LAMPETER-STRASBURG SCHOOL DISTRICT
Lampeter, Pennsylvania 17537

BOARD WORKSHOP MEETING AGENDA
November 17, 2025

Meeting Called to Order

Opportunity for Public Comment Regarding Agenda Items

Student Recognition

BUSINESS AND FINANCE COMMITTEE

1. PRESENTATION OF 2024-2025 FINANCIAL STATEMENTS AND AUDIT

CliftonLarsonAllen, LLP (CLA) will present audit information for the 2024-2025 financial statements.

MISCELLANEOUS

2. PRESENTATION OF L-S HIGH SCHOOL INITIATIVES AND COMPREHENSIVE PLANNING GOALS

Dr. Feeney will present a review of Lampeter-Strasburg High School initiatives and progress toward Comprehensive Planning Goals.

3. REVIEW OF ACHIEVEMENT DATA

Dr. Westphal will present a review of achievement data.

4. DISCUSSION OF UPDATED BOARD POLICIES

Dr. Peart will lead a discussion on the following policies that were presented for first reading at the November 3, 2025, Board meeting:

Reviewed by Academic Committee
a. Policy 105 Curriculum

Reviewed by Finance Committee
a. Policy 606 Tax Collection
b. Policy 607 Tuition Income
c. Policy 621 Local Taxpayer Bill of Rights
d. Policy 626 Federal Fiscal Compliance
e. Policy 626.1 Travel Reimbursement – Federal Programs

Reviewed by the full Board at the October Workshop meeting
a. Policy 903 Public Participation in Board Meetings
b. Policy 904 Public Attendance at School Events

5. DISCUSSION/REVIEW OF BOARD POLICIES

Dr. Peart will lead discussion reviewing Board policies, as follows and as posted:

a. Policy 907 School Visitors
b. Policy 908 Relations with Parents/Guardians
c. Policy 909 Municipal Government Relations
d. Policy 910 Community Engagement
e. Policy 911 News Media Relations
f. Policy 912 Relations with Educational Institutions

6. RECOMMENDATION FOR RATIFICATION OF BOARD OF REVIEW DECISION

Recommend the ratification of the Board of Review decision of November 3, 2025, as provided in Board folders.

7. DISCUSSION OF PSBA PRINCIPLES FOR GOVERNANCE AND LEADERSHIP

Dr. Peart will lead a discussion of PSBA Principles for Governance and Leadership, as posted.

8. ADJOURNMENT TO EXECUTIVE SESSION

The Board will adjourn to Executive Session to discuss a matter involving the employment, appointment, termination of employment, terms and conditions of employment, evaluation of performance, promotion or disciplining of any specific prospective public officer or employee or current public officer or employee employed or appointed by the agency.

Opportunity for Public Comment

Adjournment

Hans Herr Elementary School 2024-2025 PSSA Achievement Data

HANS HERR EL SCH
Performance Level Distribution by Subject

English Language Arts Performance Level Results

Percentages at Each Performance Level*	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
School 2025	7	32	44	16	39.1	60.9
School 2024	6	23	51	19	29.7	70.3
School 2023	6	29	43	22	35.2	64.8
District 2025	7	32	44	17	38.9	61.1
State 2025	15	36	36	13	51.5	48.5

In 2025, 60.9 % of the students at HANS HERR EL SCH met or exceeded proficiency in English Language Arts. Comparatively, 48.5 % of the students in Pennsylvania met or exceeded proficiency in English Language Arts. Use the 2023 and 2024 data provided to determine your school's three-year progress. These numbers indicate only the students who are in their full academic year.

Mathematics Performance Level Results

Percentages at Each Performance Level*	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
School 2025	8	25	37	30	32.2	67.8
School 2024	9	27	36	28	36.2	63.8
School 2023	9	25	41	25	33.7	66.3
District 2025	14	30	31	24	44.1	55.9
State 2025	31	27	25	17	58.3	41.7

In 2025, 67.8 % of the students at HANS HERR EL SCH met or exceeded proficiency in Mathematics. Comparatively, 41.7 % of the students in Pennsylvania met or exceeded proficiency in Mathematics. Use the 2023 and 2024 data provided to determine your school's three-year progress. These numbers indicate only the students who are in their full academic year.

HANS HERR EL SCH
2025 Performance Level Distribution by Subject and Group

English Language Arts Performance by Group

Percentages and Total Number by Group*	Total Tested	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
All Students	585	7	32	44	16	39.1	60.9
Historically Underperforming	240	15	42	33	10	57.5	42.5
IEP-Special Education	92	27	45	23	5	71.7	28.3
English Learner	13	31	54	15	0	84.6	15.4
Economically Disadvantaged	196	14	42	34	10	56.1	43.9
Male	307	9	32	44	15	41.0	59.0
Female	278	5	32	45	18	37.1	62.9
American Indian/Alaskan Native (not Hispanic)	0	0	0	0	0		
Asian (not Hispanic)	9	22	11	44	22	33.3	66.7
Black or African American (not Hispanic)	14	14	50	21	14	64.3	35.7
Hispanic (any race)	68	19	44	29	7	63.2	36.8
Multi-Racial (not Hispanic)	32	13	22	47	19	34.4	65.6
White (not Hispanic)	460	5	31	47	18	35.4	64.6
Native Hawaiian/other Pacific Islander (not Hispanic)	2	0	0	100	0		100.0
Migrant	1	0	0	100	0		100.0

Mathematics Performance by Group

Percentages and Total Number by Group*	Total Tested	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
All Students	584	8	25	37	30	32.2	67.8
Historically Underperforming	240	16	33	32	19	48.8	51.3
IEP-Special Education	92	27	35	21	17	62.0	38.0
English Learner	13	46	31	15	8	76.9	23.1
Economically Disadvantaged	196	16	32	34	18	48.0	52.0
Male	306	7	23	36	35	29.4	70.6
Female	278	8	27	39	26	35.3	64.7
American Indian/Alaskan Native (not Hispanic)	0	0	0	0	0		
Asian (not Hispanic)	9	22	11	33	33	33.3	66.7
Black or African American (not Hispanic)	14	21	29	29	21	50.0	50.0
Hispanic (any race)	68	25	31	28	16	55.9	44.1
Multi-Racial (not Hispanic)	32	6	22	44	28	28.1	71.9
White (not Hispanic)	459	4	24	39	33	28.5	71.5
Native Hawaiian/other Pacific Islander (not Hispanic)	2	0	0	50	50		100.0
Migrant	1	0	0	100	0		100.0

HANS HERR EL SCH
2025 Performance Level Distribution by Subject and Grade

English Language Arts
School, District, and State Performances by Grade

Percentages at Each Performance Level*	Grade	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
School	3	10	33	44	14	42.6 10 33	44 14 57.4
District	3	11	32	43	14	43.1 11 32	43 14 56.9
State	3	20	31	38	11	51.4 20 31	38 11 48.6
School	4	3	35	45	17	37.4 35	45 17 62.6
District	4	3	35	45	17	37.4 35	45 17 62.6
State	4	17	34	35	13	51.6 17 34	35 13 48.4
School	5	9	28	45	18	37.4 9 28	45 18 62.6
District	5	9	28	45	18	37.4 9 28	45 18 62.6
State	5	19	36	36	9	55.3 19 36	36 9 44.7

Mathematics
School, District, and State Performances by Grade

Percentages at Each Performance Level*	Grade	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
School	3	9	26	37	27	35.4 9 26	37 27 64.6
District	3	10	26	37	27	36.0 10 26	37 27 64.0
State	3	25	21	30	24	46.4 25 21	30 24 53.6
School	4	6	17	36	41	23.1 6 17	36 41 76.9
District	4	6	17	36	41	23.1 6 17	36 41 76.9
State	4	25	25	29	21	49.4 25 25	29 21 50.6
School	5	8	30	39	23	38.1 8 30	39 23 61.9
District	5	8	30	39	23	38.1 8 30	39 23 61.9
State	5	23	33	28	16	56.1 23 33	28 16 43.9

Martin Meylin Middle School 2024-2025 PSSA Achievement Data

MARTIN MEYLIN MS
Performance Level Distribution by Subject

English Language Arts Performance Level Results

Percentages at Each Performance Level*	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
School 2025	6	32	45	17	38.2	61.8
School 2024	5	32	45	18	37.3	62.7
School 2023	3	28	45	24	31.2	68.8
District 2025	7	32	44	17	38.9	61.1
State 2025	15	36	36	13	51.5	48.5

In 2025, 61.8 % of the students at MARTIN MEYLIN MS met or exceeded proficiency in English Language Arts. Comparatively, 48.5 % of the students in Pennsylvania met or exceeded proficiency in English Language Arts. Use the 2023 and 2024 data provided to determine your school's three-year progress. These numbers indicate only the students who are in their full academic year.

Mathematics Performance Level Results

Percentages at Each Performance Level*	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
School 2025	19	35	26	19	54.2	45.8
School 2024	16	31	32	20	47.2	52.8
School 2023	18	32	31	19	50.0	50.0
District 2025	14	30	31	24	44.1	55.9
State 2025	31	27	25	17	58.3	41.7

In 2025, 45.8 % of the students at MARTIN MEYLIN MS met or exceeded proficiency in Mathematics. Comparatively, 41.7 % of the students in Pennsylvania met or exceeded proficiency in Mathematics. Use the 2023 and 2024 data provided to determine your school's three-year progress. These numbers indicate only the students who are in their full academic year.

MARTIN MEYLIN MS
2025 Performance Level Distribution by Subject and Group

English Language Arts Performance by Group

Percentages and Total Number by Group*	Total Tested	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
All Students	667	6	32	45	17	38.2	61.8
Historically Underperforming	244	15	46	32	7	61.1	38.9
IEP-Special Education	97	30	57	13	0	86.6	13.4
English Learner	16	25	69	6	0	93.8	6.3
Economically Disadvantaged	195	14	41	35	9	55.4	44.6
Male	339	10	37	40	13	47.2	52.8
Female	328	3	26	50	21	29.0	71.0
American Indian/Alaskan Native (not Hispanic)	1	0	0	100	0		100.0
Asian (not Hispanic)	19	0	42	37	21	42.1	57.9
Black or African American (not Hispanic)	18	17	22	44	17	38.9	61.1
Hispanic (any race)	75	19	35	37	9	53.3	46.7
Multi-Racial (not Hispanic)	29	7	31	41	21	37.9	62.1
White (not Hispanic)	525	5	31	46	18	36.0	64.0
Native Hawaiian/other Pacific Islander (not Hispanic)	0	0	0	0	0		
Migrant	7	0	71	29	0	71.4	28.6

Mathematics Performance by Group

Percentages and Total Number by Group*	Total Tested	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
All Students	666	19	35	26	19	54.2	45.8
Historically Underperforming	244	39	35	17	9	74.2	25.8
IEP-Special Education	97	65	31	2	2	95.9	4.1
English Learner	16	63	38	0	0	100.0	
Economically Disadvantaged	195	33	35	21	10	68.7	31.3
Male	339	21	37	22	20	58.4	41.6
Female	327	17	33	31	19	49.8	50.2
American Indian/Alaskan Native (not Hispanic)	1	0	100	0	0	100.0	
Asian (not Hispanic)	19	16	37	16	32	52.6	47.4
Black or African American (not Hispanic)	18	39	39	11	11	77.8	22.2
Hispanic (any race)	74	42	24	24	9	66.2	33.8
Multi-Racial (not Hispanic)	29	21	31	21	28	51.7	48.3
White (not Hispanic)	525	15	36	28	20	51.8	48.2
Native Hawaiian/other Pacific Islander (not Hispanic)	0	0	0	0	0		
Migrant	7	57	43	0	0	100.0	

MARTIN MEYLIN MS
2025 Performance Level Distribution by Subject and Grade

English Language Arts
School, District, and State Performances by Grade

Percentages at Each Performance Level*	Grade	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in English Language Arts	Percentage of Students Proficient and Advanced in English Language Arts
School	6	7	37	39	17	44.0	56.0
District	6	7	37	39	17	44.2	55.8
State	6	11	38	35	16	49.2	50.8
School	7	2	31	50	17	32.6	67.4
District	7	2	31	50	17	32.9	67.1
State	7	6	45	36	13	50.8	49.2
School	8	11	27	44	17	38.2	61.8
District	8	11	27	44	17	38.2	61.8
State	8	16	35	35	15	50.7	49.3

Mathematics
School, District, and State Performances by Grade

Percentages at Each Performance Level*	Grade	Below Basic	Basic	Proficient	Advanced	Percentage of Students Below Basic and Basic in Mathematics	Percentage of Students Proficient and Advanced in Mathematics
School	6	17	35	28	20	51.8	48.2
District	6	17	35	28	20	52.0	48.0
State	6	31	31	23	15	62.2	37.8
School	7	18	41	25	16	59.1	40.9
District	7	19	41	25	16	59.3	40.7
State	7	38	28	20	14	66.3	33.7
School	8	23	29	26	22	51.4	48.6
District	8	23	29	26	22	51.4	48.6
State	8	44	26	21	10	69.5	30.5

Martin Meylin Middle School 2024-2025 Algebra 1 Keystone Achievement Data

Performance Level Summary: All Testers

Algebra I	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
School: All Testers	59	0	0.0	1	1.7	8	13.6	50	84.7
District: All Testers	183	12	6.6	60	32.8	52	28.4	59	32.2
State: All Testers	152,014	37,358	24.6	66,718	43.9	26,734	17.6	21,204	13.9

Percentages by Performance Level[1]

Percentage of Students Below Basic and Basic in Algebra I | Percentage of Students Proficient and Advanced in Algebra I

[1] If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

Lampeter-Strasburg High School 2024-2025 Keystone Achievement Data

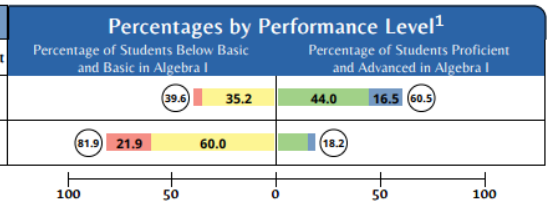
Algebra 1

WINTER 2024-25

Performance Level Summary: All Testers

Algebra I	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
District: All Testers	91	4	4.4	32	35.2	40	44.0	15	16.5
State: All Testers	46,228	10,117	21.9	27,726	60.0	6,593	14.3	1,792	3.9

