

Plan for use of ESSER III ARP Funds at STEAM Academy of Warren

1. Please tell the extent to which the school has adopted policies and a description of any such policies on each of the following mitigation strategies:

- a. Universal and correct wearing of masks:

Students should use cloth face coverings, especially in circumstances when physical distancing cannot be maintained. Students will be advised and have the option to bring in their cloth face coverings, so long as they meet CDC safety guidelines. In the scenario a student does not have access to or forgets their face covering, the school will provide face coverings to be used. At a minimum, face coverings will be worn:

- While waiting to enter the school campus.
- While on school grounds including classrooms (except when eating or drinking).
- While leaving school.
- While on a school bus.

If students are not able to wear masks the School will work directly with families to develop accommodations and interventions which ensure compliance of all student and school health and safety initiatives.

- b. Physical distancing (e.g., including use of cohorts/podding):

Student Physical Distancing plans include:

- School plans will include limitations on the number of students physically reporting to school to maintain physical distancing.
 - Schools will determine student and staff capacity of each school meeting 3-foot physical distancing objectives.
 - To accommodate capacity limitations, various educational modalities and alternative schedules will be utilized.
- Schools will be recommending virtual activities instead of field trips and intergroup events.
- Schools will be posting signage and installing barriers to direct traffic around campus.

Buses

- Students and parents will be instructed to maintain 6-foot distancing at bus stops and while loading and unloading.
- Students and staff should wear face coverings at bus stops and on buses.
- School Districts are currently defining and communicating their steps and guidelines for health and safety protocols within school buses. It is expected that guidelines will vary across Districts but should include the following protocols:
 - Limitations will be placed on seating capacity for students in each vehicle while meeting 6-foot physical distancing objectives.

Bus routes should accommodate the capacity limitations. Seats will be marked or blocked that must be left vacant. Sample seating options:

- Option 1: Seat one student to a bench on both sides of the bus, skipping every other row.

- Option 2: Seat one student to a bench, alternating rows on each side to create a zigzag pattern on the bus.
- Students will be seated from the rear of the bus forward to prevent students from walking past each other. To prevent students from walking past one another, afternoon runs will be boarded based on the order in which students will be dropped off. (Students who get off first should board last and sit in the front.)

Playgrounds/Outside Spaces/Athletics

- Supervision will be in place to ensure physical distancing.
- Physical education (PE) and intramural/interscholastic athletics will be limited to activities that do not involve physical contact with other students or shared equipment until advised otherwise by state/local public health officials.

Classrooms

- Schools will determine the maximum capacity for students of each classroom in consideration of physical distancing objectives.
- Desks are to be arranged in a way that minimizes face-to-face contact (i.e., forward-facing) and meets the considerations of physical distancing objectives.
- If necessary, other campus spaces will be utilized for instructional activities (i.e., lecture halls, gyms, auditoriums, cafeterias, outdoors).
- Classroom arrangements of developmentally appropriate activities for smaller group activities and rearrangement of furniture and play spaces to maintain separation will be accommodated where possible.
- Physical distancing objectives will be communicated and addressed as students move between classrooms.

Food Service

- Strategies to limit physical interaction during meal preparation and meal service will include preparations to serve meals in classrooms and staggering cafeteria use.
- The use of share tables and self-service buffets for food and condiments will be suspended until further notice.
- Installation of physical barriers, such as sneeze guards and partitions, at point of sale, and other areas where maintaining a physical distance of 6 feet is difficult is recommended.
- With an approved National School Lunch Program waiver, meal pickup will be provided for students quarantined or in a virtual or hybrid cohort.

Staff

- Physical distancing among staff in their work environment to reduce the spread of the virus will include:
 - Avoiding staff congregations in work environments, break rooms, staff rooms, and bathrooms.
 - Avoidance of grouping staff together for training or staff development programs. Training should be conducted virtually or, if in-person, ensuring physical distancing is maintained.
- Staff schedules will accommodate student schedules, modalities, and physical distancing strategies.
- Workspaces will be evaluated to ensure that all employees can maintain physical distancing to the extent possible.

