

Appendix B.4 Enhance State Plans to Enable Community Mitigation through Student Dismissal and School Closure

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<p>0 = Response missing; documentation does not address activity.</p> <p>1 = Minimally responsive; documentation only indicates intention or beginning of planning for activity, or only a part of the activity has been addressed.</p> <p>2 = Substantial, but incomplete response; documentation indicates that State has largely addressed activity, but response is not complete or actionable.</p> <p>3 = Complete response; documentation indicates actionable plan.</p>	Score (0-3)	Reviewer Comments
<i>Prepare</i>		
Sub-objective B.4.1 - Review legal authorities and delegations of authority for closing schools and/or dismissing students.		
Identify the legal authority to close schools during a pandemic prior to declaration of state of emergency. <i>(For example, does this authority rest with the Governor? State Educational Agency? Local authorities?).</i>	2	Although the plan states that the LEAs requested that the Superintendent and State Health Officer recommend to the Governor when schools need to close, they do not explain whether or not this will happen. Also, if LEAs have the authority to close, why would they be advising the Governor and not local Superintendents? This point is unclear.
Identify the legal authority to close schools during an emergency (declared state of emergency) <i>(For example, does this authority rest with the Governor? State Educational Agency? Local authorities?).</i> Provide citation.	1	They cite the authorities that state that the local health officer has the unstated authority to shut down schools (quarantine or shut down activities, does not specify schools) and that the local county board has in its authority the oversight of the schools. They not only do not address how these authorities operate together, they do not specify whether or not an emergency must be declared, nor do they address who ultimately has the authority to shut down schools (either locally or at the state level) in the event of a pandemic. They do not address how these authorities would be analyzed, understood or operationalized during a pandemic. In fact, it is unclear that this is a specific authority for school closure during a declared emergency at all.

If there are no existing authorities, identify the state's plans for establishing this authority.	N/A	N/A
Identify the state's legal authority to dismiss students from state-funded post-secondary schools (PSSs). Provide citation, if available. If not, describe state's legal role in and/or obligations to PSSs, if applicable. (<i>For example, do PSSs function under a Board of Regents? If so, does this body have legal authority to dismiss students?</i>)	0	This element was not addressed.
Identify the state's legal authority to close day care centers, if applicable.	1	State identifies that the Alabama Department of Human Resources Commissioner has the authority to close day care centers but does not examine how the Commissioner would collaborate with the Governor or other entity to determine how they would determine whether or not to close day care centers.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	4	
SUM of Ratings	4	
Percentage	33%	
Standard Phrase	Inadequate preparedness	
Sub-objective B.4.2 - Develop and/or enhance planning and coordination efforts for school closure/student dismissal and reopening.		

<p>Delineate process for coordinating the response efforts for the state educational agency (SEA). Identify the positions designated in lines of authority. (<i>For example</i>, describe who within the State Educational Agency (SEA) the Governor would contact if a state of emergency was declared, as well as who would be designated next if the person in that position was not available.)</p>	1	<p>They describe the three designated authorities that will determine school closure at the state level but do not describe how the entities will collaborate or who would have the deciding authority to close schools or the process that would be used to determine to close schools. They do not designate lines of authority (rather three positions that would "coordinate efforts" for the state board of education.</p>
<p>Identify the position within the governing entity for PSSs that serves on the state-level pandemic planning team.</p>	0	<p>They did not address the criteria or cite as N/A</p>
<p>Designate representative to the state's Pandemic Flu coordinating team for state educational agency.</p>	3	<p>The State Superintendent of Education and Director of Prevention and Support Services is on the state's Pan Flu coordinating team.</p>

