AGENDA –Wednesday, March 12, 2025
REGIONAL SCHOOL DISTRICT NO. 7
BOARD OF EDUCATION
6:00 p.m.
Newbury Library Media Center

Regional School District No. 7 Board of Education Mission Statement:

We believe the public education is an essential component of a free and democratic society. In a partnership of family, school, community, and local and state government, our mission is to enable all students to meet high standards, make productive choices in their personal lives, contribute to a diverse global society and act as responsible citizens.

1.0 CALL TO ORDER

2.0 PUBLIC PORTION

3.0 APPROVAL OF MINUTES

- 3.1 February 26, 2025 Regular Board of Education Meeting
- 3.2 March 5, 2025 BOE Budget Workshop

4.0 REPORTS

- 4.1 Student Representatives - Amaya Washington, Owen Langer
- 4.2 Principals' Report - R. Cornelius, G. Franklin
- 4.3 Superintendent's Report - S. LePage
- 4.4 Director of Finance and Operations- J. Gaskins

5.0 OLD BUSINESS

- 5.1 2025-2026 Budget Discussion
- 5.2 Updates
- 5.3 BOE Goals

6.0 NEW BUSINESS

- 6.1 Healthy Food Certification for 7.1.2025 to 6.30.2026
- 6.2 Action- Motion for BOE Approval of RSD#7 New Hartford Transportation
- 6.3 Discussion and Possible Action Vo-Ag Roof State Project # 207-0032RR
- 6.4 Policy Review Series 2000
  - a. Policy Regarding Holds on the Destruction of Electronic Information and Paper Records
  - b. Administrative Regulations Regarding the Retention and Disposition of Records/Information
  - c. Uniform Treatment of Recruiters

7.0 CORRESPONDENCE

8.0 OPPORTUNITY FOR PUBLIC TO SPEAK ON AGENDA ITEMS

9.0 ADJOURNMENT

Enclosures: Regular Board of Education Meeting Minutes 2.26.2025
Budget Workshop Meeting Minutes 3.5.2025
25-26 HFC Specifications for Votes/Motions
Policies 2000 Series for review

Next Meetings:	*March 15, 2025*	*@ 8:00 a.m. – Budget Workshop New Hartford BOF- New Hartford Town Hall*
	March 19, 2025	*@ 6:00 p.m. – First Town Budget Presentation ~ Colebrook*
	March 26, 2025	*@ 6:30 p.m. – Second Town Budget Presentation ~ Norfolk*
	April 1, 2025	*@ 7:00 p.m. – Third Town Budget Presentation ~ New Hartford*
	April 8, 2025	*@ 7:00 p.m. – Fourth Town Budget Presentation ~ Barkhamsted*

We welcome the public to share their comments via publicinput@nwr7.org. Your emails will be considered during the Public Comment session of the meeting. Thank you for your participation.

REGIONAL SCHOOL DISTRICT NO. 7

Newbury Library Media Center
Board of Education Meeting
February 26, 2025 – 6:00 p.m.
DRAFT

PRESENT: Chair Ms. Molly Sexton Read (B), Vice-Chair Mr. Robert Jerram (NH), Ms. Deborah Bell (N), Ms. Terri Kenneson (C), Ms. Lisa Fragale (C), Ms. Mary Duran (B) Superintendent Steven K. LePage, Director of Finance & Operations Mr. James Gaskins, Secretary / Treasurer Mr. Noel Gauthier (NH).
Absent: HS Principal Gary Franklin, MS Principal Ryan Cornelius, and Student Representatives Amaya Washington and Owen Langer.

CALL TO ORDER: Ms. Sexton Read called the Regular Board of Education meeting to order at 6:00 p.m.

PUBLIC PORTION: None.

APPROVAL OF MINUTES

MOTION by Ms. Fragale, seconded by Mr. Gauthier, to **APPROVE** the February 12th, 2025 Regular Meeting Minutes as presented. **AYE**: Ms. Sexton Read, Mr. Jerram, Ms. Bell, Mr. Gauthier, Ms. Kenneson, Ms. Crone, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

SUPERINTENDENT REPORT

Budget Presentation: Superintendent LePage gave the board an overview of the proposed 2025-2026 budget. This budget reflects a 2.97% increase. Budget drivers include an increase in the cost of health insurance for employees, salary contractual obligations, a reduced funding of the Excess Cost Grant and the continued need for academic support for students. He emphasized the balance of significant needs and finite resources. The presentation included mitigation strategies such as reducing the Capital Projects budget by $50k, and other projects have been deferred at this time to try and best utilize funds for the upcoming year. The presentation reviewed all object areas within the budget, noting those where there is an increase and those where there is a decrease. Included in the presentation were comparisons with other districts within the same DRG, an explanation about the tiered support system being implemented in the Middle School, as well as the expansion of courses available in the High School. This budget reflects a 4.1% increase in the assessment to the member towns.
A discussion followed.

DIRECTOR OF FINANCE AND OPERATIONS

Accounting update: Mr. Gaskins explained to the board that Wells Fargo account will no longer maintain the account for the Adele Winn Scholarship. He recommends we close the account and move the funds to The Greenwoods Scholarship account.

