

Victory College Prep IAQ Management Plan

1. Mission Statement

The health, comfort, and learning environment of students and staff are important aspects of Victory College Prep's mission. Working with the EPA and their IAQ Tools for Schools Program, along with the Marion County Health Department, we developed an IAQ Management Plan that will help monitor and improve the quality of air in school buildings. The objectives of this IAQ Management Plan are:

- Reduce the levels of indoor air pollutants through preventive measures such as routine maintenance activities, periodic building evaluations and inspections, and IAQ-specific policies.
- Provide and maintain adequate airflow by repairing and maintaining ventilation equipment, which will promote a comfortable and healthy learning and working environment.
- Respond to IAQ-related concerns and problems in a prompt and thorough manner, and effectively communicate the progress of investigations and their resolution to all interested parties.

2. Role of the IAQ Coordinator and IAQ Team

IAQ Coordinator

Victory College Prep (VCP) has identified the Facilities Coordinator, as the IAQ Coordinator for the organization. The organization's administration and board of directors are committed to providing the necessary support to meet the school's IAQ Management Plan objectives.

The IAQ Coordinator's responsibilities include:

- Acting as the key contact person within the school to respond to and address IAQ issues and concerns.
- Coordinating the development and management of the school's IAQ Management Plan. This includes:
 - Establishing and overseeing an IAQ Team,
 - Coordinating building walkthrough inspections,
 - Coordinating the building system evaluations and preventative maintenance plans,
 - Coordinating the investigations of reported IAQ issues and concerns,
 - Modifying the IAQ Management Plan to fit the school's specific needs and objectives
 - Responding to IAQ concerns and issues that are discussed or reported.
 - Coordinating the IAQ Team's activities and meetings, including distribution of the IAQ checklists.
 - Communicating with staff, parents and other parties regarding the progress made with the Plan and the process of reporting IAQ concerns.
 - Coordinating the annual review of the Plan, which involves building walkthrough inspections, building systems evaluations and revising the Plan to include new information.
 - Obtaining school board approval of the IAQ Management Plan after every major revision.

IAQ Team

VCP has established an IAQ Team to represent staff, students, and parents at each school. The IAQ Team assists both organization and school administration by reviewing IAQ-related information and recommending IAQ policies to maintain and improve the air quality within school facilities and school buildings.

Led by the IAQ Coordinator, the IAQ Team is involved in the following efforts:

- Supporting the IAQ Coordinator to ensure good IAQ in all facilities and areas.
- Contributing to the IAQ Management Plan creation and implementation. The members distribute the IAQ checklists and the IAQ Background to the appropriate staff members.
- Meeting regularly biannually to review and resolve IAQ issues.



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- Meeting as needed to review the IAQ Management Plan, which includes the completion of walkthrough inspections of school buildings, key building systems evaluations and the review of existing policies in the IAQ Management Plan.
- Meeting to evaluate and respond to IAQ concerns that have been reported to the school. The Team takes steps or recommends measures to resolve the reported concern.
- Maintaining IAQ Team meeting minutes, reports and other documents in the IAQ Management Plan.

The following individuals are members of the IAQ Team:

Name	Position	Contact Information	Specific Duties
Chris Mason	Facilities Coordinator	chris.mason@vcpindy.org (317) 362-3833	Coordinate checklist distribution and collection; oversee VCP IAQ Plan adherence at all sites. Conduct facility walkthroughs and ensure that ventilation systems are operating properly.
Jess Monk	Chief Operating Officer	Jess.monk@vcpindy.org (765) 586-0660	Oversee implementation of IAQ and other operational policies related to the physical plant and student/staff health & safety.
Michelle DeLashmit	School Nurse	michelle.delashmit@vcpindy.org (317) 775-6660	Track health symptoms throughout the school

During the walkthrough inspections and building systems evaluations, the IAQ Coordinator identifies IAQ and problems and issues. The issues are prioritized from most important to least important. Urgent or simple issues are addressed first and issues that require continual attention are scheduled appropriately.

Problems are reported to the IAQ Coordinator, who documents all IAQ concerns, performs an initial investigation and documents and communicates the resolution to all interested parties. Many issues are resolved using in-house staff. However, professionals, experts and other outside personnel may be brought in to deal with specific issues. The school administration expects to complete the necessary maintenance, renovations and construction within 30 business days.

