



# Board of Education Informational Report

## MEMORANDUM

**Date:** November 6, 2018

**To:** Board of Education

**From:** John Burnham, Senior Director, Environmental Health & Safety  
Dan Jung, Senior Director, Office of School Modernization

**Subject:** Health, Safety & Accessibility Short-Term Plans

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The Office of School Modernization has developed Short Term Plans (STP) for each of the 8 identified Health and Safety scope categories:

<b>Category</b>	<b>Page #</b>	<b>Original Bond Budget</b>
Accessibility Improvements	2	\$10,000,000
Asbestos Removal or Encapsulation	7	\$12,000,000
Fire Alarms and Sprinklers	10	\$25,849,990
Lead Paint Stabilization	13	\$16,623,936
Radon Mitigation	24	\$1,126,125
Roofs-Seismic Strengthening	26	\$50,907,949
Security Improvements	30	\$5,000,000
Water Quality Improvements	34	\$28,492,000
		<b>\$150,000,000</b>

The STPs are provided to outline the scope of the work, identify the prioritization criteria for each scope of work, and overview recent and active projects. Each of the STPs are crafted in the format approved by the Health, Safety & Accessibility Board Subcommittee on June 6, 2018:

- A. Original Bond Proposal
- B. Assessment Process Description
- C. Early Project – Readily Available Projects
- D. Prioritization Criteria and Process
- E. Scope
- F. Health and Safety Program Bundling
- G. Action Plan
- H. Communications Plan

The most current information and data were used to create each STP. All STPs will be reviewed annually for updates based on new assessments and data.

## **Accessibility Improvements Short-Term Plan**

### **Original Bond Proposal**

- The 2017 capital bond passed by voters in the PPS District allocated \$10 million to improve accessibility for people with disabilities in District schools. The accessibility improvements to be completed with this funding is in addition to the work that will be completed in the four school modernization projects in the 2017 capital bond program (Benson Polytechnic HS, Lincoln HS, Madison HS, Kellogg MS) to make these buildings fully accessible.
- The capital bond funding for accessibility improvements allows the District to complete more work that it is responsible for under the 1990 American's with Disabilities Act (ADA) as amended. The forthcoming ADA Transition Plan will identify the general categories of work the District needs to perform in each school to make the educational programs in each school accessible to all students and users of each building. Additional District resources beyond the current capital bond funding will be required to make all District facilities fully compliant with accessibility requirements.

### **Assessment Process Description**

- 2009 & 2012 Facility ADA Assessments
  - PPS Facilities and Asset Management (FAM) contracted with Ankrom Moisan Architects (AMA) in 2009 to complete an ADA facilities assessment for all District facilities. AMA updated the assessment in 2012-2013 and developed a prioritization of program-based ADA improvements with cost estimates for PPS FAM. The PPS 2012 capital bond program ADA improvements were informed by the 2012-13 AMA assessments and prioritization study.
  - FAM staff have updated the 2012 ADA assessment (Section D of the survey) to capture ADA work accomplished as part of the 2012 capital bond program.
- ADA Transition Plan Update
  - PPS developed an ADA Transition Plan (Transition Plan) in 1994 in response to the passage of the ADA in 1990. The Transition Plan established initial goals for eliminating architectural barriers at identified facilities. This plan was developed in conjunction with the City of Portland, but never adopted by the PPS Board of Education.
  - Additional updates to the 1994 PPS ADA Transition Plan will be made to capture information from the current facility condition assessment as well as changes to programs and activities, methodologies, priorities and schedules since 1994.

## **Early Projects - Readily Available Projects**

- 2012 ADA Assessment Field Updates
  - The Office of School Modernization (OSM) project team members performed field updates of 2012 ADA Assessment to refine the scope of individual ADA improvements projects completed as part of the 2012 and 2017 capital bond program.
  - Three schools, Roseway Heights, Rose City Park and Tubman were selected for early accessibility projects.

## **Prioritization Criteria and Process**

- 2017 Capital Bond: Early Projects
  - Accessibility improvements funded by the 2017 capital bond are largely in conjunction with 2017 “early” projects and in support of the middle school conversion project. The scope of ADA improvements funded by the 2017 capital bond is largely based on the work identified in the 2012 ADA facility assessment. Prioritization for the scope of work completed in the 2017 projects is based on the prioritization in 2012 Facility ADA Assessments.
  - Minor revisions made to the scope of 2012 projects are based on more recent field observations by OSM and input from building staff.
- ADA Transition Plan Update:
  - Draft ADA Transition Plan update will propose an emphasis on making one elementary, middle and high school in each high school cohort fully accessible
  - Prioritization within each cohort takes into consideration other capital bond funded accessibility improvements (modernization projects) and the scale of the accessibility needs for each school
  - Completion of the ADA Transition Plan scope/schedule of projects to be completed by capital bond and general fund dollars (Facilities and Asset Management)
  - Formal direction to be set by Board of Education upon adoption of upcoming ADA Transition Plan update
  - ADA Transition Plan to be further refined upon completion of Facility Condition Assessment

## **Scope**

- 2017 Capital Bond ADA work – “Early” Projects
  - The Office of School Modernization has included accessibility work in the scope of the Health and Safety Improvements “Early Project” work. The scope of the accessibility work was taken from the 2012 ADA facilities assessment with field verification by OSM project management and the project architects. The scope of the accessibility work for HS&A Groups 2, 3 and 4 for the 2018 summer work included:

<b>School</b>	<b>ADA Scope</b>
Beverly Cleary Fernwood	Improve accessibility from parking lot; add lift nest to auditorium exit; add accessible double handrail; add lift to in media center; add accessible door handle hardware; provide accessible toilet stall partitions; ensure exit/entry doors are compliant with width and clearance requirements; accessible improvements to locker rooms; adjustments (as needed) to drinking fountain and sink heights; provide assisted listening devices in cafetorium, west gym and SPED classroom; accessible signage
Jackson	New exterior handrails and guardrails, access controls, interior stair handrail improvements, lever door hardware, accessible toilet stalls, drinking fountains and plumbing fixtures, signage, listening devices; improved accessible parking areas
King	Elevator; new exterior handrails and guardrails, access controls, interior stair handrail improvements, lever door hardware, accessible toilet stalls, drinking fountains and plumbing fixtures, signage, listening devices, and improved accessible parking areas
Lewis	New exterior handrails and guardrails; access controls,; interior stair handrail improvements; lever door hardware; accessible toilet stalls; drinking fountains and plumbing fixtures; signage, listening devices; improvement accessible parking.
Rigler	Elevator; new exterior handrails and guardrails, access controls, interior stair handrail improvements, lever door hardware, accessible toilet stalls, drinking fountains and plumbing fixtures, signage, listening devices, and improved accessible parking areas will be installed to improve accessibility