OLD BUSINESS

Second Readings of Policies: #6146, #5131.911, #5144.12(a)

MOTION by Ms. Crone, seconded by Ms. Kenneson, to **APPROVE Policy #6146** Graduation Policy, as presented. **AYE**: Ms. Sexton Read, Mr. Jerram, Ms. Bell, Mr. Gauthier, Ms. Kenneson, Ms. Crone, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

MOTION by Ms. Bell, seconded by Mr. Jerram, to **APPROVE Policy #5131.911** School Climate Policy, as presented. **AYE**: Ms. Sexton Read, Mr. Jerram, Ms. Bell, Mr. Gauthier, Ms. Kenneson, Ms. Crone, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

MOTION by Mr. Jerram, seconded by Ms.Bell, to **APPROVE Policy #5144.12(a)** Restorative Practices Policy, as presented. **AYE**: Ms. Sexton Read, Mr. Jerram, Ms. Bell, Mr. Gauthier, Ms. Kenneson, Ms. Crone, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

NEW BUSINESS

MOTION by Ms. Crone, seconded by Mr. Jerram, to **APPROVE** the closure of the Wells Fargo account. The Regional School District No. 7 Board of Education hereby authorizes the Director of Finance to close Wells Fargo Account and transfer all funds to The Greenwoods Scholarship Foundation. These funds shall be solely used for the purpose of maintaining and administering the Adele Winn Scholarship according to the criteria set forth by the Winn family. **AYE:** Ms. Sexton Read, Mr. Jerram, Ms. Bell, Mr. Gauthier, Ms. Kenneson, Ms. Crone, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

CORRESPONDENCE
None.

OPPORTUNITY FOR PUBLIC TO SPEAK ON AGENDA ITEMS
None.

ADJOURNMENT

MOTION by Mr. Jerram, seconded by Ms. Duran, to **ADJOURN** at 7:06 p.m. **AYE:** Ms. Sexton Read, Mr. Jerram, Ms. Kenneson, Ms. Bell, Ms. Crone, Mr. Gauthier, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

The next BOE Meeting is scheduled for March 5, 2025.

Respectfully submitted,

Emily Vacila
Board Clerk

REGIONAL SCHOOL DISTRICT NO. 7

Newbury Library Media Center
Board of Education Meeting – Budget Workshop
March 5, 2025 – 6:00 p.m.
DRAFT

PRESENT: Chair Ms. Molly Sexton Read (B), Vice-Chair Mr. Robert Jerram (NH), Secretary / Treasurer Mr. Noel Gauthier (NH), Ms. Deborah Bell (N), Ms. Kim Crone (N), Ms. Terri Kenneson (C), Ms. Lisa Fragale (C), Ms. Mary Duran (B), Superintendent Steven K. LePage, Director of Finance & Operations Mr. James Gaskins,. Barkhamsted First Selectman Mr. Nicholas Lukiwsky, Barkhamsted Board of Finance Chairperson Mr. Richard Winn, New Hartford First Selectman Mr. Daniel Jerram, New Hartford Board of Finance Chairperson Ms. Kerry Guilfoyle, Colebrook First Selectman Mr. Brad Bremer, Colebrook Board of Finance Chairperson Mr. Duncan Wilber, Norfolk First Selectman Mr. Matthew Riiska, Norfolk Board of Finance Chairperson Mr. Michael Sconyers.

Absent: HS Principal Gary Franklin, MS Principal Ryan Cornelius, and Student Representatives Amaya Washington and Owen Langer.

CALL TO ORDER: Ms. Sexton Read called the Regular Board of Education meeting to order at 6:04 p.m.

PUBLIC PORTION: None.

SUPERINTENDENT REPORT

Superintendent LePage completed a presentation for the Board of Education and First Selectmen on the Proposed Budget for 2025-2026. He discussed which areas of the budget had decreases, as well as areas of unavoidable increases. Breakdowns of student enrollment per town was shown in chart form to show a decreasing pattern for Norfolk and Barkhamsted while New Hartford and Colebrook showed either increase in enrollment or consistent enrollment. Discussion followed the enrollment charts as the number of students does affect the amount of money the towns are responsible for. After his presentation, he opened the floor to the Selectmen, Board members, and guests for any further discussion or questions.

DIRECTOR OF FINANCE AND OPERATIONS

Mr. Gaskins did not have a presentation, but contributed to conversation in regards to areas where cuts have already been made and potential options to better utilize the budget money.

OLD BUSINESS

None.

NEW BUSINESS

None.

CORRESPONDENCE

None.

OPPORTUNITY FOR PUBLIC TO SPEAK ON AGENDA ITEMS

First Selectman Jerram thanked everyone at the meeting and explained that his area of concern was the staffing situation and the decline of the student population. First Selectman Jerram stated that over the 10 years, the student enrollment has decreased significantly from 1100 students, yet the staffing population has had a minimal decrease; noting that the price per pupil 10 years ago was approximately $16,000-$17,000. While today's price per pupil is $30,600.00, noting that it is a 70% increase and averaging increase of 7%. He followed this statement by stating the chart for COLA and Social Security are not true because the checks being written are on an average rate of 7%. Superintendent LePage interjected that the current state of inflation and COVID were factored into this budget as we are not in the same financial and economic situation 10 years ago. First Selectman Jerram acknowledged this and stated how we are down 30% percent down in students but have the same amount of employees and feels that the budget has been "massaged". He then asked if there were areas of non-teaching staff the could be consolidated (i.e. counselors) as caseloads have decreased with the noticeable decrease in student body. Superintendent LePage communicated that he appreciated Mr. Jerram asking this question, and explained that he feels the counselors are needed now more than ever with the uptick in mental health needs and special education requirements. Ms. Sexton Read joined the discussion and voiced how with the increase in student needs we do need the bodies in the building to give the students the best support. Whether it is students with IEPs, struggling with specific subjects, or needing assistance with FAFSA and other college related material. Mr. Jerram began comparing our budget to school districts such as Thomaston and East Granby. Superintendent LePage presented a chart with the surrounding districts budgets showing how Thomaston's budget is proposed higher than our districts, and it is difficult to compare with East Granby as they are a K-12 and categorized differently. Ms. Sexton Read thanked First Selectman Jerram for the well-articulated challenge and the Board will be looking into the concerns he proposed. She stated that the Board will be creative in finding solutions that will not sacrifice the experience the students have at the school. She did acknowledge that we do have less students today.

