

ADMINISTRATION
(Series 300)

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310 JOINT COMMITTEES

311 Purpose

In order to foster continuing cooperative spirit and aid in the contribution of teachers to Christian education, the Board of Trustees invites staff to participate in the structuring and attainment of the following goals:

1. Development of channels for improving liaison among teachers, administrators and the board;
2. Understanding of the powers, duties, rights and obligations of teachers, administrators, and board; and
3. Formulation and development of programs involving teachers, administrators and board in the following areas:
 - a. Curriculum
 - c. Compensation
 - d. Professional Status

Each joint committee may request, through the superintendent, meetings with relevant staff persons to gain information or to explain proposed or adopted programs or policies.

312 Board Appointees to Joint Committees

The Executive Committee will review all joint committee appointments annually and appoint board members to joint committees as necessary to support each committee's purpose. The superintendent is an advisory member of each committee.

313 Terms of Office of Board Members on Joint Committee

Board members on joint committees whose board terms have expired may remain in their respective positions on the joint committees until September 1 of each year to assure completion of tasks.

314 Terms of Office for Teachers on Joint Committees

All committee members begin their respective terms September 1 of each year and will hold office for three years when possible. Teachers will be elected by the staff members at the respective schools and each school will be represented by a teacher representative.

315 Guidelines for Joint Committee Operation

- 315.1** Joint committees are responsible to appoint a chairperson and secretary, who will be responsible to take minutes of each meeting. The joint committees serve in an advisory capacity to the superintendent and the Board of Trustees and make recommendations to assigned Board committees (below). Minutes are to be provided to the assigned Board committees:

 - Curriculum Committee – Education Committee
 - Professional Status Committee – Education Committee
 - Compensation Committee – Finance and Operations Committee
- 315.2** Each representative group (teacher, administrative, board) may meet separately at its own discretion.
- 315.3** Proposals for actions or policies may be formulated by any one of the three representative groups. Proposals will be presented to the joint committee for refinement and approval. Any representative group may, through the superintendent, request joint committee meetings.
- 315.4** A properly called joint committee meeting may transact business if there is one or more representative(s) present from each representative group. A meeting is properly called if telephone or mail notice is given at least two days before the meeting.
- 315.5** Recommendations of the joint committees will be implemented by procedures deemed best by the superintendent. Each joint committee will report back to the Board of Trustees through its assigned board committee and the superintendent to seek approval of recommendations at its next scheduled meeting.

316 Committee Charge and Membership Guidelines

316.1 Professional Status Committee

Description

The Committee addresses issues relating to personnel policies including the review of existing policies and consideration of new policies. The Committee serves as step in the grievance process as called for in Policy 577.

Schedule

The Committee meets as needed.

Composition

Board
3

Administrative
2

Teachers
4 + 1 (FC)

316.2 Compensation Committee

Description

The Committee identifies issues to be discussed in order to recommend to the Finance and Operations Committee a fair and equitable compensation package by December so that the package may be reviewed by the Board of Trustees no later than January of each year.

Recommendations not accepted by the Finance and Operations Committee will be returned to the Compensation Committee with stated reasons for rejection; further review by the Committee may occur and one additional recommendation may be considered by the Finance and Operations Committee.

Schedule

The Committee begins regularly scheduled meetings in September of each year and generally completes its work prior to Christmas Break or the end of the first semester.

Composition

<u>Board</u>	<u>Administrative</u>	<u>Teachers</u>
1 + up to 2 additional	2	5

316.3 Curriculum Committee

Description

The Committee works to ensure integrity, guidance, and oversight for curriculum and promote district-wide communication and collaboration.

Schedule

The Committee begins its meetings in the fall and meets a minimum of five additional times over the course of a school year.

Composition

<u>Board</u>	<u>Administrative</u>	<u>Teachers</u>
1 (or designee)	2-3	6

320 FACULTY COUNCIL

321 Introduction

Faculty Councils are intended to facilitate communication between non-administrative contracted staff (Staff) and administrative staff about issues relevant to Staff. Faculty Councils provide an opportunity for Staff to bring Staff perspectives, priorities, and concerns - including unsatisfied working conditions or administrative decisions adversely affecting Staff - to the attention of building level and GRCS administrative staff. Faculty Councils encourage first-hand dialogue between Staff and administrative staff in order to strengthen understanding of Staff and administrative staff perspective.

Each school shall have a faculty council, which has its own officers. Principals are not voting members of the council but may be invited to attend meetings. The councils are advisory to the principals and the GRCS Faculty Council.