Percentages by Performance Level[1]



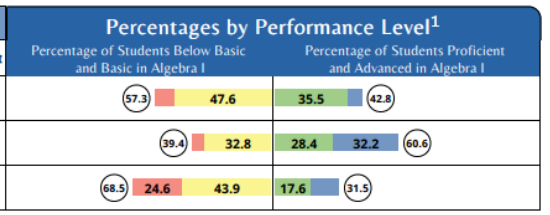
[1]If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

SPRING 2025

Performance Level Summary: All Testers

Algebra I	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
School: All Testers	124	12	9.7	59	47.6	44	35.5	9	7.3
District: All Testers	183	12	6.6	60	32.8	52	28.4	59	32.2
State: All Testers	152,014	37,358	24.6	66,718	43.9	26,734	17.6	21,204	13.9

Percentages by Performance Level[1]



[1]If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

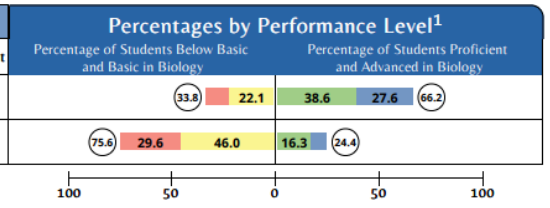
Biology

WINTER 2024-25

Performance Level Summary: All Testers

Biology	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
District: All Testers	145	17	11.7	32	22.1	56	38.6	40	27.6
State: All Testers	35,637	10,551	29.6	16,383	46.0	5,823	16.3	2,880	8.1

Percentages by Performance Level[1]



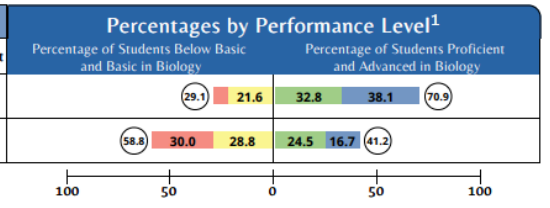
[1]If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

SPRING 2025

Performance Level Summary: All Testers

Biology	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
District: All Testers	134	10	7.5	29	21.6	44	32.8	51	38.1
State: All Testers	129,467	38,858	30.0	37,247	28.8	31,744	24.5	21,618	16.7

Percentages by Performance Level[1]



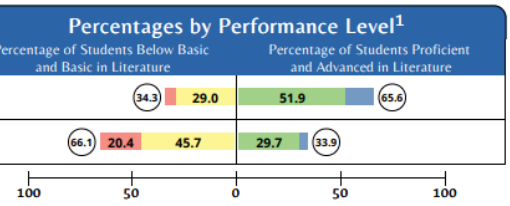
[1]If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

Literature

WINTER 2024-2025

Performance Level Summary: All Testers

Literature	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
District: All Testers	131	7	5.3	38	29.0	68	51.9	18	13.7
State: All Testers	32,776	6,689	20.4	14,978	45.7	9,732	29.7	1,377	4.2

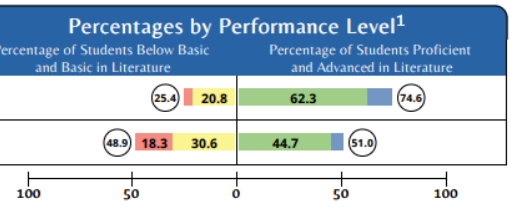


[1] If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

SPRING 2025

Performance Level Summary: All Testers

Literature	Total Tested	Below Basic		Basic		Proficient		Advanced	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
District: All Testers	130	6	4.6	27	20.8	81	62.3	16	12.3
State: All Testers	121,805	22,325	18.3	37,315	30.6	54,460	44.7	7,705	6.3



[1] If a percentage is not displayed within the bar graph, consult the table for the actual percentage.
Summaries are based on students' highest scores to date.
Please note that the percentages in the tables may not add up to 100% due to rounding.

Book	School District for PNN+
Section	100 Programs
Title	Curriculum
Code	105 Vol IV 2025
Status	Active

Purpose

The Board recognizes its responsibility for the development, assessment and improvement of the educational program of the schools. To this end, the curriculum shall be evaluated, developed and modified on a continuing basis and in accordance with a plan for curriculum improvement.[1]

Definition

For purposes of this policy, **curriculum** shall be defined as a series of planned instruction aligned with established academic standards in each subject that is coordinated, articulated and implemented in a manner designed to result in the achievement of academic standards at the proficient level by all students.[2][3][4]

Authority

The Board shall be responsible for the curriculum of the district's schools. The curriculum shall be designed to provide students the opportunity to achieve the academic standards established by the Board. Attaining the academic standards requires students to demonstrate the acquisition and application of knowledge.[1][2][4]

In order to provide a quality educational program for district students, the Board shall adopt a curriculum plan that includes the requirements for courses to be taught; subjects to be taught in the English language; courses adapted to the age, development and needs of students; and strategies for assisting those students having difficulty attaining the academic standards.[1][2][5][6][7][8]

Special Instruction/Observances

The district's curriculum plan must also include provisions for special instruction and observances to comply with state and federal law.[9][10][11]

Guidelines

The district's curriculum shall provide the following:

1. Continuous learning through effective collaboration among the schools of this district.

2. Continuous access for all students to sufficient programs and services of a library/media facility and classroom collection to support the educational program.[12]

3. Guidance and counseling services for all students to assist in career and academic planning.[13]

4. A continuum of educational programs and services for all students with disabilities, pursuant to law and regulation.[14]

5. Language Instruction Educational Program for English Learner students, pursuant to law, regulation and Board policy.[15][16]

6. Compensatory education programs for students, pursuant to law and regulation.

7. Equal educational opportunity for all students, pursuant to law and regulation.[17][18]

8. Career awareness and vocational education, pursuant to law and regulation.[19]

9. Educational opportunities for identified gifted students, pursuant to law and regulation.[20]

10. Regular and continuous instruction in required safety procedures.[21]

Delegation of Responsibility

As the educational leader of the district, the Superintendent shall be responsible to the Board for the district's curriculum. **The Superintendent** shall establish procedures for curriculum development, evaluation and modification, which ensure the utilization of available resources, and effective participation of administrators and teaching staff members. [1]

A listing of all curriculum materials shall be made available for the information of parents/guardians, students, staff and Board members.[1][22]

With prior Board approval, the Superintendent may conduct pilot programs as deemed necessary to the continuing improvement of the instructional program. The Superintendent shall report periodically to the Board on the status of each pilot program, along with its objectives, evaluative criteria, and costs.

The Board encourages, where it is feasible and in the best interest of district students, participation in state-initiated pilot programs of educational research.

The Board directs the Superintendent to actively pursue state and federal aid in support of research activities.

Legal References
1. 22 PA Code 4.4
2. 22 PA Code 4.12
3. 22 PA Code 4.3
4. Pol. 102
5. 24 P.S. 1511
6. 24 P.S. 1512
7. Pol. 107
8. Pol. 127

9. 36 U.S.C. 106
10. P.L. 108-447
11. 24 P.S. 1541-1555
12. Pol. 109
13. Pol. 112
14. Pol. 113
15. 22 PA Code 4.26
16. Pol. 138
17. Pol. 103
18. Pol. 103.1
19. Pol. 115
20. Pol. 114
21. Pol. 805
22. Pol. 105.1
22 PA Code 4.21
22 PA Code 4.22
22 PA Code 4.23
22 PA Code 4.25
22 PA Code 4.27
22 PA Code 4.29
22 PA Code 4.82
Pol. 100
Pol. 106
Pol. 116

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

105-AR-0. CURRICULUM DEVELOPMENT CYCLE

The objective of a Curriculum Development Cycle is to identify grade level and/or course objectives for the K-12 educational program. Establishing such objectives, when related to program goals, will facilitate the definition of an orderly progression toward the accomplishment of district academic standards for student achievement.

Development of grade level/course objectives by discipline is planned to be completed during a five (5) year period, consistent with the textbook review cycle. Basic to attaining this target is maintaining economic resources to support the broad-based participation of administrative and professional staff.

The Assistant Superintendent is responsible to implement a cyclical plan to assist in the development of K-12 planned courses of instruction that are coordinated and articulated across grade levels, staff and buildings.

The Assistant Superintendent will coordinate a Curriculum Development Committee for each academic discipline. The committees will be comprised of elementary and secondary principals and teacher representatives from each grade level. The appropriate building principals will select teachers to serve on a committee, based on their certification and assignment, educational background, and potential to make positive contributions.

Each Curriculum Development Committee will define grade and course level objectives to provide guidance for articulation between grades and schools.

For each academic discipline, the Committee will be responsible to:

1. Establish scope and sequence of learning – sequence of topics, units or themes to be covered at each grade, with the major emphasis on a learning continuum through all levels.

2. Define desired goals or specific academic standards or concepts – in behavioral terms, each statement will describe what the student will be able to do after s/he has had the learning experience.

3. Identify suggested activities – descriptions of learning activities that should assist students in achieving the specific academic standards.

4. Develop a list of suggested materials – identify textbooks, supplementary resources, audiovisual aids and any other material or technology that will assist in teaching the unit; identify a list of community resources, individuals, etc.

5. Suggest evaluation procedures – assessment tools for teachers to use to determine the extent to which students have mastered the academic standards.

The curriculum format should be effective, concise, specific and operational so that it can assist the classroom teacher. It should be designed so that teachers can add and delete material resources and activities as the need for changes in content, methods and materials is determined.

The district is responsible to develop and maintain curriculum, based on the students' need and mandatory programs. Input will be accepted from the various sources in the district, such as Board members, administrators, employees, students, parents/guardians, and community members.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

105-AR-1. PROPOSAL FOR PILOT PROGRAM

1. School(s): _____
2. Administrator: _____
3. Subject: _____
4. Grade(s) and/or courses involved: _____

   _____
5. Describe the program or segment of a program to be piloted:

   _____

   _____

   _____
6. If the pilot is part of a program, is it intended that a program, curriculum, and/or course of study be modified or replaced?

   _____

   _____

   _____
7. Teacher(s) involved, with grade or subject:

   _____

   _____

8. Rationale and Objectives: _____

_____

_____

_____

_____

9. Pilot program being proposed:

_____

_____

10. Explain how the pilot aligns with the planned cycle of curriculum development:

_____

_____

11. Pilot will begin: _____ End: _____

12. Benefits that will accrue to students during the pilot, and afterwards for all students, if the program, materials, etc., are approved:

_____

_____

_____

_____

13. Describe the plan to inservice the teachers who will participate in the pilot:

_____

_____

_____

_____

14. List other major curriculum changes in this program area proposed for this year:

_____

_____

_____

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

105-AR-2. EVALUATION/DISPOSITION OF PILOT PROGRAM

1. School(s): _____
2. Administrator: _____
3. Subject: _____
4. Grade(s) and/or courses involved: _____
5. Teacher(s) involved, with grade and subject: _____
6. Describe the successes of the piloted program; provide examples to support the successes experienced through the new program:

   _____

   _____

   _____

   _____
7. Describe possible modifications to current curriculum or course of study that will be affected should the new program be adopted:

   _____

   _____

   _____

   _____
8. Explain how this program aligns with district curriculum; explain connections made between curriculum and academic standards:

   _____

   _____

   _____

   _____

9. Explain any staff development that occurred throughout the piloting of this program. List the teachers and staff that participated in the staff development and the provider of the training:

_____

_____

_____

_____

10. Describe any problems that were experienced throughout the program and how these problems were addressed. Explain if the problems experienced caused any major setbacks for students or teachers:

_____

_____

_____

_____

11. Is the program recommended for implementation to the current course of study or curriculum? If so, what modifications will need to be made to accommodate the new program?

_____

_____

_____

_____

12. If the program is not adopted, would another similar program be suggested for review? If so, note brief points that are being sought through a different program:

_____

_____

_____

_____

Program approval ☐

Program denial ☐

_____
Superintendent of Schools

_____
Date

Book	Policy Manual
Section	600 Finances
Title	Tax Collection
Code	606
Status	Active
Adopted	April 1, 2019

Authority

Real estate ~~and per capita~~ taxes provided for in the School Code shall be collected by the elected tax collector, who shall be properly bonded during the term of office.[1][2]

[3][4]

~~In cases where there is a tax collector vacancy, the Board shall make necessary appointments for the collection of taxes.~~
All other taxes shall be collected by the cooperative agency with other units of local government.

Delegation of Responsibility

~~Taxes being collected by elected tax collectors shall be remitted to the school district's general fund account on a daily basis.~~All taxes shall be collected and remitted to the district Treasurer or his/her designee with a report detailing the sources of tax revenues. [5]

~~The tax collectors shall provide to the Business Manager a monthly report of total taxes collected. This report should list the actual tax receipts collected from each individual taxpayer by type of tax. The monthly report must be received by the school district by the fifth working day of the following month. Each tax collector shall submit a final report in settlement of the duplicate by May 1 of the respective year.~~

~~The elected tax collector must provide for Board approved office hours.~~

~~The annual tax duplicates cannot be delivered to the tax collector until the school district has received evidence of bonding.~~

The Board Secretary shall be responsible to ascertain that a tax collector is properly bonded and shall submit information on estimated collection required to set proper bond.[2][6]

All monies received from the tax collectors shall be deposited on the day of receipt or as soon as possible, and all receipts shall be supported by documentary evidence.

~~Failure to fulfill these responsibilities shall constitute causes for removal of the elected tax collector. Any losses as a result of not meeting these conditions may require the district's recovery of these losses including interest.~~

Guidelines

Delinquent Taxes

Unpaid real estate taxes shall be turned over to the Lancaster County Tax Claim Bureau by January 15 of each year. All tax collectors must provide information that is necessary in a timely fashion to meet these deadlines.[7]

Legal
1. 24 P.S. 683
2. 24 P.S. 684
3. 53 P.S. 6924.313
4. 53 P.S. 6926.322
5. 24 P.S. 439
6. 24 P.S. 433
7. 24 P.S. 686
53 P.S. 6924.101 et seq
53 P.S. 6926.301 et seq
Pol. 605

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LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

606-AR-0. TAX COLLECTION

The district establishes administrative regulations for the collection of designated school taxes and for clarification of the tax collector's responsibilities. Tax collectors are responsible to adhere to Board policy and district administrative regulations.