- 2017 Capital Bond ADA work – Middle School Conversion project
  - The ADA improvements required by improvements to Tubman Middle School, Roseway Heights Middle School and Rose City Park School as part of the Middle School Conversion project were also funded by the 2017 Capital Bond. The scope of accessibility improvements in these projects included:

<b>School</b>	<b>ADA Scope</b>
Roseway Heights	ADA: wall removal to accommodate larger restroom for SPED ADA: change key access to push call on existing elevator SPED: demolish three existing offices to create Supplement Education Services SPED room
Rose City Park	ADA: install three chairlifts to create accessible stairways to all floors and stage; install two elevators; modify restrooms in eight locations to make them accessible; addition of exterior accessible ramps and auto-operators at main entrances; replace door hardware; replacement/upgrade to 10 door openings to allow at least two fully accessible egress paths
Tubman	ADA: Door hardware replacement; restroom ADA upgrades SPED: Classroom programmatic requirements

The scope of accessibility improvements in the early projects and middle school conversion project encompass the budget resources for accessibility improvements of the 2017 capital bond.

### **Health and Safety Program Bundling**

- Bundling additional health and safety work with accessibility improvements, as appropriate, will take place over the summer construction season.
  - Example: performing accessibility improvements while performing security and roof upgrades at a school.

### **Action Plan**

- 2017 Capital bond program - OSM
  - Completion of accessibility work in early projects – fall 2019
  - Completion of accessibility work in middle school conversion project: Rose City Park stair lifts (end of 2018 calendar year); Rose City Park elevators (summer 2019)
- ADA Transition Plan Scope Completion - FAM
  - Complete ADA Transition Plan – fall 2018
  - Update Transition Plan upon completion of the facility condition assessment
  - Design/bid/build work to sequentially complete ADA Transition Plan scope of work through annual budgeting

## **Communication Plan**

- Early projects: communication with affected schools and programs about construction work; schools communicate with staff, parent and students about changes in each building that improve accessibility
- ADA Transition Plan: Board of Education public notice of board meeting(s) about adoption of plan

## Asbestos Removal or Encapsulation Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health, Safety & Modernization Bond provided \$12,000,000 for removal or encapsulation of exposed asbestos in up to 48 schools.
- **Assessment Process Description**
  - The assessment used for defining and prioritizing the large-scale asbestos work for the 2017 bond projects is based on bi-annual and 3-year asbestos material re-inspections and physical assessments of all asbestos containing building materials in District facilities. These assessments have been conducted in all District facilities since 1980 and are updated annually. Using these assessments approximately 60 sites have been identified that are currently being further assessed for prioritization of work based on the criteria and process as listed below.
- **Early Projects – Readily Available Projects**
  - The survey and design process for asbestos abatement have been completed for the following sites: Beaumont, Chapman, Jefferson, Ockley Green, Tubman, Rose City Parks, and Vernon. A total of 4 large scale asbestos abatement projects will be completed during the summer of 2018. (Table 1)
- **Prioritization Criteria and Process**
  - The priority for choosing the specific facilities and asbestos materials to be addressed is based on the degree of hazards that were found during the bi-annual and 3-year asbestos inspections and the safety of students and staff, using the following criteria;
    - Remove or repair severely damaged or moderately damaged asbestos containing materials.
      - The majority of asbestos containing building materials in this category include structural spray on fire proofing, piping, air duct, and boiler insulation. These materials are typically located in mechanical rooms, attics, tunnels, and crawl spaces.
    - Remove asbestos containing building materials that are considered highly or easily accessible to students and staff.
      - The majority of asbestos containing building materials in this category include floor and wall tiles, and piping insulation in frequently occupied spaces.

- **Scope**
  - Current priority group (Table 1)
    - Beaumont, Chapman, Jefferson, Ockley Green, Tubman, Rose City Parks, and Vernon.
  - Approximately 8 – 12 additional sites (Table 1) are currently being assessed and scheduled for completion over the summer of 2019.
  - The development of further priority groups will be based on the assessments and prioritization criteria listed above and discussion with maintenance staff.
- **Health and Safety Program Bundling**
  - Bundling additional health and safety work with asbestos removal projects, as feasible, will take place over the summer construction seasons to limit building closures and impact.
    - Example is doing large scale asbestos removal work during a roofing replacement project.
    - This type of project bundling will lessen impact to site and facilities and building closures over multiple summers.
- **Action Plan**
  - The goal is to complete approximately 6-10 large scale projects over summer breaks and infill multiple smaller scale projects throughout the next several years. Numerous other small-scale asbestos related work is currently being performed in conjunction with facilities and maintenance projects. In addition, asbestos removal work will be performed over the course of the bond in other bond funded construction projects that impact asbestos materials during construction or remodel.
- **Communication Plan**
  - Informational flyers will be provided to building staff which detail the building impacts or closures and safety information regarding asbestos removal prior to work on site. Additional asbestos project information and updates will be provided on the District's OSM Bond Project web-page.

**Table 1**

**LARGE - SCALE ASBESTOS REMOVAL PROJECTS TIME LINE**

<b>PHASE - 1</b>	
<b>YEAR</b>	<b>SCHOOL</b>
2018	Chapman (Flooring)
	Jefferson
	Rose City Park
	Tubman
<b>PHASE - 2</b>	
<b>YEAR</b>	<b>SCHOOL</b>
2019	Beaumont
	Chapman (Crawl Space)
	Ockley Green
	Rigler
	Sitton
	Vernon
<b>PHASE - 2 / 3 (Additional Sites Under Assessment)</b>	
<b>YEAR</b>	<b>SCHOOL</b>
2019 - 2020	Creston
	Divinci / Monroe
	Dunnaway
	Fernwood
	Glenco
	Grant
	Hosford
	Irvington
	James John
	Lane
	Lent
	Marysville
	Richmond
	Vestal
	Woodstock