322 Election Procedures

322.1 GRCS Faculty Council

The GRCS Faculty Council is comprised of the chairperson from each school's Faculty Council or the chairperson's designee and up to one additional member as approved by the council if desired by the particular council. It elects its own officers.

The elected chairperson of the GRCS Faculty Council will be the contact liaison between administrative personnel (including principals, board, and superintendent) and the teachers. Contact with the Faculty Council chairperson by the superintendent will be considered as contact with all Staff.

322.1.1 Procedures

The GRCS Faculty Council annually elects a chairperson from among its membership. This should be accomplished prior to the end of a school year to ensure a smooth transition in leadership from one year to the next.

322.1.2 Purposes and Functions

- a. The GRCS Faculty Council will recommend a standard election procedure for the school faculty councils. The chairperson of each council elected at large will be a member of the GRCS Faculty Council.
- b. The Council shall receive and consider recommendations made from school faculty councils and committees and shall help process these recommendations for orderly action.
- c. The Council shall elect a chairperson who will serve as liaison among the

GRCS Faculty Council, school councils, the superintendent, administrators, and the Board of Trustees.

- d. The Council is advisory to the superintendent and the Board of Trustees and shall make recommendations through the appropriate joint committee of the board as necessary.
- e. The Council shall meet a minimum of two times per year, typically once each semester, and as required in order to address agenda items.

322.2 School Faculty Council

322.2.1 Procedure

- a. Schools will conduct elections for council members annually. It is recommended that each member be elected to a three-year term.
- b. Each school faculty will determine the number of elected officers. The elected chairperson who will, by virtue of that office, serve as a member of the GRCS Faculty Council unless a designee is selected.
- c. The Faculty Council in each school will select a chairperson.
- d. If a school council member terminates his/her service to the school, a replacement will be elected by open ballot to fill the unexpired term.

GRCS administrators will cooperate in providing communication media for the Faculty Council to communicate with all Staff.

322.2.2 Purposes and Functions

- a. Receive recommendations from Staff concerning ideas to be brought to the attention of the various committees, coordinators, and administrators of the system through the GRCS Faculty Council.
- b. Discuss policies and make recommendations concerning problems arising in the local school which are relevant only to that school to its administrator. If necessary, the council may make recommendations to the superintendent concerning these policies or problems.
- c. Conduct elections or appoint representatives to professional organizations such as CEA.

330 ADMINISTRATORS COUNCIL

331 Membership

The Administrators' Council is comprised of all GRCS building principals, central office administrators, and other directors as determined by the superintendent. The superintendent serves as chairperson on the Council.

332 Meetings

Meetings shall be held as needed at the discretion of the superintendent, but at least one meeting a month will be held. Business may be transacted if more than half of the members are present. Notice of such meeting will be given at least three days prior to meeting date.

333 Purpose

The Administrators' Council recommends policies to the Board through committees and the superintendent and implements board policy and the superintendent's recommendations.

340 CRIMINAL HISTORY RECORD INFORMATION

Pursuant to MCL 380.1234a, Grand Rapids Christian Schools is considered a Noncriminal Justice Agency (NCJA) and is an Authorized Recipient (AR), wherein certain Authorized Personnel are able to request and receive fingerprint-based Criminal History Record Information (CHRI) checks. Authorization for ARs to receive CHRI is for the purpose of employment, licensing, and volunteer determinations. Therefore, Grand Rapids Christian Schools ensures compliance with applicable state and federal laws, applicable rules and regulations, the most current version of the Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) Security Policy, in addition to Grand Rapids Christian Schools policies, procedures, and processes.

The most stringent requirement shall prevail if conflict(s) is/are found between agency policies, state or federal laws, with the most current version of the FBI CJIS Security Policy, and corresponding rules, or regulations.

341 Definitions

As used in this policy:

341.1 Authorized Recipients

- a. A criminal justice agency or federal agency authorized to receive CHRI pursuant to federal statute or executive order;
- b. A nongovernmental entity authorized by federal statute or executive order to receive CHRI for noncriminal justice purposes; or
- c. A government agency authorized by federal statute or executive order, or state statute which has been approved by the United States Attorney General, to receive CHRI for noncriminal justice purposes.

341.2 Authorized User/Personnel

An individual, or group of individuals, who have been appropriately vetted through a national fingerprint-based background check, where required, and have been granted access to CJI data, wherein access is only for the purpose of evaluating an individual's qualifications for employment or assignment.

341.3 Noncriminal Justice Governmental Agency

An agency authorized by federal statute, executive order, or state statute and approved by the U.S. Attorney General to be able to receive state and federal fingerprint based CHRI, directly or indirectly, from the Michigan State Police (MSP).

