPA's recommendation of 20 ppb (parts per billion) as the action level.

### **Plan to Address Elevated Levels:**

Should the initial test reveal elevated levels at any fixture, the District will immediately close access to that fixture. The flush test will then be processed. A resample will occur as a follow up and based on that result, further action may be needed including replacing the fixture. If another elevated level is detected at the same faucet, we will investigate the issue further and take necessary action to correct the problem.

### **Communication of Results:**

The District will be responsible for communicating results of the testing as they are available. The results will be made available on our website. Should there be an elevated testing result that requires remediation, the District will communicate the plan to address the issue. This may include communicating with Washington County Public Health.

### **Remediation:**

If a fixture has elevated levels of Lead, the District will replace the fixture and conduct further testing to ensure the issue has been resolved immediately. The fixture will not be used prior to the correction being made and follow-up testing conducted.

### **Future Testing:**

Facilities built after 2000 and those who did not have any elevated levels of lead during the testing in 2016 will be re-tested in 10 years (2026). Other facilities will be tested every five years. The District will follow testing recommendations by ODE/Oregon Health Authority and the EPA's 3 T's.

### **Informational Links**

[EPA Lead in Drinking Water in Schools and Childcare Facilities](#)

[Tualatin Valley Water District](#)

[Multnomah County Lead Poisoning Prevention](#)

[Oregon Health Authority Lead Poisoning](#)

[Center for Disease Control and Prevention, Information for Parents](#)

[Center for Disease Control and Prevention, FAQs](#)

## **VI. LEAD PAINT PLAN**

### **PLAN SUMMARY**

Background

Requirements

## **Background**

The District will follow the The Environmental Protection Agencies (EPA) 2008 Lead-Based Paint Renovation, Repair and Painting (RRP) Rule (as amended in 2010 and 2011), it aims to protect the public from lead-based paint hazards associated with renovation, repair and painting activities. These activities can create hazardous lead dust when surfaces with lead paint, even many decades ago, are disturbed. The rule requires workers to be certified and trained in the use of lead-safe work practices, and requires renovation, repair and painting firms to be EPA-certified. These requirements became fully effective April 2010. Federal law requires contractors that disturb painted surfaces in homes, childcare facilities, and schools built before 1978 to be certified and follow specific work practices to prevent lead contamination.

## **Requirements**

Federal law requires that individuals receive certain information before renovating more than six square feet of painted surfaces in a room for interior projects or more than twenty square feet of painted surfaces for external projects or window replacement or demolition in housing, childcare facilities and schools built before 1978.

Essential Requirements:

1. Hire a certified professional to check for lead-based paint
2. Contain the work area
3. Avoid renovation methods that generate large amounts of lead-contaminated dust
4. Clean up thoroughly

In order to comply with this EPA's Renovation, Repair, and Painting Program Rule, the District will contract with certified contractors to complete testing and work.

*For more information on this rule, you can visit the following website:*

<https://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/LeadPoisoning/ChildCareSchools/Pages/RulesforRenovating.aspx>

## **VII. INTEGRATED PEST MANAGEMENT PLAN**

### **PLAN SUMMARY**

Introduction

What is Integrated Pest Management?

What is an Integrated Pest Management Plan?

School District IPM Plan Coordinator

The district has adopted an integrated pest management plan as required by ORS 634.700 through 634.750. Community members can access a copy of the IPM plan here:

<http://www.hsd.k12.or.us/Community/CommunityResources/IntegratedPestManagement.aspx>

## **INTRODUCTION**

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still- developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of the Hillsboro School District to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all school districts to implement integrated pest management in their schools. For this reason, the Hillsboro School District School Board adopts this integrated pest management plan for use on the campuses of our district.

## **WHAT IS INTEGRATED PEST MANAGEMENT?**

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

### IPM Basics Education and Communication:

The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. A protocol for reporting pests or pest conducive conditions, and a record of what action was taken is the most important part of an effective IPM program.

### Cultural & Sanitation:

Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

### Physical & Mechanical:

Rodent traps, sticky monitoring traps for insects, door sweeps on exterior doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here therefore, pesticides should be rarely used and only when necessary.

### **WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?**

ORS 634.700 defines an IPM plan as a proactive strategy that:

(A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that: a) Protect the health and safety of students, staff and faculty; b) Protect the integrity of campus buildings and grounds; c) Maintain a productive learning environment; and d) Protect local ecosystem health;

(B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

(C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, allows the application of pesticides that are not low-impact pesticides;

(D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

(E) Evaluates the need for pest control by identifying acceptable pest population density levels;

(F) Monitors and evaluates the effectiveness of pest control measures;

(G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;

(H) Excludes the application of pesticides for purely aesthetic purposes;

(I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;

(J) Gives preference to the use of nonchemical pest control measures;

(K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and

(L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

Note: As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, several steps must be taken before any “routine” applications are allowed:

1) Staff must be educated on sanitation, monitoring, and exclusion as the primary means to control the pest.