## Fire Alarms and Sprinklers Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health and Safety Bond set aside \$25,849,990 for fire alarm and suppression upgrades for up to 16 schools. However, after the bond passed this was increased to 30 schools (Table 1) to assist with compliance with an intergovernmental agreement (IGA) with the City of Portland. Because of the increase in the number of schools, priority will be placed on upgrading fire alarms versus sprinkler systems (see Prioritization Criteria and Process section).
- **Assessment Process Description**
  - PPS Facilities and Asset Management (FAM) completed an assessment of all district fire alarms in response to an intergovernmental agreement (IGA) with the City of Portland. The IGA focuses exclusively on fire alarm upgrades for 76 schools with a deadline of 2020.
- **Early Projects — Readily Available Projects**
  - Prior to the 2017 bond, fire alarm upgrades were accomplished for Roseway Heights, Boise Eliot, Hosford, James John, Ainsworth, Faubion, Franklin and Roosevelt. Design is completed for Rigler and bid date is scheduled for January 2019.
  - Beverly Clearly –Fernwood, Lewis and King (Table 1) were the first three schools upgraded by OSM under the 2017 bond.
- **Prioritization Criteria and Process**
  - The City of Portland IGA prioritized schools based on the condition of the schools fire alarm notification system. This prioritized each school on the basis of risk to students and staff. The IGA does not address fire suppression which focuses on protection of property.
  - OSM Bond Team will re-evaluate and update recommended priorities and will work closely with FAM as progress is made at upgrading the remaining 27 sites (Table 1).
- **Scope**
  - Table 1 presents the schedule for all 30 schools fire alarm systems to be upgraded under the 2017 Bond.
- **Health and Safety Program Bundling**
  - Bundling additional health and safety (asbestos, accessibility, etc.) work with fire alarm and sprinkler installs will take place over 2019 summer construction season at Rigler, DaVinci, Lee, Jefferson & Maplewood.
- **Action Plan**
  - Two-year plan

- OSM completion of the remaining 27 fire alarm upgrades by December 31, 2020 to comply with the City of Portland IGA.
- Communications Plan:
  - Extensive upfront communication with school leadership and staff concerning the scope of each project. Additional communication on the status of each project prior to start of school year.
  - Table 1 will be posted on our website with info about re-assessing every 6 months. This list is subject to changing conditions and priorities.

## Proposed Sequence and Schedule for Fire Alarm/Sprinkler System Upgrades

	Year	School	Complete
<b>2018-19 Bond Improvement Projects</b>			
1	2018	Beverly Cleary –Fernwood	x
2	2018	Lewis	x
3	2018	King	x
4	2019	Rigler	
<b>2019 Bond Improvement Projects</b>			
5	2019	Anisworth Annex	
6	2019	De Vinci	
7	2019	Green Thumb	
8	2019	Jefferson	
9	2019	Lee	
10	2019	Maplewood	
11	2019	West Sylvan	
<b>PPS Fire Alarm upgrades – 9 Schools Package A</b>			
12	2019/2020	Astor	
13	2019/2020	Kenton	
14	2019/2020	Vernon	
15	2019/2020	Laurelhurst	
16	2019/2020	MLC	
17	2019/2020	Meek	
18	2019/2020	Beaumont	
19	2019/2020	Fernwood	
20	2019/2020	Sabin	
<b>PPS Fire Alarm upgrades -10 Schools Package B</b>			
21	2019/2020	Atkinson	
22	2019/2020	Forest Park	
23	2019/2020	Gray	
24	2019/2020	Lent	
25	2019/2020	Markham	
26	2019/2020	Richmond	
27	2019/2020	Stephenson	
28	2019/2020	Abernethy	
29	2019/2020	Grout	
30	2019/2020	Harrison Park	

Sprinkler system upgrade only.

# Lead Paint Stabilization Short-Term Plan

## Original Bond Proposal

- The 2017 Health and Safety Bond set aside \$16.6 million for lead paint stabilization at 88 facilities based on expected costs which includes the paint stabilization, project oversight, testing, and materials.

## Assessment Process Description

- The assessment used for defining and prioritizing the lead paint stabilization work for the 2017 bond projects is based on Housing and Urban Development (HUD) level site assessments by PBS certified Lead Paint Assessors completed for PPS sites between November 2016 and May 2017. These assessments identified approximately 10,000 areas of visually deteriorated paint and varnish on interior and exterior surfaces of buildings and adjacent soil throughout the district.

## Early Projects- Readily Available Projects

- Prior to the implementation of the current lead paint stabilization strategy, several painting projects were completed in the district. These included:
  - November 2016 - May 2017: During the course of the assessment, emergency stabilization/clean-up projects were completed at 17 sites that were considered very-high risk.
  - Summer of 2017: Exterior painting projects were completed at four sites using contract painting firms. These sites were chosen based on the assessment reports and type of exterior cladding.
  - Summer 2017 - Spring 2018: Completed interior painting in all occupied areas at three sites (James John, Sabin, Skyline)

## Prioritization Criteria and Process

- A priority ranking spreadsheet was developed using the data included in the assessment reports. Sites were ranked based on the HUD assessment guidelines that consider age of occupants (age six and younger are higher risk) in classrooms and common areas and location of paint deterioration (accessibility to children, above or below 5 feet). Additional considerations employed for ranking include amount of damage as a ratio of deterioration to total square footage of the building and whether paint chips were present in soil. Due to the scale of the project the scope of work has been broken into four phases (Phase I-IV). These four phases are based on the risk to students where Phase I is the highest risk. Schools within each phase have been prioritized based on the priority ranking system discussed above. Paint stabilization projects will be carried out beginning with Phase I as outlined below:

- PHASE I - Pre-Kindergarten through second grade (PreK-2) classrooms and common areas on building interiors with deteriorated paint surfaces below 5-feet.
- PHASE II - Exterior accessible areas with deteriorated paint or paint chips in soil frequented by PreK-2 students.
- PHASE III – 3rd-12th grade classrooms and common areas on building interiors with deteriorated paint surfaces.
- PHASE IV - Exterior accessible areas with deteriorated paint or paint chips in soil not frequented by children age 6 and under.

See attached table “Deteriorated Paint Stabilization – Task Phasing” for the order that locations will be addressed. More detail regarding the paint program including phasing and prioritization are included in the Lead Paint Stabilization Strategy dated May 23, 2018 available in the Office of School Modernization.

**Scope:**

- In the fall of 2017 PPS hired 5 internal paint staff to begin work on lead paint stabilization. In addition to the 3 interior painting projects noted in the section Early Projects – Readily Available Projects the paint crew is working on the following projects:
  - Currently the Priority 1 group within Phase I (effective July 2018).
    - Beach, Odyssey (East Sylvan), Winterhaven, Applegate, Laurelhurst, Marysville, Woodlawn (scheduled for completion Oct. 15, 2018)
  - Additional Phase I work at 10 locations in Priority 2 group (Fall 2018)
- All remaining locations identified as “deteriorated” in the PBS assessment reports will be addressed based on student risk (Phases I-IV and Priority 1-9).