- Where possible, rearrange workspaces to incorporate 6 feet between employees and students.
- If physical distancing between workspaces or between employees and students and visitors is not possible, physical barriers such as partitions may be installed.

c. Handwashing and respiratory etiquette:

Handwashing protocols will include:

- Providing regularly scheduled opportunities for students and staff to meet handwashing frequency guidance.
- Ensuring sufficient access to handwashing and sanitizer stations. Portable handwashing stations will be located throughout the facilities and near classrooms to minimize movement and congregations in bathrooms to the extent possible.
- Ensuring a fragrance-free hand sanitizer (with a minimum of 60 percent alcohol) is available and supervised at or near all workstations. Children under age nine will use hand sanitizer under adult supervision. Call Poison Control if consumed: 1-800-222-1222. Note: frequent handwashing is more effective than the use of hand sanitizers.

Staff and students will be trained on proper handwashing techniques and PPE/EPG use, including the following:

- Scrubbing hands with soap for at least 20 seconds or use hand sanitizer if soap and water are not accessible. Staff and students should use paper towels (or single-use cloth towels) to dry hands thoroughly.
- Wash hands when: arriving and leaving home; arriving at and leaving school; after playing outside; after having close contact with others; after using shared surfaces or tools; before and after using scheduled restroom times; after blowing the nose, coughing, and sneezing; and before and after eating and preparing foods.

d. Cleaning and maintaining healthy facilities, including improving ventilation:

Plan to meet cleanliness and disinfecting standards in school facilities and property include:

- Overall Cleanliness Standards. Schools must meet high cleanliness standards before reopening.
- Following CDC guidance, schools shall avoid the sharing of electronic devices, toys, books, and other games or learning aids.
- Schools will limit items that are difficult to clean and sanitize.
- Following CDC and local public health official guidance, schools will institute the following ongoing cleanliness and disinfecting standards:
 - Conduct safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning.
 - Disinfect the following surfaces between unique cohort uses, such as:
 - Desks and tables
 - Chairs
 - Keyboards, phones, headsets, copy machines
 - Disinfected high touch surfaces frequently, at least daily, which include:

- Door handles
 - Handrails
 - Sink handles
 - Restroom surfaces
 - Shared instructional materials
 - When cleaning, air out space before children arrive. Plan to do a thorough cleaning when children are not present whenever possible.
 - Close off areas used by any sick person and do not use space before cleaning and disinfecting are completed. To reduce the risk of exposure, or wait 24 hours, wait as long as possible.
 - Provide adequate outdoor air circulation:
 - Following CDC guidance, ensure that ventilation systems and fans operate properly and increase the circulation of outdoor air as much as possible by opening windows and doors and other methods. Do not open windows and doors if doing so poses a safety or health risk to children using the facility (for example, allowing pollen in or exacerbating asthma symptoms). Maximize central air filtration for heating, ventilation, and air conditioning (HVAC) systems.
 - Take steps to ensure that all drinking fountains are suspended for use.
 - Keep each child's belongings separated and in an individually labeled storage container, cubby, or area. Send belongings home each day to be cleaned.
- e. Contact tracing in combination with isolation and quarantine, in collaboration with the state, local, territorial or tribal health departments:

To prevent and minimize the spread of COVID-19 throughout our schools and communities, procedures to facilitate the documentation, reporting, tracking, and tracing of positive infections will be followed for the entirety of the current school year.

- Parents or guardians of students and school staff who have been diagnosed with COVID-19, whether by laboratory test or through clinical examination are required to notify their school no later than twenty-four (24) hours after receiving a confirmed diagnosis.
- To facilitate timely contact tracing and prevent further transmission of COVID-19, parents, guardians of students and staff must report positive tests and/or cases of COVID-19 to covidreporting@accelschools.com, a centralized and actively maintained reporting system for confirmed cases. If schools receive reports on positive tests and/or cases of COVID-19 by parents or staff using existing phone lines, emails, or attendance tracking systems, the reported case must be entered into the covidreporting@accelschools.com.
- **Reported case notifications must include the following information:**
 - School Name
 - Submitter Name
 - Submitter Email
 - Submitter Phone Number

