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Executive Summary

Rausch Advisory Services LLC (Rausch) was engaged by the Atlanta Public Schools (APS) Executive Director, Office of Internal Compliance (OIC) to perform a Covid-19 Health and Safety Review for public and charter schools under the jurisdiction of the APS school district. The primary goal was to identify and assess compliance with the APS OnCourse: Comprehensive Strategies to Return + Learn for Fall 2020. We also identified and assessed areas of improvement for Covid-19 guidance where schools were open for face-to-face instructions beginning March 2021. APS Internal compliance expressed the following additional objectives should be accomplished:

- gain a thorough understanding of the district’s Covid-19 implemented Health & Safety Protocols
- determine compliance with established health and safety guidelines at all facilities
- determine if guidance /control around the return-to-work initiative are effectively communicated
- determine if the overall program is functioning as intended

The assessment instrument for question development was created using the *APS OnCourse: Comprehensive Strategies to Return + Learn for Fall 2020* document, developed in March 2021 by APS. Seventy-six locations were reviewed. The Domains of the *APS OnCourse* that were examined during the assessment include:

1. Health and Safety
 - 1.1 Health Screening Procedures
 - 1.2 Personal Protective Equipment
 - 1.3 Social Distancing
 - 1.4 Data Tracking, Tracing, and Reporting of COVID-19
 - 1.5 Training
 - 1.6 School Decision Making Matrix
2. Academics, Student Supports, and Extracurricular Activities
 - 2.3 Athletics
3. School Operations
 - 3.2 Nutrition
 - 3.3 Facilities
 - 3.4 Safety and Security
5. Accountability and Information Systems
 - 5.3 Information Technology
 - 5.3.1 IT Service Delivery

*Scope areas listed above were requested by the APS Executive Director, OIC

Conclusion

Overall, APS has areas of opportunities for improvement regarding complying with **APS OnCourse: Comprehensive Strategies to Return + Learn for Fall 2020** guidance. Our review found that all locations made an effort to comply with the requirements. However, inconsistencies were noted from location to location pertaining to the implementation of the APS guidelines.

While there are process improvement opportunities identified, our review determined there is no evidence of an exception that would prohibit any of the locations from becoming compliant, and in some instances, exceeding the district's expectations. Rausch has identified areas of improvement within this report that should be reviewed to help ensure a safe and successful return to school for the students and staff for the 2021/2022 academic year.

Our assessment methodology and results are provided in the sections below. In addition, detailed results for each location are provided through the Power B.I. Application and associated work papers.

Assessment Methodology

Rausch's customized assessment approach and methodology for the APS Assessment included the following:

- Create assessment tool
- Site visits to capture the findings, observations, evidence documents/images, and comments into the Rausch Assessment Solution ("RAS") application
- Inform Executive Director, OIC of issues warranting immediate attention
- Interface RAS data to Power B.I. platform

We interviewed principals, assistant principals, business managers, custodians, teachers, nutritionist/cafeteria personnel, nurses, screeners, and athletic directors to understand better the activities observed and performed.

Compliance Ratings

Table 1 shows the Compliance Ratings with definitions and examples created to appropriately ascertain the level of compliance with APS’s documented expectations.

Level	Definition	Example
1 – Does Not Meet	Location is not in compliance with documented expectation	No PPE in Location
2-Partially Meets	Location is partially in compliance with documented expectation	Temperatures were taken of some but not all
3-Meets	Location is fully compliant with documented expectation	Gloves used when passing out food
4-Exceeds	Location is fully compliant and exceeds documented expectation	Staff is aware of expectation, recites expectation verbatim, and produces evidence
5-Not Verified / Not Applicable	Auditor was unable to verify documented expectation or expectation did not apply to “x” given location	N.V. = Custodian was unavailable for the day to provide documentation of cleaning. N.A. = only at high school; not at elementary schools

Table 1

Each observation or activity performed was given a compliance rating against the documented expectation extracted from the *APS OnCourse: Comprehensive Strategies to Return + Learn for Fall 2020* document. Photo evidence was taken of the requested documentation as proof of compliance. **NOTE:** Special care was taken to ensure photos of children and staff could not be identified.