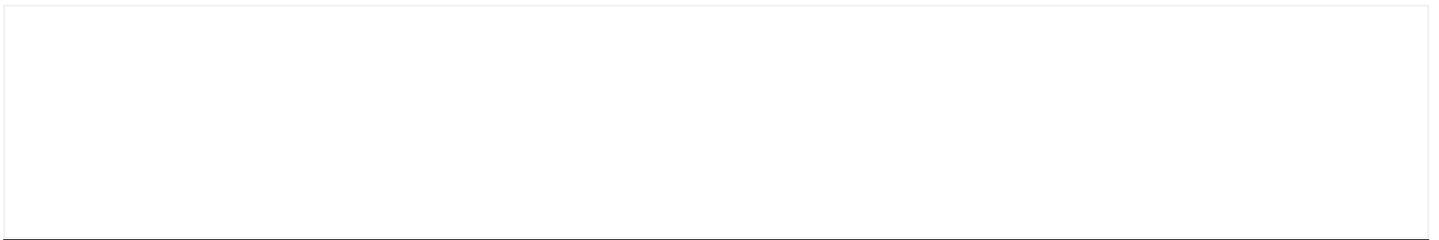
**Health and Safety Program Bundling:**

- Bundling additional health and safety work with roof replacement/seismic, fire alarm/sprinkler or asbestos removal projects, as feasible, will take place over the summer construction seasons to limit building closures and impact.
  - Example is doing large scale paint stabilization projects during a seismic or fire sprinkler project.
  - This type of project bundling will lesson impact to site and facilities and building closures over multiple summers.

**Action Plan:**

- The goal is to complete all Phase I locations during the 2018-2019 school year. In addition to the PPS bond paint crew completing paint stabilization projects, EPA certified RRP painting contractors will be utilized to

accelerate and complete all paint stabilization projects. Following the completion of Phase I project locations Phase II – IV projects locations will continue over the next several years. In addition, paint stabilization work will be performed over the course of the bond in other bond funded construction projects that impact lead containing painted surfaces during construction or remodel.



## Deteriorated Paint Stabilization - Task Phasing

Phase	Priority	School/Site	
<b>Phase I</b>	<b>Priority 1 PK-2nd Grade Locations (Interior)</b>	Odyssey / E. Syvan Site	
		Beach	
		Winterhaven	
		Applegate	
		Laurelhurst	
		Marysville	
		Woodlawn	
	<b>Priority 2 PK - 2nd Grade Locations (Interior)</b>	Grout <sup>3</sup>	<sup>1</sup> - Main Building at these sites completed as part of Group 4
		Sacajawea <sup>2</sup>	
		King <sup>3</sup>	
		Whitman <sup>3</sup>	
		Kelly (Center) <sup>1,3</sup>	<sup>2</sup> - Only PK program locations. Other locations in building addressed in Phase II
		Sitton <sup>3</sup>	
		Marshall <sup>2</sup>	
		Creston (Annex) <sup>1</sup>	<sup>3</sup> - PK - 2nd locations. Other locations in building addressed in Phase II
		Jackson <sup>2</sup>	
		Lane <sup>2</sup>	
	Madison <sup>2</sup>		
	<b>Priority 3 PK - 2nd Grade Locations (Interior)</b>	Sunnyside	
		Edwards	
		Duniway	
		Ainsworth	
		Buckman	
		Irvington	
		Metropolitan Learning Center	
		Terwilliger	
		Maplewood	
		Lewis	
		Markham	
		Harrison Park	
Arleta			
Bridlemile			
Alameda			
Rose City Park			
Lee			
Beverly			
Cleary_Fernwood			
Rigler			

		Richmond
		Chapman
		Scott
<b>Phase I</b>	<b>Priority 3 PK - 2nd Grade Locations (Interior)</b>	Faubion @ Tubman Site
		Vernon
		Llewellyn
		Roseway Heights
		Cesar Chavez
		Abernathy
		Peninsula
		Woodstock
		Atkinson
		Kelly
	<b>Priority 4 PK - 2nd Grade Locations (Interior)</b>	Stephenson
		Hayhurst
		Rieke
		Astor
		Glencoe
		Capitol Hill
		Boise Eliot
		Bridger
		Humboldt
		Lent
		Chief Joseph
		Hollyrood
		Creston
		Creative Science (Clark)
		Vestal
		Woodmere
		Holladay Center
		Clarendon
		<b>Phase II</b>
Beach		
Winterhaven		
Applegate		
Laurelhurst		
Marysville		
Woodlawn		
Maplewood		
Lewis		
Markham		

		Sacajawea	
		Kelly	
		Stephenson	
		Rieke	
		Glencoe	
		Sitton	
		Capitol Hill	
		Boise Eliot	
		James John	
		Harrison Park	
		Arleta	
		Sunnyside	
		Edwards	
		Duniway	
		Ainsworth	
		Buckman	
		Bridlemile	
		Alameda	
		Bridger	
		Humboldt	
		Irvington	
		Metropolitan Learning Center	
		Grout	
		Lee	
		Beverly Cleary_Fernwood	
		Rigler	
		Richmond	
		Chapman	
		Scott	
		Vernon	
		Llewellyn	
		Lent	
		Roseway Heights	
<b>Phase II</b>	<b>Priority 5 PK - 2nd Grade Accessible (Exteriors)</b>	Chief Joseph	
		Hollyrood	
		Sabin	
		Skyline	
		Faubion @ Tubman Site	
		Rose City Park	
		Terwilliger	
		Cesar Chavez	

		King
		Whitman
		Abernathy
		Peninsula
		Creston
		Creative Science (Clark)
		Vestal
		Woodmere
		Jackson
		Holladay Center
		Clarendon
<b>Phase III</b>	<b>Priority 6 3rd - 12th Grade Locations (Interior) at K-5, K-8, K-12 Schools</b>	Odyssey / E. Syvan Site
		Beach
		Winterhaven
		Applegate
		Laurelhurst
		Marysville
		Woodlawn
		Sunnyside
		Edwards
		Duniway
		Ainsworth
		Buckman
		Irvington
		Metropolitan Learning Center
		Grout
		Terwilliger
		Maplewood
		Lewis
		Markham
		Sacajawea
		Atkinson
		Harrison Park
		Arleta
		Bridlemile
		Woodstock
		Alameda
		Lee
Beverly Cleary_Fernwood		
Rigler		
Richmond		