- Notification of positive diagnosis of COVID-19
- Role: Student or Staff
- Current Modality: Virtual or Traditional
- All schools will appoint a COVID-19 coordinator to facilitate health and safety requirements of the school, including coordination and reporting needs of local health departments. The appointed coordinator name and contact information shall be provided to the local health department.
- Once a confirmed case has been reported (within twenty-four (24) hours), the school will notify parents, guardians, and staff of the existence of the case in writing and share as much information as possible without disclosing protected health information which includes:
 - Written notification of a positive test or case shall be sent to the parents or guardians of all students and staff who share a classroom space or have participated in a school activity during the COVID-19 infectious period of a student, teacher, staff member, or coach.
 - Written notification shall also be provided to all parents or guardians of students at the school building notifying them of a positive test result. Notifications will be made using school communication tools and website platforms. Schools are required to provide this notification with each case, although schools may consolidate notifications if necessary.
 - Schools must use approved Accel Schools notification templates.
 - Each school shall report the case(s) to their local health department.

f. Diagnostic and screening testing:

Guidelines to minimize access to school campuses, and limit nonessential visitors, facility use, and volunteers include:

- Schools are to exclude entry for any student, parent, caregiver, visitor, or staff showing symptoms of COVID-19 (reference CDC guidelines for COVID-19 symptoms). If students are showing symptoms, staff will discuss with the parent or caregiver and refer to the student's health history form or emergency card to identify whether the student has a history of allergies, which would not be a reason to exclude.
- Students will be monitored throughout the day for signs of illness.
- Students entering school campuses will require symptom screening which includes:
 - Passive Screening - parents will be required to screen students before leaving for school (check temperature to ensure temperatures below 100.4 degrees Fahrenheit, observe for symptoms outlined below) and to keep students at home if they have symptoms consistent with COVID-19 or if they have had close contact with a person diagnosed with COVID-19.
 - Symptoms consistent with COVID-19 include:
 - Fever above 100.4 degrees Fahrenheit or chills
 - Cough
 - Shortness of breath or difficulty breathing

- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Active Screening - as students enter campus and buses, staff will conduct a combination of visual wellness checks, temperature checks with no-touch thermometers (check temperature to ensure temperatures below 100.4 degrees Fahrenheit), and ask students whether they have experienced COVID-19 symptoms within the last 24 hours and whether anyone in their home has had COVID-19 symptoms or a positive test.
- All students must wash or sanitize hands as they enter campuses.
- Schools will provide supervised, sufficient points of access to avoid larger gatherings.
- If a student is symptomatic while entering campus or during the school day:
 - Students who develop symptoms of illness while at school will be separated from others right away and isolated in an area through which others do not enter or pass. If more than one student is in an isolation area physical distancing measures will be in place.
 - Any students or staff exhibiting symptoms will be required to immediately wear a face covering and wait in an isolation area until they can be transported home or to a healthcare facility.
 - Students will remain in isolation with continued supervision and care until picked up by an authorized adult.
 - Schools will follow established guidelines for triaging students, recognizing not all symptoms are COVID-19 related.
 - Parents will be advised of sick students and that students are not to return until they have met the criteria to discontinue home isolation.
- Return to School after illness and exposure including after students recover from COVID-19 or complete recommended home isolation after exposure to a person with COVID-19.
 - All students must follow the following guidelines for discontinuing home isolation and returning to school:
 - Exposure with no symptoms (Asymptomatic):
 - All asymptomatic students must follow the following guidelines for discontinuing quarantine and returning to school.

All Students:

- During School Day – students in close contact during the school day with someone diagnosed with COVID-19, had worn a mask, and followed COVID-19 mitigation protocols are not required to quarantine and may return to school.
- Outside School Day - Attest that at least ten (10) days have passed since last contact with a person diagnosed with COVID-19; and Attest

that at least twenty-four (24) hours have passed without use of medication.

- Exposure with mild symptoms (Symptomatic):
 - All symptomatic students must follow the following guidelines for discontinuing quarantine and returning to school;
 - Attest that at least fourteen (14) days have passed since last contact with a person who diagnosed with COVID-19;
 - Attest that at least ten (10) days have passed since symptoms first appeared or since positive COVID-19 test result;
 - Attest that at least twenty-four (24) hours have passed without use of medication.

- Exposure with strong symptoms or diagnosis of COVID-19 (Symptomatic):
 - All symptomatic or positive diagnosed students must follow the following guidelines for discontinuing quarantine and returning to school;
 - Attest that at least ten (10) days have passed since symptoms first appeared or since positive test diagnosis;
 - Attest that at least twenty-four (24) hours have passed without fever and use of medication;
 - Attest that all symptoms have improved and are resolved.