A **taxpayer** is defined as any individual eighteen (18) years of age or older who is or becomes a school district resident or inhabitant during the period of July 1 through June 30 of the tax year billed.

Tax Collector Bond

The tax collector will select the bond agent and the bonding company and will submit both names to the district for approval.

Procedure

The Business Manager will be responsible to ensure that district funds are deposited into the appropriate account on a timely basis according to established district procedures.

The tax collection accounts will be open to inspection by the district or its auditors at any time upon request by the district.

The periodic reports and final account of tax collection may be audited by the district auditors.

Tax exemptions and exonerations must be approved by the Board.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

606-AR-1. TAX CERTIFICATION

Certification of taxes paid on properties within the school district will be provided to individual taxpayers, mortgage companies, title insurance companies or attorneys upon written request to the Lancaster County Tax Collection Bureau.

Requests can be submitted online here: https://www.lctcb.org/?page_id=383

Duplicate Bills

Duplicate bills will be provided to an individual taxpayer upon request by contacting the Lancaster County Tax Collection Bureau at (717) 569-4521, option 4.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

606-AR-3. DELINQUENT REAL ESTATE TAX COLLECTION

The district establishes these administrative regulations to ensure a diligent and effective practice for the collection of collectible delinquent tax claims that also takes into consideration, to the extent reasonable, the reasons why the taxes have not been paid in a timely manner.

The Lancaster County Tax Collection Bureau determines all unpaid taxes annually on or before January 1. This list is shared with the Business Manager or his/her designee as well as the Lancaster County Tax Claim Bureau.

Delinquent taxes are collected by the Lancaster County Tax Claim Bureau.

Book	School District for PNN+
Section	600 Finances
Title	Tuition Income
Code	607 Vol V 2024
Status	Active

Authority

Tuition shall be assessed for those students who are residents of another school district but whose attendance within this district has been approved by the Board, in accordance with applicable law and Board policy.[1][2]**[3]**

Delegation of Responsibility

It shall be the responsibility of the Business Manager to invoice tuition for approved students.

Guidelines

Tuition rates shall be determined annually.**[1]**[3]

Tuition billings will be made in advance of the attendance period.

When payment is more than thirty (30) days overdue, services will be terminated, and a student may be disenrolled in accordance with applicable law and Board policy.[2]

When a student attends more than one (1) week, the sender will be charged for a full month of tuition.

Legal References
1. 24 P.S. 1316
2. Pol. 202
3. 24 P.S. 2561
24 P.S. 1301
24 P.S. 1302
24 P.S. 1306
24 P.S. 1307
24 P.S. 1308
24 P.S. 1309
24 P.S. 1310
24 P.S. 1313
24 P.S. 2503

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

607-AR-0. NONRESIDENT TUITION

The Business Manager will be responsible for annually determining the most recently approved tuition rates for elementary and secondary grades as calculated by the Pennsylvania Department of Education. The Business Manager will inform the Board, Superintendent and administrators of the approved tuition rates.

The Business Office will invoice the parent/guardian of the nonresident student in accordance with Board policy.

When tuition payments are not being submitted monthly, the Business Manager will send the parent/guardian a Notice of Tuition Past Due. The notice will inform the parent/guardian of the delinquency of the tuition payment, the amount currently due, and the consequences of nonpayment. The Superintendent will receive a copy of the Notice.

The Business Manager will inform the Superintendent of any nonpayment of tuition within the period specified in the Notice. The parents/guardians will then be provided with the reasons for the district's decision to disenroll the student, the opportunity to appeal the decision and information regarding the rights of homeless students. If the appeal process is exhausted or if the parents/guardians decline to appeal the decision, the Superintendent will take final action regarding the termination of a student's enrollment due to nonpayment of tuition.

When a nonresident student's school district of residence is required to pay the approved tuition rate, in accordance with law and regulations, the Business Manager will invoice the school district in accordance with Board policy.

Resource:

PA Department of Education Tuition Rate Calculation:
https://www.education.pa.gov/Teachers%20-%20Administrators/School%20Finances/Office%20of%20Comptroller%20Operations/Pages/SDTuitionRates.aspx

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

607-AR-1. NOTICE OF TUITION PAST DUE

☐ First Notice ☐ Second Notice

Date: _____

Dear _____,
(Name of Parent/Guardian)

This is to inform you that the tuition payment for _____ has been
(Name of Student)

past due since _____, and the payment amounting to _____
(Inclusive Dates) (Amount)

needs to be submitted to my office within ten (10) days of the date of this letter.

If you have any questions regarding this matter, please contact me at the following number: _____.
(Phone Number)

If you have not contacted me or submitted the amount indicated in this correspondence within ten (10) days from the date of this notice, the student's enrollment in the school district will be terminated in accordance with law and Board policy.

Sincerely,

_____
Business Manager

c: Superintendent

Book	Policy Manual
Section	600 Finances
Title	Local Taxpayer Bill of Rights
Code	621
Status	Active
Adopted	April 1, 2019

Purpose

As a local taxing authority, the Board recognizes the school district's responsibility to comply with the requirements of applicable law.[1]

Definition

Eligible taxes shall be defined as all non-real estate taxes, including per capita; occupation, occupation assessment and occupation privilege; income and net profits; business gross receipts; privilege; amusements or admissions; and any other tax authorized by the Local Tax Enabling Law.[2][3]

Authority

The Board shall adopt a Local Taxpayer Bill of Rights that includes the following components in simple and nontechnical terms:[4]

1. Taxpayer rights and the district's obligation during an audit or administrative review of the taxpayer's books or records.

2. Administrative and judicial procedures for a taxpayer to appeal or seek review of any adverse tax decision.

3. Procedures for filing and processing refund claims and taxpayer complaints.

4. Enforcement procedures.

The Board shall ensure that taxpayers are notified about the district's Local Taxpayer Bill of Rights any time they are contacted regarding assessment, audit, determination, review and collection of any tax other than property taxes.[4]

Delegation of Responsibility

It shall be the responsibility of the Superintendent, Business Manager, and/or other designated school district employee to develop administrative regulations to implement this policy which shall include:

1. Preparation and dissemination of the required notice of availability of the Local Taxpayer Bill of Rights.

2. Preparation of a Local Taxpayer Bill of Rights.

3. Preparation of a procedure for the district to request information from a taxpayer.

4. Establishment of an administrative appeals process.

5. Development of the form, content, process and deadlines for taxpayers to file a tax appeal petition.

6. Formulation of rules of practice and procedure for hearings.

The district shall respond to taxpayer requests for the Local Taxpayer Bill of Rights by making copies available at the district offices or mailing at district expense.[4]

~~The only person authorized to respond, on behalf of the school district, to specific taxpayer questions or requests for advice regarding the determination of the tax owed shall be the Business Manager, and that answer or advice must be given in writing.~~

Guidelines

Information obtained by the school district as a result of an audit, return, report, investigation, hearing or verification shall be confidential. If a violation of confidentiality is committed by an officer or employee of the Board, s/he shall be subject to fines and dismissal from office or discharge from employment.[5]

Appeals Process

The district establishes the following as the choice for an administrative process to receive and make determinations on petitions from taxpayers relating to assessment, determination or refund of an eligible tax:[6]

1. Review and decision by the Finance Committee of the Board.

Legal
1. 53 Pa. C.S.A. 8401 et seq
2. 53 P.S. 6924.101 et seq
3. 53 Pa. C.S.A. 8422
4. 53 Pa. C.S.A. 8423
5. 53 Pa. C.S.A. 8437
6. 53 Pa. C.S.A. 8430

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

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621-AR-0. TAXPAYERS BILL OF RIGHTS NOTICE

You are entitled to receive a written explanation of your rights with regard to the assessment, audit, appeal, enforcement, refund, and collection of certain school district taxes. The written explanation is entitled *Lampeter-Strasburg School District Taxpayers Bill of Rights Disclosure Statement*. Upon receiving a request from you, the school district will give you a copy of the *Disclosure Statement* at no charge. You may request a copy in person, or by mailing a request to the following address:

Lampeter-Strasburg School District
Business Office
PO Box 428
Lampeter, PA 17537

A copy will also be mailed to you if you call the school district at the following number:

(717) 464-3311

You may call the above telephone number or appear in person at the Administration Building at 1632 Book Road, Lancaster, PA 17602 to request a copy during the hours of 7:30 a.m. to 4:00 p.m. on any weekday that the district is open.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

621-AR-4. TAX APPEAL PETITION

Taxpayer Name: _____

Address: _____

City/Township/Borough: _____

Phone Number: _____

Representative of Taxpayer Name: _____

Address: _____

Phone: _____

1. Type of tax(es) involved: _____
2. Tax year(s) involved: _____
3. Amount of tax in dispute: _____
4. Account number(s) if applicable: _____
5. This is a petition for appeal of (check one): ___ a refund request ___ a deficiency assessment

If this is a petition for appeal of a refund request, please complete the following:

6. Date of your original written request for refund: _____
   Attach a copy of the deficiency or delinquency notice you received to this petition.

If this is a petition for appeal of a deficiency assessment, please complete the following:

7. Date of deficiency or delinquency notice you received: _____
   Attach a copy of the deficiency or delinquency notice you received to this petition.
8. *For all petitions:* please set forth on the back all the reasons that support your position. Attach copies of all local tax returns which may apply and all federal and state returns or schedules as they relate to your case. Use additional sheets if necessary.
9. Are you requesting a hearing? Yes _____ No _____

Notice Of Hearing

A hearing has been scheduled on your petition for appeal for: _____

Date: _____ Time: _____

Place: _____

The hearing will be before _____, Tax Hearing Officer.

Statement specifying relief and related data:

I, _____, petitioner, being duly sworn according to law, depose and say that the facts set forth in the foregoing Petition for Appeal are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section §4904, relating to unsworn falsification to authorities. I further assert that this petition if not being filed for the purpose of delay.

_____
Petitioner

Book	School District for PNN+
Section	600 Finances
Title	Federal Fiscal Compliance
Code	626 Vol III 2025
Status	Active

Authority

The Board shall ensure federal funds received by the district are administered in accordance with federal requirements, including but not limited to the federal Uniform Guidance.[1]

The Board shall review and approve all applications for federal funds submitted by the district.

Delegation of Responsibility

The Board designates the Federal Programs Coordinator as the district contact for all federal programs and funding.

The Superintendent or designee, in collaboration with the Federal Programs Coordinator and Business Manager, shall establish and maintain a sound financial management system to include internal controls and federal grant management standards covering the receipt of both direct and state-administered federal grants, and to track costs and expenditures of funds associated with grant awards.[1]

The Superintendent, to assist in the proper administration of federal funds and implementation of this policy, may approve additional procedures as attachments to this policy.

Guidelines

The district's financial management system shall be designed with strong internal controls, a high level of transparency and accountability, and documented procedures to ensure that all financial management system requirements are met.

The district's financial management system is subject to periodic internal and external audits. For any fiscal year in which the district expends $1,000,000 or more in federal awards, the district is required to have a single or program-specific audit in compliance with federal requirements.[2]

District financial management standards and procedures shall **include requirements for the following**:

1. Identification – The district must identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received.

2. Financial Reporting – Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the

financial reporting requirements of **federal regulations**.

3. Accounting Records – The district must maintain records which adequately identify the source and application of funds provided for federally-assisted activities.

4. Internal Controls – Effective control and accountability, including segregation of duties, must be maintained for all funds, real and personal property and other assets. The district must adequately safeguard all such property and **take steps to ensure** that it is used solely for authorized purposes. **Reasonable cybersecurity and other measures must be in place to protect personally identifiable information and other types of information.**

5. Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each federal award. Procedures shall be developed to establish determination for allowability of costs for federal funds.

6. Cash Management – The district shall maintain written procedures to implement the cash management requirements found in **federal regulations**.

7. Allowability of Costs – The district shall ensure that allowability of all costs charged to each federal award is accurately determined and documented.

Standards of Conduct

The district shall maintain standards of conduct covering conflicts of interest and the actions of employees and school officials engaged in the selection, award and administration of contracts.**[3]**[4][5]

All employees shall be informed of conduct that is required for federal fiscal compliance and the disciplinary actions that may be applied for violation of Board policies, administrative regulations, rules and procedures.[6]

Employees - Time and Effort Reporting

All district employees paid with federal funds shall document **their** time **working** in support of each federal program, in accordance with law. Time and effort reporting requirements do not apply to contracted individuals.[7]

District employees shall be reimbursed for travel costs incurred in the course of performing services related to official business as a federal grant recipient.[8]

The district shall establish and maintain employee policies and procedures on hiring, benefits and leave and outside activities, as approved by the Board. District procedures on payment of staff shall apply to employees paid with federal funds and shall include payment in extenuating or emergency conditions, in accordance with applicable law, regulations or emergency declarations by state or federal authorities.[9][10][11][12][13][14][15][16]

Record Keeping

The district shall develop and maintain a Records Management Plan and related Board policy and administrative regulations for the retention, retrieval and disposition of manual and electronic records, including emails.**[17]**[18]

The district shall comply with federal record conversion and quality control review requirements to safeguard the integrity of electronic records.[19]

The district shall ensure the proper maintenance of federal fiscal records documenting:[18][20][21][22]

1. Amount of federal funds.
2. How funds are used.
3. Total cost of each project.
4. Share of total cost of each project provided from other sources.
5. Other records to facilitate an effective audit.
6. Other records to show compliance with federal program requirements.
7. Significant project experiences and results **to:**
    a. **Determine progress.**
    b. **Inform periodic review and continuous improvement of project plan.**
    c. **Revise project objectives, if necessary.**

All records must be retrievable and available for programmatic or financial audit.