The IAQ Coordinator (and Team) uses a variety of tools, such as the Problem Solving Wheel, Problem Solving Checklist and Sections 4-6 of the EPA's IAQ Reference Guide to help identify IAQ problems. If the problem cannot be identified or persists despite the school's efforts to identify and remediate it, the IAQ Coordinator discusses the matter with the Chief Operating Officer in order to determine whether a contracted service provider is needed.

When a problem has been identified, the IAQ Coordinator:

- Coordinates a response,
- Communicates with the relevant parties,
- Documents actions taken, and

Keeps copies of all documents. When the problem is not urgent but requires a policy change, the IAQ Coordinator organizes a meeting with the IAQ Team to develop and recommend specific policy changes. These policy changes are presented to the appropriate school officials for review and adoption. All new or revised policies are added to the existing IAQ Management Plan. All interested parties are informed about the measures taken to resolve the problem and all policy changes.



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3. IAQ Policies and Plans

All policies and plans are located in the office of the Facilities Coordinator, in the school's Operations Drive, and on the school's website.

- Animals in the Classroom Policy
- Food in the Classroom Policy
- Painting Policy
- Hazardous Materials Policy
- Asbestos Hazard Emergency Response Act (AHERA) Management Plan
- Integrated Pest Management Program
- Lead Policy
- Radon Gas Policy
- Non-Smoking Policy
- Anti-Idling Policy

Animals in the Classroom Policy

While many teachers and students have classroom pets, animals can be a source of allergens, asthma triggers and microorganisms that may cause infectious diseases. Therefore, VCP has instituted an animal policy based on information gathered from:

- Walkthrough inspections,
- building systems evaluations,
- IAQ concern reports,
- and staff meetings

Animals should be isolated to the extent possible and should be kept away from carpets, upholstered furniture and stuffed toys. Specific types of animals may be restricted from the classroom if a concern is expressed by staff, students, or parents. The school also reserves the right to ban certain animals if they pose a threat to the safety or comfort of staff and students. Classroom pets are to be placed away from return air ducts and from students with known allergy or asthma problems.

VCP allows fish, reptiles, amphibians, baby chickens, adult chickens, and other animals on an individual approval basis in the classrooms for educational purposes.

1. Animals will only be brought into classrooms when curricular plans have been made by the teacher and approved by administration. All efforts will be made to bring the students to the animals, rather than bringing the animals into the classroom. Animals will be used to support the curriculum throughout the year.
2. Most animals will remain in their respective habitats at all times.
3. After interacting with any VCP animals, staff and students will wash their hands/use hand sanitizer.
 - a. Cleaning of habitats will occur once a week
 - b. Minor requirements for indoor animals – removal of feces, changing bedding, cleaning food and water bowls, maintaining clean glass
4. No animals will be permitted into classrooms with students who have allergies unless written consent has been given by the parents AND the severity of the allergy has been identified as tolerable

Food in the Classroom Policy

Food shall not be left in classrooms or offices. When it is necessary to store food in classrooms or offices, it must be kept airtight, sealed containers to minimize the potential for pests, odors, and biological growth.



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Painting Policy

VCP uses latex, water-based paints; using paints that contain mercury or lead is prohibited. Painting and drying will only occur when the area of the building is unoccupied and properly ventilated. VCP will inform all affected staff and students before a painting job begins.

Hazardous Materials Policy

It is important to handle hazardous materials per the manufacturers' guidelines. Wastes generated from hazardous materials are stored separately from regular waste and disposed of in appropriate containers. Hazardous materials are common in art, science, and vocational/industrial classes. Professional development training sessions for staff are held to explain the risks associated with hazardous materials and the importance of complying with this policy.

Asbestos Hazard Emergency Response Act (AHERA) Management Plan

An AHERA Management Plan is required by Federal law and is intended to prevent staff exposure to asbestos during general operation and maintenance activities. VCP AHERA plans are located in the front office for viewing upon request. Contact the IAQ Coordinator to view AHERA plans.