342 Criminal History Guidelines

342.1 Grand Rapids Christian Schools shall complete and maintain a Noncriminal Justice Agency User Agreement for Release of Criminal History Record Information (RI-087) provided by the Michigan State Police (MSP). Agreements are in place to provide for data ownership, individual roles, responsibilities, etc. When changes in contact information (address, e-mail address, contact name, etc.) occur, Grand Rapids Christian Schools shall complete and return a new user agreement. The most current copy of this user agreement will be maintained on file at the agency indefinitely.

342.2 The superintendent or administrative assistant to the superintendent will designate a Local Agency Security Officer (LASO) by means of completing and returning to the MSP, Security & Access Section (SAS), a Noncriminal Justice Agency Local Agency Security Officer Appointment (CJIS-015). An individual designated as LASO is:

- An “authorized user/personnel.”
- An individual that has completed a fingerprint-based background check, where required, and found appropriate to have access to CHRI.
- An employee directly involved in evaluating an individual’s qualifications for employment or assignment.

A LASO is responsible for:

- Identifying who is using or accessing CHRI and/or systems with access to CHRI.
- Identifying and documenting any equipment connected to the state system.
- Ensuring personnel security screening procedures are being followed as stated in this policy.
- Confirming the approved and appropriate security measures are in place and working as expected.
- Supporting policy compliance and ensuring the MSP Information Security Officer (ISO) is promptly informed of security incidents.

When changes in the LASO appointment occur, Grand Rapids Christian Schools shall complete and return a new LASO appointment form. The most current copy of the LASO appointment form will be kept on file indefinitely by the agency (CJIS-015).

All MSP fingerprint account changes are to be made by the LASO.

342.3 All personnel requiring access to CHRI must first be deemed “Authorized Personnel.” Prior to access of CHRI, such individuals shall complete a fingerprint-based CHRI

background check. The LASO or authorized designee will review and determine if access is appropriate. Access is denied if:

- a. The law prohibits the individual from working in or with Grand Rapids Christian Schools.
- b. The individual has ever had a felony, of any kind, no matter when it occurred.

If a record of any other kind is found, the LASO or authorized designee will review if access is appropriate. Persons believed to be a fugitive, or having an arrest history without conviction, must be reviewed to determine if access to CHRI is appropriate. The LASO or authorized designee may ask for a review by the CJIS Systems Officer (CSO) of the MSP in extenuating circumstances where the severity of the offense and the time that has passed would support a possible variance.

Access may be granted upon determination by the LASO or authorized designee, so long as providing such access would not be detrimental to the agency or the individual for which the record pertains.

Persons with access to CHRI and are subsequently arrested and/or convicted of a crime will:

- a. Have their access to CHRI suspended until the outcome of an arrest is determined and reviewed by the LASO or authorized designee in order to determine if continued access is appropriate.
- b. Have their access suspended indefinitely if a conviction results in a felony of any kind.
- c. Have their access denied by the LASO or authorized designee where she/he determines that access to CHRI by the person would not be in the public's best interest.

Whenever possible, access to CHRI by support personnel, contractors, and custodial workers will be denied. If a need should arise for such individuals to be in an area(s) where CHRI is maintained or processed (at rest or in transit); persons will be escorted by or under the supervision of authorized personnel at all times while in these area(s).

Contracted Information Technology (IT) contractors or vendors will be physically or virtually escorted by authorized personnel anytime said individuals have access to facilities, areas, rooms, or an agency's CHRI information system.

Virtual escorting of privileged functions is permitted only when all the following conditions are met:

- a. The session shall be monitored at all times by an authorized escort.

- b. The escort shall be familiar with the system/area in which the work is being performed.
- c. The escort shall have the ability to end the session at any time.
- d. The remote administrative personnel connection shall be via an encrypted (FIPS 140-2 certified) path.
- e. The remote administrative personnel shall be identified prior to access and authenticated prior to or during the session. This authentication may be accomplished prior to the session via an Advanced Authentication (AA) solution or during the session via active teleconference with the escort throughout the session.

NCJAs that do not have passed and federally-approved legislation authorizing or requiring the civil fingerprint-based background checks are exempt from this requirement until such a time as appropriate legislation has been written into law.

342.4 Personnel Termination

The LASO or authorized designee shall terminate access to CHRI immediately, which is within 24 hours of a notification that an individual's termination of employment has occurred.

- a. Superintendent will inform employee of termination date and requirements.
- b. Superintendent or building principal will receive physical building keys and or key card access to all buildings.
- c. Superintendent will inform the IT department to shut down LASO access to email and login ability to any CHRI system of records.