The district shall provide the federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other district records which are pertinent to the federal award. The district shall also permit timely and reasonable access to the district's personnel for the purpose of interview and discussion related to such documents.[23]

Records shall be retained for a minimum of **three (3)** years from the date **of submission of the final financial report**, or as otherwise specified in the requirements of the federal award, unless a written extension is provided by the awarding agency, cognizant agency for audit, oversight agency for audit or cognizant agency for indirect costs.[20]

If any litigation, claim or audit is started before the expiration of the standard record retention period, the records shall be retained until all litigation, claims or audits have been resolved and final action taken.[20]

Records for property and equipment acquired with federal funds shall be retained for three (3) years after final disposition of the property or equipment.[20]

As part of the Records Management Plan, the district shall develop and maintain a records retention schedule, which shall delineate the record retention format, retention period and method of disposal.[18]

The Records Management Plan shall include identification of staff authorized to access records, appropriate training, and preservation measures to protect the integrity of records and data.[18]**[20]**

The district shall ensure that all personally identifiable data protected by law or regulations is handled in accordance with the requirements of applicable law, regulations, Board policy and administrative regulations.[24][25][26]**[27][28]**

Subrecipient Monitoring

In the event that the district awards subgrants, the district shall establish **written** procedures to:**[29]**

1. Assess the risk of **fraud and** noncompliance.

2. Monitor grant subrecipients to ensure compliance with federal, state, and local laws and Board policy and procedures.

3. Ensure the district's record retention schedule addresses document retention on assessment and monitoring.[18]

Compliance Violations

Employees and contractors involved in federally funded programs and subrecipients shall be made aware that failure to comply with federal law, regulations or terms and conditions of a federal award may result in the federal awarding agency or pass-through entity imposing additional conditions or terminating the award in whole or in part.[30]**[31]**

Mandatory Reporting of Violations

An applicant, recipient or subrecipient of a federal award must promptly disclose whenever, in connection with the federal award (including any related activities or subawards) it has credible evidence of a violation of federal criminal law involving fraud, conflict of interest, bribery or gratuity violations under Title 18 of the United States Code or a violation of the federal civil False Claims Act. The written disclosure must be made to the federal agency, the agency's Office of Inspector General, and pass-through entity (if applicable). Recipients and subrecipients are also required to report issues related to a recipient integrity and performance in accordance with Appendix XII to 2 CFR Part 200. Failure to make required disclosures can result in compliance violations.[32]

Whistleblower Protections

District employees may not be discharged, demoted or otherwise discriminated against as a reprisal for making a protected disclosure of information that the employee reasonably believes to be:[33][34]

1. **Evidence of gross mismanagement of a federal contract or grant; or**

2. **Gross waste of federal funds; or**

3. **An abuse of authority relating to a federal contract or grant; or**

4. **A substantial and specific danger to public health or safety; or**

5. **A violation of law, rule or regulation related to a federal contract, including the competition for or negotiation of a contract or grant.**

District employees may disclose such information to any of the following:

1. **The Superintendent or designee authorized to investigate, discover or address such misconduct.**

2. **A federal employee responsible for contract or grant oversight or management of the relevant agency.**

3. **An authorized official of the United States Department of Justice or other law enforcement agency.**

4. **A member of Congress or a representative of a committee of Congress.**

5. **A federal Inspector General.**

6. **The federal Government Accountability Office.**

7. **A court or grand jury, including providing evidence of misconduct in any judicial or administrative proceeding relating to waste, fraud or abuse on a federal contract or grant.**

A district employee who believes that they have been subjected to a reprisal for making a protected disclosure may submit a complaint to the Inspector General of the federal executive agency that is responsible for the relevant federal funding or federal contract. The federal agency and the agency's Inspector General have the authority to investigate such complaints and provide appropriate remedies for substantiated complaints.

The district shall provide written notification to employees of their rights and protections under the Whistleblower Law by posting notices on the district's website.

Legal References
1. 2 CFR Part 200
2. 2 CFR 200.501
3. 2 CFR 200.318
4. Pol. 827
5. Pol. 828
6. Pol. 317
7. 2 CFR 200.430
8. Pol. 626.1
9. 24 P.S. 1153
10. Pol. 304
11. Pol. 319
12. Pol. 336
13. Pol. 337

14. Pol. 624
15. Pol. 805
16. Pol. 813
17. 2 CFR 200.334-200.338
18. Pol. 800
19. 2 CFR 200.336
20. 2 CFR 200.334
21. 34 CFR 75.730-75.732
22. 34 CFR 76.730-76.732
23. 2 CFR 200.337
24. Pol. 113.4
25. Pol. 216
26. Pol. 324
27. Pol. 830
28. Pol. 830.1
29. 2 CFR 200.331-200.332
30. 2 CFR 200.339
31. 2 CFR 200.340
32. 2 CFR 200.113
33. 2 CFR 200.217
34. 41 U.S.C. 4712
Pol. 610
Pol. 611
Pol. 612
Pol. 613
Pol. 625

Allowability of Costs – Federal Programs

Expenditures must be aligned with approved budgeted items. Any changes or variations from the state-approved budget and grant application need prior approval from the state**.**

Delegation of Responsibility

When determining how the district will spend its grant funds, the Federal Programs Coordinator will review the proposed cost to determine whether it is an allowable use of federal grant funds *before* obligating and spending those funds on the proposed good or service. **The decision for such determination shall be in writing and provide justification for the allowability determination.**

Allowability Determinations

All costs supported by federal education funds must meet the standards outlined in **applicable laws and regulations**, **including but not limited to,** 2 CFR Part 3474 and 2 CFR Part 200, Subpart E, which are listed below. The Federal Programs Coordinator must consider these factors when making an allowability determination. A section entitled, *Helpful Questions for Determining Whether Costs are Allowable,* is located at the end of this document.

Part 200 sets forth general cost guidelines that must be considered, as well as rules for specific types of items, both of which must be considered when determining whether a cost is an allowable expenditure of federal funds. The expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, nonregulatory guidance and grant award notifications.

Restrictions in state and local rules or policy also must be considered. For example, travel and other job-related expenses incurred by employees are not allowable unless they also are in compliance with Board Policy 331 (Job Related Expenses) and related administrative regulations.

Whichever allowability requirements are stricter will govern whether a cost is allowable.

Except where otherwise authorized by law, determination factors **for allowability of costs** include the following:

1. **Be Necessary and Reasonable for the performance of the federal award.** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incur the cost was made. For example, **reasonable** means that sound business practices were followed, and purchases were comparable to market prices.

   When determining reasonableness of a cost, consideration must be given to:

- Whether the cost is a type generally recognized as ordinary and necessary for the operation of the district or the proper and efficient performance of the federal award.

- The restraints or requirements imposed by factors, such as: sound business practices; arm's-length bargaining; federal, state and other laws and regulations; and terms and conditions of the federal award.

- Market prices for comparable goods or services for the geographic area.

- Whether the individual incurring the cost acted with prudence in the circumstances considering responsibilities to the district, its employees, its students, the public at large, and the federal government.

- Whether the district significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost. (2 CFR 200.404)

Whether a cost is **necessary** will be determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the district can demonstrate that the cost addresses an existing need and can prove it. For example, the school entity may deem a language skills software program necessary for a Language Instruction Educational Program.

When determining whether a cost is necessary, consideration may be given to:

- Whether the cost is needed for the proper and efficient performance of the federal award program.

- Whether the cost is identified in the approved budget or application.

- Whether there is an educational benefit associated with the cost.

- Whether the cost aligns with identified needs based on results and findings from a needs assessment.

- Whether the cost addresses program goals and objectives and is based on program data.

2. **Allocable to the federal award.** A cost is allocable to the federal award **or other cost objective** if the **cost is** assignable to the federal award **or other cost objective** in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. (2 CFR 200.405)

   For example, if fifty percent (50%) of a teacher's salary is paid with grant funds, then that teacher must spend at least fifty percent (50%) of his/her time on the grant program.

3. **Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the school entity.**

4. **Conform to any limitations or exclusions set forth as cost principles in 2 CFR Part 200 or in the terms and conditions of the federal award.**

5. **Consistent treatment.** A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.

6. **Adequately documented.** All expenditures must be properly documented. **(2 CFR §200.300 through 200.309)**

   Direct cost allocation principles: If a cost benefits two (2) or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two (2) or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. (2 CFR 200.405)

7. **Be calculated in accordance with generally accepted accounting principles (GAAP), unless provided otherwise in 2 CFR Part 200.**

8. **Not included as a cost or used to meet cost-sharing requirements in either the current or a prior period, unless the specific federal program authorizes federal costs to be treated as such.** Some federal program statutes require the nonfederal entity to contribute a certain amount of nonfederal resources to be eligible for the federal program. **(2 CFR 200.306)**

9. **Administrative closeout costs may be incurred until the due date of the final report(s). If incurred, closeout costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the federal agency. All other costs must be incurred during the approved budget period. (2 CFR 200.308, 200.344)**

10. **Be the net of all applicable credits.** The term **applicable credits** refers to those receipts or reduction of expenditures that operate to offset or reduce **direct or indirect costs** allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the **recipient or subrecipient** relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate. (2 CFR 200.406)

Selected Items of Cost

Subpart E of Part 200 sets forth principles to be applied in establishing the allowability of specific cost items (commonly referred to as Selected Items of Cost), at 2 CFR **200.420-200.476**. These specific cost items are listed in the chart below along with the citation to the section of Subpart E addressing the allowability of that item. These principles are in addition to the other general allowability standards, and apply whether or not a particular item of cost is properly treated as direct cost or indirect (F&A) cost. Meeting the specific criteria for a listed item does not by itself mean the cost is allowable, as it may be unallowable under other standards or for other reasons, such as restrictions contained in the terms and conditions of a particular grant or restrictions established by the **recipient or subrecipient** or in Board policy. If an item is unallowable for any of these reasons, federal funds cannot be used to purchase it.

The fact that a particular item of cost is not listed is not intended to imply that it is either allowable or unallowable; rather, determination as to allowability in each case should be based on the treatment provided for similar or related items of cost and based on the principles described in applicable law and regulations. In case of discrepancy between the provisions of a specific federal award and the provisions below, the federal award governs. (2 CFR 200.102, 200.409, 200.420)

School district personnel responsible for spending federal grant funds and for determining allowability must be familiar with and refer to the Part 200 selected items of cost section. These rules must be followed when charging these specific expenditures to a federal grant. When applicable, employees must check costs against the selected items of cost requirements to ensure the cost is allowable, and also check **recipient, subrecipient**, district and program-specific rules.

The selected item of cost addressed in Part 200 includes the following (in alphabetical order):

Item of Cost	**Citation of Allowability Rule**
Advertising and public relations costs	2 CFR § 200.421
Advisory councils	2 CFR § 200.422
Alcoholic beverages	2 CFR § 200.423
Alumni/ae activities	2 CFR § 200.424
Audit services	2 CFR § 200.425
Bad debts	2 CFR § 200.426
Bonding costs	2 CFR § 200.427
Collection of improper payments	2 CFR § 200.428
Commencement and convocation costs	2 CFR § 200.429
Compensation – personal services	2 CFR § 200.430
Compensation – fringe benefits	2 CFR § 200.431
Conferences	2 CFR § 200.432
Contingency provisions	2 CFR § 200.433
Contributions and donations	2 CFR § 200.434
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	2 CFR § 200.435

Depreciation	2 CFR § 200.436
Employee health and welfare costs	2 CFR § 200.437
Entertainment costs	2 CFR § 200.438
Equipment and other capital expenditures	2 CFR § 200.439
Exchange rates	2 CFR § 200.440
Fines, penalties, damages and other settlements	2 CFR § 200.441
Fund raising and investment management costs	2 CFR § 200.442
Gains and losses on disposition of depreciable assets	2 CFR § 200.443
General costs of government	2 CFR § 200.444
Goods and services for personal use	2 CFR § 200.445
Idle facilities and idle capacity	2 CFR § 200.446
Insurance and indemnification	2 CFR § 200.447
Intellectual property	2 CFR § 200.448
Interest	2 CFR § 200.449
Lobbying	2 CFR § 200.450
Losses on other awards or contracts	2 CFR § 200.451
Maintenance and repair costs	2 CFR § 200.452
Materials and supplies costs, including costs of computing devices	2 CFR § 200.453
Memberships, subscriptions, and professional activity costs	2 CFR § 200.454
Organization costs	2 CFR § 200.455
Participant support costs	2 CFR § 200.456
Plant and security costs	2 CFR § 200.457
Pre-award costs	2 CFR § 200.458
Professional services costs	2 CFR § 200.459
Proposal costs	2 CFR § 200.460
Publication and printing costs	2 CFR § 200.461
Rearrangement and reconversion costs	2 CFR § 200.462
Recruiting costs	2 CFR § 200.463
Relocation costs of employees	2 CFR § 200.464
Rental costs of real property and equipment	2 CFR § 200.465
Scholarships and student aid costs	2 CFR § 200.466
Selling and marketing costs	2 CFR § 200.467
Specialized service facilities	2 CFR § 200.468
Student activity costs	2 CFR § 200.469
Taxes (including Value Added Tax)	2 CFR § 200.470
Telecommunication and video surveillance	**2 CFR § 200.471**
Termination costs	**2 CFR § 200.472**

Training and education costs	**2 CFR § 200.473**
Transportation costs	**2 CFR § 200.474**
Travel costs	**2 CFR § 200.475**
Trustees	**2 CFR § 200.476**

Prior Written Approval

A request for prior written approval to ensure reasonableness and allocability of any expense related to a federal award before incurring the cost is permissible. The elements listed below *require* prior written approval:

Reason Requiring Prior Written Approval	Citation
Cost sharing	**2 CFR § 200.306**
Program income	**2 CFR § 200.307**
Revision of budget and program plans	**2 CFR § 200.308**
Fixed amount subawards	**2 CFR § 200.333**
Compensation – personal services	**2 CFR § 200.430**
Compensation – fringe benefits	**2 CFR § 200.431**
Equipment and other capital expenditures	**2 CFR § 200.439**
Exchange rates	**2 CFR § 200.440**
Fines, penalties, damages and other settlements	**2 CFR § 200.441**
Fund raising and investment management costs	**2 CFR § 200.442**
Goods or services for personal use	**2 CFR § 200.445**
Insurance and indemnification	**2 CFR § 200.447**
Organization costs	**2 CFR § 200.455**
Pre-award costs	**2 CFR § 200.458**
Rearrangement and reconversion costs	**2 CFR § 200.462**
Travel costs	**2 CFR § 200.475**

Helpful Questions for Determining Whether Costs are Allowable -

In addition to applying the cost principles and standards described above, district staff involved in expending federal funds should ask the following questions when assessing the allowability of a particular cost:

1. Is the proposed cost allowable under the relevant program?

2. Is the proposed cost consistent with an approved program plan and budget?

3. Is the proposed cost consistent with program specific fiscal rules? For example, the school entity may be required to use federal funds only to supplement the amount of funds available from nonfederal (and possibly other federal) sources, or only as a match for funds from nonfederal sources.