Norfolk Board of Finance Chair Michael Sconyers stated that the numbers for Norfolk are interesting and he has had townspeople question the assessment and percentage they have to contribute with such a small amount of student population. He explained to the board how they have consolidated some classes, stating that their class population has decreased from 190 students to approximately 61-67 today.

Kerry Guilfoyle, the Board of Finance Chairperson from New Hartford, asked on the status of the New Hartford transportation contracts. Mr. Gaskins stated they are currently still out to bid, but that the other three contracts have been settled. Dattco being the current company in question. There has been a 5% increase budgeted for transportation as we have seen steady increase in their fees. The bid has been modified from a 10 bus request to 9 buses for the year.

ADJOURNMENT

MOTION by Mr. Jerram, seconded by Mr. Gauthier, to **ADJOURN** at 7:48 p.m. **AYE:** Ms. Sexton Read, Mr. Jerram, Ms. Kenneson, Ms. Bell, Ms. Crone, Mr. Gauthier, Ms. Fragale, Ms. Duran. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

The next BOE Meeting is scheduled for March 12th 2025.

Respectfully submitted,

Emily Vacila
Board Clerk

2025-26 Healthy Food Certification Statement

VOTE # 1 : Required vote for participation in healthy food option of HFC (use this language in your minutes)

Pursuant to C.G.S. Section 10-215f, the **Regional School District No.7 Board of Education** certifies that all food items offered for sale to students in the schools under its jurisdiction, and not exempted from the Connecticut Nutrition Standards published by the Connecticut State Department of Education, will comply with the Connecticut Nutrition Standards during the period of **July 1, 2025, through June 30, 2026**. This certification shall include all food offered for sale to students separately from reimbursable meals at all times and from all sources, including but not limited to school stores, vending machines, school cafeterias, culinary programs, and any fundraising activities on school premises sponsored by the school or non-school organizations and groups.

VOTE # 2 : Required vote for participation in healthy food option of HFC (use this language in your minutes)

The **Regional School District No.7 Board of Education** will allow the sale to students of food items that do not meet the Connecticut Nutrition Standards and beverages not listed in Section 10-221q of the Connecticut General Statutes provided that the following conditions are met: **1)** the sale is in connection with an event occurring after the end of the regular school day or on the weekend; **2)** the sale is at the location of the event; and **3)** the food and beverage items are not sold from a vending machine or school store. An "event" is an occurrence that involves more than just a regularly scheduled practice, meeting, or extracurricular activity. For example, soccer games, school plays, and interscholastic debates are events but soccer practices, play rehearsals, and debate team meetings are not. The "regular school day" is the period from midnight before to 30 minutes after the end of the official school day. "Location" means where the event is being held and must be the same place as the food and beverage sales.

Series 2460
Administration

POLICY REGARDING HOLDS ON THE DESTRUCTION OF ELECTRONIC INFORMATION AND PAPER RECORDS

The Board of Education (the "Board") complies with all state and federal regulations regarding the retention, storage and destruction of electronic information and paper records. The Superintendent or his/her designee shall be responsible for implementing administrative regulations concerning the placing of a "hold" on electronic information and paper records that may reasonably be anticipated to be subject to discovery in the course of litigation.

All school officials and employees have a duty to preserve all paper records and electronic information, including records and electronic information that might otherwise be deleted or destroyed, that relate to any matter that is currently in litigation or may be anticipated to involve future litigation.

The Superintendent or his/her designee shall be responsible for developing and implementing administrative regulations to preserve records, including e-mails and electronically stored information, that could potentially be related to any matter that is currently in litigation or may be anticipated to result in future litigation. Such regulations shall identify those individuals responsible for identifying those matters for which records must be preserved as well as developing procedures, with the help of technical staff, for the preservation of electronically stored information.

Legal References:

Rules 34 and 45 of the Federal Rules of Civil Procedure
General Letter 2009-2 of the Public Records Administrator Record Retention Schedules Towns, Municipalities and Boards of Education

ADOPTED:_____
REVISED:_____

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Series 2460
Administration

ADMINISTRATIVE REGULATIONS REGARDING HOLDS ON THE DESTRUCTION OF ELECTRONIC INFORMATION AND PAPER RECORDS

I. RECORDS CUSTODIAN

These regulations are designed to assist in implementation of Board Policy #2460 regarding holds on the destruction of electronic information and paper records. The Superintendent of Schools shall designate a Records Custodian who will be responsible for implementation of District policies and regulations for the preservation of paper records and electronically stored information, including e-mails.