Describe relationships between SEA, public health, and other entities, such as mental health. Describe the other partners involved in planning the educational response to a pandemic and their specific roles. <i>(For example, do these entities collaborate on issues related to pandemic influenza? Are there formal Interagency Agreements or Memoranda of Understanding?)</i>	1	The state identifies the Alabama Department of Mental Health and Mental Retardation and their support of students through a volunteer basis for specialized services. They also discuss a recovery training for LEA personnel. However, nothing they discuss is related back to the pandemic, how these resources will be utilized, or how they would even be coordinated during a pandemic.
Describe if state has disease surveillance system in which schools or PSSs participate or plans for developing such a system (If applicable.) (Refer to Appendix B.1 if applicable)	1	The State describes their agreement with the SDE Information Systems Services to monitor state-wide school attendance on a daily basis but does not describe what they would do with the information, who would collect the information, if there would be any follow-up to students related to syndromic surveillance, etc. They also do not describe if they have already developed this system or if it is only the agreement that has been made to do absentee surveillance through the system.
Activity Added by State		
TOTAL Number of Activities <i>(do not include elements cited as N/A)</i>	5	
SUM of Ratings	6	
Percentage	40%	
Standard Phrase	Inadequate preparedness	
Sub-objective B.4.3 - <i>Develop and/or enhance communications planning for school closure/student dismissal and reopening.</i>		

Describe the SEA's mechanism in place for communicating with LEAs in the event of an emergency (e.g. reverse 911, email groups, phone tree, etc) and key audiences for messaging (<i>For example</i> , will private schools also be included in communications or will this audience receive messages from LEAs?)	3	The plan describes the SchoolCast communication procedures that would provide 5 mechanisms for reaching the LEAs.
Describe if and how the communications systems are redundant and if not, plans for ensuring redundancy.	3	The system is redundant and messages can be sent anytime and modified as needed.
Designate the state-level education spokesperson (spokespeople, if applicable) for both media relations and communicating with LEAs. (<i>For example</i> , is this the SEA's Public Information Officer? Who will back up this position?)	3	The plan offers not only the State Superintendent as the PIO and the backup (and that person's backup as well), but how they will assess the situation on an ongoing basis.
Identify the position designated to communicate with PSSs.	0	The plan does not address this criteria or cite as N/A
Identify the position designated to communicate with day care centers.	3	The state identifies ADHR Division of Child Care Services Director as point of contact for communications with day care centers.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	5	

SUM of Ratings	12	
Percentage	80%	
Standard Phrase	A few major gaps	
Sub-objective B.4.4 - Establish expectations and procedures for providing continuity of education for students.		
Describe the SEA's expectations for continuity of education (<i>for example</i> , does the state or do communities plan to offer educational content that allows for students to remain connected to "normalcy" vs. expectation for advancement).	0	The plan does not address this criteria or cite as N/A
Identify who will have the primary responsibility for development and/or delivery of educational content. (<i>For example</i> , is this the SEA or LEAs?)	0	The plan does not address this criteria or cite as N/A
Describe the existing technological resources at the state level for continuing education. (<i>For example</i> , does the SEA have a website, access to public cable, etc.? Will these resources be available to K-12 or to PSSs also?)	2	The state is still developing some of their possible technical capabilities, including the use of public television, webcasts, and possible video/audio taping, which is actually quite a promising avenue, given the varied technological capabilities of students' families. They also discuss the recently approved program of credit recovery that allows students to complete only the parts of core subjects missed or failed due to non-completion for any reason, though they do not discuss how this may be leveraged during a pandemic (on a large scale).

Describe how the state will address the needs of special education students or students with special needs, if applicable. <i>(For example, will the SEA provide technical assistance to districts in assessing IEPs or developing content for these students to be delivered remotely?)</i>	1	This reviewer cannot assess this first sentence of the response but the state does agree to help provide technical assistance to districts regarding retrieving or reassessing IEP records that may have been lost during the emergency, though it is not clear what kind of assistance they would provide for reassessing IEP records (just the records? reassessing the students? This is unclear.)
Activity Added by State		
TOTAL Number of Activities <i>(do not include elements cited as N/A)</i>	5	
SUM of Ratings	3	
Percentage	20%	
Standard Phrase	Inadequate preparedness	
Sub-objective B.4.5 - Establish policies and procedures for use of school facilities and resources during a pandemic.		
Describe the SEA's policies or guidance about alternative uses of K-12 school facilities or resources. <i>(For example, are there assets that are owned by the SEA or whose contracts are negotiated by the SEA, such as buses?)</i>	2	Although this is not the responsibility of the SEA, they do not specify if they will provide guidance to the LEAs.