4. Is the proposed cost consistent with **applicable laws and regulations**?

5. Is the proposed cost consistent with specific conditions imposed on the grant (if applicable)?

6. Is the proposed cost consistent with the underlying needs of the program? For example, program funds must benefit the appropriate population of students for which they are allocated. This means that, for instance, funds allocated under Title III of the Elementary and Secondary Education Act (ESEA) governing language instruction programs for English Learner (EL) students must only be spent on EL students and cannot be used to benefit non-EL students.

7. Will the cost be targeted at addressing specific areas of weakness that are the focus of the program, as indicated by available data?

8. **Has this expenditure been reviewed by legal for compliance if there is any uncertainty?**

Any questions related to specific costs should be forwarded to the Business Manager, who shall consult with the school solicitor for clarification as appropriate.

Refunds

Payments made for costs determined to be unallowable by either the federal awarding agency, cognizant agency for indirect costs, or pass-through entity, must be refunded with interest to the federal government in accordance with instructions from the federal awarding agency that determined the costs are unallowable unless applicable statute or regulation directs otherwise. (2 CFR 200.410)

Cash Management – Federal Programs

Generally, the school district receives payment from the Pennsylvania Department of Education (PDE) **in advance, provided the district maintains both written procedures that minimize the time elapsing between the transfer of funds and disbursement, and financial management systems that meet the standards for fund control and accountability.** In circumstances **where the requirements for advance payment cannot be met, the district may use the reimbursement method.**

This attachment addresses the responsibilities of the district and district staff under those alternative payment methods. **In accordance with 2 CFR §200.305(b)(1), advance payments are the preferred method of payment. Reimbursement is used only when the requirements for advance payment cannot be met, as outlined in 2 CFR §200.305(b)(3).** In either case, the district shall maintain accounting methods and internal controls and procedures that assure those responsibilities are met.

When **available**, the district shall use existing resources within a program before requesting additional **cash payments**. Such resources include program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds. (2 CFR 200.305(b)(5)).

Payment Methods

Advances –

When the district receives advance payments of federal grant funds, it must minimize the time elapsing between the transfer of funds to the district and the expenditure of those funds on allowable costs of the applicable federal program. (2 CFR 200.305(b)). The district shall attempt to expend all advances of federal funds within seventy-two (72) hours of receipt.

Whenever possible, advance payment requests must be consolidated to cover anticipated cash needed for all federal awards received by the district. (2 CFR 200.305(b)(2)).

The district shall submit payment requests as often as necessary when electronic fund transfers are used or at least monthly when electronic transfers are not used. (2 CFR 200.305(b)(2)(ii)).

Reimbursements –

The Federal Programs Coordinator will request reimbursement for actual expenditures incurred under the federal grants quarterly.

Such requests shall be submitted with appropriate documentation and signed by the requestor.

Requests for reimbursements will be approved by the Federal Programs Coordinator.

Reimbursement will be submitted on the appropriate form to the PDE portal. All reimbursements are based on actual disbursements, not on obligations. PDE will process reimbursement requests within the timeframes required for disbursement.

Consistent with state and federal requirements, the school district will maintain source documentation supporting the federal expenditures (invoices **and receipts**, time **and** payroll **records**, **grant award letters, budget justifications,** etc.) and will make such documentation available for PDE to review upon request.

Reimbursements of actual expenditures do not involve interest calculations.

Accounting Methods/Internal Controls

The district shall hold federal advance payments in insured, interest-bearing accounts.

The school district is permitted to retain for administrative expense up to $500 per year of interest earned on federal grant cash balances. Regardless of the federal awarding agency, interest earnings exceeding $500 per year shall be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. (2 CFR 200.305(b)**(9)).**

Pursuant to federal guidelines, interest earnings shall be calculated from the date that the federal funds are drawn down from the G5 system until the date on which those funds are disbursed by the district. Consistent with state guidelines, interest accruing on total federal grant cash balances shall be calculated on cash balances per grant and applying the actual or average interest rate earned.

Remittance of interest shall be the responsibility of the Business Manager.

Administration of Federal Funds
Type of Costs, Financial Obligations and Property Management

The district establishes and maintains Board policies, administrative regulations and procedures on administration of federal funds in federal programs as required by the Uniform Guidance and other federal, state and local laws, regulations and requirements. The district's financial management system includes internal controls and grant management standards in the following areas.

Direct and Indirect Costs

Direct costs – costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. **(2 CFR 200.1, 200.413)**

Examples of direct costs may include, but are not limited to, salaries and benefits of staff working directly on the federal program, travel costs for program-related training and equipment purchased specifically for the program.

Indirect costs – costs incurred for a common or joint purpose benefiting more than one (1) cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. **(2 CFR 200.1, 200.414)**

Examples of indirect costs may include, but are not limited to, salaries and benefits of Human Resource staff, network infrastructure and building maintenance and repairs.

Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. (2 CFR 200.405, 200.413)

Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs.

Direct and indirect costs shall be determined in accordance with law, regulations, the terms and conditions of the federal award, and the district's negotiated indirect cost rate.

The district shall develop an indirect cost rate proposal and cost allocation plan in accordance with law, regulations and the terms and conditions of the federal award.

Timely **Financial** Obligation of Funds

Financial Obligations – orders placed for property and services, contracts and subawards made, and similar transactions **that require payment by a recipient or subrecipient under a federal award that will result in expenditures by a recipient or subrecipient under a federal award.**

The following table illustrates when funds must be obligated under federal regulations:

Financial Obligation is for:	**Financial Obligation is made:**
Acquisition of **real or personal** property	On the date on which the district makes a binding written commitment to acquire the property
Personal services by a district employee	When the services are performed
Personal services by a contractor who is not a district employee	On the date on which the district makes a binding written commitment to obtain the services
Work other than personal services	**On the date on which the district makes a binding written commitment to obtain the services**
Public utility services	When the district receives the services
Travel	When the travel occurs
Rental of **real or personal** property	When the district uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR Part 200, Subpart E - Cost Principles	On the first day of the project period

34 CFR §75.707

All **financial** obligations must occur between the beginning and **planned** ending dates of the federal award project, which is known as the period of performance. The period of performance is dictated by law and regulations and will be indicated in the federal award. Specific requirements for carryover funds may be specified in the federal award and must be adhered to by the district. (2 CFR 200.309)

The district will handle **financial** obligations and carryover of state-administered and direct grants in accordance with state and federal law and regulations, and the terms and conditions of the federal award. Carryover will be calculated and documented by the Federal Programs Coordinator.

The district may exercise an extension of the period of performance in accordance with law, regulations and the terms and conditions of the federal award, when written notice is provided to the federal awarding agency at least ten (10) calendar days prior to the end of the period of performance. (2 CFR 200.308(d)(2))

The Federal Programs Coordinator will decide when an extension of the period of performance is necessary and will recommend that the Business Manager approve this process.

The Federal Programs Coordinator will develop the required written notice, including the reasons for the extension and revised period of performance; the notice will be issued no later

than ten (10) calendar days prior to the end of the currently documented period of performance in the federal award.

The district must seek approval from the federal awarding agency for an extension of the period of performance when the extension is not contrary to federal law or regulations, and the following conditions apply: **(2 CFR 200.308(d)(2))**

1. The terms and conditions of the federal award prohibit the extension;

2. The extension requires additional federal funds; or

3. The extension involves any change in the approved objectives or scope of the project.

The Federal Programs Coordinator will determine when an extension must be requested for approval by the federal awarding agency, draft the written request and notify the Business Manager of the requested extension.

When an extension to a federal award is approved, the period of performance will be amended to end at the completion of the extension. If termination occurs, the period of performance will be amended to end upon the effective date of termination. The start date of a renewal award begins a new and distinct period of performance. (2 CFR 200.309)

Management of Property Acquired with Federal Funds

Definitions -

Equipment – tangible personal property, including information technology systems, having a useful life of more than one (1) year and a per unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the recipient or subrecipient for financial statement purposes, or $10,000.

Real Property – land, including land improvements, structures, and appurtenances, and legal interest in land, including fee interest, licenses, rights of way and easements. Real property excludes moveable machinery and equipment.

Personal Property – tangible or intangible property other than real property.

Supply – all tangible personal property other than those defined as equipment. Computing devices costing less than $10,000 per unit qualify as supplies.

Insurance Coverage -

The recipient or subrecipient must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with federal funds as it provides to property and equipment owned by the recipient or subrecipient.

Contract and Purchasing Administration -

The district maintains internal controls, administrative regulations and procedures to ensure that contractors deliver goods and services in accordance with the terms, conditions and specifications of the designated contract, purchase order or requisition.

Property Classifications -

Property shall be classified as **equipment, supplies, computing devices and capital assets** as defined and specified in accordance with law, regulations and Board policy. (Pol. 622)

Inventory Control/Management -

All property purchased with federal funds, regardless of cost, will be inventoried as a safeguard.

Inventory will be received by the department or program requesting the item; designated staff will inspect the property, compare it to the applicable purchase order or requisition, and ensure it is appropriately logged and tagged in the district's property management system.

Items acquired will be physically labeled by source of funding and acquisition date.

Inventory records of **property** must be current and available for review and audit, and include the following information:

1. Description of the item.

2. Manufacturer's serial number or other identification number.

3. Identification of funding source.

4. **Who holds title of the property.**

5. Acquisition date and unit cost.

6. Source of items, such as company name.

7. Percentage of federal **contribution** used in the purchase **and identification of the federal award**.

8. Present location, use, condition of item, and date information was reported.

9. Pertinent information on the ultimate transfer, replacement or disposition of the item and sale price of the property.

Inventory will be updated as items are sold, lost or stolen, or cannot be repaired, and new items are purchased.

Equipment must be used in the program or project for which it was acquired for as long as needed, whether or not the project or program continues to be supported by a federal award. (2 CFR 200.313)

During the time that equipment is used on the project or program for which it was acquired, the recipient or subrecipient must also make the equipment available for use on other programs or projects supported by the federal government, provided that such use will not interfere with the purpose for which it was originally acquired. First preference for other use of the equipment must be given to other programs or projects supported by the federal agency that financed the equipment. Second preference must be given to programs or projects under federal awards from other federal agencies. Use for nonfederally-funded projects is also permissible, provided such use will not interfere with the purpose for which it was originally acquired. The recipient or subrecipient should consider charging user fees as appropriate. (2 CFR 200.313)

Physical Inventory -

Physical inventory of property will be completed by designated district staff in accordance with applicable federal and state law and regulation and Board policy. (Pol. 622, 706)

The physical inventory of items will be conducted **at least every two (2) years or more often if required by law or Board policy**, and the results will be reconciled with the inventory records and reported to the federal awarding agency. **(2 CFR 200.313)**

Maintenance -

The district establishes **regular** maintenance procedures to ensure that property is maintained in good condition in accordance with law, regulation and Board policy. (Pol. 704, 708, 710)

Safeguards -

The district ensures that adequate safeguards are in place to prevent loss, damage or theft of property:

1. Any loss, damage or theft **must be investigated, fully documented and reported to the federal agency or pass-through entity of any loss, damage or theft that will have an impact on the program. The** Business Manager, may **also** report **the loss, damage or theft** to local law enforcement.

2. If stolen items are not recovered, the district will submit copies of the investigative report and insurance claim to the federal awarding agency.

3. The district may be responsible for replacing or repairing lost, damaged, destroyed or stolen items.

4. Replaced equipment is property of the originally funded program and should be inventoried accordingly.

5. District property may only be loaned in accordance with Board policy and administrative regulations. (Pol. 707, 708, 710)

Disposition of Property Acquired with Federal Funds –

When the district determines that real property, including land, land improvements, structures and accessories thereto, acquired under a federal award is no longer needed for the originally authorized purpose, the district must obtain disposition instructions from the federal awarding agency or pass-through entity administering the program, in accordance with applicable law and regulations. (2 CFR 200.311)

When the district determines that equipment or supplies acquired under a federal award are no longer needed for the original project or program or for other activities currently or previously supported by a federal awarding agency, the Business Manager will **follow the terms and conditions of the federal award, the disposition instructions in the Department of Federal Programs Administrative Manual on the PA Department of Education's website, and may** contact the federal awarding agency or pass-through entity administering the program to obtain disposition instructions.

Equipment with a **current** fair market value of $**10,000** or less **per unit** may be retained, sold **or otherwise disposed of with no further responsibility to the federal agency or pass-through entity**. For items with a fair market value greater than $**10,000 per unit**, the federal awarding agency **or pass-through entity** is entitled to the federal share of the current market value or sales proceeds**, in accordance with applicable law and regulations**. (**2 CFR 200.313, 200.314, 200.453)**

Supplies acquired under a federal award will vest upon acquisition in the recipient or subrecipient. After the period of performance, if there is a residual inventory of supplies exceeding $10,000 in total aggregate value, and the supplies are not needed for any other federal award the recipient or subrecipient may retain or sell the unused supplies which are new, have never been used or opened. The aggregate value of supplies consists of all supply types, not just like-item supplies. (2 CFR 200.314)

The federal agency or pass-through entity is entitled to compensation in an amount calculated by multiplying the percentage of the federal agency's or pass-through entity's contribution towards the cost of the original purchase(s) by the current market value or proceeds from the sale. (2 CFR 200.314)

The district may retain $1,000 to cover expenses associated with the selling and handling of the equipment or supplies. (2 CFR 200.313, 200.314)

If the district will be replacing the equipment or supplies, the district may use the existing equipment or supplies as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

The Business Manager will be responsible for contacting the federal awarding agency and determining the process for disposition of equipment or supplies.

The district may use the following methods in disposing of unnecessary equipment or supplies acquired with federal funds:

1. Public auction and/or online sale – generally conducted by a licensed auctioneer.

2. Salvage – scrap sold to local dealers.

3. Negotiated sale – normally used when disposing of items of substantial value.

4. Sealed bid – normally used for items of substantial value or unique qualities.

5. Pre-priced sale – large quantities of obsolete or surplus equipment or supplies may be sold by this method.

6. Donation to charitable organizations, for equipment or supplies with little to no value.

7. Disposition to trash for equipment or supplies with no value.

The Business Manager will be responsible for maintaining records of obsolete and surplus property disposed of and will report to the federal awarding agency when required.