342.5 Personnel Transfer

Individuals with access to CHRI, and where the individual has been reassigned or transferred, shall have his or her access reviewed by the LASO or authorized designee to ensure access is still appropriate. If access is determined to be suspended, the individual shall be restricted from access to CHRI within the immediate 24 hours of transfer or reassignment and the following steps shall be taken by Grand Rapids Christian Schools immediately:

- a. LASO and superintendent will determine if the transfer of employee changes the requirements of the position to access CHRI records.
- b. Review of the position change will take place upon notification of transfer of employee.

- c. Should employee no longer require access to physical CHRI media to perform their daily job responsibilities, the employee shall return any keys or access cards to administrative offices, and file room.
- d. Should employee no longer require access to digital CHRI media to perform their daily job responsibilities, access to the agency's digital CHRI (thumb drive) will be eliminated.

342.6 Sanctions

Persons found noncompliant with state or federal laws, current FBI CJIS Security Policy, rules or regulations, including Grand Rapids Christian Schools Information Security Policy, will be formally disciplined. Discipline can be, but not limited to, counseling, the reassignment of CHRI responsibilities, dismissal, or prosecution. Discipline will be based on the severity of the infraction and at the discretion of Grand Rapids Christian Schools

342.7 Media Protection

CHRI media is to be protected and secured at all times. The following is established and is to be implemented to ensure the appropriate security, handling, transporting, and storing of CHRI media in all its forms.

342.7.1 Media Storage & Access

Digital and physical CHRI media shall be securely stored within physically secured locations or controlled areas, and within the agency's facility unless otherwise permitted. Access to such media is restricted to authorized personnel only and secured at all times when not in use or under the supervision of an authorized individual.

Physical CHRI media:

- a. Is stored within individual records when feasible or by itself when necessary.
- b. Is maintained within a lockable closet or office drawer.

Digital CHRI media:

- a. Is secured on an Encrypted (AES) thumbdrive as suggested in the most current FBI CJIS Security Policy.
- b. Thumb drive is maintained within a lockable closet or drawer.

342.7.2 Media Transport (Digital and/or Physical)

Should the need arise to move CHRI media outside of the secured location or controlled area, Grand Rapids Christian Schools shall establish and implement appropriate security controls to prevent compromise of the data while transporting. The transport of CHRI media will be conducted by authorized personnel.

CHRI media includes:

- a. Physical CHRI media such as paper/hard copies.
- b. Digital CHRI media is stored on an AES thumbdrive kept in a locked closet and will be transported by the LASO should the thumbdrive need to be transported.

Only LASO or other authorized employees will handle and transport CHRI media. Transport or removal of CHRI records will only occur at the request and approval of the LASO. Transportation of media will occur in a locked file cabinet or sealed envelope depending on appropriateness (size) of the document(s). Identity media is to remain in the physical possession of the LASO or designated authorized employee until CHRI media is delivered to its intended destination.

342.7.3 Disposal of Physical Media

Once physical CHRI media (paper copies) is determined no longer needed by the agency, media shall be destroyed and disposed of according to the FBI CJIS Security Policy. Formal procedures for the secure disposal or destruction of physical media:

- a. Grand Rapids Christian Schools authorizes the LASO to dispose of physical CHRI media according to an Active + 6 year retention policy.
- b. Disposal or destruction of physical CHRI media shall be witnessed or carried out by the LASO or authorized user.
- c. Any destruction of Grand Rapids Christian Schools CHRI results will be crosscut shredded.

343 Physical Protection

Grand Rapids Christian Schools shall document and implement a physical protection policy and procedures to ensure CHRI and information system hardware, software, and media are physically protected through access control measures.

343.1 Physically Secure Location

Grand Rapids Christian Schools will ensure both sufficient physical and personnel security controls exist for the protection of CHRI and associated information systems. By securing it in a locked closet located in the Administrative offices of Grand Rapids Christian Schools:

- a. Prominently post the perimeter of the physically secured location and keep separate from non-secure locations by physical controls.
- b. Keep a current list of personnel with authorized access to the physically secure location or use a method of credentials to keep track of authorized personnel.
- c. Ensure all physical areas where CHRI or information systems are stored and/or used for processing shall be controlled. Individuals requiring access to such locations will be verified before granting access. Physical access to information system distribution and transmission lines within the physically secure location will be controlled and safeguarded.
- d. Position information system devices that display CHRI in such a way as to prevent unauthorized individuals from accessing and viewing CHRI.
- e. Ensure methods are in place to monitor, detect and respond to information system incidents for individuals attaining physical access to secured areas.
- f. Validate all visitors before admittance to the physically secure locations, and visitors will be escorted and monitored at all times.
- g. Authorize and control information system-related items entering and exiting the physically secure location.