<b>Phase III</b>		Chapman
		Scott
		Vernon
		Llewellyn
		Faubion @ Tubman Site
		Rose City Park
		Cesar Chavez
		King
		Whitman
		Abernathy
		Peninsula
	Kelly	
	<b>Priority 6 3rd - 12th Grade Locations (Interior) at K-5, K-8, K-12 Schools</b>	Stephenson
		Hayhurst
		Rieke
		Astor
		Glencoe
		Sitton
		Capitol Hill
		Boise Eliot
Bridger		
Peninsula		
Lent		
Chief Joseph		
Creative Science (Clark)		
Vestal		
Woodmere		
Creston		
Jackson		
Clarendon		
<b>Priority 7 6th - 12th Grade Locations (Interior) at Middle and High Schools</b>		Rice
	Green Thumb	
	Marshall	
	Kenton	
	Benson	
	Columbia	
	Da Vinci	
	Jefferson	
	Lane	
	Lincoln	
	Wilson	
West Sylvan		

		Beaumont
		Sellwood
		Alliance (Meek)
		Cleveland
		Ockley Green
		Youngson
		George
		Madison
		Hosford
		MtTabor
		Gray
		Holladay Annex
		Wilcox
<b>Phase IV</b>	<b>Priority 8 3rd - 12th Grade Locations (Exterior) at K-5, K-8, K-12 Schools</b>	Odyssey / E. Syvan Site
		Beach
		Winterhaven
		Applegate
		Laurelhurst
		Marysville
		Woodlawn
		Maplewood
		Lewis
		Markham
		Sacajawea
		Kelly
		Atkinson
		Stephenson
		Rieke
		Glencoe
		Sitton
		Capitol Hill
		Boise Eliot
		James John
		Harrison Park
		Arleta
		Sunnyside
		Edwards
		Duniway
Ainsworth		
Buckman		
Bridlemile		
Woodstock		
Alameda		

		Bridger
		Peninsula
		Irvington
		Metropolitan Learning Center
		Grout
		Skyline
		Sabin
		Lee
		Beverly Cleary_Fernwood
		Rigler
		Richmond
		Chapman
		Scott
<b>Phase IV</b>	<b>Priority 8 3rd - 12th Grade Locations (Exterior) at K-5, K-8, K-12 Schools</b>	Vernon
		Llewellyn
		Lent
		Chief Joseph
		Faubion @ Tubman Site
		Rose City Park
		Terwilliger
		Cesar Chavez
		King
		Whitman
		Abernathy
		Peninsula
		Creative Science (Clark)
		Vestal
		Woodmere
		Clarendon
		Creston
	Jackson	
	<b>Priority 9 6th - 12th Grade Locations (Exterior) at Middle and High Schools</b>	Rice
		Green Thumb
		Marshall
		Kenton
		Benson
Columbia		
Da Vinci		
Jefferson		
Lane		
Lincoln		

		Wilson	
		West Sylvan	
		Beaumont	
		Sellwood	
		Alliance (Meek)	
		Cleveland	
		Ockley Green	
		Youngson	
		George	
		Madison	
		Hosford	
		MtTabor	
		Gray	
		Holladay Annex	
		Wilcox	

## Radon Mitigation Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health and Safety Bond secured \$1.1 million for mitigating radon in up to 90 schools. 2016 radon tests provided information indicating this amount of money would cover radon mitigation, where required, district-wide.
- **Assessment Process Description**
  - In response to the passage of ORS 332.345, PPS began testing all schools for radon during the 2016-2017 winter heating season, before the 2017 bond.
- **Early Projects – Readily Available Projects**
  - Per OHA (Oregon Health Authority) testing protocol, rooms verified by two short-term tests to have high levels (over 8 pCi/L) were the early (first) mitigation projects at Lent and Meek.
- **Prioritization Criteria and Process**
  - Per OHA testing protocol, rooms verified by one short-term and one nine-month long-term test to have mid-range levels (4 - 8 pCi/L) were prioritized as the second group of radon mitigation projects.
  - Schools having undergone major remodeling are prioritized for testing in a winter heating season after construction is completed.
  - All schools requiring testing or mitigation are receiving work during the winter heating seasons.
- **Scope**
  - Throughout 2017 and 2018, 20 permanent radon mitigation systems were installed in rooms at 16 schools – Astor, Beaumont, Edwards, Humboldt, Jefferson, Kelly, Lane, Lent, Marysville\*, Meek, Ockley Green, Peninsula, Roseway Heights, Skyline, Vernon, Wilcox. *\*Marysville design system is in place, final hard pipe system venting will be installed after completion of summer 2019 asbestos abatement.*
  - Efforts will continue to achieve radon mitigation by the end of each winter heating season when determined by testing results.
  - 2018-2019 testing or retesting will take place at César Chávez, Lane, Tubman, Roosevelt, Faubion, Franklin, Green Thumb, BESC, and other locations as determined by OHA protocol.
- **Health and Safety Program Bundling**
  - Direct bundling is not possible. Oregon Health Authority protocol requires radon testing in schools after major renovations.

- Indirect bundling: Modern building code requires radon resistant construction of new and modernized buildings.
- **Action Plan**
  - Continue to determine and achieve all known radon mitigation needs each winter heating season.
  - Further refine long-range schedule of repeat radon testing per OHA protocol, build long-range annual schedule.
    - Every five years where mitigation systems are installed
    - Every 10 years where mitigation was not required
    - Modernized and remodeled schools as completed
  - Post 2017 Bond - Perpetual work per ORS 332.345. Determine annual Risk Management program budget for repeat testing and capital budget for additional mitigation if needed. Determine annual budget for replacement of mitigation system fans at end of service life.
- **Communication Plan**
  - PPS Web – Healthy and Safe Schools page which includes narratives, test results, mitigation system reports, and PPS Radon Testing plan submitted to OHA.
  - Direct messaging to specific school communities. Consult and utilize OHA communications toolkit.
  - Risk Management presentation to the PPS Board of Directors – annual review of the Healthy and Safe Schools Plan.
  - Participation in the NW Radon Coalition