Monitoring Program Performance

The district will monitor activities of federally-funded programs to assure compliance with appliable laws, regulations, and federal requirements, and to ensure that performance expectations and cost-effective practices are being achieved.

Data on compliance and program performance shall be provided in the form, and at the time intervals required by the state and federal law or the federal awarding agency.

Procurement – Federal Programs

This document is intended to integrate standard district purchasing procedures with additional requirements applicable to procurements that are subject to the federal Uniform Guidance regulations, federal guidance of the Office of Management and Budget and/or U.S. Department of Agriculture (USDA) regulations governing school food service programs. The district maintains the following purchasing procedures, in accordance with federal and state laws, regulations and Board policy. (2 CFR **200.1,** 200.102, 200.318-200.325; 7 CFR 210.16, 210.19, 210.21, 215.14a, 220.16; 24 P.S. 120, 24 P.S. 504, 24 P.S. 508, 24 P.S. 521, 24 P.S. 607, 24 P.S. 609, 24 P.S. 751, 24 P.S. 807.1; 62 Pa. C.S.A. 4601 et seq; Pol. 610, 611, 612, 613, 808**, 827**)

Procurement Method §200.320	**Goods/Supplies**	**Services**	**Requirements**
Micro-purchase (No quotes required)	Less than $10,000 Note: Must use more restrictive $0 Federal threshold instead of the state threshold	Less than $10,000 Note: Must use more restrictive $10,000 Federal threshold instead of state exemption for services	Consider price to be reasonable Distribute equitably among suppliers to the extent practical
Simplified Acquisition Procedures (Small Purchases - relatively simple and informal)	$10,000 - $23,800 Note: Must use more restrictive $10,000 Federal threshold instead of the state threshold	$10,000 - $249,999 Note: Must use more restrictive $10,000 Federal threshold instead of state exemption for services	Obtain/document price or rate quotations from a reasonable number of qualified sources (at least three per 24 PS 8.807.1) Written or documented quotes
Sealed Bids (Formal advertising)	$23,800 or more Note: Must use more restrictive $23,800 state threshold instead of the Federal threshold	N/A	Bids are publicly solicited Firm fixed price contract awarded to the responsible bidder lowest in price Cost or price analysis for purchases in excess of the Simplified Acquisition Threshold ($250,000)
Competitive	N/A	$250,000 or more	Conducted with more than

Proposals (Formal RFPs)		Note: Must use more restrictive $250,000 Federal threshold instead of state exemption for services	one source submitting an offer Price in not used as sole selection factor Fixed price or cost-reimbursement type contract is awarded Cost or price analysis for purchases in excess of the Simplified Acquisition Threshold ($250,000)
Non-competitive proposals	Appropriate only when these circumstances apply: - Available only from a single source (sole source) - Public emergency - After soliciting from several sources, competition is deemed inadequate - Consult with your school solicitor		Solicitation from only one source Used only when qualifying circumstances apply Fixed price or cost-reimbursement type contract is awarded

*Please review this Procurement attachment annually and update amounts accordingly

The district implements exceptions to the Micro-Purchase and Simplified Acquisition Threshold amounts announced by the federal Office of Management and Budget as part of its procurement procedures. **The state threshold of $12,900 is not applicable to federal procurement thresholds.**

Responsibility for Purchasing

The Board has outlined standard district purchasing responsibility, methods of purchasing, price quotations and bid requirements in the following Board policies and their accompanying administrative regulations or procedures:

Policy 610. Purchases Subject to Bid/Quotation
Policy 611. Purchases Budgeted

Policy 612. Purchases Not Budgeted
Policy 613. Cooperative Purchasing

Purchase Methods

When a request for purchase of equipment, supplies or services has been submitted and approved as outlined below, the procurement method to be used will be determined based on the type of purchase and the total cost of the purchase as further outlined below. This procedure outlines how the cost thresholds for determining when the quote or formal bidding procedures that are required by state law as reflected in Policy 610 must be modified when making purchases for federally funded purposes to which the Uniform Guidance or USDA regulations apply, so as to comply with both state and federal requirements. At each point where requirements for food service-related procurement under USDA regulations differ, a note will refer to the Food Service Program Notes at the end of this procedure. Final determination of which purchasing procedures are to be applied is delegated to the Business Manager under the authority of the Board.

Standard Procurement Documents and Purchase Request Process

The district shall use purchase orders for purchase requests in accordance with the applicable purchase method.

The district shall use electronic purchasing records, which are pre-numbered and are accessible to designated purchasing staff in the Business Office.

Purchase requests by an employee must be submitted to the building administrator or immediate supervisor. Purchase of ~~**all**~~ budgeted items or items approved by an administrator or supervisor **may** be initiated by use of a purchase order or requisition submitted to the Business Manager.

Purchase orders and requisitions shall contain information including, but not limited to:

1. Description of the services to be performed or goods to be delivered.

2. Location of where services will be performed, or goods will be delivered.

3. Appropriate dates of service or delivery.

Documentation on purchase orders and requisitions shall be maintained in accordance with the district's Records Management Policy and records retention schedule. (Pol. 800)

Contracts shall be reviewed by the Business Manager prior to submission to the Board for approval.

Contracts to which the Uniform Guidance apply shall contain the clauses specified in Appendix II to 2 CFR Part 200 (Contract Provisions for Non-Federal Entity Contracts Under Federal Awards), when applicable.

[See Additional Provisions for Food Service Programs below for specific clauses required by USDA regulations to be included in cost reimbursable procurement contracts.]

Micro-Purchases Not Requiring Quotes or Bidding

For purposes of this procedure**, micro-purchase** means a purchase of equipment, supplies or services for use in federally funded programs using simplified acquisition procedures, the aggregate amount of which does not exceed a base amount of $10,000. The micro-purchase dollar threshold is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register or announced as an exception by the federal Office of Management and Budget shall apply if other than $10,000.(48 CFR Subpart 2.1)

Note: The micro-purchase maximum for federal purposes is lower than the amount which the School Code allows purchase for nonfederal purposes to be made without obtaining at least three (3) written or telephonic quotes or using formal competitive bidding.

The micro-purchase method is used to expedite the completion of its lowest dollar small purchase transactions and minimize the associated administrative burdens and **reduce** costs. Procurement by micro-purchase is the acquisition of equipment, supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold.

To the extent practicable, the district distributes micro-purchases equitably among qualified suppliers when the same or materially interchangeable products are identified and such suppliers offer effectively equivalent rates, prices and other terms. The Business Manager will be responsible to determine the equitable distribution of micro-purchases.

Micro-purchases may be awarded without soliciting competitive quotations if the district considers the price to be reasonable. The district will maintain evidence of this reasonableness in the records of all micro-purchases. **Reasonable can be demonstrated through** sound business practices **documenting research, experience, purchase history, or other information.** Such determinations of reasonableness may include comparison of the price to previous purchases of the same item or comparison of the price of items similar to the item being purchased. **(2 CFR 200.320)**

Even if the cost of a purchase qualifies it as a micro-purchase, bidding or small purchase procedures may be used optionally when those procedures may result in cost savings.

Simplified Acquisition Procedures

For purposes of this procedure, **simplified acquisition procedures** are those relatively simple and informal procurement methods for securing equipment or supplies that cost more than the amount qualifying as a micro-purchase and do not cost $23,800 or more, or in the case of services other than construction, maintenance or repair on school facilities, where the total cost does not exceed the $250,000 federal Simplified Acquisition Threshold at which formal competitive bidding or competitive proposals are required. **Simplified acquisition** procedures

cannot be used for purchases of equipment or supplies or for construction, repair or maintenance services costing $23,800 or more because the School Code requires formal competitive bidding at that level of cost.

The base amount at which bidding is required under state law for purchases of equipment, supplies and construction, maintenance or repair services on school facilities is adjusted for inflation annually, and the adjusted amount most recently determined and published in the Pennsylvania Bulletin shall apply if other than $23,800. (24 P.S. Sec. 120)

The federal Simplified Acquisition Threshold at which competitive bidding or competitive proposals are required is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register or announced as an exception by the federal Office of Management and Budget shall apply if other than $250,000. (48 CFR Subpart 2.1, 2 CFR 200.102)

Because state law does not require competitive bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost, **simplified acquisition** procedures may be used for procurement of such other services except when the estimated total cost will be at or over the federal threshold at which formal competitive bidding or competitive proposals are required ($250,000).

A request for proposal (RFP) may be made for small purchases; however, the procurement process must comply with formal RFP procedures, including public notice.

[See Additional Provisions for Food Service Programs below for exemption from bidding for purchases of perishable food items costing less than $250,000.]

If **simplified acquisition** procedures are used, written or telephonic price or rate quotations are obtained from at least three (3) qualified sources and records of quotes are maintained as provided in Policy 610. (Pol. 610)

Formal Competitive Bidding

Publicly Solicited Sealed Competitive Bids -

For purchases of equipment or supplies, or of services for construction, maintenance or repairs of school facilities, sealed competitive bids are publicly solicited and awarded to the lowest responsive and responsible bidder as provided in Policy 610 when the total cost is estimated to be $23,800 or more. (Pol. 610)

Note: The amount at which formal competitive bidding or competitive proposals are required by federal regulations is much higher than the base amount at which the School Code requires competitive bidding. Therefore, the lower base amount specified by the School Code, as annually adjusted, is used to determine when bidding will be used for purchases of equipment or supplies, or for obtaining services for construction, maintenance or repairs on school facilities. (24 P.S. Sec. 120)

State law does not require bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost. For procurement of such other services for federally funded purposes to which the Uniform Guidance applies, formal competitive bidding or competitive proposals will be used when the estimated total cost will be at or over the federal threshold of $250,000.

The federal Simplified Acquisition Threshold at which competitive bidding or competitive proposals are required is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register or announced as an exception by the federal Office of Management and Budget shall apply if other than $250,000. (48 CFR Subpart 2.1, 2 CFR 200.102)

For procurement of services costing at or over the $250,000 federal threshold other than for construction, maintenance or repairs on school facilities, the use of competitive sealed bidding is considered feasible and appropriate when:

1. A complete, adequate, and realistic specification or purchase description is available;

2. Two (2) or more responsible bidders are willing and able to compete effectively for the business; and

3. The procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price.

Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. Any or all bids may be rejected if there is a **justified and** documented reason.

[See Additional Provisions for Food Service Programs below for reference to state requirements regarding contracts with food service management companies and contractors of pre-plated meals.]

Competitive Proposals -

State law does not require public school entities to solicit competitive bids for services other than construction, repairs or maintenance of school facilities, for which competitive bidding is required if the cost will be a base amount of $23,800 or more. State law allows competitive proposals relating to work on facilities in lieu of bidding only in the context of guaranteed energy savings contracts.

Federal regulations allow the use of competitive proposals as an alternative to formal competitive bidding when conditions are not appropriate for the use of sealed bids.

In the case of services other than for construction, repairs or maintenance of school facilities costing less than that threshold, the district may use **simplified acquisition** procedures or micro-purchase procedures as applicable based on total cost. A request for proposal (RFP) process can also meet or exceed the small purchase competition requirements under state law and Policy 610 for the acquisition of services other than for construction, repairs or maintenance of school facilities, and can be used if the total cost will be less than $250,000.

When permitted, the technique of competitive proposals is normally conducted with more than one (1) source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. Competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The district shall comply with other applicable state and federal law and regulations, Board policy and administrative regulations regarding purchasing; the district may consult with the school solicitor or other qualified counsel in determining the required process for purchasing through competitive proposals when necessary.

If this method is used, the following requirements apply:

1. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.

2. Proposals must be solicited from an adequate number of qualified sources.

3. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

An alternative form of competitive proposal is permitted only for qualifications-based procurement of architectural and engineering services, in which price is not a selection factor and reasonable compensation is negotiated after source selection. This alternative is not permitted for procurement of other types of services.

Competitive proposals shall be evaluated by the Business Manager based on factors including but not limited to:

1. Cost.

2. Experience of contractor.

3. Availability.

4. Personnel qualifications.

5. Financial stability.

6. Minority business, women's business enterprise, **veteran-owned business** or labor surplus area firm status.

7. Project management expertise.

8. Understanding of district needs.

Evaluations shall be completed in a timely manner, documented and shall be reviewed by the Business Manager.

Contract/Price Analysis

The district performs a cost or price analysis in connection with every procurement action in excess of $250,000, including contract modifications. (2 CFR 200.323(a)).

A **cost analysis** generally means evaluating the separate cost elements that make up the total price, while a **price analysis** means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the Business Manager must come to an independent estimate prior to receiving bids or proposals. (2 CFR 200.323(a)). As part of the analysis, the Business Manager will enact established business practices which may include evaluation of similar prior procurements and a review process.

Negotiated Profit

In any procurement in which there has been no price competition, or in which a cost-analysis is performed, profit must be negotiated separately as an element of price. Accordingly, solicitations of bids, proposals or quotes shall require that bids, proposals or quotes be limited to costs other than profit, and exclude profit.

To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work. (2 CFR 200.323(b)).

When profit must be negotiated as a separate element of the total price, it shall be negotiated by the Business Manager.

Noncompetitive Proposals (Sole Sourcing)

Procurement by noncompetitive proposals means procurement through solicitation of a proposal from only one (1) source and may be used only when one **(1)** or more of the following circumstances apply: **(2 CFR 200.320)**

1. **The aggregate amount of the procurement transaction does not exceed the micro-purchasing provisions.**

2. The **procurement transaction can only be fulfilled by** a single source.

3. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation. An **emergency** exists whenever the time required for the Board to act in accordance with regular procedures would endanger life or property or threaten continuance of existing school classes.

4. The federal awarding agency or pass-through entity **provides written approval for** noncompetitive **procurement** in response to a written request from the **recipient or subrecipient**.

5. After solicitation of a number of sources, the **recipient or subrecipient** determines the competition is inadequate.

In addition to standard procurement policy and procedures, the district will **provide** the grounds, **including analysis and documentation,** for using the noncompetitive method in lieu of an otherwise required competitive method of procurement**. A** written confirmation from the contractor as the sole source of the item **may be included as a supplement to the district's record of analysis**. Documentation must be submitted to and maintained by the Business Office.

All noncompetitive proposals will ultimately be approved by the Board. The district may utilize legal advice from the solicitor regarding noncompetitive proposals.