Describe the state's policies or guidance about the use of state-funded PSS property or assets. (For example, could the state use PSS's facilities, such as a stadium as vaccination sites? If so, has the state developed appropriate Memoranda of Understanding with the relevant PSS?)	0	This element was not addressed.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	2	
SUM of Ratings	2	
Percentage	33%	
Standard Phrase	Inadequate preparedness	
Sub-objective B.4.6 - Ensure that Continuity of Operations and Business Continuity Plans include considerations for pandemic for the		
Provide a hyperlink or reference to the Labor section of the pandemic plan (Appendix A.1), ensuring that the SEA has included considerations for the implications on staffing levels of a pandemic in their COOP or BCPs and if SEA staff will be covered in the state's overall plan for paying state staff.	1	The state does not consider functioning with various staffing levels (p. 15 PI Operational Plan) for K-12 and provides a superficial assessment of functioning under this condition. The Department of Post-Secondary Schools provides a more complete assessment. The state does not consider how they will pay employees during prolonged school closure stating "there is the assumption that all SEA and LEA (K-12 program) will be paid as long as funds are available."

Describe the state responsibility, if any, for paying staff/faculty at state-funded PSSs.	0	
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	2	
SUM of Ratings	1	
Percentage	67%	
Standard Phrase	Many major gaps	
<i>Respond</i>		
Sub-objective B.4.7 - Implement policies and procedures for closing schools and/or dismissing students.		
List steps for closing schools/dismissing students (if applicable).	3	The plan provides a clear set of steps for determining local school closures.
List process for closing day care centers (if applicable).	2	The plan provides a clear set of steps for communicating regarding day care center closures but not the actual process for deciding to close day care centers.
List process for closing state PSSs (if applicable).	0	
List steps for working with health officials to assess/coordinate closures in regions of state that border other states.	3	The plan provides a clear set of steps for determining local school closures when an area of the state is adjacent to an infected portion of a different state.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	4	
SUM of Ratings	8	
Percentage	67%	

Standard Phrase	Many major gaps	
<i>Sub-objective B.4.8 - Implement policies and procedures for continuing education during prolonged school closure/student dismissal.</i>		
List steps for activating continuity of education plans. (<i>For example, would these plans only be activated as a result of a formal declaration of emergency?</i>)	1	It is not clear what the plan for activating continuity of education plans would be.
List how the state would assist in delivering educational content to students across the age spectrum (<i>For example, would educational content be coordinated for K-12 students? PSS?</i>).	3	The state has resources including web-based learning, public television, or audio or video-taping. However, the state may want to clarify how these would be activated during a pandemic.
Describe how the state will participate in helping provide nutrition assistance to children who normally would receive free meals through USDA's school/child care feeding programs (National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program), if applicable..	1	The state has determined that they would have no role in this function at all and have given no thought to how their state Child Nutrition Director could participate in aiding LEAs in coordinating this function in advance of a pandemic.
Activity Added by State		
<i>TOTAL Number of Activities (do not include elements cited as N/A)</i>	3	
<i>SUM of Ratings</i>	5	
<i>Percentage</i>	56%	

Standard Phrase	Many major gaps	
<i>Sub-objective B.4.9 - Clearly communicate policies and procedures about school closures/dismissal of students and other important</i>		
<p>List steps that SEA will take to provide ongoing communications about key health information to specific audiences, including LEAs and stakeholders.</p> <p>Designate key positions and lines of authority for receipt of and responsibility for dissemination of health information. (For example, if CDC or state health authority provides information about thresholds for dismissing students, reconvening students, etc., who at the SEA will be the recipient of this information and how will this person disseminate information?)</p>	3	<p>The State identifies the lines of authority for disseminating health-related information to LEAs. This has worked in the past, when they have disseminated health information in preparation for the pandemic.</p>