II. HOLDS ON THE DESTRUCTION OF ELECTRONIC INFORMATION AND PAPER RECORDS

Upon receipt of notice that the District is involved in litigation as a party to a lawsuit, the District is issued a subpoena by a party to a lawsuit in which it is not a party, or if the District receives information that would lead a reasonable person to anticipate the possibility of litigation, the Records Custodian is to immediately take steps to ensure that any paper records and electronically stored information that could be related to the litigation or potential litigation are preserved from deletion or destruction. Actions to preserve records and electronically stored information shall include, but are not limited to, the postponing or canceling of any automatic deletion of electronically stored information until relevant information and documents can be identified and stored, notification to employees of a "litigation hold" to prevent the deletion and destruction of documents that might be related to the litigation or potential litigation, and the identification of documents and information that are subject to preservation. This litigation hold triggers the duty to preserve documents, such as transitory messages, that otherwise could be deleted under the district's record retention policy.

The Records Custodian shall issue a "litigation hold" memorandum that specifically describes the types of documents and information that must be preserved and describes how those materials are to be identified, maintained and stored. The memorandum shall specifically state that the duty of preservation is ongoing and that it is the responsibility of employees to continue to identify and preserve relevant documents until notified via a subsequent memorandum that the litigation hold is no longer in effect. All employees who are sent a "litigation hold" memorandum are to acknowledge receipt and understanding of the memorandum in writing, which may be in the form of an email response. A copy of any "litigation hold" memorandum shall be sent to the District IT department.

The Records Custodian shall be responsible for the collection and coordination of the retention of documents that are subject to the litigation hold, including electronically

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stored information. He/she shall work with the District's IT personnel to ensure compliance with the litigation hold. Specifically, the Records Custodian shall determine the types of electronically stored information that exist and where that information is maintained, identify where both identified paper documents and electronically stored information will be stored, and implement procedures to ensure that District employees are complying with the litigation hold. No system wide process for automatic deletion of electronic information will be implemented while a litigation hold is in effect without prior notice to the Records Custodian and verification by the Records Custodian that the deletion process will not destroy documents or information that is subject to a litigation hold. The Records Custodian may need to periodically reissue the "litigation hold" memorandum and will ensure that the "litigation hold" memorandum is provided to new employees who may have access to relevant information. Finally, the Records Custodian shall ensure that all steps taken by the District to identify and preserve relevant information are documented.

Legal References:

General Letters 96-2, 2001-1, 2009-2 of the Public Records Administrator
Record Retention Schedules Towns, Municipalities and Boards of Education
Rules 34 and 45 of the Federal Rules of Civil Procedure
Silvestri v. General Motors Corp., 271 F.3d 583 (4th Cir. 2001)

ADOPTED:_____
REVISED:_____

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NOTICE REGARDING A LITIGATION HOLD CONCERNING ELECTRONIC INFORMATION AND PAPER DOCUMENTS

This memorandum places a "litigation hold" on all documents, both paper and electronically stored information, concerning **[identify the matter that is subject to the litigation hold].** Materials that fall under this litigation hold include, but are not limited to, e-mail, word processing documents, spreadsheets, databases, calendars, voice mail, internet usage files and network access information **[the school district can be more specific in the identification of documents if that information is available]**. All District employees are to immediately suspend any and all document destruction, including any scheduled document destruction or electronic information deletion programs, for any materials that might fall within the parameters of this memorandum. If you have questions as to what materials are subject to the litigation hold, you are to contact the Records Custodian **[insert name and contract information]**.

If you are in possession of materials subject to this litigation hold, you shall take steps to preserve and store these materials. Paper documents are to be copied and segregated in a separate hard copy file. Electronic information is to be stored in computer folders and saved on the network drive and/or saved to a removable disk which is to be clearly marked and stored in a safe and appropriate location **[the school district can develop its own set of storage guidelines for identified materials]**. Under no circumstances are you to destroy or delete materials, documents or electronic information that might be subject to this litigation hold without the written permission of the Records Custodian.

You must give prompt attention to the issues addressed in this memorandum, specifically the responsibility to identify and preserve documents and electronic information concerning **[the matter that is subject to the litigation hold].** Serious consequences may result from the failure of District employees to take immediate and reasonable precautions to properly preserve information. Therefore, you must acknowledge your receipt and understanding of this memorandum in writing or via e-mail.

The restrictions put into place by this memorandum are ongoing until you receive notice in a memorandum from the Records Custodian that the litigation hold is no longer in effect. You are encouraged to direct any questions concerning this memorandum to the Records Custodian.

08/2010

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Series 2461(P)
Administration

RETENTION AND DISPOSITION OF RECORDS AND INFORMATION

I. INTRODUCTION

The Regional School District No. 7 Board of Education (the "Board") complies with all state and federal laws and regulations regarding the retention, storage, and disposition of records. The Superintendent or designee shall be responsible for developing and implementing administrative regulations concerning the retention, storage, and disposition of records and the dissemination of such administrative regulations to all school officials, employees, and individuals granted access to the computer systems and/or networks of the Regional School District No. 7 Public Schools (the "District") and/or who send electronic messages as part of their work for the District. Collectively, all individuals granted access to the District's computer systems are referred to as the "Users".

II. RETENTION OF RECORDS

The District shall comply with all minimum standards set forth in the Municipal Records Retention Schedules for public records, as issued by the Office of the Public Records Administrator for the State of Connecticut ("OPRA"). Retention requirements apply to the official record copy of a public record and are based on the content and function of the public record, not the media type. As such, the same record retention period that applies to paper records applies to electronically stored information. Therefore, like paper records, the content and function of an electronic record, including electronic messages, determine the retention period for that document.