- If all the above criteria have been met but the student has medical documentation stating they are not cleared to return to school, that student may not return until cleared by a medical provider.
 - Staff entering school campuses will require symptom screening which includes:
 - Screening – staff will be required to self-screen before leaving for work (check temperature to ensure temperatures below-required threshold, observe for symptoms outlined by public health officials in state/jurisdiction) and to stay home if they have symptoms consistent with COVID-19 or if they have had close contact with a person diagnosed with COVID-19.
 - All staff must wash or sanitize hands as they enter worksites.
 - Employees who are exhibiting symptoms will be excluded from entering the workplace.
 - Staff members who develop symptoms of illness will be sent to medical care. School leaders will administer the use of emergency substitute plans.
 - Sick staff members will be advised not to return until they have met the criteria to discontinue home isolation.

- Return to work after illness and exposure including after staff recover from COVID-19 or complete recommended home isolation after exposure to a person with COVID-19.
 - All staff must follow the following guidelines for discontinuing home isolation and returning to work:
 - Exposure with no symptoms (Asymptomatic):
 - All asymptomatic staff must follow the following guidelines for discontinuing quarantine and returning to work;

All Staff:

- During School Day
 - Not required provided the employee had worn a mask and followed other COVID-19 mitigation protocols.
 - In all cases, employees should self-monitor for symptoms through day 14. Employees may return to work after the 7-day quarantine if the test result is negative.
- Outside School Day
 - Minimum of 7 days. Employees should make an appointment to get tested on the 5th day of quarantine.
 - Employees may return to work after the 7-day quarantine if the test result is negative.
 - Employee may not return to work until
 - § Negative test result has been submitted or;
 - § Attest that at least ten (10) days have passed since last contact with a person diagnosed with COVID-19 and;
 - § Attest that at least twenty-four (24) hours have passed without use of medication.
- Exposure with mild symptoms (Symptomatic):
 - All symptomatic staff must follow the following guidelines for discontinuing quarantine and returning to work;
 - Attest that at least fourteen (14) days have passed since last contact with a person who diagnosed with COVID-19;
 - Attest that at least ten (10) days have passed since symptoms first appeared or since positive COVID-19 test result;
 - Attest that at least twenty-four (24) hours have passed without use of medication.
- Exposure with strong symptoms or diagnosis of COVID-19 (Symptomatic):
 - All symptomatic or positive diagnosed staff must follow the following guidelines for discontinuing quarantine and returning to work;
 - Attest that at least ten (10) days have passed since symptoms first appeared or since positive test diagnosis;

- Attest that at least twenty-four (24) hours have passed without fever and use of medication;
 - Attest that all symptoms have improved and are resolved.
- If all the above criteria have been met but the employee has medical documentation stating they are not cleared to return to work, that employee may not return until cleared by a medical provider.
- Outside Visitors and Groups
 - Access to campus for parents will be limited and based on the school's evaluation as to whether and to what extent external visitors can safely utilize the facilities and campus resources. All individuals that use the facilities will be required to follow the school's health and safety plans and DPH guidance.
 - Protocols will be enforced for accepting deliveries safely.
- g. Efforts to provide vaccinations to educators, other staff and students, if eligible:

Below is an email communication to all employees on January 28, 2021. Further communication was provided specific to time and location opportunities for staff.

We're excited to have received confirmation of the first vaccine appointment windows for school staff in Franklin, Mahoning, and Summit counties.

As we have been communicating, ACCEL encourages employees to register for a COVID-19 vaccine provided they have consulted with a medical provider to address any health concerns. We understand that appointments are limited and that staff may not be able to schedule a time outside of the workday.

Below are a number of FAQs and responses you should discuss with your school leaders.

Does an employee have to use PTO if they are away from work for vaccination?

- We would prefer that staff schedule vaccination appointments outside of work hours. Should that not be possible, a limited amount of paid leave will be approved for employees who miss work time for a vaccination appointment.
- In many cases, 90 minutes allows ample travel time to/from school to the vaccine location as well as time for the appointment and post-injection monitoring. If a school is located further from the designated vaccination site or appointment times are not as narrowly set, additional leave may be approved.
- All staff must present their Principal with proof of vaccination appointment that shows date and time of appointment as soon as they receive appointment confirmation so that the Principal can make any necessary coverage adjustments.