Technology

Rausch leveraged technology to facilitate efficient site visits and built executive dashboard reporting. Rausch loaded the assessment program into our Rausch Assessment Solution “RAS” to provide a Software as a Service-based platform to perform on-site assessments.

This allowed the auditors to assess the environment and capture data uploads such as documentation evidence and photo evidence directly into the platform, reducing the upload time as the evidence is automatically mapped to the work papers and the Executive BI dashboards.

Rausch leveraged Microsoft Power B.I. to analyze the collected data and generate reports reflecting the level of compliance by facility, location, or by reporting structure determined by APS. Reports include data dashboards, charts, and graphs that will help APS see what guidelines are being implemented and which ones have not been implemented.

Domain Assessment Results

Health and Safety

The Health and Safety domain consists of guidelines related to the physical health and safety of students and faculty including temperature/general health screening, personal protective equipment, social distancing, and Covid – 19 case tracing.

Summary Location Results:

Meets: 65

Partially Meets: 11

Areas of Concern:

- Documentation/ Recording/ Retention
- Isolation Room
- HVAC/Air Purifiers
- Screening
- Organizational Communication
- Training
- Thermometer
- Signage

Observations:

In requesting the documentation needed to complete the location assessment, the auditors noted that documentation was missing and lacked some of the required detail. The locations observed were inconsistent with the methods used to complete documentation. Additionally, there was no documentation provided from the contracted 3rd parties that performed deep cleaning on Wednesdays in the schools or other 3rd party vendors utilized throughout the school year.

Isolation rooms were present in most of the schools. Several of the observation rooms did not comply with the APS Isolation Care Room Guidance. One of the criteria for an isolation room is that it must be “in a controlled room with the door closed and adhere to social distancing and wear facemask at all times. They should have access to a dedicated restroom”. Due to the isolation room considerations, several schools utilized spaces such as the gym, cafeteria, teacher break room, and other areas that would not be compliant with the APS standard to be in a controlled environment.

The auditors could not inspect or validate the presence of an HVAC system that complied with the APS standards regarding isolation rooms.

Some form of screening took place at each of the locations where reviews were conducted. However, the level of documentation regarding screenings and methods used to perform the screening varied from location to location. In addition, it was noted that locations were missing barriers in the location that the screenings occurred. Several of the locations where barriers were not used also lacked the use of proper personal protective equipment.

The screening method used at the car was implemented in some schools and was reported to be an effective method of catching and capturing suspected Covid-19 symptoms that occurred with the student(s). However, the APS Covid – 19 Symptoms Screening Log was not utilized to track screening information consistently.

Inconsistencies were noted in how APS guidelines were implemented as a result of gaps in communication regarding the proper application of the APS guidelines. School faculty were uncertain of which guidelines to follow due to inconsistent and changing communication from APS leadership.

Documentation regarding proper training was not retained at most schools. The training was to be completed for specific school staff (i.e., screeners) to comply with APS guidelines.

Auditors observed the use of various types of non-contact thermometers throughout their visits. The auditors noticed staff using the devices in various manners, including improperly utilizing them by contacting the individual's head. APS guidance states that the thermometer was to be cleaned between uses if contamination occurred. The auditors noted that they rarely observed the cleaning of thermometers after contamination. When cleaning occurred, it was often performed with wipes that did not meet manufacturer's guidance. The guidance required that 95% alcohol wipes be used to clean the thermometers. Auditors observed screeners used 70% alcohol wipes to clean thermometers.

The signage observed by the auditors was mainly following the APS guidance. However, occurrences were noted of improper signage that would not inform students and faculty of the proper social distancing protocols.