Integrated Pest Management Program

Integrated Pest Management (IPM) is a comprehensive strategy for controlling pests, pest generated substances (such as cockroach fecal matter) and pesticides, which can act as irritants and trigger allergies and asthma. The school's IPM program aims to reduce the frequency and magnitude of both pesticide uses and pest problems.

When a pesticide must be used to meet important management goals, the least hazardous material adequate to control the pest should be chosen and label directions should be followed exactly. The application of pesticides may be subject to:

- School policies and procedures,
- Federal Insecticide, Fungicide and Rodenticide Act (7 United States Code 136 et seq.),
- EPA regulations in 40 Code of Federal Regulations,
- OSHA regulations,
- and state and local regulations

Pests

Pests are defined as unwanted populations of living organisms (animals, plants, or microorganisms). Strategies for managing pest populations will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

Pest Management

Approved pest management plans are site-specific, developed in partnership with a vetted vendor, and include proposed pest management measures to:

- reduce any potential human health hazard or to protect against a significant threat to public safety,
- prevent loss of or damage to school structures or property,
- prevent pests from spreading into the community or to plant and animal populations beyond the site,
- enhance the quality of life to students, staff and others.



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Integrated Pest Management Procedures

Integrated pest management (IPM) procedures will be used to determine when to control pests and whether to use:

- mechanical,
- physical,
- chemical,
- or biological means

IPM practitioners depend on current, comprehensive information about the pest and its environment and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage by the most economical means and with the least possible hazard to people, property and the environment.

The decision to use a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or are not feasible. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents and selected non-chemical pest management methods will be implemented whenever possible to provide the desired control. It is the policy of VCP to utilize IPM principles to manage pest populations adequately. The full range of alternatives, including no action, will be considered.

Education

Staff, students, pest managers, and the public will be educated about potential school pest problems and the IPM policies and procedures that will be implemented.

Record Keeping

Records of pesticide use are maintained on site to meet the requirements of the state regulatory agency and board of directors. Records must be current and accurate for IPM to be effective. In addition, pest surveillance data sheets that record the number of pests or other indicators of pest populations should be maintained to verify the need for treatments.

Notification

VCP is responsible for notifying school staff and parents in advance of any pesticide applications that will be applied while students are in the building or if students will be onsite the day after pesticide applications.

Pesticide Storage and Purchase

Pesticide purchases are limited to the amount authorized by VCP Administration for use during the year. Pesticides are stored and disposed of in accordance with the EPA-registered label directions and state regulations. Pesticides are stored in an area inaccessible to students or unauthorized personnel.

Pesticide Applicators

Pesticide applicators have a working knowledge of the principles and practices of IPM and use only pesticides approved by this school. They follow regulations and label precautions. Applicators comply with this school IPM policy and pest management plan.

Pests and pesticides can pose significant problems and risks to people, property and the environment. It is, therefore, the policy of VCP to incorporate IPM procedures for control of structural and landscape pests. This policy minimizes the amount and toxicity of pesticides used in the school.



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Lead Policy

Lead can adversely affect the nervous system. Young children are particularly susceptible. Lead is not present in VCP's school building paint coatings nor the water. VCP partners with the local health department to test for lead in kindergarten and 1st grade students annually. VCP has a data use agreement with Marion County Public Health Department allowing the school principal and nurse to receive notice of all students with elevated levels of lead present via a blood test. The school then implements social and academic interventions immediately to offset any potential negative effects of lead exposure.

Radon Gas Policy

Radon is a naturally occurring gas that can enter into school buildings from the underlying soils, and build-up to levels that increase occupants' risk for developing lung cancer. Radon testing and mitigation is performed in Mechanical Rooms and basements of all buildings. Immediate measures are taken if radon levels exceed 4 pCi/L to reduce to levels comparable to the outside air.

Non-Smoking Policy

VCP prohibits tobacco use in all public and school facilities and vehicles. Information about smoking regulations is in the Drug Free Workplace policy in the staff handbook in the Front Office and on the school's HR Drive.

Anti-Idling Policy

This policy is to limit vehicle emissions that might be brought into school buildings as mandated by 410 IAC 33-4-3. This improves the health of students, staff, and the community through reduced exposure to these emissions. This policy applies to all public and private vehicles on the school campus.