If records are kept in both electronic and hard copy format, the District shall designate which record is the official record copy. The designated official copy shall be the legally recognized copy maintained for record retention purposes.

In addition to the retention guidelines established by the Board and used by District officials and employees, all District officials and employees have a duty to preserve all records and electronic information, including records and electronic information that might otherwise be deleted or destroyed, that relate to any matter that is currently in litigation or may be anticipated to involve future litigation. Record preservation under such circumstances shall only be required after receipt of formal written notice of such requirement by the Superintendent or designee.

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III. USE OF ELECTRONIC MESSAGES AND ELECTRONIC COMMUNICATIONS

The Board has installed computers and a computer network(s), including Internet access and electronic messaging systems, on Board premises and may provide other electronic devices that can access the network(s) and/or have the ability to send and receive messages with an operating system or network communication framework. Devices include but are not limited to personal computing devices, cellular phones, Smartphones, network access devices, radios, personal cassette players, CD players, tablets, walkie-talkies, personal gaming systems, Bluetooth speakers, personal data assistants, and other electronic signaling devices. Electronic messaging systems include mobile, chat, and instant message; cloud collaboration platforms, including internal chat, peer-to-peer messaging systems, and draft email message transfer; and products that have the ability to create duration-based or subjective removal of content, such as Snapchat, and security focused platforms, such as Signal. The Board's computers, computer networks, electronic devices, Internet access and electronic messaging systems are referred to collectively as "the computer systems" and are provided in order to enhance both the educational opportunities for our students and the business operations of the District.

Electronic messages sent by Users as part of their work and/or by using the District's computer systems and/or network(s) are not private communications and are potentially subject to disclosure, regardless of whether the messages are sent using personal devices or the District's computer systems. Users must understand that the Board has reserved the right to conduct monitoring of the District's computer systems and may do so *despite* the assignment to individual Users of passwords for system security. Any password systems implemented by the District are designed solely to provide system security from unauthorized users, not to provide privacy to the individual system User.

The system's security aspects, message delete function and personal passwords may be bypassed for monitoring purposes. Therefore, *Users must be aware that they should not have any expectation of personal privacy in the use of these computer systems*. This provision applies to any and all uses of the District's computer systems, including any incidental personal use permitted in accordance with the Board's policy and regulations regarding computer use by Users.

Any retained messages may be retrieved for a variety of purposes, including but not limited to as part of routine monitoring by the District, an employee investigation, a search for documents pursuant to a Freedom of Information Act request, or a formal discovery process as part of litigation. Users should bear in mind that electronic messages may be retained at different locations within the computer network and that these messages are

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subject to retrieval, regardless of whether the User has deleted such messages from the User's accounts. Consequently, Users should use discretion when using computers or other electronic technology to send, record or retain electronic messages and information.

IV. DISPOSITION OF RECORDS

The disposition of records, or the destruction or transfer of records to the custody of another entity, shall only occur in accordance with relevant state and federal laws and guidelines established by the OPRA. The District shall also follow the OPRA's specific protocols for the disposition of permanent, historical and archival records. If a record does not appear on a records retention schedule, the District shall contact the OPRA for further guidance before disposing of any such record.

Legal References:

Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)
Conn. Gen. Stat. § 7-109
Conn. Gen. Stat. § 11-8 et seq.

General Letters 96-2 and 2009-2 of the Office of the Public Records Administrator ("OPRA")

OPRA, Public Records Policy 04, *Electronic Records Management* (Dec. 2022)
OPRA, Public Records Policy 04-1, *Electronic Records* (Dec. 2022)
OPRA, Public Records Policy 04-2, *Digital Imaging* (Dec. 2022)
OPRA, Public Records Policy 05, *Disposition of Public Records* (Nov. 2011)
OPRA, *Public Records Memorandum 101: Disposition of Original Paper Records After Scanning* (Apr. 2023)

Connecticut State Library, State Archives ("State Archives"), State Archives Policy 01: *Transfer of Historical Records to the State Archives of Other Approved Archival Repository* (October 15, 2019)

Record Retention Schedules Towns, Municipalities and Boards of Education

OPRA, Authorization for Disposal of Original (Non-Permanent) Paper Records Stored as Digital Images, Form RC-075.1 (revised 12/2021)

OPRA, Records Disposition Authorization, Form RC-075 (revised 12/2021)

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Frequently Asked Questions about E-mail, CT Public Records Administrator, *available at* https://ctstatelibrary.org/wp-content/uploads/2015/05/EmailGuidelines.pdf .

ADOPTED:_____
REVISED:_____

12/4/2023

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Series 2461(R)
Administration

ADMINISTRATIVE REGULATIONS REGARDING THE RETENTION AND DISPOSITION OF RECORDS AND INFORMATION

I. INTRODUCTION

The Regional School District No. 7 Board of Education (the "Board") complies with all state and federal laws and regulations regarding the retention, storage and disposition of records.

These administrative regulations are designed to assist in implementation of Board Policy 2460 regarding the retention, storage, and disposition of public records. These regulations shall be disseminated and/or made available to all school officials, employees, and individuals granted access to the computer systems and/or networks of the Regional School District No. 7 Public Schools (the "District") and/or who send electronic messages as part of their work for the District. Collectively, all individuals granted access to the District's computer systems are referred to as the "Users."

These regulations supplement and do not replace District policy relating to education records.