## Roofs-Seismic Strengthening Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health and Safety Bond set aside \$50,907,949 for reroofing up to 14 roofs based on average expected repair/replacement costs.
- **Assessment Process Description**
  - 2009 & 2012 Roof Assessments
    - Professional Roof Consultants performed roof assessments in 2009 & 2012. They reviewed past roof assessment efforts and in 2009 carried out a more detailed assessment of nineteen buildings categorized as Priority 1. In 2012 they evaluated three additional buildings designated as needing more detailed assessments.
    - A total of 23 schools had roof repairs or replacements over 2013-2017 and Grant will be completed in 2019 (see attached table).
- **Early Projects – Readily Available Projects**
  - Design has started for Jackson, Fernwood/Beverly Cleary, Rigler, King/MLK and Tubman (see attached table).
- **Prioritization Criteria and Process**
  - Prioritization is based on the 2009/2012 Roof Assessment reports and input from maintenance personnel. Minor revisions were made to the 2009/2012 Assessment priorities based on field input by the PPS Roofer.
    - Roofs known to have problems based on the surveys or recent events and the age of the roof were the primary criteria used to prioritize the work.
  - Maintenance will re-evaluate after rainy seasons, update recommended priorities and will work hand in hand with the OSM Bond Team and Project Management.
    - Roof evaluation and prioritization will occur every six months.
  - Exact scope and design will be evaluated and established as the engineering firm starts design and performs a detailed site visit and analysis.
- **Scope**
  - Current priority group (effective March 2018)

- Sitton, W. Sylvan, Ockley Green, Kelly, Richmond, Irvington, Duniway, Glencoe, Harrison Park, Chapman (see attached table).
  - Further priority groups will be based on the 2009/2012 roof survey, evaluation by maintenance staff, discussions with OSM and updated every 6 months.
- **Health and Safety Program Bundling**
  - Bundling additional health and safety work with roofing projects, as appropriate, will take place over summer construction season.
    - Example is doing asbestos remediation, alarms and ADA while replacing roof.
    - This will lessen impact on school operations.
- **Action Plan**
  - 3-4 roofs per year – depends on bundling and contractor availability to design and construct new roof.
  - Post 2017 Bond – Additional capital funding and/or next bond.
- **Communications Plan:**
  - Communications to develop description and qualifiers based on OSM input.
  - Current group list to be kept on website with info about re-assessing every 6 months and the list is subject to changing conditions and priorities.

# PPS ROOF REPLACEMENT TABLE\*

Phase I			Complete	Comments
Number	Year	School		
1	2013	Alameda	x	
2	2013	Bridlemile	x	
3	2013	Laurelhurst	x	
4	2013	Lewis	x	
5	2013	Wilson	x	
6	2014	Arleta	x	
7	2014	Boise Eliot	x	
8	2014	Creston	x	
9	2014	Hosford	x	
10	2014	James John	x	
11	2015	Ainsworth	x	
12	2015	Buckman	x	
13	2015	Creative Science/Clark	x	
14	2015	Hayhurst	x	
15	2015	Sabin	x	
16	2015	Stephenson	x	
17	2015	Maplewood	x	
18	2016	Abernethy	x	
19	2016	Cleveland	x	
20	2016	Sellwood	x	
21	2016-17	Roosevelt	x	
22	2017	Faubion	x	
23	2017	Franklin	x	
24	2019	Grant	x	
<b>Phase II (Readily Available Projects)</b>				
25	2018/2019	Jackson		
26	2018/2019	Beverly Cleary Fernwood	x	
27	2018/2019	Rigler		
28	2018/2019	King/MLK	x	
29	2018/2019	Tubman	x	
<b>Phase III</b>				
30		Sitton		
31		West Sylvan		
32		Ockley Green		
33		Kelly (Partial)		

34		Richmond		
35		Irvington		
36		Duniway		
37		Glencoe		
38		Harrison Park (Partial)	<b>UV Tile Areas Only</b>	
39		Chapman	<b>Area around skylight is priority</b>	
<b>Phase IV</b>				
40		Lent	<b>Okay condition</b>	
41		Jefferson		
42		Ainsworth Annex		
43		MLC		
44		Kenton		
45		Roseway Heights (Partial)		
46		Cesar Chavez		
47		Woodlawn		
48		Vernon		
49		Chief Joseph		
50		Gray		
51		Llewellyn		
52		Woodmere		
53		Da Vinci/Monroe		
<b>Phase V</b>				
54		Astor	<b>Recently Done</b>	
55		Bridger		
56		George		
57		Holladay Annex		
58		Markham		
59		Scott	<b>Recently Done</b>	
60		Terwilliger		
61		Winterhaven		
62		Lee	<b>Okay condition</b>	
63		George		
64		Lewis		
65		Mt. Tabor		
66		Pioneer-Columbia		
67		Smith		
*Schools are divided into priority groups (not prioritized within the group).				

## Security Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health and Safety Bond set aside \$5,000,000 for security upgrades in up to 11 PPS schools.
- **Assessment Process Description**
  - NewDawn Security Assessment
    - NewDawn Security conducted a physical security assessment for thirteen representative schools in the summer of 2018. The thirteen schools included four elementary, three K-8, four middle schools and two high schools. Specific schools chosen were Ainsworth, Atkinson, Cleveland, Chief Joseph, Jefferson, Lent, Mt. Tabor, Ockley Green, Sellwood, Stephenson, Sunnyside, Vestal and West Sylvan.
    - The assessment focused on access control, signage, emergency announcement in common areas, fencing, video surveillance and classroom locks. See section on Prioritization Criteria and Process.
- **Early Projects – Readily Available Projects**
  - Under the 2012 Bond, we added interior and some exterior cameras at Franklin, Faubion, Roosevelt and Grant. In addition, Faubion has access control card readers on exterior doors and an intercom system on the front doors. Roosevelt and Grant have vestibules that lead visitors to the main office.
- **Prioritization Criteria and Process**

The following criteria were used to assign a risk ranking of 0-3 to each school for each of the eight criteria below, where a risk ranking of 0-No Rank, 1-Low Rank, 2-Medium Rank and 3-High Rank. The scores are then totaled where the maximum possible score is 24. The higher the score the higher the risk ranking.

- Occurrence of safety and security related incidents in the school – schools with more incidents will get a higher ranking.
- Crime stats for the immediate surrounding community – schools with more community related incidents will get a higher ranking.
- Surrounding area environmental and geographical effects on safety and security (parks, freeways, high crime area, homeless camps, etc.)