What happens if large numbers of staff are absent at the same time for vaccination?

- Should staffing be challenging for a portion of the school day due to large numbers of scheduled staff vaccination appointments, Principals should consult their RVP for alternative building plans.

Can employees have a paid day off after their vaccination appointment to monitor for side effects?

- In some cases, vaccine appointments will be available on a Friday or Saturday, in which cases employees will have at least one weekend day before reporting back to work. In general employees are expected to report to work as scheduled following vaccination. Most vaccine side effects have been mild to moderate and not affected a person's ability to do daily activities.
- Should an employee experience more severe side effects that are impacting their ability to report to work, the employee may use available hours from their regular PTO award.

How should schools report absences due to vaccination?

- Employee absences for vaccine appointments should be reported to payroll as Vaccine Leave. If an employee takes more than the approved 90 minutes (or designated school maximum) away from work, the excess should be reported as PTO.

How can staff obtain the proof of employment required for vaccine appointments?

- Employees may take their current employment agreement, a recent pay stub, or a badge if one is used at the school location.
 - Employees should be able to find their offer letter, they should check their email box. All offer letters were distributed via DocuSign to employee email addresses.
 - Employees may use Single Sign On (SSO) access pay stubs via UKG (UltiPro)

Go to <https://www.office.com/>

Sign in using your Active Directory credentials. These are the same credentials you use for your work computer.

Look under Apps → UltiPro or it may be under All Apps → Other → UltiPro

When logging in for the first time you will be asked the below security questions. Please use the examples for help on formatting.

Date of Birth (Example: mm/dd/yyyy)

Address City (Example: McLean)

Last Name (Example: Smith)

Employees will receive a Multi-Factor Authentication will be required due to the sensitive information. You will need to enter in your access code.

- Schools may provide employees or related services providers a letter verifying employment at the school. The verification should be printed on the school letterhead. Sample text is below.

To Whom It May Concern:

Please accept this letter as verification that [Insert Staff Member's Name] is currently employed at STEAM Academy of Warren, a K-8 public charter school.

Should you have any questions, please feel free to contact me at 330-394-3800 or jnatko@steamacademywarren.org.

Sincerely,

Jon Natko
Principal

- What information do schools or employees need to provide to Human Resources?
 - Schools should provide hr@accelschools.com with a list of employees who have signed up for the vaccine and the dates of the vaccine appointments.
 - Staff should keep proof of vaccination as they may be asked for it at a later point in time.
- h. Appropriate accommodations for children with disabilities with respect to the health and safety policies:
 - Policies should be practical, feasible, and appropriate for a child and adolescent's developmental stage.
 - Special considerations and accommodations to account for the diversity of youth should be made, especially for our vulnerable populations, including those who are medically fragile, have developmental challenges, or have special health care needs or disabilities, with the goal of safe return to school.
 - No child or adolescents should be excluded from school unless required to adhere to local public health mandates or because of unique medical needs.
- 2. Describe how the school will ensure continuity of services including but not limited to services to address the students' academic needs, and students' and staff social, emotional, mental health and other needs, which may include student health and food services:

Three options allowed for continuity of services while families considered their student's health, their comfort with the current COVID-19 status in our community, their ability or interest in facilitating learning at home and many other important factors. Families were asked to make a choice prior to the start of school and continue with that modality until the end of the 1st semester. Our school leadership team had the discretion to accommodate a family's request for an option change at any point. In the event health conditions at the school change, or the Governor enacts a closure order, all students were able to pivot to Option 3 immediately.

Option 1: Full time in school

Students come to the school building each day for a full instructional day based on the Board approved calendar. Teachers facilitate standards-based instruction using materials that are aligned with the Ohio standards for content and rigor. Specials, electives and other regularly scheduled academic experiences will occur in the building on these days. Based on the grade level of the student, their academic needs and the teacher's discretion, additional work may be sent home for additional practice or enrichment. Students with Special Education needs will receive these services as specified in their IEP during their time in the school building. Regular communication will occur with the family regarding the child's academic progress and their social emotional well-being. Communications may occur through phone calls, text messages, video conferencing or other means dependent on health and safety considerations. Extensive health protocols ensuring the safety of students and staff are followed daily and monitored by the Regional Vice President.