Profit must be negotiated separately for noncompetitive proposals, and a cost or price analysis will also be performed for noncompetitive proposals when the price exceeds $250,000.

Purchase Cards

The district approves the use of procurement cards for permissible purchases by designated employees to improve the efficiency of purchasing activities, reduce processing expenses, improve controls for small-dollar purchases, and streamline contractor payment.

Procurement cards may be used for purchases under federal programs. The use of procurement cards is governed by Board policy 625 Procurement Cards and established administrative regulations. (Pol. 625)

Full and Open Competition

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 CFR 200.319. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be

excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

1. Placing unreasonable requirements on firms in order for them to qualify to do business.

2. Requiring unnecessary experience and excessive bonding.

3. Noncompetitive pricing practices between firms or between affiliated companies.

4. Noncompetitive contracts to consultants that are on retainer contracts.

5. Organizational conflicts of interest.

6. Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement.

7. Any arbitrary action in the procurement process.

Scoring mechanisms that reward bidders that commit to specific numbers and types of U.S. jobs, minimum compensation, benefits, on-the-job-training for employees making work products or providing services on a contract, and other worker protections, may be assigned when consistent with established practices and legal requirements.
(2 CFR 300.319)

Minority Businesses, Women's Business Enterprises, Veteran-Owned Businesses, Labor Surplus Area Firms

The district must take necessary affirmative steps to assure that minority businesses, women's business enterprises, **veteran-owned businesses** and labor surplus area firms are **considered** when possible. **Such consideration means**: (2 CFR 200.321)

1. Placing **such** business**es** on solicitation lists;

2. Assuring that **such businesses** are solicited whenever they are **deemed eligible as** potential sources;

3. Dividing total purchasing requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by **such businesses**;

4. Establishing delivery schedules, where the requirement permits, which encourage participation **by such businesses**;

5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of

Commerce**; and**

6. Requiring the prime contractor, if subcontracts are let, to **apply these conditions to subcontracts.**

Prequalified Lists

The district must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the district must not preclude potential bidders from qualifying during the solicitation period.

[**See Additional Provisions for Food Service Programs below for reference to state requirements regarding contracts with food service management companies and contractors of pre-plated meals.]**

Solicitation Language

The district must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

Avoiding Acquisition of Unnecessary or Duplicative Items

The district must avoid the acquisition of unnecessary or duplicative items. Additionally, consideration must be given to consolidating or breaking out procurements to obtain a more economical purchase; and, where appropriate, an analysis must be made of leases versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

These considerations are given as part of the process to determine the allowability of each purchase made with federal funds. Such considerations are accessible in the procedure attached to Policy 626: Allowability of Costs – Federal Programs.

Use of Intergovernmental Agreements and Cooperative Purchasing

To foster greater economy and efficiency, the district enters into state and local intergovernmental agreements where appropriate for cooperative purchasing or use of common or shared goods and services, as permitted by the Intergovernmental Cooperation Act, the School Code and the Commonwealth Procurement Code. (Pol. 613; 53 Pa. C.S. Ch. 23; 24 P.S. 521; 62 Pa. C.S. Ch. 19**, 2 CFR 200.318 (e)**)

When procuring supplies or services for federally funded purposes to which the Uniform Guidance applies, the district shall verify **and document** that the organization conducting the procurement pursuant to such agreements complies with the applicable procurement methods, requirements and standards of the Uniform Guidance as outlined in this procedure.

The district considers the use of federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

Recovered Materials

The recipient or subrecipient should, to the greatest extent practicable and consistent with law, purchase, acquire or use products and services that can be reused, refurbished or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable. This may include purchasing compostable items and other products and services that reduce the use of single-use plastic products. (2 CFR 200.323)

Debarment and Suspension

The district awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

[See Additional Provisions for Food Service Programs below for reference to state requirements regarding contracts with food service management companies and contractors of pre-plated meals.]

The district may not subcontract with or award subgrants to any person or company who is debarred or suspended. For all contracts over $25,000 the district verifies that the contractor with whom the district intends to do business is not excluded or disqualified. (2 CFR Part 200, Appendix II, and 2 CFR 180.220 and 180.300).

All successful contractors must provide written certification that they have not been suspended or debarred from federal projects. The Business Manager will be responsible for verification. Such verification **to determine whether a potential subrecipient is subject to any suspension or debarment restrictions must include one of the following:**

1. Accessing the online federal System for Award Management (SAM); or

2. **Collecting a certification from that person; or**

3. **Adding a clause or condition to the covered transaction with that person. (2 CFR 180.300)**

Maintenance of Procurement Records

The district must maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred.

Maintenance of records of procurement will be governed by Board policy 800 Records Management and the district's established records retention schedule. (Pol. 800)

Time and Materials Contracts

The district may use a time and materials type contract only: (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. **Time and materials type contract** means a contract whose cost to the district is the sum of: the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the district must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Settlements of Issues Arising Out of Procurements

The district alone is responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the district of any contractual responsibilities under its contracts. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction.

Protest Procedures to Resolve Dispute

The district maintains protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency. Protest procedures will be acted on in accordance with current state law and regulations, established district administrative regulations and the advice of the solicitor. (Pol. 610)

ADDITIONAL PROVISIONS FOR FOOD SERVICE PROGRAMS

Exemption from Bidding for Perishable Food Items -

The School Code exempts purchases of perishable food items from bidding requirements. Bidding for perishable food items is required only if the cost would be at or over the federal threshold at which formal competitive bidding is required ($250,000). **Simplified acquisition** procedures may be used for purchases below $250,000, or micro-purchase procedures for purchases below $10,000. Use of bidding should be considered as an option if it is feasible and likely to result in cost savings.(24 P.S. 504(d))

Geographic Preferences -

The district is permitted to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products. When a geographic preference is applied, the district has discretion to determine the local area to which the geographic preference option will be applied.

Unprocessed locally grown or locally raised agricultural products means only those agricultural products that retain their inherent character. The effects of the following food handling and preservation techniques shall not be considered as changing an agricultural product into a product of a different kind or character: cooling; refrigerating; freezing; size adjustment made by peeling, slicing, dicing, cutting, chopping, shucking, and grinding; forming ground products into patties without any additives or fillers; drying/dehydration; washing; packaging (such as placing eggs in cartons), vacuum packing and bagging (such as placing vegetables in bags or combining two (2) or more types of vegetables or fruits in a single package); the addition of ascorbic acid or other preservatives to prevent oxidation of produce; butchering livestock and poultry; cleaning fish; and the pasteurization of milk. (7 CFR 210.21, 215.14a, 220.16)

Buy American -

The district shall purchase, to the maximum extent practicable, domestic commodities or products for food service purposes.

The term **domestic commodity or product** means: (7 CFR. 210.21, 220.16)

1. An agricultural commodity that is produced in the United States; and

2. A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States**, meaning over 51% of a food product must consist of agricultural commodities that were grown domestically**.

All procurement procedures, solicitations and contracts related to food service programs must include language regarding the *Buy American* requirements for food purchases.

The two main exceptions to the *Buy American* requirements are:

1. **The product is not produced or manufactured in the United States in sufficient and reasonably available quantities of a satisfactory quality; or**

2. **Competitive bids reveal the costs of a United States product are significantly higher than the non-domestic product.**

Mandatory Contract Clauses -

The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts: (7 CFR 210.21, 215.14a, 220.16)

1. Allowable costs will be paid from the nonprofit school food service account to the contractor net of all discounts, rebates and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority;

2. (a) The contractor must separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the nonprofit school food service account) and the amount that is unallowable (cannot be paid from the nonprofit school food service account); or

   (b) The contractor must exclude all unallowable costs from its billing documents and certify that only allowable costs are submitted for payment and records have been established that maintain the visibility of unallowable costs, including directly associated costs in a manner suitable for contract cost determination and verification;

3. The contractor's determination of its allowable costs must be made in compliance with the applicable departmental and program regulations and Office of Management and Budget cost circulars;

4. The contractor must identify the amount of each discount, rebate and other applicable credit on bills and invoices presented to the school food authority for payment and individually identify the amount as a discount, rebate, or in the case of other applicable credits, the nature of the credit. If approved by the state agency, the school food authority may permit the contractor to report this information on a less frequent basis than monthly, but no less frequently than annually;

5. The contractor must identify the method by which it will report discounts, rebates and other applicable credits allocable to the contract that are not reported prior to conclusion of the contract; and

6. The contractor must maintain documentation of costs and discounts, rebates and other applicable credits, and must furnish such documentation upon request to the school food authority, the state agency, or the department.

Contracts with Food Service Management Companies -

Procedures for selecting and contracting with a food service management company (FSMC) shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR 210.16, 210.19, 210.21, 215.14a, 220.16)

Pre-Plated Meals -

Procedures for selecting and contracting with contractors of pre-plated meals shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR 210.16, 210.19, 210.21, 220.16)

Standards of Conduct -

The district will comply with the written standards of conduct in Policy 827. Conflict of Interest which governs the actions of employees and Board members regarding the selection, award and administration of contracts.

No employee or Board member may participate in the selection, award or administration of a contract supported by a federal award if s/he has a real or apparent conflict of interest as well as any other circumstance in which the employee, Board member, any member of his/her immediate family, his/her business partner, or an organization which employs or is about to employ any of them, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. (2 CFR 200.318)

Violations of the standards of conduct by employees may result in disciplinary action up to and including discharge, fines and possible imprisonment. Disciplinary actions shall be consistent with Board policies, procedures, applicable collective bargaining agreements and state and federal law.

Grant Subrecipient Monitoring Procedures – Federal Programs

In the event the district disperses federal funds received through a federal award to other entities and assigns responsibilities to the outside entity to conduct a portion of the work, the district shall be responsible for determining, on a case-by-case basis, whether the agreement with such entity places the outside entity in the role of a subrecipient receiving a subaward of federal funding, or the role of a contractor.

If the district grants subawards of federal funding to other entities as subrecipients, the district shall be responsible for:

1. Evaluating the entity for risk of noncompliance to determine appropriate monitoring practices.

2. Monitoring the subrecipient entity's implementation to ensure compliance with federal, state and local laws, conditions of the federal funding award, and Board policy and procedures.

3. Notifying the subrecipient entity of identified deficiencies found during the monitoring process and ensuring that identified deficiencies are corrected.

4. Documenting and retaining records on subrecipient identification, notification, evaluation, monitoring and corrective actions taken.

Definitions

For purposes of policies and procedures related to federal programs, the following definitions shall apply:

Contract – **for the purpose of federal financial assistance,** a legal instrument by which a **recipient or subrecipient conducts procurement transactions under a federal award.**

Contractor – an entity that receives a contract.

Participant – generally an individual participating in or attending program activities under a federal award, such as trainings or conferences, but who is not responsible for implementation of the federal award. Examples include community members participating in a community outreach program, students, conference attendees or a member of the public whose input is sought.

Pass-through entity – a **recipient or subrecipient** that provides a subaward to a subrecipient to carry out part of a federal program. The district serves as the pass-through entity in cases where it awards federal funding to a subrecipient as defined in this procedure.

Subaward – an award provided by a pass-through entity to a subrecipient in order to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor**, participant** or payments to an individual that is a beneficiary of a federal program. A

subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient – **an** entity that receives a subaward **from a pass-through entity** to carry out part of a federal program; but does not include **a participant or** an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.

Subrecipient Versus Contractor

The district must determine, on a case-by-case basis, whether an entity receiving funds from the district as part of a federal funding program serves in a role of subrecipient or contractor. (2 CFR **200.331**)

The Business Manager shall be responsible for analyzing the criteria listed in the chart below and evaluating the relationship with the entity based on the substance of the **relationship**, rather than the form of the agreement. The Business Manager may consult with the school solicitor or other qualified counsel in making such determination.

Subrecipient	Contractor
Purpose: To carry out a portion of the federal award and create a **federal financial assistance relationship**	Purpose: To obtain goods and services for the **recipient's or subrecipient's** own use and create a **procurement relationship**
Subrecipient Characteristics ***Include but are not limited to when the entity -***	**Contractor Characteristics** ***Include but are not limited to when the contractor -***
Determines who is eligible to receive what federal assistance	Provides the goods and services within normal business operations
Has its performance measured in relation to whether objectives of a federal program were met	Provides similar goods or services to many different purchasers
Has responsibility for programmatic decision making	Normally operates in a competitive environment
Is responsible for adherence to applicable federal program requirements specified in the federal award; and	Provides goods or services that are ancillary to the operation of the federal program; and
In accordance with its agreement, uses the federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity	Is not subject to compliance requirements of the federal program as a result of the agreement, **although** similar requirements may apply for other reasons

Qualification Verification

The district must verify that the subrecipient is not excluded or disqualified by: (2 CFR 180.300)

- **Checking SAM.gov;**

- **Collecting a certification from subrecipient; or**

- **Adding a clause or condition to the subaward.**

Subaward Notification and Information

After verification, the district shall notify subrecipients that they have been identified as a subrecipient and that the funding qualifies as a subaward. The district shall provide the subrecipient with the following information as specified at 2 CFR **200.332** regarding the federal funding award, and any subsequent changes:

1. Federal Award Identification information, including:

    a. Subrecipient name (which must match the name associated with its unique entity identifier);

    b. Subrecipient's unique entity identifier;

    c. Federal Award Identification Number (FAIN);

    d. Federal Award Date **– the** date **the federal agency officially signed the federal award or when an authorized alternative is reached with the recipient**;

    e. Subaward Period of Performance Start and End Date;

    f. **Subaward Budget Period Start and End Date;**

    g. Amount of Federal Funds Obligated **in the subaward;**

    h. Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current **financial** obligation;

    i. Total Amount of the Federal Award committed to the subrecipient by the pass-through entity;

    j. Federal award project description, as required **by** the Federal Funding Accountability and Transparency Act (FFATA);

    k. Name of federal awarding agency, pass-through entity, and contact information for awarding official of the pass-through entity;

    l. **Assistance Listing Title and** Number; the pass-through entity must identify the dollar amount made available under each federal award and the **Assistance Listing** Number at time of disbursement;

    m. Identification of whether the award is **for research and development**; and

n. Indirect cost rate for the federal award (including if the de minimis rate is charged per **2 CFR** 200.414 Indirect (F&A) costs).