- Type of school students (High school, middle school, elementary, SPED, alternative schools, and other vulnerable populations) – Schools with younger students and most vulnerable students will get a higher ranking.
- School design and construction effects on safety and security. Schools with vestibules, and electronic access control already installed (Crime Prevention Through Environmental Design) will be ranked lower. Schools that do not currently have these safety features will be ranked higher.
- Communication and surveillance equipment installed and area of coverage. Schools that have effective communication systems in place/working in all areas will be ranked lower.
- Schools with main offices near the main entry way will be ranked lower and schools with poor office line of sight to the entry way will be ranked higher.
- Buildings/Schools with all the above security items installed will not be on the install list.

The current four cohorts of schools will be used to separate all district schools into five groups and risk rankings will be used to establish the priority of each school within its group (See Table 1).

- **Scope**

The NewDawn Security assessment was used to identify security improvements. Although the 2017 Bond was funded for security improvements at only 11 schools, PPS administration elected to improve security at all schools currently operating PPS school programs. This may present budget challenges requiring new funding or the transfer of funds from fungible 2017 bond accounts. Those improvements are presented below.

- Access control systems at main entry ways.
- Video monitors and support computers for front office areas of schools.
- Public address system speakers in interior and exterior common areas.
- New signage to direct school visitors to the main entry way for required check-in at the main office.
- Securing some outside entryways with fencing and gates.

The final scope will be developed after completing an evaluation of the overall security capability of each PPS school building to identify those schools that currently have some, all or none of these improvements.

- **Health and Safety Program Bundling**

- Security upgrades at some schools may be bundled with other health and safety work.
- Security improvements are anticipated to be conducted on a year-round basis and each project will be scheduled and designed to minimize disruption for staff/students and other health and safety projects.

- **Action Plan**

- Each group of schools will be assigned a construction crew resulting in five crews working simultaneously. Each crew will follow the order presented in Table 1 based on risk ranking.
- Estimated time to complete all security upgrades will be determined after completion of first three schools in each group.

- **Communications Plan:**

- Updates will be presented to the PPS Board as requested.
- District-wide communications will be released at selected milestones (planning stages, construction startup, etc.) to update staff on progress being made on implementation of security improvements for each school.
- Build website and update monthly.
- Create frequently asked questions (FAQ) and update every six months.
- Training for staff on security improvements and the necessary changes in staff behavior (door propping, etc.) to fully utilize improvements will take place simultaneously with completion of improvements at each school.
- PPS Area Assistant Superintendents will be included in the development of district and school communications and training.

Table 1  
School Risk Ranking Sequence by Group

Franklin/Grant-A	Franklin/Grant-B	Lincoln/Roosevelt	Jefferson/Madison	Cleveland/Wilson
Alliance at Meek	Beaumont	George	Harrison Park	Cleveland
Lent	Beverly Cleary - Fernwood	Lincoln	Jefferson	Buckman
Arleta	Irvington	MLC	King	Whitman
Bridger	Green Thumb	Cesar Chavez	Marshall	Wilson
Kelly	daVinci	Astor	Boise-Eliot	Grout
Sunnyside	Youngson/Holladay	Chapman	Madison	Hosford MS
Atkinson	Laurelhurst	Sitton	Ockley Green	Llewellyn
Creston	Sabin	Chapman @ The Ramona	Beach	Abernethy
Franklin	Beverly Cleary - Hollyrood	Clarendon	Chief Joseph	Gray MS
Lane	Alameda	James John	Clark/Creative Science	Sellwood
Woodmere	Tubman	Roosevelt	Rice	Winterhaven
Marysville		Skyline	Woodlawn	Duniway
Mt. Tabor		West Sylvan	Applegate	Hayhurst
Glencoe		Ainsworth	Lee	Lewis
Richmond		Bridlemile	Rigler	Stephenson
		East Sylvan	Vernon	Jackson MS
		Peninsula	Sacajawea	Markham
		Rosa Parks	Vestal	Woodstock
		Forest Park	Scott	Capitol Hill
			Roseway Heights	Maplewood
			Rose City Park	Rieke
			Faubion	Smith
ADMIN - TBD				
Columbia-Transportation				
BESC Admin Site				
Holladay Annex-Admin				
Wilcox-Admin Site				

## Water Quality Short-Term Plan

- **Original Bond Proposal**
  - The 2017 Health and Safety Bond provided \$28.5M to reduce lead contamination in drinking and food preparation water.
- **Assessment Process Description**
  - Beginning in May 2016, nearly all of the cold-water fixtures at PPS facilities district wide were sampled and tested, with the results posted on the PPS Water Quality Website at: <https://www.pps.net/Page/5378>
  - In October 2016, PPS consultant CH2M published “Water Assessment and Gap Report for Reducing Lead in Drinking Water in Portland Public Schools”.
  - This report was followed by a CH2M report “Cost Estimates for Water Fixture and Building Piping Replacement” in January 2017.
  - After working in partnership with PPS to review building records and perform site evaluation, CH2M presented “Portland Public Schools (PPS) Water System Assessment and Proposed Capital Improvement Program” to the PPS Board of Directors in February 2017.
  - On June 14, 2017 CH2M published “Implementation Plan – Fixture and Partial Pipe Replacement” and presented it to the Board.
- **Early Projects – Readily Available Projects**
  - The water quality program applies to all PPS schools and buildings where water is used for human consumption. All PPS facilities were separated into six clusters of schools and a small seventh cluster containing schools and administrative facilities. These clusters were designated Groups 1-7 (see Table 1). Because of the multiple steps to replace fixtures, test water, flush cold water plumbing and potentially perform partial pipe replacement for over 2,000 fixtures, Group 1 was designated as a pilot project to develop standard operating procedures to be used for Groups 2-7.
  - Group 1 Schools – Replace and test only the common area and kitchen food preparation fixtures in all Group 1 schools. Return fixtures to service if below action level (15 ppb lead; 1.3

ppm copper). Evaluate fixtures above or at action level for repairs.