2) An acceptable pest population density level must be established.



- 3) The use of sanitation, structural remediation or habitat manipulation, or of mechanical or biological control methods must be incorporated into the management strategy of the pest.
- 4) Documentation that the above steps were ineffective.
- 5) The pesticide label must be read thoroughly to make sure the pesticide will be used in strict compliance with all label instructions.

### **SCHOOL DISTRICT IPM PLAN COORDINATOR**

ORS 634.720 states that the Plan Coordinator “must be an employee of the governed body, unit, school or entity unless the governing body delegates pest management duties to an independent contractor.”

The Hillsboro School District School Board designates the Facilities Coordinator as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in the Hillsboro School District, and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

- A. Attending not less than six hours of IPM training each year The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 – 634.750.
- B. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school’s IPM plan; The IPM Plan Coordinator (or designee) will provide training as outlined in Section VII below.
- C. Overseeing pest prevention efforts; The Coordinator will work with custodians, teachers, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points.
- D. Assuring that the decision-making process for implementing IPM in the district is followed; The Coordinator will continually assess and improve the pest monitoring / reporting / action protocol.
- E. Assuring that all notification, posting, and recordkeeping requirements are met when the decision to make a pesticide application is made;
- F. Maintaining the approved pesticides list as per section;
- G. Responding to inquiries and complaints about noncompliance with the plan. Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

## **VIII. ASBESTOS MANAGEMENT: AHERA**

### **PLAN SUMMARY**

Background

Requirements

The District has complied with the federal Asbestos Hazard Emergency Response Act (AHERA) [40 CFR 763.93(e) (10)] by completing the following requirements:

1. Inspecting all facilities for both friable and non-friable asbestos containing building materials.
2. Samples taken during the inspections of materials suspected of containing asbestos were analyzed at an EPA-accredited laboratory.
3. A management plan was written, based upon the report and laboratory findings, outlining the administration's intent in controlling any asbestos-containing materials.

Some asbestos-containing building materials were found in the District. An operations and maintenance plan, which is part of the management plan, describes the location of these materials and specific steps for maintaining the existing materials until their ultimate removal.

The inspection results and management plan are also available for review in the administrative office at each site, or the District maintenance facility, located at 4901 SE Witch Hazel Road, Hillsboro, Oregon. More detailed information regarding this program can be obtained by contacting the District Asbestos Coordinator, or his designee at 503-844-1320.

## **IX. INDOOR AIR QUALITY**

### **PLAN SUMMARY**

#### **Background**

The District conducts Indoor Air Quality testing at all school buildings and the District administration building every four years. This monitoring ensures district staff and students have a comfortable learning and working environment. The District's monitoring program measures four main areas using a random sampling of occupied rooms.

**Carbon Dioxide:** Follows the American Society of Heating, Refrigeration, and Air-conditioning Engineers (ASHRAE) recommending maintaining indoor carbon dioxide concentrations below 1000 ppm for classroom environments and below 800 ppm for office environments.

**Carbon Monoxide:** Follows OR-OSHA permissible exposure limit (PEL) of 50 ppm.

**Temperature:** Follows OSHA technical manuals of recommended temperature for a comfortable indoor working environment range between 68 and 76 degrees F.

**Relative Humidity and Moisture:** Follows OSHA technical manuals of maintaining relative humidity between 20% and 60% to help maintain a comfortable indoor air quality environment and below 70% to prevent mold growth.

## **X. COMMUNICATION PLAN**

The District will communicate results to the public within 5 business days of receiving the test results. These results will be made available to the public the following ways:

1. Results posted on the District website.
2. Using the auto-dialer system to call parents to alert them of elevated test levels.
3. Individual schools may send email updates to their community.
4. Results will be available in hard copy form at the school office upon request.
5. The District will provide detailed information explaining the results and providing the name and contact information of the District administrator responsible to answer questions.

## **XI. ANNUAL COMPLIANCE PROCEDURES**

Annual reporting of the Healthy and Safe School Plan:

- a) School Board
- b) Community by posting information on the district web site
- c) Name the responsible position for maintaining and implementing the plan
- d) Make public aware of how to obtain a copy of the plan
- e) Certification that the plan is up to date and all testing has been completed
- f) Access to the results of all tests
- g) Summary of all mitigation efforts