List process for how the State will provide ongoing communication about education-related issues (such as declarations of emergency which would trigger school closures) and whether or not this will be the same person as above. Designate key positions and lines of authority for receipt of and responsibility for dissemination of education information (if different than above).	3	The plan provides clear and coherent steps for action, including delegations of authority for positions in the communication chain.
List steps the education spokesperson will take to coordinate messages with other state entities. (If appropriate, link to communications section of pandemic plan.)	0	The state plan does not address how messages will be coordinated with other state entities (such as the health department).
If applicable, describe process by which LEAs and/or state PSSs will report to SEA on closures.	0	The plan states that this is not necessary because the closures would be at the state level; yet earlier, it states that closures would all be local responses.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	4	
SUM of Ratings	6	
Percentage	50%	
Standard Phrase	Many major gaps	

Sub-objective B.4.10 - <i>Protect state assets (school facilities and resources) during a pandemic.</i>		
List SEA's steps to protect state-owned assets related to schools or PSSs (if applicable).	1	The plan states that there is no need to create plans for state owned assets but they only address LEA assets, not PSS.
List steps state will undertake if the state will use state-owned educational facilities for alternate uses (if applicable). Describe the steps necessary to ensure that sites are prepared to function in desired capacity (<i>for example</i> , if a university stadium is being used for a vaccination delivery site, are there sufficient refrigeration units available and easily accessible? How will these sites be cleaned and maintained?)	1	Local boards have control of the local assets but there is no plan for utilizing facilities.
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	2	
SUM of Ratings	2	
Percentage	33%	
Standard Phrase	Inadequate preparedness	
<i>Recover</i>		
Sub-objective B.4.11 - <i>Implement steps to reopen schools/reconvene students.</i>		
List SEA's steps for reopening schools/reconvening students (if this is a state function).	3	

List steps the state will take to facilitate reopening/reconvening day care centers and children.	3	
List steps the state will take to facilitate reopening/reconvening PSSs and students.	0	
Activity Added by State		
TOTAL Number of Activities (do not include elements cited as N/A)	3	
SUM of Ratings	6	
Percentage	67%	
Standard Phrase	Many major gaps	
Sub-objective B.4.12 - Communicate policies for reopening schools/reconvening students.		
Describe the communication plan for reopening schools/reconvening students (if this is a state function). (<i>For example</i> , will the state provide messaging for the LEAs to use uniformly about state policy? Will these messages be delivered in daily press conferences? Letters to LEA staff? Email?)	3	
Identify the state spokesperson who will provide messages during the recovery stage, as well as the second person in the line of succession for this function (if different than during response).	3	All points addressed.

Activity Added by State		
TOTAL Number of Activities <i>(do not include elements cited as N/A)</i>	2	
SUM of Ratings	6	
Percentage	100%	
Standard Phrase	No major gaps	
Sub-objective B.4.13 - Restore the learning environment.		
Describe process State will recommend that LEAs use to assess student's levels with respect to state academic standards.	1	The state will recommend that the LEAs use the Credit Recovery Plan and assessment procedures prescribed for a student's transfer of credit from one school to another but they do not explain how either of these processes would play out for an entire state's population and how they would address younger children (who usually do not complete "credits").
List steps that SEA will take to support LEAs in screening and referring students for mental health services, if applicable. <i>(For example, does the state support efforts for linkages between schools and mental health systems?)</i>	1	They describe the relationship with the mental health authority but not how they would collaborate to facilitate recovery.
Describe if/how the state will provide additional mental health staff or funding for services to students and staff.	2	They emphasize the recovery training for LEA personnel but this is typically provided to facilitate recovery for students, not faculty or staff. They would provided funding "if available".
List steps that the SEA will take to support LEAs in assessing students with special needs in reviewing, revising, or creating Individualized Education Plans (IEPs).	1	This reviewer cannot assess this first sentence of the response but the state does agree to help provide technical assistance to districts regarding retrieving or reassessing IEP records that may have been lost during the emergency, though it is not clear what kind of assistance they would provide for reassessing IEP records (just the records? reassessing the students? unclear.)

If the state used state-owned school facilities for alternate uses, identify the process and/or funding stream that the state will use to support any necessary remediation.	1	The plan only considers assets that are K-12, not PSS. All responsibility is deferred to the local level.
Activity Added by State		
TOTAL Number of Activities <i>(do not include elements cited as N/A)</i>	5	
SUM of Ratings	6	
Percentage	40%	
Standard Phrase	Inadequate preparedness	