1. Posting
 - a) The school shall post signs in areas where idling is prohibited.
2. Requirements
 - a) Drivers of vehicles are to turn off the engine if the vehicle is to be stopped for more than 5 minutes. (Engine cool down periods recommended by vehicle manufacturer may be followed)
 - b) The employee contracting services through a bus company shall inform the busdriver of these requirements.
 - c) Teachers and school staff are informed of this policy at the start of each school year or upon hire.
 - d) During student/parent orientations, all parents and students are informed of this policy.
 - e) Any complaints of non-compliance are to be filed with the IAQ Coordinator.
 - f) Any complaints of non-compliance will be reviewed and action will be taken as necessary and appropriate.
 - g) Delivery and bus pickup and drop off zones have been located away from building outdoor air intakes to ensure that exhaust fumes do not enter the facility.

VCP prohibits buses and cars from idling while waiting to pick up or drop off students. Buses shall idle no longer than the time required to bring engines to a proper operating temperature and to defrost all windows.

5. Procedures

- Cleaning and Chemicals



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- Flooring
- Preventive Maintenance and Operations
- Construction and Renovation
- Microbial Management
- Staff Education

Cleaning and Chemicals

Regular and thorough cleaning is an important means for the removal of air pollutant sources. However, the use of cleaning products may also contribute to indoor air pollution. To ensure that cleaning practices remove pollutant sources while using cleaning products appropriately, guidelines have been created.

- Custodial staff only use cleaning agents approved by the school for school use. All products are clearly labeled and stored in a secure area. Bottles of cleaning agents are tightly closed when stored.
- All material safety data sheets are stored in an area available to all staff, and the location of this information is discussed in the school's "Employee Right to Know" annual training.
- Rooms are kept clean. Slightly damp cloths are used to remove dust from surfaces; however, wiped surfaces are not left damp or wet for extended periods of time, since this can cause mold growth.
- Ammonia-based cleaning agents and chlorine-containing cleaners (such as bleach) are never be mixed because this generates toxic gases.
- During routine operations, pollutant-releasing activities are restricted by time of day, week, or year. For example, the waxing of floors will be performed [on Friday afternoons or vacations, to ensure that gases are removed by the time classes resume.
- Areas of frequent use should be cleaned more often than areas of infrequent use.
- Large walk-off mats are used to trap dirt and moisture at building entrances. These mats are cleaned according to manufacturers' guidelines to ensure optimal performance. Trapping dirt and moisture at building entrances helps to maintain the cleanliness of floors and carpets throughout the building.
- Staff are not permitted to bring any
 - cleaning products,
 - scented candles,
 - pesticides,
 - air purifiers,
 - air fresheners,
 - or other chemicals into the school.

Flooring

The two most common types of floor covering for general use in schools are carpet and resilient floor covering products (LVT). Carpet offers acoustical and comfort benefits that are generally not available with other floor coverings. Resilient flooring is used for high traffic areas including:

- cafeterias,
- art rooms,
- restrooms,
- and anywhere liquid spills are likely.

While there is considerable debate about the most appropriate flooring material for use in schools, VCP recognizes that there are advantages and disadvantages associated with all types of floor coverings. Regardless of the floor covering type, regular and effective cleaning and maintenance is essential to keep it dry and clean. All carpets are cleaned with hot water extraction at least twice a year. Carpet may not be cleaned during summer months unless it can be dried within 24 hours.



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Preventive Maintenance and Operations

Preventive maintenance involves routine inspection, adjustment and repair of building structures and systems, including:

- the heating, ventilating and air conditioning system (HVAC),
- unit ventilators,
- local exhaust,
- fresh air intakes,
- and flooring.

Preventive maintenance plays a major role in maintaining the quality of air by assuring that the building comfortable temperatures and humidity in occupied spaces.

The preventive maintenance schedule can be found in the Facilities Office. The schedule describes the time intervals and locations of building and ventilation components that are inspected and maintained on a routine basis. The schedule was established using the past experience of school maintenance professionals, the availability of financial resources and technical guides, including the manufacturer's specifications. All records of preventive maintenance are kept attached to the relevant operating system for easy evaluation.