II. DEFINITIONS

A. Archival record means a public record, which, regardless of format, possesses enduring value if it documents or contains information on one or more of the following: 1) the evolution of the Board, the District, or their policies and practices; 2) claims or petitions against the Board or the District and the disposition of those claims or petitions; 3) obligations and claims made on citizens by the Board or the District and their disposition; 4) the legal and legislative history of the Board or the District; and/or 5) topics of research value beyond the specific administrative, legal or fiscal reasons the records were originally created.

B. Computer systems mean the Board's computers, computer networks, electronic devices, Internet access and electronic messaging systems, which are provided in order to enhance both the educational opportunities for students and the business operations of the District.

C. Digital imaging means the process of converting original records on paper or film into electronic images. The process typically requires a document

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scanner or digital camera, a computer and software to capture the image, and indexing of the digitized images.

D. Digitized record means an electronic record created by converting paper or other media formats to a digital form that is of sufficient authenticity, reliability, usability, and integrity to serve in place of the original source record.

E. Disposition means a final administrative action taken with regard to records, including destruction, transfer to another entity, or permanent preservation.

F. Electronic messages mean e-mail, fax, instant messaging, text messaging, and Web-based messaging services. Electronic messages may be transmitted by a variety of mediums, including computers and mobile computing devices. In addition to the body of the message, electronic messages also contain metadata, such as transactional information (*e.g.*, date and time sent, sender/receiver) and may contain attachments such as calendars, directories, distribution lists, sound recordings, photographs, images, word-processing documents, spreadsheets, and other electronic documents.

G. Electronic messaging systems mean mobile, chat, and instant message; cloud collaboration platforms, including internal chat, peer-to-peer messaging systems, and draft email message transfer; and products that have the ability to create duration-based or subjective removal of content, such as Snapchat, and security focused platforms, such as Signal.

H. Electronically stored information means information that is fixed in a tangible form and is stored in a medium from which it can be retrieved and examined. It can consist of writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained into usable form.

I. Historical record means a public record that has been determined to possess value in documenting the history of an organization and is thus worthy of permanent preservation.

J. Official record copy means the specific copy of a public record, as provided in C.G.S. § 1-200(5), designated by the public agency as the legally recognized copy that must be maintained for records retention, preservation, and authentication.

K. Non-records mean items that are not usually included within the scope of official records. Examples of non-records are extra (duplicate) copies kept only for convenience, reference materials, blank forms, and spam and unsolicited advertisements.

L. Permanent records mean records that have been determined to have sufficient historical, administrative, legal, fiscal, or other value to warrant continuing preservation.

M. Public records mean any recorded data or information relating to the conduct of the public's business prepared, owned, used, or received by a public agency, whether such data or information is handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any method.

A. Routine correspondence means any communication that is part of or relates to commonplace tasks or duties within an office and is done at regular or specified intervals.

B. Source record/original source record means the record from which a digitized version or digitized record is created.

C. Transitory correspondence consists of communication that does not relate to an individual's job responsibilities or has a short-term administrative value.

III. RECORDS CUSTODIAN

The Superintendent of Schools shall designate a Records Custodian who will be responsible for the implementation of District policies and regulations for the retention of records, including electronic messages and electronically stored information.

The District's Record Custodian is:

The Administrative Assistant to the Superintendent

IV. RETENTION OF RECORDS

The District shall comply with the minimum standards set forth in the Municipal Records Retention Schedules for public records, as issued by the Office of the Public Records Administrator for the State of Connecticut ("OPRA"). Retention requirements apply to the official record copy of a public record and are based on the content and function of the public record, not the media type.

If records are kept in both electronic and hard copy format, the District shall designate which record is the official record copy. The designated official record copy shall be the legally recognized copy maintained for records retention. When Users are unsure which copy serves as the official record copy, they should contact the Record Custodian for clarification.

In addition to the retention guidelines established by the Board and used by District officials and employees, all District officials and employees have a duty to preserve all records and electronic information, including records and electronic information that might otherwise be deleted or destroyed, that relate to any matter that is currently in litigation or may be anticipated to involve future litigation. Record preservation under such circumstances shall only be required after receipt of formal written notice of such requirement by the Superintendent or designee.

V. CLASSIFICATION OF ELECTRONIC MESSAGES

The same record retention policy that applies to paper records applies to electronically stored information, including electronic messages. Therefore, like paper records, the content and function of an electronic record, including electronic messages, determine the retention period for that document.

Users shall use the following steps in determining whether to maintain electronic messages and, if so, for how long:

Step 1: Determine whether the message is a public record or a non-record.

Step 2: If the message is a non-record, destroy at will (e.g., spam and unsolicited advertisements).

Step 3: If the message is a record, determine which records series the message belongs to, for example:

1. If the message is Transitory Correspondence, delete at will.
2. If the message is Routine Correspondence, retain it for 2 years.
3. If the message is All Other Correspondence, retain it for the equivalent records series.

Step 4: Maintain the messages for the required retention period under the equivalent records series.

VI. DIGITAL IMAGING OF PAPER/HARD COPY RECORDS

Paper records may be digitized and maintained as electronic records; however, in doing so, the District must ensure the authenticity, reliability, integrity and usability of the reformatted records. If the District uses a vendor for digital imaging services, the District remains responsible for ensuring compliance with this policy.

In its use of digital imaging, the District shall:

1. Establish and maintain a quality assurance process to ensure the creation of accurate and authentic digital images and accurate indexes and production metadata.