Potential Risks:

Risks associated with the Health and Safety domain include:

- Lack of appropriate documentation of incidences, temperatures, training, and Covid-19 case tracking may result in non-compliance with APS guidelines
- COVID-19 may spread due to isolation rooms that do not adhere to APS guidelines
- A COVID-19 case possibly going undetected as a result of an ineffective screening process
- Thermometers may render faulty readings if not properly cleaned
- Proper social distancing may not occur
- Increase possibility that undocumented incidences are not contained properly

[Academics, Student Support, and Extracurricular Activities](#)

The Academics, Student Support, and Extracurricular Activities domain consist of guidelines related to the resumption of athletic activities, curriculum production, and attendance policies.

Summary Location Results:

Meets:8
Partially Meets: 1
Not Verified: 67

Areas of Concern:

No areas of concern were noted due to limited athletics activities at the schools.

School Operations

The School Operations domain consists of guidelines pertaining to student transportation, facilities maintenance, and the preparation and distribution of student meals.

Summary Location Results:

Meets: 46
Partially Meets: 30

Areas of Concern:

- Signage
- 3rd Party Vendors (cleaning)

Observations:

There were occurrences of signage that were not correctly posted. The signage was either missing or on the floors where required. Signage was not always posted by the elevators. And signage did not indicate the number of people who could occupy a given space.

The cleaning log from 3rd party cleaning vendors was not available and could not be inspected by the auditors. Therefore, there was no evidence that the scheduled cleaning occurred.

Potential Risks:

- Students and faculty may not adhere to the APS guidelines related to social distancing
- The possibility that school cleanings are not conducted in accordance with the APS guidelines

Accountability and Information Systems

The Accountability and Information System domain consist of guidelines related to student data and the technology and equipment needed to conduct remote learning.

Summary Location Results:

Meets: 8
Partially Meets: 67
Not Verified: 1

Areas of Concern:

- I.T. Asset Tracking

Observations:

Auditors were rarely able to receive evidence of the completed and signed APS Technology Agreement. Auditors were not provided with any form of documentation to determine how many devices had been issued, to whom, and the locations. Without accurate records of the devices that are assigned and acknowledgement of receiving those devices, it becomes difficult to validate that each student is not sharing a device in accordance with the guidance. Additionally, reclaiming inventory becomes progressively more difficult without the receipt being signed by the receiving party.

Potential Risks:

- The possibility that each student is not using his or her device in accordance with the APS guidance
- Students/parents may not return the schools assets when the school year is complete

Overall Recommendations

Documentation:

Maintain appropriate documentation in accordance with APS Record retention policy.

Training:

Document and retain training logs and other evidence of training provided to the school staff.

APS Isolation Rooms:

Isolation rooms should be set up according to the instructions outlined in the APS Isolation Care Room guidance. The room should be assessed and approved by APS leadership before the room is used.

HVAC Maintenance:

An assessment should be performed to ensure that ventilation to the isolation rooms is operating properly and increase circulation of outdoor air within the facility.

Screening Process:

Re-evaluate and standardize the expectations in the APS guidance document regarding screening processes. Document retraining efforts with hands-on exercises to demonstrate and prove comprehension and understanding of what is expected of screeners/security personnel.

Communication:

Develop a consistent method and process for communicating updates to Covid-19 guidance, communicate the changes to the appropriate faculty, and document the receipt of the communication and agreement to implement the necessary changes.

Thermometers:

Thermometers should be cleaned in accordance with manufacturers' guidance.

Signage:

APS facilities management should perform a walkthrough of all the schools to measure and ensure expected placement of the signage as instructed for proper social distancing per current APS guidance.

Inventory Asset Control:

Local school administration should develop and track inventory of the assets provided to students.

References

APS OnCourse: Comprehensive Strategies to Return + Learn for Fall 2020:

<https://www.atlantapublicschools.us/Page/65113>

APS Isolation Care Room Guidance Updated – 10/15/2020:



APS Isolation CARE Room Guidance Updated.pdf

APS Record Retention Policy:



20140521 AtlantaPublicSchoolsRetentionSchedule - Approved.pdf

Assessed Locations List:



School Visit
List.xlsx