343.2 Controlled Area

If an agency cannot meet all of the controls required for establishing a physically secure location, but has an operational need to access or store CHRI, the agency shall designate an area, a room, or a storage container, as a controlled area for the purpose of day-to-day CHRI access or storage. At a minimum:

- a. Access is limited to controlled area during CHRI processing times and to authorized personnel, approved by the agency to access or view CHRI.
- b. CHRI will be locked and secured to prevent unauthorized access when unattended.
- c. Information system devices and documents containing CHRI will be positioned in such a way as to prevent an unauthorized individual from access or view.

- d. Encryption requirements will be implemented for digital storage (i.e. data “at rest”) of CHRI.

344 Incident Response

Grand Rapids Christian Schools shall establish operational incident handling procedures for instances of an information security breach. Information security incidents are major incidents that significantly endanger the security or integrity of CHRI. GRCS will identify responsibilities for information security incidents and include how and who to report such incidents to. GRCS will ensure appropriate security incident capabilities exist, and should incorporate the lessons learned from ongoing incident handling activities. GRCS will ensure procedures exist and are implemented for a follow-up action of a security breach and for the collection of evidence in cases of legal action. All individuals with direct or indirect access to CHRI shall be trained on how to handle an information security incident, and such training is to be included within the GRCS’s Security Awareness Training. (See section on Security Awareness Training at the end of this document.) Procedures shall be in place to track and document information security incidents, whether physical or digital, on an ongoing basis. When an incident has been determined to be a breach having to do with CHRI, the agency will report the security breach to the MSP ISO through the use of a “Information Security Officer (ISO) Computer Security Incident Response Capability Reporting,” form (CJIS-016).

344.1 Incident Response Procedures:

- a. Any incident that is discovered will be reported to immediate superior who will then report to the superintendent and the LASO.
- b. Provide specific steps for handling capabilities, for the digital and physical CHRI media, utilized by the agency.
 - 1. Preparation – The CHRI files will be locked at all times in the business office which will be locked when office staff is not present.
 - 2. Detection – Grand Rapids Christian Schools is protected through SecureAlarm security system monitored day and night. All doors are checked and locked at night.
 - 3. Analysis – The LASO and superintendent will work with GRPD authorities to determine how the incident occurred and what data were affected.
 - 4. Containment – The LASO and superintendent will lock uncompromised CHRI information in a secure container, or transport CHRI to secure area.
 - 5. Eradication - LASO and superintendent will work with GRPD to remove any threats that compromise CHRI data.

6. Recovery – GRPD will be in charge and will handle and oversee recovery of stolen CHRI media. The LASO or superintendent may contact MSP for assistance in re-fingerprinting if necessary.
- c. Provide specific steps for the appropriate collection of evidence of an information security breach that meets relevant jurisdiction(s). Should the agency choose to take legal action, whether criminal or civil, what steps are taken in terms of evidence collection (calling law enforcement to take a report or contacting legal counsel).
- d. Grand Rapids Christian School will use form (CJIS-016) which is the required method of reporting security incidents to the MSP.
- e. LASO will collect the CJIS-016 form when used for the reporting of security incidents, Grand Rapids Christian Schools will retain completed forms on an ongoing basis in order to meet policy requirement for tracking.

345 Secondary Dissemination

When permitted by law, and Grand Rapids Christian Schools releases a CHRI response to another authorized recipient pursuant to authorized sharing provisions, a log of such release(s) shall be established, implemented, and kept current. The log will be maintained indefinitely and be made available upon request to a MSP representative for audit purposes. Fields required for the log are:

- The date the record was shared.
- Record disseminated.
- Requesting agency (whom the response was shared with) / Recipient Name.
- Method of sharing; either by U.S. Mail or landline fax. (No emailing).
- Agency personnel that shared the CHRI.

346 Security Awareness Training

Grand Rapids Christian Schools will establish, implement, and administer basic Security Awareness Training (SAT) that meets the minimum standards provided within the most current version of the FBI CJIS Security Policy. The LASO will, every two years and starting from date of adopting agency SAT, review the FBI CJIS Security Policy to ensure agency implemented SAT meets the most current requirement(s). All individuals having access to CHRI, whether digital or physical, shall complete SAT provided by the agency within six (6) months of assignment and every two (2) years thereafter. The agency will also include any or all Information Technology (IT) personnel having access to digital systems used to process CHRI. The agency will document and keep current completed SAT records, past and current.