

August 19, 2020

The County of Ventura has been on the State monitoring list since June 11, 2020. On July 17, 2020 Governor Gavin Newsom announced that if a county has been on the monitoring list within the prior 14 days, a school must conduct distance learning only, until the county has been off the monitoring list for at least 14 days.

In counties on the monitoring list, CDPH guidance allows a district superintendent, private school principal/head of school, or executive director of a charter school (hereinafter superintendent) to apply for a waiver from the local health officer to open an elementary school for in-person instruction. This waiver is applicable only for grades TK-6, even if the grade configuration at the school includes additional grades.

When applying for the waiver, the superintendent must submit to the local health officer evidence of (1) consultation with labor and parent organizations and (2) publication of the elementary school reopening plans on the website of the local educational agency (or equivalent).

The local health officer then reviews the application and reopening plan (along with local community epidemiological data), makes a determination whether to grant or deny the waiver, and consults with CDPH regarding that determination. Elementary schools in counties on the monitoring list within the prior 14 days may not open for in-person instruction until they have received approval of a submitted waiver from the local health officer.

In order to apply for a waiver, please complete and submit the attached Waiver Application Cover Form. An application must contain:

- Attestation that the superintendent (equivalent or designated staff) has consulted with all parent and labor organizations at each school site for which an application is being submitted. If no labor organization represents the school site staff, then consultation with school site staff is sufficient.
- Confirmation that elementary school reopening plans have been published on the website of the local educational agency (or equivalent). Reopening plans must address the components in the CDPH guidance for schools and school-based programs (which are also listed in the attached Application Cover Form).

Applications and all supporting documents should be submitted at least 14 days prior to the desired reopening date to COVIDSchools@ventura.org.

(for use by a Local Education Agency or equivalent)

Background Information

School Type:

<u>x</u>	Private, Independent, or Faith-Based School
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Enrollment: 180

Address: 200 Bethany Court. Thousand Oaks, CA 91360

TK	K	1st	2nd	3rd	4th	5th	6th
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Phone Number: 805-497-7072 Email: tmorrow@bcsto.org

Date: 8/19/20

I. Consultation

Please confirm consultation with the following groups:

☐ Labor Organization – N/A

Name of Organization(s) and Date(s) Consulted:

☒ Parent and Community Organizations

Name of Organization(s) and Date(s) Consulted:

Consulted parent volunteers in July 2020. See letter attached.

Consulted community physicians who are also BCS parents in July 2020. See letter attached.

If no labor organization represents staff at the school, please describe the process for consultation with school staff:

Consulted full time and part time teaching staff in July 2020. See letter attached.

August 19, 2020

Dear Dr. Levin,

We are writing on behalf of the administration and school board of Bethany Christian School. We are a small Christian day school in Thousand Oaks beginning our 46th year onsite with a student population in K-8 of around 200. We respectfully request to be approved for a waiver to allow our Kindergarten through at least 6th grade (preferably through 8th grade) students to attend school onsite beginning Wednesday, August 26, 2020.

We take very seriously the health and safety of our students and staff and have designed a plan according to all major agency's recommendations (CDC, State of CA Guidelines, Ventura County). Our plan is prudent and robust and goes above and beyond the recommendations. Because of this and the fact that statistically students through age 11 are at a much lower risk for both contracting and spreading COVID 19, we believe we should be allowed to instruct students in person. We have attached additional letters from our teachers, parent association, and local community members to the waiver application.

Our campus is spacious, which is allowing us to spread out classes and students to attain the recommended six foot physical distancing in the classroom. We also have several different play areas outside that students will be assigned to for recess and lunch in their cohorts. We have plenty of staff for supervision. We have purchased the necessary PPE equipment to further protect our community members including desk shields for every K-8 student, which goes above and beyond the mask recommendations. We are limiting visitors onsite to only those who have pre-arranged appointments so that we can monitor the number of adults at any given time. We have also created an Independent Study Program for families who would prefer to keep their children home due to immunocompromised family members or other situations.

In addition to following all guidelines that have been published, we are also concerned about our students' social, emotional and mental health during this time should they be forced to learn remotely. Although our school created and executed a successful eLearning plan March through June of 2020, we are taking to heart the recommendations from the American Academy of Pediatrics and the paper posted on July 24 to the CDC website which stated it is important for students to have in-person instruction with other students onsite.