- **Prioritization Criteria and Process**

- Common Areas (Phase 1) – These areas include hallways, cafeterias, libraries, kitchen food preparation and gyms. Common areas will be given priority over classrooms. The only exceptions being those fixtures with mechanical issues (drain issues, low flow, etc.) and those with elevated lead or copper.
- Classroom Areas (Phase 2) – These areas include classroom, CTE rooms and staff areas. Classroom fixtures will be lower priority than common area fixtures and steps will be taken using contractors and custodians to continue to maintain these fixtures in non-functional or inaccessible condition. Testing of these fixtures will begin prior to the start of the 2018/19 school year and those fixtures testing below action level will be returned to service. Those testing at or above action level will be replaced with lead-free fixtures and retested. If a classroom fixture with new lead-free hardware continues to test above action level, consideration will be given to perform partial pipe replacement.
- School Priorities – Schools will be prioritized based on community equity, summer-break accessibility and minimizing travel time for mechanical and testing contractors when possible. All schools and administrative buildings will be selected for placement in one of seven groups (see Table 1), where Group one will be highest priority, followed by Group two, etc. What seems like a simple process of replacing drinking, kitchen and classroom fixtures actually involves several steps because all of these fixtures were turned off in May 2016 or covered. This means that we are unable to conduct testing under conditions of normal usage. Those steps include, but are not limited to: 1) Shut off water to school; 2) Replace fixture; 3) Flush to test new fixture and test drain; 4) Conduct additional repairs as needed; 5) Flush header and lateral lines night before taking samples; 6) Take initial and follow-up flush samples after 8-18 hours; 7) Evaluate results (1-2 weeks); 8) Flush header lines (10 minutes) and lateral lines (1 minute) for fixtures below action level to reactivate usage (school year only); 9) Re-flush fixtures at or above action level;

10) Resample to start mitigation analysis/partial-pipe replacement process; 11) Conduct mitigation for elevated fixtures.

Because PPS has not performed lead-in-water mitigation on this scale, Group one will be deemed a pilot project to establish an efficient process and development of a master standard operating procedure (MSOP) for application on Groups two through seven.

- **Scope (Schools and Schedule)**
  - Phase 1 - Replace and test the common area drinking and kitchen food preparation fixtures in all schools and administrative facilities.
  - Phase 2 - Test all classroom and other drinking fixtures not identified for replacement in Phase 1. Replace fixtures testing at or above action level and repair as needed.
- **Health and Safety Program Bundling**
  - Bundling additional health and safety work with the water quality program will take place as appropriate from an operational, not contractual perspective. Every effort will be made to minimize impact on the learning environment.
- **Action Plan**
  - Implement Phase 1 to provide common area drinking water and kitchen water for food preparation by start of 2018/2019 school year in all schools.
  - Implement Phase 2 to provide classroom drinking water to all schools by end of calendar year 2018.
  - Complete repairs for all Phase 1 and 2 fixtures in schools and administrative facilities by start of 2019/2020 school year.
- **Communication Plan**
  - Step 1 – Communicate with each school. Provide status report, the planned final status, the process required and expected timeline. The intent is to complete required work while minimizing disruption.
  - Step 2 – Prior to start of work at each school, email Principal, Custodian and FOM what they can expect. Follow up with a meeting invitation. Provide contact information, dates and detailed goals concerning number of fixtures and location upon completion. Provide weekly updates summarizing progress and forecasting of future work.

- Step 3 – Execute formal exit plan to document specific achievements and plan to remove bottled water. Provide printed and electronic copies of school maps showing all fixtures and signage.

Table 1  
Water Quality Groups 1-7

Group 1 (Pilot)	Group 2	Group 3
Applegate Astor Chief Joseph Meek Chapman Hayhurst Skyline West Sylvan Atkinson Lewis Richmond Woodstock Beverly Cleary Fernwood Rose City Park Sacajawea	Chavez George James John Ockley Green Boise-Eliot Clarendon Creston Sitton Woodlawn Beach Peninsula Rosa parks Vernon Jefferson King	Irvington Sabin Tubman Alameda Beaumont Hollyrood Laurelhurst Lee Rigler Roseway Heights Scott Cleveland Harrison Park Vestal

Group 4	Group 5	Group 6	Group 7
Lane Lent Holladay Ctr Youngson Benson Bridger Glencoe Sunnyside Creative Sci Maryville Mt. Tabor Woodmere Arleta Kelly Whitman	Capitol Hill Markham Stephenson Wilson Hosford Jackson Lincoln Abernathy Buckman Duniway Llewellyn Grout Monroe/Vinci Sellwood Winterhaven	Ainsworth Bridlemile East Sylvan Forest Park Grant@Marshall Edwards Green Thumb Rice Gray Maplewood Rieke Terwilliger MLC Columbia Humboldt Kenton	Holladay-Annex BESC Wilcox Madison Smith Washington DEQ Auto Shop



### **3.XX.XXX-AD Water Quality in Schools**

#### **Legal Citation**

- (1) Board Policy 8.60.010-P Risk Management Program requires the establishment of programs by which risks may be controlled, reduced or eliminated.
- (2) Senate Bill 1062
- (3) OAR 581-022-2223 (Healthy and Safe Schools Plan)
- (4) OAR 333-061-0400 (Drinking Water in Schools)

#### **Purpose**

The purpose of this administrative directive is to:

- (1) To provide direction for those individuals who are responsible for administering the PPS Healthy and Safe Schools Plan.
- (2) To define water fixtures used for drinking or food preparation.
- (3) To direct the long-term periodic testing and maintenance of plumbing fixtures designated as a tap.

#### **Definitions**

- (1) "Tap" means any plumbing fixture in a building or on property owned or leased by PPS where student or staff are present on a regular basis and where water is used for drinking or food preparation. At PPS this includes bubblers and bottle-fill stations in both common areas and classrooms. Food preparation fixtures include kitchen faucets, sprayers, staff break room and career/technical education (CTE) skills classroom faucets, Head Start and nurse/medical room faucets and ice machines (used for high school athletics only). For a list of fixtures not included in the definition of tap see OAR 333-061-0400.
- (2) "Periodic testing" means Risk Management will implement testing of all water fixtures used for drinking or food preparation designated as a tap for levels of copper and lead to comply with the PPS Healthy and Safe Schools Plan.

- (3) “Maintenance” means PPS Facilities and Asset Management shall correct deficiencies identified through Risk Management periodic testing in accordance with building code, educational specifications, etc.
- (4) “Signage” means permanent signs placed near each fixture or on doors providing access to fixtures that are green in color and clearly state THIS DRINKING FIXTURE IS READY FOR USE, are red in color and clearly state DO NOT DRINK FROM THIS FIXTURE or red in color and clearly state DO NOT DRINK FROM FIXTURES IN THIS ROOM.

### **PPS Water Quality Program**

Risk Management will oversee the PPS water quality program through periodic testing and maintenance of all fixtures designated as a tap to reduce exposure to lead and copper in water and maintain compliance with the PPS Healthy and Safe Schools Plan. All periodic testing and maintenance will be conducted using the Portland Public Schools Lead-In-Water Remediation Program – Master Standard Operating Procedure.

Policy Implemented: 8.60.010-P Risk Management Program

History: Established 2018  
Approved: xx/xx/2018  
Superintendent signature