Option 3: Full time at home

Students learn from home every day school is in session as delineated in the school's Board approved calendar. Students were provided a Chromebook and internet reimbursement if needed based on participation and eligibility guidelines. Teachers facilitate standards-based instruction using the ACCEL curriculum which is aligned to Ohio standards for content and rigor. Teachers can modify the activities within each lesson to provide additional practice opportunities, an alternative approach, or add opportunities to engage with tools such as iXL, iReady or other programs to differentiate for student learning needs around a given standard. Teachers also use the assessments within the virtual curriculum, or they can add their own formative and summative measures. Opportunities to engage in special subjects and electives such as Art, Music or PE, as defined by the school's instructional schedule, are also offered to virtual students. Each day instruction is a mix of teacher-led, synchronous sessions and student-led practice activities. Expectations were set for the number of hours students should be expected to engage in learning, and how the family should be prepared to support their child's learning at home. There is a mix of online learning that requires a computer and other offline activities that require solving math problems, collaborating with peers, exercising, etc. Students with Special Education needs will receive these services as specified in their IEP virtually within Canvas, our learning management platform. The Big Blue Button feature inside our closed Canvas platform is HIPPA and FERPA compliant, thus providing a safe environment for our specialists to work directly with students on their caseload to provide the necessary services. This feature is also used by our Title I teachers and those that support our English Learners. Regular communication occurs with the family regarding the child's academic progress and their social emotional well-being. Communications may occur through the Canvas platform, phone calls, text messages, video conferencing or other means.

While other schools predetermined the learning scenario for their students, we were prepared to meet the complexities of giving families choice. Organization, communication, and

coordination were paramount to our student's success. As such, we decided that all students, regardless of their modality, would receive standards-based instruction in a defined sequence for each course. This allowed all students in the same grade or course within the school to receive instruction around the same sequence of standards, for approximately the same amount of time, depending on student need. This coordination allowed for the seamless integration for a student who needs to change from one modality to another due to extenuating circumstances. It also allowed regular assessment data in all three modalities to be used to assess students for support throughout the RtI process.

While maximizing educational options for families, the school minimized risk of exposure to COVID-19 by aligning with the guidance provided by National, State, and local health officials. Mitigation efforts included facial coverings, health monitoring, cleaning, and sanitizing measures, limiting guests, and implementing social distancing and one-way foot traffic. Careful consideration was given to the emotional well-being of students as we worked to provide an equitable and safe learning environment for all students, regardless of their modality.

3. Describe how the school will engage in meaningful consultation with stakeholders:

Schools will consult with authorities and medical professionals and will communicate decisions with stakeholders to ensure the following local conditions are regularly reviewed and in place:

- Flexibility or Lifting of State Stay-Home Order
 - The state has lifted or relaxed the stay-home order to allow schools to physically reopen.
- Flexibility or Lifting of County Stay-Home Order
 - The county has lifted or relaxed the stay-home or shelter-in-place order to allow schools to physically reopen.
- Local Public Health Clearance
 - Testing Availability. The local public health officials have ensured adequate tests and tracking/tracing resources are available.
 - Local public health officials have reported a sufficient duration of decline or stability of confirmed cases, hospitalizations, and deaths.
 - Local public health officials have reported sufficient surge capacity exists in local hospitals.
- Equipment Availability
 - Schools will have sufficient protective equipment to comply with the Department of Public Health guidance for students and staff appropriate for each classification or duty, as well as relevant Division of Occupational Safety and Health Administration (OSHA) requirements.
 - Schools will have plans for an ongoing supply of protective equipment (masks, gloves, gowns, etc.).

- Schools have purchased no-touch thermal scan thermometers for symptom screenings.
 - Cleaning Supply Availability
 - Schools will have enough school-appropriate cleaning supplies to continuously disinfect the school site following DPH guidance.
 - Schools will ensure there are sufficient supplies of hand sanitizers, soap, tissues, no-touch trash cans, gloves, and paper towels.
4. Please state the next review period for this plan: (must be at least every 6 months):

This guidance is in place through July 31, 2021. Updates will be made available prior to August 1, 2021.