Unless otherwise noted, school buildings are maintained according to the American Society of Heating, Refrigerating and Air-Conditioning Engineers' (ASHRAE) recommended comfort parameters. If the recommended parameters cannot be met, the school staff makes ventilation adjustments that provide fresh air, temperature and humidity levels that are as close to the ASHRAE parameters as possible.

Construction and Renovation

VCP considers IAQ when planning construction and renovation projects. The IAQ Coordinator, IAQ Team, Executive Director, COO and board of directors shall discuss major structural changes that may impact IAQ. The findings from walkthrough inspections and building systems evaluations shall be considered when planning renovations. IAQ Design Tools for Schools is utilized for establishing good IAQ practices into the

- design,
- construction,
- renovation,
- operation,
- and maintenance of K-12 school facilities.

These plans are summarized in the Facilities Office.

To the extent possible, major renovations should be performed when school is not in session. If renovation projects must be performed while school is in session, the return air from any area being renovated should be isolated from the main ventilation system. Engineering controls shall be used to contain and minimize the distribution of dust and other contaminants produced by construction activities. Cleaning operations should be more frequent during and after renovation.

Microbial Management

Microbials, such as mold, bacteria and viruses, are a significant cause of illness, health symptoms and discomfort. School staff should be aware that the easiest way to control microbial growth is to control moisture.



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Signs of water intrusion and microbial growth are investigated during the walkthrough inspections, building system evaluations and other efforts. The maintenance staff are informed about damaged buildings systems and components that cause water leaks and water condensation. School staff make the necessary repairs and adjustments in a prompt manner. Materials damaged by water are removed immediately and replaced when possible. Damp or wet materials are dried within 48 hours (preferably within 24 hours).

Materials contaminated with microbials are promptly cleaned or replaced. Mold growth is removed from non-porous surfaces with a strong brush and non-ammonia containing detergent and thorough drying. Remediation projects that cannot be handled by school staff are contracted to a professional. Large-scale remediation projects may require specific control and protection measures. School facilities staff refer to the EPA's guide.

Staff Education

All school employees play an important role in maintaining and improving air quality since their behavior can affect the quality of the air present in school buildings. For example, placing objects on unit ventilators, adjusting room thermostats, or turning off unit ventilators can worsen the quality of air in a room. An educated employee is more likely to take steps to maintain good air quality. In addition, an employee with an understanding of IAQ is more likely to report IAQ concerns quickly and accurately. For these reasons, the school staff are educated about IAQ.

VCP performs an annual IAQ training session as part of preservice staff professional development. The IAQ Coordinator or another qualified person performs the training. The training includes the importance of IAQ to health and learning and preventative measures to take to remain in IAQ compliance.

The EPA's IAQ Tools for Schools Backgrounder and checklists (distributed annually) are educational tools utilized in these training sessions. Staff complete all the checklists, at a minimum, once each year.

Communication

Communication is a critical element to successful IAQ management. The IAQ Coordinator and other school authorities try to limit misinformation and confusion using effective communication. To develop and maintain the trust of the community and staff, the IAQ Coordinator and other designated school employees shall communicate with relevant parties in a prompt, honest and courteous manner until the issue is resolved. Every time an IAQ concern is addressed or resolved, the IAQ Coordinator shall report the measures taken and the resolution of the identified concern to the appropriate parties.

In the unlikely event of an IAQ emergency, the school will accommodate the needs of students, parents, and staff. The Director of Development and Communications and Executive Director are selected to handle the media and update the community during a crisis. No one other than the school representative(s) are to discuss IAQ related issues with the press. The media will be alerted by the Director of Development and Communications when it is necessary to provide information to a broader audience. Every effort will be made to share appropriate information as soon as it becomes available to the school.

The IAQ Team and Coordinator will inform parents and staff about:

- The IAQ Management Plan and ongoing efforts, how to view the Plan upon request, and how to obtain an IAQ Concern Reporting Form
- How to contact the IAQ Coordinator about IAQ issues
- Where to find self-help information on how to evaluate IAQ in the school and learn about structural features and operational practices of the school buildings

VCP provides this information to parents and staff using the school's website.