We respectfully request that you grant Bethany Christian School the waiver to reopen as soon as possible.

Sincerely,



Tara C. Morrow
Principal

Jim Hines
School Board President

August 2020

Dr. Robert Levin
Ventura County Public Health Officer



Dr. Levin,

On behalf of the parents of Bethany Christian School, we are writing to implore you to grant the waiver that will allow our children to receive in-person instruction starting August 26, 2020. While I do not envy your position attempting to navigate the health and safety of our county in these uncertain times, I urge you to consider the perspective of us as parents with the over-arching shared concern of safety at the helm. Please consider the following in contemplating a waiver for our small, private school located in the heart of Thousand Oaks:

- While balancing California State mandates from Governor Newsom along with County-level data, we urge you to focus on schools on a case-by-case basis rather than blanket the County. Bethany Christian School is located in the heart of Thousand Oaks – the student and family demographic of which is comprised almost entirely of Westlake, Thousand Oaks, and Newbury Park families. Each of these cities at the city level are mid-level to below in the rankings of COVID positive cases. To that end, we urge you to consider our waiver as it does not come from a reported hot spot of cases within County limits.
- The reassembling plan proposed by Bethany Christian School sets forth protocols and safety provisions that far exceed the guidelines set forth by the CDC. We welcome you to review the written materials attached to this letter and invite you to inspect our campus at any time.
- Tara Morrow, acting Principal of Bethany Christian School has and remains in constant contact with you, personally, in order to stay vigilant navigating the highest of protocols best suited to provide a safe on-campus learning environment.
- Bethany Christian School has the unique benefit of being associated with Bethany Church. The church has granted the school use of additional real estate on the campus that will allow each grade to maintain CDC approved social distancing while in the classroom and throughout the day. The leadership of the school has put forth a thoughtful reassembling plan that provides a safe learning environment for the students, teachers, administration and staff.
- The parents of Bethany present a unified front in that we are the First Responders, Physicians, Nurses and other medical staff on the frontlines of Los Robles Hospital serving our demographic in the time of COVID. We are the community – the teachers, homemakers, musicians, actors, professional athletes, scientists, engineers, attorneys, financial advisors and business owners (to name a few) who believe in the waiver process and the ability to support it based on the evidence.

Based on the data above and our unique position, the parents of Bethany Christian School feel strongly that our children can be safely educated in the classroom this fall.

The reassembling plan is supported by the parents and we respectfully request that you grant a waiver to Bethany Christian School to allow it to reopen.

Respectfully,
Amber Johnson,
Bethany Christian School Parent Liason

Parent volunteers: Jenny Cavallero, Nichole Collet, Lyndsey Gallagher, Jackie Gerber, Gina Gonzalez, Aime Gutierrez, Jordan Hardman, Taylor Johnson, Lana Lee, Heather Meyer, Michelle Pina

August 2020

Dr. Robert Levin
Ventura County Public Health Officer



Dr. Levin,

We would like to express our support and encouragement for the opening of Bethany Christian School K-6. As local physicians (OBGYN and Infectious Diseases) in Thousand Oaks as well as local residents of this city for nearly our entire lives, we feel very strongly that our school should be open for our children who will be in kindergarten, 3rd grade and 4th grade as well as all the children at our school.

First and most importantly, our principal Mrs. Tara Morrow has created a re-entry plan which is extremely comprehensive. She has made it safe for children and teachers with regard to every possible aspect of the school day experience. These measures include keeping the children at least six feet apart, using masks at school, temperature checks at the time of drop off, limiting visitors to the school and even contact tracing. There are many more plans as well. We feel very safe in sending all three of our children back to school with these plans in place.

Second, we live in a community with relatively low COVID numbers. Though the Ventura County numbers are high enough to keep us on the state watch list, the city of Thousand Oaks where Bethany is located has lower COVID numbers per 100,000 in our population. While the numbers of positive tests seem to rise, it is important to remember that the data is not accurate. Also, the more important information to track is how many hospitalized COVID patients we have locally and number of COVID patients on the ventilator. We both work as doctors at Los Robles hospital and the hospital sends out a daily report of these numbers. As of August 3rd, we only had 11 COVID patients in the hospital and only one on a ventilator. We have 27 available ventilator/ICU beds. These numbers are not concerning compared to the much bigger risks incurred by children not being in school. We are prepared and have capacity to take care of patients if there is a surge.