2. Create and maintain accurate and authentic digital images in accordance with accepted standards and best practices.

3. Create and maintain accurate indexes and production metadata to properly identify and retrieve digital images.

4. Store and protect digital images against file corruption, alteration, or deletion throughout the designated retention period.

5. Perform periodic backups of all digital images, associated indices, and production metadata and maintain a geographically remote offsite backup copy to enable recovery and access in the event of a wide-spread disaster or emergency.

6. Perform and certify annual tests of backup media to ensure all files have been backed up and are readable.

7. Migrate digital images, associated indexes, and production metadata to a newer media platform or file format as needed to ensure the content remains accessible.

8. Define and document the normal operations and use of the imaging technology and electronic content management system to ensure system trustworthiness.

VII. RETENTION OF ELECTRONIC RECORDS

Electronic messages and electronically stored information will be archived by the District for their required retention period using method(s) approved by the Records Custodian, which may include the following:

1. Print message or record and store in appropriate hard copy file.
2. Place in computer folders and save on the hard drive.
3. Save to a removable disk which is then stored in an appropriate location.
4. Transfer to an automated records management software application.
5. Managed at the server by an automated classification system.

The Records Custodian will be responsible for working with the District Systems Administrator to implement a schedule and system for reviewing electronically stored information. This review shall occur at least annually. No system wide process for automatic deletion of electronic information will be implemented without notice to any individual who may have such information and each such individual will verify that they have reviewed and archived information that must be retained. Following this review, all electronic messages and/or electronically stored information that have not been archived according to District policies and procedures shall be designated for deletion or archiving, and the affected Users will be notified about the procedures to be followed to implement this process. The Records Custodian or designee shall follow up with notified Users to promote compliance.

Additionally, the Records Custodian, working with the District Systems Administrator, shall establish processes designed to ensure that any process for automatic deletion of electronic information from the system will not delete information stored in folders and/or system locations that have been designated as appropriate for archiving electronically stored information.

VIII. DISPOSITION OF PUBLIC RECORDS

The disposition of public records shall only occur in accordance with relevant state and federal statutes and guidelines established by the OPRA. The District shall also follow the OPRA's specific protocols for the disposition of permanent, historical and archival records. If a record does not appear on a records retention schedule, the District shall contact the OPRA for further guidance before disposing of any such record.

The OPRA provides for two separate processes for (1) the disposition of official record copies and (2) the disposition of original source records, where such records have been appropriately digitized. If the District uses a vendor for disposition of records, the District remains responsible for ensuring compliance with these regulations.

A. Disposition of Official Record Copies

If a record is the official record copy, the District may not dispose of such record until the applicable retention period has been met and the District has received signed authorization from the OPRA or State Archives. The District shall adhere to the following steps in determining whether to dispose of official record copies:

Step 1: Ensure the proper records retention schedule has been met for the document(s) at issue. All records proposed for disposition must be on an approved records retention schedule. *If a record is not on a schedule, the record cannot be disposed of, and the OPRA must be*

contacted for further direction. For permanent, historical, and/or archival records, contact the State Archives for further instruction.

Step 2: Submit the Records Disposition Authorization Form RC-075 ("RC-075 Form) to request authorization to dispose of the official record copy, in accordance with Public Records Policy 05: Disposition of Public Records (PRP 05) and at least thirty (30) days prior to the proposed date of destruction.

Step 3: Receive signed authorization indicating approval from the OPRA before disposing of any official record copy.

Step 4: Follow the OPRA guidance regarding the method of disposal. If records are being destroyed, follow OPRA guidance based on the format of the record to be destroyed (e.g., whether hard copy or electronic media).

Step 5: Document that the original source records were destroyed lawfully. The District shall follow a destruction process by which content is systematically deleted with an audit trail that is legally admissible in court.

Step 6: Record the actual date of destruction on RC-075 Form and attach any supporting documentation.

Step 7: Retain the RC-075 Form and any supporting documentation for the retention period for Records Disposition Authorization records.

B. Disposition of Original Source Records After Scanning

If paper public records have been converted to digitized records, the District shall retain and/or dispose of *less than permanent* original source records pursuant to the following guidelines.

[NOTE TO CLIENT: After scanning, the District may dispose of less than permanent original source records in either of the following manners. Please note that Option 1 requires that the District first adopt a written policy for digitizing public records that has been submitted for filing to the OPRA. The District is advised to review the OPRA's Records Digitization Policy Template when drafting its District-specific policy and procedures. If the District does not have a written policy and acknowledgement of receipt from the OPRA, it MUST use Option 2 prior to disposing of original source records that have been digitized in accordance with Section VI, above.]

[Option 1:

1. *The District shall develop and maintain a policy and procedures for digitizing public records (the "Digitalization Policy").*
2. *The Digitalization Policy must:*
    a. *Adhere to Public Records Policy 04: Electronic Records Management (PRP 04) for all scanning projects undertaken by the board of education, whether internally or via vendor contracts for imaging, management or storage of electronic records.*
    b. *Comply with Public Records Standards 04-1: Electronic Records (PRS 04-1), Public Records Standards 04-2: Digital Imaging (PRS 04-2), and Public Records Memorandum 101: Disposition of Original Paper Records After Scanning (PRM 101).*
    c. *Include, among other things, requirements for the disposition of original source records, including any additional procedures applicable to records designated as permanent, archival, archival review required, may have historical value, or life of structure (collectively referred to as "designated permanent records").*
3. *The Digitization Policy shall be submitted to the OPRA for filing. The District shall ensure written acknowledgment of receipt by the OPRA. The District shall also seek written confirmation from the OPRA regarding whether the District should await approval of the Digitization Policy before proceeding.*
4. *Once such Digitization Policy is on file with the OPRA, the District may dispose of original source records, other than designated permanent records, pursuant to the Digitalization Policy. The District need not request further OPRA authorization to dispose of original source records that have been scanned in accordance with the Digitization Policy, unless the record is a designated permanent record and additional procedures, including but not limited to retaining security copies of the records in a "human-readable" format, such as paper or microfilm as approved by the OPRA, apply.*