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6. Staff Responsibilities for Maintaining Good IAQ

All staff members are responsible for improving and maintaining good IAQ:

- **Teachers** shall:
 - Refrain from interfering with airflow from ventilators (e.g., do not stack books or other items on ventilators, cover vents with posters, or turn off the fan due to noise)
 - Remove clutter in their classrooms
 - Properly dispose of hazardous waste
 - Enforce the school's various IAQ policies in their classrooms
- **Administrators** shall communicate the school's activities to the
 - Board of Directors
 - Staff
 - Students
 - Community

They also will ensure that the school is implementing IAQ policies appropriately.

- **The Facilities Coordinator** will ensure that HVAC systems are operating properly and that buildings are maintained adequately and cleaned regularly.
- **Custodians** will follow all policies regarding:
 - Cleaning chemicals
 - Ensure that the school is regularly vacuumed and swept
 - Check/Clean drain pans
 - Empty trash cans

They shall also look for signs of pest problems and inform the appropriate people of any issues.

- **Health Officers/School Nurses** shall track illnesses, such as asthma, that may provide an early warning of IAQ problems.

7. Applicable Local and State Requirements/Regulations

VCP will meet local and state requirements and regulations related to IAQ.

For example:

- Non-smoking laws
- Asbestos regulations

8. Emergency Response Policy

An emergency is defined as an unforeseen circumstance that requires immediate action, assistance, or relief. This includes situations that are potentially life threatening, such as:

- Spills of hazardous materials;
- Complaints of severe headaches, nausea and combustion odors; and
- Diagnosed Legionnaire's disease or tuberculosis.

In addition, emergencies include situations where there is limited time available to prevent serious property



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damage, such as flooding in a carpeted area or health problems. It is up to the discretion of the school administrators to identify and react to emergencies on a case-by-case basis, using the above definition as a general guideline only. If doubt exists about whether exposure to a specific hazard constitutes an emergency, a precautionary approach may be used where the matter is handled as an emergency. Non-emergency situations are addressed according to the "Reporting and Response Policy."

School officials will respond to emergencies immediately. If the problem cannot be resolved with in-house resources, external help will be acquired (e.g., local health agency, IAQ professionals). If a hazard poses an immediate health threat to the students and staff, the affected building areas must be evacuated. All avenues of communication need to be utilized to warn and inform affected or interested parties in a prompt manner.

IAQ Reporting and Response Policy

VCP encourages the reporting of IAQ concerns, regardless of how trivial the issue may seem. The prompt reporting and resolution of IAQ issues has the potential to prevent serious problems from developing, which will help to prevent potential health effects, discomfort and unnecessary costs. This makes the investigation of all reported concerns worthwhile.

The IAQ Coordinator shall request concerned staff, students and parents to report their IAQ concerns in writing. A written description of the concerns reduces misunderstanding and creates a history that can be referred to at a future date. All written concerns shall be sent to the IAQ Coordinator to initiate an official IAQ concern reporting process. The resolution of the issue needs to be documented and the affected parties should be informed in writing about the measures taken. Information collected must be processed and stored according to the school's policies.

9. Steps to Prevention

VCP is committed to preventing IAQ problems. To reach this goal, the school completes the following activities:

- Designate an IAQ contact, distribute and collect checklists and report results to the IAQ Coordinator.
- The IAQ Coordinator shall ensure that all IAQ efforts are coordinated and completed in a timely manner.
- All IAQ policies and programs
 - for radon
 - IPM
 - anti-idling
 - non-smoking, etc.
- These individuals are updated on the school's IAQ efforts:
 - The board of directors
 - The community
 - Staff
 - Students
- The school completes an annual review to make changes to the IAQ Management Plan. The annual review is necessary because changes may occur in:
 - The building systems
 - Components
 - Occupants
 - The administration's attitudes and priorities

The annual review involves:

- Building systems evaluations;
- Walkthrough inspections;



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- Reviewing IAQ concerns and other information;
- Discussing new issues with the IAQ Team; and
- Updating the IAQ Management Plan as needed.

A brief description of the changes to the Plan shall be summarized and included in all future versions of the Plan. This documentation shall reduce the likelihood of repeating policies and procedures that were ineffective or inefficient and ensure the success of the IAQ program.



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