Finally, the reason to go back to school is nearest to our hearts - our children. They are suffering by being at home rather than learning at school, interacting with their friends and burning off their energy. We both work full time outside of the home and need childcare during the day; school work is not completed until late into the evening after dinner. The CDC (Dr. Redfield), the NIH (Dr. Fauci) and all leaders who consider the social, psychological and academic needs of children have stated that schools should re-open. The New England Journal of Medicine wrote a powerful essay about how important it is that children return to school: <https://www.nejm.org/doi/full/10.1056/NEJMms2024920>

In conclusion, we are in a safe city with low COVID numbers with a great plan for safe re-opening and are looking out for the best for our families. Please allow our little school on the hill, Bethany Christian School, to open by granting us a waiver as outlined by the Governor of California. We are happy to discuss further or answer any questions.

Sincerely,

Dr. Leena Nathan, Obstetrics and Gynecology
Dr. Ramesh Nathan, Infectious Diseases
805-338-8664

August 2020

Dr. Robert Levin
Ventura County Public Health Officer



Dr. Levin,

To Whom It May Concern, I am speaking on behalf of the teachers at Bethany Christian School in Thousand Oaks, California. We personally believe that Bethany Christian School has a thoughtful plan in place to open onsite this fall.

We were able to transition quickly as a small school and started teaching online mid-March when COVID-19 first hit. We were able to witness firsthand the process of remote and distance learning. With this in mind, we feel that instruction is best delivered and received in person. We have been working tirelessly throughout the summer to ensure the safety of both students and teachers. I have a vested interest in staying healthy, as I am technically a high-risk person (because of my age and cancer survivor with compromised lungs). However, I feel very comfortable working under the plan that we as a staff have developed.

We will closely follow all CDC guidelines. This includes, but is not limited to, increased levels of cleaning, sanitizing, keeping small groups of students together, so that contact tracing is possible during any time of the school year. Most of our classrooms are large enough to accommodate an entire class physically distanced. We are hiring extra teachers for other classrooms, so that our classes can be split into two rooms, socially distanced apart, with masks, and have the technology in place to broadcast into the second classroom. We will keep the students isolated into separate cohorts. Please see the accompanying letters for exact details as to our plans.

We will work closely with parents in our school community to practice preventative behaviors. Although we will be prepared to teach remotely when called upon, we know that it is possible to work IN PERSON in a safe manner. We feel that this is what is best for students academically, as well as for students' emotional and social development. I am quoting my principal when I say that we always make decisions based on what is best for students. We will effectively educate, communicate, and reinforce developmentally appropriate hygiene practices in our classrooms.

Although it will be impossible to totally mitigate all risks of COVID-19 to staff and students, we as teachers have carefully weighed these risks and are more than willing to accept responsibility for the choices we are making to continue in our career and profession. We all love teaching, and entered this profession because we do make a difference in students' lives. Please consider the social, emotional and mental needs of our students and allow us to reopen in the fall.

Respectfully,

Susan Harvey, Loreen Robertson, Emily Dewitt, Julie Shannon, Mary Jo Bodenhamer, Kelly Yui, Jennifer Given, Char Hurley, Cindy Hatch, Julie Feinstein, Dawn Walters, Leilani Smith

Bethany Christian School Teachers

Elementary School Reopening Plans **Bethany Christian School (BCS)**

Please confirm that elementary school reopening plan(s) addressing the following, consistent with guidance from the California Department of Public Health and the local health department, have been published on the website of the local educational agency (or equivalent):

Cleaning and Disinfection: How shared surfaces will be regularly cleaned and disinfected and how use of shared items will be minimized:

1. Water fountains will not be used. However, no touch, filtered water bottle stations are available for students and staff.
2. Staff and trained custodial staff will clean and disinfect frequently touched surfaces. A professional cleaning company will also come in and clean at the end of school daily.
3. Minimal shared objects will be used in the classrooms, which will be cleaned and disinfected between uses.
4. Cleaning products have been chosen from the **EPA approved list “N”** and will be stored away from the student areas. Proper PPE will be used by custodial staff and any other staff during disinfection.
5. Ventilate with outdoor air during cleaning. (Ventilation with outside air is not a problem as every room has exterior windows.) Windows will not be opened on days with high pollen counts or high smoke particulates in the air. Two rooms without windows will have doors open and will use H13 Hepa 13 air filters.
6. Each child’s belongings will be separated from other students’ belongings. Belongings will go home daily to be sanitized by the family.
7. Adequate supplies will be available to ensure minimal sharing of high touch materials, such as art supplies. When shared supplies, such as electronic devices, books, etc. are used, they will be disinfected between uses.
8. In communal areas such as the front office, clean pens and used pens will be designated.

Cohorting: How students will be kept in small, stable, groups with fixed membership that stay together for all activities (e.g.; instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the cohort.

1. Students are in small cohorts throughout the day, including lunch and recess times. Teachers will remain with their cohorts as much as is practical.
2. Various technological platforms (Google Classroom, Seesaw, etc.) will be used to minimize contact when turning in assignments.
3. Staggered lunch and recess times will allow students to eat meals at their desks inside or weather and physical distance permitting, outside.

4. Students will not travel between or mix with other cohorts.
5. Minimal group movement in hallways and common areas will be enforced.
6. Outdoor PE classes will be conducted in cohorts that are physically distanced by a minimum of 6 feet. Indoor PE activities (yoga, pilates, balance exercises, etc.) can be done at the students' desks on high smoke or pollen particulate days.
7. School will have staggered drop off and pickup, recess, and lunch schedules.
8. No after-school sports teams, band, musical presentations at this time.

Entrance, Egress, and Movement Within the School: How movement of students, staff and parents will be managed to avoid close contact and/or mixing of cohorts.

1. Visitors will be limited on campus. Any appointments with parents must be pre-scheduled. We encourage meetings to take place outside.
2. All staff meetings and professional development will involve 6 feet physical distancing of staff. The congregation of adults in common areas, such as the staff room will be minimized. Meetings will be held outside whenever possible.
3. Minimal group movement in hallways and common areas will be enforced.
4. Telework and teaching virtually are permissible for staff and faculty who are at a higher risk for severe illness.
5. Traffic flow will be monitored in hallways, and class schedules will be staggered to allow for fewer students and staff in the hallways at one time.

Face Coverings and Other Essential Protective Gear: How CDPH's face covering requirements will be satisfied and enforced.

1. All employees and families will read and adhere to the CDPH Guidance for the Use of Face Coverings protocols. Exemptions will be made in accordance to the above document.
2. Students in grades 3-6 will wear face coverings on campus.
3. Families will be taught how to properly use, remove, and wash face coverings.
4. Training will be provided on how people who are exempted from wearing a face mask will be treated.
5. Face coverings will be removed during mealtimes.
6. Food workers will use masks and gloves.
7. Typically, staff and students will provide their own face masks. However, BCS will have disposable face masks onsite for anyone who needs one.
8. BCS has purchased face shields for all staff.
9. BCS has also purchased desk shields with front windows for an extra layer of protection in the classroom.

Health Screenings for Students and Staff: How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

1. Students will be symptom checked daily, including temperatures taken daily with a touchless thermometer while they are in their family's car. If temperature is below 100.4 F orally or below 99.5 with a no touch thermometer, they will go to class with a mask on, following the designated routes for entry (and exit at the end of the day) to minimize contact with others.
2. Families will complete a daily health screening for each child upon arrival electronically. Staff will continue to monitor for symptoms throughout the day.
3. Students and staff will be asked to stay home if they have had any close contact with someone who has COVID-19. Policy is in place that no staff or student will need to fear discrimination or reprisals for staying home or for contracting COVID-19.
4. BCS will document and track incidents of possible exposure and notify the Ventura County Department of Public Health, families, and staff of any possible exposure to COVID-19 while at school. Privacy regulations by FERPA and HIPAA state regulations will be strictly adhered to. Families will be notified that their child "may have been exposed to COVID-19".
5. Staff will communicate with the parents of a sick child regarding symptoms of COVID-19.
6. An isolation area with a protective acrylic wall has been created to hold sick students, staff, or visitors. Students with symptoms will remain in this area with the face covering on while waiting to be transported home or to a healthcare facility. 911 will be called for emergency care if needed. Staff and students may not return until they have met the CDC criteria to discontinue home isolation. (3 days w/ no fever, symptoms have improved, and at least 10 days since symptoms first appeared) Students will be provided with distance learning during their time away from school.
7. The health department will be notified immediately of any positive cases on campus. BCS will maintain confidentiality.
8. Areas of symptomatic staff or students will be closed off for 24 hours where practical and disinfected with safe and correct application of disinfectants. Proper PPE will be worn by cleaning staff.
9. All CDPH guidelines will be adhered to. **See Health Protocol Checklist.