Option 2:

The District may not dispose of any original source record until the applicable retention period has been met and the District has received signed authorization from the OPRA or State Archives. The District shall adhere to the following steps in determining whether to dispose of original source records:

1. *Once digitized, the Records Custodian must designate the digitized record as the official record copy.*
2. *The Records Custodian must ensure the proper records retention schedule has been met for the document(s) at issue. All records proposed for disposition must be on an approved records retention schedule. If a record is not on a schedule, the record cannot be disposed of, and the OPRA must be contacted for further direction.*
3. *The Records Custodian must submit the Authorization for Disposal of Original (Non-Permanent) Paper Records Stored As Digital Images Form RC-075.1 ("RC-075.1 Form") to request authorization to dispose of the original source record. The RC-075.1 Form must be submitted to the OPRA at least thirty (30) days prior to the proposed date of destruction.*
    a. *If the original source record is permanent, archival, archival review required, may have historical value, or life of structure (collectively referred to as "designated permanent records"), it may be digitally scanned and retained in an electronic format, but security copies of the records must be retained in a "human-readable" format, such as paper or microfilm. The Records Custodian must first verify with the OPRA for approval of the security copy storage format.*
    b. *The District shall not dispose of any designated permanent records and/or records without a retention period and may contact OPRA and/or the State Archives for additional information and instruction.*
4. *The District must receive signed authorization indicating approval from the OPRA before disposing of an original source record.*
5. *The District shall follow OPRA guidance regarding the method of disposal.*
6. *Following destruction of the original source records, the District must document that the original source records were destroyed lawfully. The District shall follow a destruction process by which content is systematically deleted with an audit trail that is legally admissible in court.*
7. *The District shall record the date of destruction on the RC-075.1 Form and attach any supporting documentation.*
8. *The District shall retain the RC-075.1 Form and any supporting documentation for the retention period for Records Disposition Authorization records.]*

Legal References:

Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)
Conn. Gen. Stat. § 7-109
Conn. Gen. Stat. § 11-8 et seq.

General Letters 96-2 and 2009-2 of the Office of the Public Records Administrator

OPRA, Public Records Policy 04, *Electronic Records Management* (Dec. 2022)
OPRA, Public Records Policy 04-1, *Electronic Records* (Dec. 2022)
OPRA, Public Records Policy 04-2, *Digital Imaging* (Dec. 2022)
OPRA, Public Records Policy 05, *Disposition of Public Records* (Nov. 2011)
OPRA, *Public Records Memorandum 101*: *Disposition of Original Paper Records After Scanning* (Apr. 2023)
OPRA, *Records Management Terms* (July 2015)

Connecticut State Library, State Archives ("State Archives"), State Archives Policy 01: *Transfer of Historical Records to the State Archives of Other Approved Archival Repository (October 15, 2019)*

Record Retention Schedules Towns, Municipalities and Boards of Education

OPRA, Authorization for Disposal of Original (Non-Permanent) Paper Records Stored as Digital Images, Form RC-075.1 (revised 12/2021)

OPRA, Records Disposition Authorization, Form RC-075 (revised 12/2021)

Frequently Asked Questions about E-mail, CT Public Records Administrator, *available at* https://ctstatelibrary.org/wp-content/uploads/2015/05/EmailGuidelines.pdf.

ADOPTED:_____
REVISED:_____

12/4/2023

Series 2100
Administration

UNIFORM TREATMENT OF RECRUITERS

Subject to the provisions of law, all recruiters, including commercial, military and nonmilitary concerns, recruiters representing institutions of higher education, and prospective employers shall be provided equal opportunities of access to students enrolled in the district's secondary school[s]. Access may be granted through programs conducted by the Guidance Department. Such programs may consist of career days, college fairs, and individual school visitations typically made during the lunch period.

Except as provided below, military recruiters and institutions of higher education shall, upon request, be given access to the names, addresses and telephone numbers of secondary school students.

On an annual basis, the school district will notify parents of secondary school students of their right to object to the disclosure of the student's name, address and telephone number to military recruiters or to an institution of higher education. If a secondary school student or the parent of a secondary school student objects in writing to the disclosure of a student's name, address or telephone number to a military recruiter or an institution of higher education, then the district shall not disclose the student's name, address or telephone number to a military recruiter or an institution of higher education. The objection shall remain in force until the district re-issues the annual notification referenced above, after which time the parents and/or secondary school student must inform the school district in writing again of their objection to the disclosure of the information described above.

Legal References:

Conn. Gen. Stat. §10-221b Boards of education to establish written uniform policy re treatment of recruiters
Every Student Succeeds Act § 8025, 20 U.S.C. § 7908 Armed Forces recruiter access to students and student recruiting information
National Defense Authorization Act for Fiscal Year 2002 § 544, 10 U.S.C. § 503 Enlistments: recruiting campaigns; compilation of directory information

ADOPTED: _____
REVISED: _____
9/11/2020

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