Healthy Hygiene Practices: The availability of handwashing stations and hand sanitizer, and how their use will be promoted and incorporated into routines.

1. Teachers will instruct students in proper handwashing techniques and allow students to wash hands several times a day.

2. Students will wash hands:
 - Upon entering the classroom
 - After coughing and sneezing,
 - Before and after eating,
 - Before/after recess/lunch
 - After using the restroom
 - All other necessary times
3. Instructions on proper handwashing techniques will be displayed in the restrooms and classrooms.
4. Soap and ethyl alcohol-based hand sanitizers will be used. Touchless hand sanitizers are located in several parts of the building and outside.
5. Two additional handwashing stations have been installed for outside use. Classrooms also have handwashing stations in addition to restrooms.

Identification and tracing of Contacts: Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to local health department and notification of exposed persons. Each school must designate a person for local health department to contact about COVID-19.

1. Office Administrator, Taylor Wild, is our designated COVID-19 tracker.
2. The health department will be notified immediately of any positive cases on campus. We will maintain confidentiality.
3. If someone has been exposed to a confirmed positive case, he or she must stay at home for 14 days in quarantine, regardless of the testing outcome.
4. Areas of symptomatic staff or students will be closed off for 24 hours where practical and disinfected with safe and correct application of disinfectants. Proper PPE must be worn by cleaning staff.
5. All CDPH guidelines will be adhered to. ** See Health Protocol Checklist.
6. School staff will notify affected cohorts and will explain that “their child may have been exposed to COVID-19.”
7. Staff will maintain privacy per FERPA and HIPAA.

Physical Distancing: How space and routines will be arranged to allow for physical distancing of students and staff.

1. All student and teacher desks are physically distanced by 6 feet. ALL student desks will have an acrylic desk shield. Markings on the floor will promote safe physical distancing in the classroom. Hallways will have markings to minimize traffic indoors and outdoors.
2. Student desks will all face forward and will be arranged in staggered rows instead of cooperative learning groups.
3. Outdoor campus spaces are large and can accommodate at least 6 foot distancing for students to play outside in designated areas.
4. Markings will be displayed on the floors in designated areas to help students and staff stand 6 feet apart.
5. Cones and other tools will be used during outside activities like PE to show 6 foot distances.
6. School will have staggered drop off and pickup, recess, and lunch schedules.
7. No after-school sports teams, band, or musical presentations at this time.

Staff Training and Family Education: How staff will be trained and families will be educated on the application and enforcement of the plan.

1. All staff and families will be trained in the following safety actions: Enhanced sanitation practices, physical distancing guidelines and their importance, the proper use, removal, and washing of face coverings, screening practices, how COVID-19 is spread, COVID-19 symptom identification, when to seek medical attention, employer's plans and procedures to follow when children or adults become sick at school, and employer's plans and procedures to protect workers from COVID-19 illness.
2. Teachers will teach students the proper way to cough etiquette: coughing into the elbow and away from other people. Students will wash hands after coughing.
3. Teachers will be trained during in-service.
4. Families will be trained through a COVID-19 handbook.
5. Families have had access to the BCS reassembling plan since July 6, as it has been on the website since then and has been updated regularly to comply with executive orders.

Testing of Students and Staff: How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Describe how staff will be tested periodically to detect asymptomatic infections.

1. Staff will be tested by a private company before the school year begins.
2. Staff and families will have access to the private company for future testing.
3. Random staff will be tested mid-fall and periodically over a period of time to ensure safety.

Triggers for Switching to Distance Learning: The criteria the superintendent will use to determine when to physically close the school and prohibit in-person instruction.

1. BCS will monitor state and local orders and health department notices daily about transmission in the area and adjust accordingly.
2. When a teacher, staff member, or student tests positive for COVID-19 and has exposed others, refer to the CDPH Framework for K-12 Schools.
3. BCS will implement the following steps:
 - a) The appropriate school official will contact the local health department to ensure proper cleaning of exposed spaces and the quarantine of the exposed persons and whether any other additional intervention is needed.
 - b) Close off ALL areas that the staff member or student visited, and do not use these areas for 24 hours after which disinfection and cleaning will be done. If 24 hours is not feasible, wait at least 2 hours to clean and disinfect.
 - c) Communication plans will be implemented for exposure at school and potential school closures to families, staff, teachers, and the community.
 - d) Communicate to staff regarding labor laws, Disability Insurance, PFL sick leave rights, and workman's compensation pursuant to Governor's Executive Order N-62-20, and Unemployment Insurance.
 - e) Remind families of the importance of physical distancing measures while the school is closed. Discourage school employees and students from gathering elsewhere.
 - f) Begin and/or continue distance learning.
 - g) Maintain regular communications with the local health department.

Communication Plans: How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

1. School staff will notify affected cohorts and will explain that "their child may have been exposed to COVID-19."
2. Staff will maintain privacy per FERPA and HIPAA.

***Health Protocol Checklist**

- ☐ School wide temperature screenings will be conducted at drop off every morning. High temperatures will be documented and asked to stay at home until the student has been fever free for 48 hours.
- ☐ If a student becomes symptomatic during school hours, Aide walks the student up to the designated isolation area (Hallway between the front office and auditorium). Dividers will be utilized.
- ☐ Point contact person is Taylor Wild.
- ☐ Temperature screen will take place as the student is in isolation.
- ☐ Student name, date, time, symptoms, temperature will be documented on excel spreadsheets for records.
- ☐ BCS Health Response Team will notify Mrs. Morrow right away, call the family, Ventura County Health Department, and update the teacher.
- ☐ Any student or staff member with a fever will be sent home immediately.
- ☐ If a positive case is confirmed, the student will be quarantined at home for 14 days after the last date at school.
- ☐ If a negative case is confirmed, the student may return to school 3 days after symptoms resolve.
- ☐ Evaluation of student's household members and tracing:
 - ☐ Do they have siblings or relatives at school?
 - ☐ How did the student travel to school today and within the last 48 hours?
 - ☐ What areas did the student pass through and possibly touch on their way to the classroom? (bathrooms, sinks, water fountains, handrails, etc)
 - ☐ Has the student been wearing a mask at all times?
- ☐ Templated email will be quickly composed and sent from Mrs. Morrow. COVID Response templates are located on the Front Office computer desktop and shared on google docs. The email will be sent to parents in the grade the symptomatic student attends. Faculty and Staff, Board, School Community will also be notified by Mrs. Morrow with the appropriate template located on the Front Office computer desktop and shared on google docs.
- ☐ Families can be directed to our website to view our Health Response Team protocol and FAQ's referencing the precautions that have and are being completed.
- ☐ Health Response Team meet to discuss the following questions:
 - ☐ Will student and teacher testing be required, evaluating primary and secondary exposure?
 - ☐ Will the students in the specific grade need to be picked up right away?
 - ☐ Is there a need to cancel the grade and/or entire school for a 24 hour cleaning period?
 - ☐ Will school need to be closed for more than 1 week? If so, remote learning should be in place to adequately continue online schooling.
- ☐ A 24 hour deep cleaning and disinfecting period will immediately begin in the grade room once all students have left the building. Areas identified in the student's contact tracing evaluation will be closed off until proper cleaning has taken place. (at least 24 hours)
- ☐ Cleaning supplies will be monitored by Mrs. Gerber in the front office.

* Please reference the *California Department of Public Health* document in the BCS COVID response binder under tab D (Principal's Office) or tab J (Front Office) on page 3, per individual case.