2. All requirements **of the subaward including requirements imposed by** federal statutes, regulations and the terms and conditions of the federal award;

3. Any additional requirements that the pass-through entity imposes on the subrecipient for the pass-through entity to meet its own responsibility to the federal awarding agency including **information and certifications** required **for submitting** financial and performance reports; **(2 CFR 200.415)**

4. An approved indirect cost rate negotiated between the subrecipient and the federal government or, if no **approved** rate exists, either a rate negotiated between the pass-through entity and the subrecipient (**2 CFR 200.332**), or a de minimis indirect cost rate as defined in §200.414 Indirect (F&A) costs, paragraph (f). **The pass-through entity must not require the use of the de minimis indirect cost rate if the subrecipient has an approved indirect cost rate negotiated with the federal government. Subrecipients may elect to use the cost allocation method to account for indirect costs; (2 CFR 200.405)**

5. A requirement that the subrecipient permit the pass-through entity and auditors to access the subrecipient's records and financial statements as necessary for the pass-through entity to **fulfill its monitoring requirements**; and

6. Appropriate terms and conditions concerning closeout of the subaward.

Evaluation of Risk

The district shall evaluate each subrecipient's **fraud risk and** risk of noncompliance with law, regulations and the terms and conditions of the subaward to determine appropriate monitoring practices. (2 CFR **200.332**)

The Business Manager or designee shall be responsible for evaluating risk based on the following factors:

1. The subrecipient's prior experience with the same or similar subawards;

2. The results of previous audits, including whether the subrecipient receives a single audit and the extent to which the same or similar subaward has been audited **as a major program**;

3. Whether the subrecipient has new personnel, or new or substantially changed systems and processes;

4. The extent and results of any federal award agency's monitoring of the subrecipient.

The Business Manager or designee shall request adequate documentation from the subrecipient to conduct the evaluation of risk; such documentation may include, but shall not be limited to,

audit reports, financial reports, policies and procedures, and detailed descriptions or users' guides of current systems and processes.

The district shall evaluate subrecipients for risk of noncompliance as specified in the legal agreement or contract.

Based on the results of the risk evaluation, the district may consider imposing specific conditions on implementation of the subaward and **shall notify the federal agency of the specific conditions,** in accordance with applicable law and regulations. (2 CFR 200.207, **200.332**)

Monitoring

The district shall monitor the **overall performance, including** implementation and activities of each subrecipient as necessary to ensure that the subaward is used for authorized purposes **and that the performance goals are achieved**, in accordance with law, regulations and the terms and conditions of the subaward. The district shall notify subrecipients of monitoring requirements and may provide technical assistance to subrecipients in complying with monitoring requirements.

As part of the monitoring process, the district shall: (2 CFR **200.332**)

1. Review financial and performance reports.

2. **Ensure that the subrecipient takes corrective action on all significant developments that negatively affect the subaward. Significant developments include Single Audit findings related to the subaward, other audit findings, site visits, and written notifications from a subrecipient of adverse conditions which will impact their ability to meet the milestones or the objectives of a subaward. When significant developments negatively impact the subaward, a subrecipient must provide the pass-through entity with information on their plan for corrective action and any assistance needed to resolve the situation.**

3. Issue a management decision for audit findings pertaining to the subaward provided to the subrecipient, in accordance with applicable law and regulations. (2 CFR 200.521)

4. **Resolve audit findings specifically related to the subaward. However, the pass-through entity is not responsible for resolving cross-cutting audit findings that apply to the subaward and other federal awards or subawards. If the subrecipient has a current Single Audit report and has not been excluded from receiving federal funding, the pass-through entity may rely on the subrecipient's cognizant agency findings. (2 CFR 200.513)**

*Monitoring – **Delegation of Responsibility***

The Business Manager or designee shall be responsible for the monitoring of subrecipients. Monitoring activities may include, but shall not be limited to:

1. **Providing training and technical assistance.**

2. Review of progress reports, financial reports and data quality.

3. On-site visits.

4. Review of federal or state debarment lists.

5. Review of other agreed-upon procedures specified in the legal agreement or contract. (2 CFR 200.425)

The district shall verify that subrecipients are audited as required by applicable law and regulations. (2 CFR **200.332**, 2 CFR 200.500-200.521, Pol. 619)

Follow-Up Actions –

The Business Manager or designee shall provide subrecipients with written documentation detailing their monitoring results and listing any identified deficiencies. The district shall consider whether the results of monitoring indicate the need to revise existing district policy and procedures **or the need to take other enforcement action**. **(2 CFR 200.332**)

The district may impose specific conditions on the subrecipient, in accordance with applicable law and regulations. (2 CFR 200.208)

The district shall require subrecipients to take immediate action on issues involving ineligible or illegal use of federal funding and notify the district of corrective action taken.

The district shall require subrecipients to develop a corrective action plan to address other identified deficiencies or noncompliance issues; such plan shall be submitted to the district as specified in the agreed-upon procedures, and the district shall evaluate and monitor the activities taken by the subrecipient under the corrective action plan. The district may provide technical assistance and/or training to subrecipients in complying with corrective action requirements.

The Business Manager or designee shall maintain all documentation on monitoring of subrecipients, and corrective action taken during the monitoring process.

The district shall report issues of noncompliance to the appropriate federal agency where required by law, regulations, or requirements of the federal funding program.

Remedies for Noncompliance –

When monitoring activities identify issues of noncompliance that are not addressed through corrective action, the district may take the following actions: (**2 CFR 200.332, 200.339)**

1. Temporarily withhold payments, **until the recipient or subrecipient takes corrective action**.

2. Disallow or deny use of funds for all or part of the cost of the activity or action **associated with noncompliance of the recipient or subrecipient.**

3. Suspend or terminate the federal award in whole or in part.

4. Recommend that the federal agency initiate suspension and debarment proceedings.

5. Withhold further **federal funds (new** awards or **continuation of funding**) for the project or program.

6. Take other remedies legally available, in consultation with the school solicitor or other qualified counsel.

Record Retention

The Business Manager shall ensure that all documentation regarding subrecipient identification, notification, evaluation, monitoring activities and corrective action is maintained in accordance with Board policy and procedures. (Pol. 800)

Records shall be retained in accordance with applicable law, regulations, specific requirements of the federal program and the district's records retention schedule. (**2 CFR 200.334-200.338**, Pol. 800)

Book	School District for PNN+
Section	600 Finances
Title	Travel Reimbursement - Federal Programs
Code	626.1 Vol III 2025
Status	Active

Authority

The Board shall reimburse administrative, professional and support employees, school officials, **and participants in federal awards** for travel costs incurred in the course of performing services related to official business as a federal grant recipient.[1][2]**[3]**

Definitions

A participant is generally an individual participating in or attending activities under a federal award such as training or conferences, but who is not responsible for implementation of the federal award. Participants can include, but are not limited to, community members, students and conference attendees.[4]

For purposes of this policy, **travel costs** shall mean the expenses for transportation, **airfare,** lodging, subsistence, and related items incurred by **individuals who are traveling on approved** official business as a federal grant recipient.**[3]**

Delegation of Responsibility

School officials**,** district employees **and participants** shall comply with applicable Board policies and administrative regulations established for reimbursement of travel and other expenses.[5][6]

School officials and district employees shall acquire prior written approval to incur travel costs for official business related to a federal award.[3]

The validity of payments for travel **costs shall** be determined by the Superintendent or designee.

Guidelines

Reimbursement for travel costs related to official business as a federal grant recipient must be consistent with standard methods established in general travel reimbursement policies and administrative regulations.[3][5][6]

Travel costs shall be reimbursed on a mileage basis for travel using **a** personal vehicle and on an actual cost basis for meals, lodging and other allowable expenses, consistent with those normally allowed in like circumstances in the district's nonfederally funded activities, and in accordance with the district's travel reimbursement policies and administrative regulations.**[3]**[5][6]

Mileage reimbursements shall be at the rate approved by the Board for other district travel reimbursements. Actual costs for meals, lodging and other allowable expenses shall be reimbursed only to the extent they are reasonable and do not exceed the per diem limits established by the Board.

All travel costs must be presented with an itemized, verified statement prior to reimbursement.[1][2]

In addition, if these costs are charged directly to the federal award, documentation must be maintained that justifies that:**[3]**[5][6]

1. Participation of the individual is necessary to the federal award.

2. The costs are reasonable and consistent with the district's established policy.

Legal References
1. 24 P.S. 516.1
2. 24 P.S. 517
3. 2 CFR 200.475
4. 2 CFR 200.1
5. Pol. 004
6. Pol. 331

Book	Policy Manual
Section	900 Community
Title	Public Participation in Board Meetings
Code	903 Vol I 2024
Status	Active

Purpose

The Board recognizes the value of public **input** and the importance of **designating time for** public **comment during open** Board meetings. **The Board also recognizes the importance of diverse viewpoints and commentary.**

This policy addresses the right for the public to comment at open Board meetings and the responsibility of the Board to conduct its business in an orderly and efficient manner. **An authorized individual's public comment will be free from interruption, except when the individual's conduct is in violation of law or Board policy.**[1]

Authority

An opportunity for district residents and taxpayers to provide comment on matters of concern, official action or deliberation which are or may be before the Board, shall be provided as designated on the Board meeting agenda and in compliance with law, Board policy and district procedures.[1][2][3][4][5]

Copies of the agenda, which includes a listing of each matter of business that will be or may be the subject of deliberation or official action at the meeting, shall be made available to individuals in attendance at the meeting.[3]

The Board **requires** that public comment **on agenda items** be made at the beginning of each meeting.**[4]**

If the Board determines there is not sufficient time at a meeting for public comments, the comment period may be deferred to the next regular meeting or to a special meeting occurring before the next regular meeting.[4]

The Board shall provide a second public comment period, after the items for action or deliberation have been completed, to comment on items of concern or other matters involving the school district.

When items are added to the agenda after the public comment period has ended, the Board shall offer a further public comment opportunity limited to the added items.[4][6]

An individual's public comment may be interrupted or terminated only under limited circumstances, such as when the individual's commentary is in clear violation of law or Board policy, including but not limited to the following:

1. **Sexual harassment, racial, ethnic, religious or nationality intimidation towards an individual or individuals in the school community.[7][8][9]**

2. **Disclosure of confidential personal information regarding students or staff.**

3. **Speech that traditionally has not been protected under the First Amendment, such as obscenity, defamation and speech integral to criminal conduct.**

4. **Speech that is profane.**

5. **Speech that constitutes true threats such as inciting imminent lawless action or subjecting individuals to fear of violence.**

6. **Speech that does not concern matters that may come before the Board for deliberation or official action, for example, sales of commercial products or services.**

Guidelines

Sign-in and Request to Comment

All individuals wishing to **comment during** the Board meeting **shall sign in on the sheet provided at the meeting and provide the following information on the sign-in sheet:**

1. Name **of commenter.**

2. **Municipality** of the **commenter**.

3. Topic to be addressed.

4. Group **or organization** affiliation, if applicable

Statement of Presiding Officer

Prior to public comment during the meeting, the presiding officer shall make a statement providing direction and establishing expectations for the period of public comment.

Public Comment

Individuals shall wait to be recognized by the presiding officer **before commenting, must direct all comments to the Board,** and must preface their comments by an announcement of their name, and group affiliation, if applicable.

The public comment session at the beginning of the meeting shall be limited to not more than one (1) hour, unless extended by the presiding officer.

The second public comment period shall be limited to not more than thirty (30) minutes, unless extended by the presiding officer.

Each statement made by a participant shall be limited to **five (5)** minutes, **unless extended by the presiding officer.**

Commenters may not cede their time to other individuals.

No individual may speak more than once on the same topic, unless all others who wish to speak on that topic have been heard **and there is time remaining in the public comment period.**

All statements shall be directed to the presiding officer; no participant may address or question school directors individually.

The presiding officer and **the district solicitor have the authority to:**

1. Interrupt **an individual to warn the commenter that the statement is** too lengthy **or conduct is otherwise in violation of this policy.**

2. **After warning,** terminate **the individual's opportunity to comment when the conduct continues and is in violation of this policy.**

3. **Call a recess or adjourn to another time when an individual's conduct is otherwise in violation of this policy.**

4. Request an individual to leave the meeting when that person's **conduct is disrupting the operation of the meeting.[10][11]**

5. **If the individual refuses to leave the meeting, request the assistance of school security personnel or law enforcement to remove the disorderly person to enable the Board to proceed with the orderly operation of the meeting.[12][13]**

6. **Waive the Board's rules regarding public comment with the approval of a majority of those present and voting.**

Response to Public Comment

The purpose of public comment at Board meetings is to allow the Board to learn the thoughts of the public prior to Board deliberation and official action.

Although the public comment period of the meeting is not a question and answer session between the public and the Board, the Board may direct staff to follow up and address public inquiries in a reasonably prompt manner.

Whenever public comments are subject to the Board policy regarding public complaints, the individual shall be directed to follow the process outlined in the policy for resolution of the issue.[14]

Public Comment Recorded in Board Minutes

The following information regarding public comment is required to appear in the official minutes of each open Board meeting:[5][19]

1. **The names of all citizens who appeared before the Board.**

2. **The subject of their testimony.**

Recording Devices and Cameras

Electronic recording devices and cameras, in addition to those used as official recording devices, shall be permitted at open meetings. **The Board is authorized to establish reasonable rules for the use of recording devices and cameras during Board meetings.[1]**[21]

Legal
1. 65 Pa. C.S.A. 710
2. 24 P.S. 407
3. 65 Pa. C.S.A. 709
4. 65 Pa. C.S.A. 710.1
5. Pol. 006
6. 65 Pa. C.S.A. 712.1
7. Pol. 103
8. Pol. 103.1
9. Pol. 104
10. 18 Pa. C.S.A. 5101
11. 18 Pa. C.S.A. 5508
12. 18 Pa. C.S.A. 3503
13. Pol. 805.2
14. Pol. 906
15. Pol. 113.4
16. Pol. 216
17. Pol. 800
18. Pol. 801
19. 65 Pa. C.S.A. 706
20. Alekseev v. City Council of Philadelphia, 8 A.3d 311 (Pa. 2010)
21. 65 Pa. C.S.A. 711
U.S. Const. Amend. I
PA Const. Art. I
65 Pa. C.S.A. 701 et seq
18 Pa. C.S.A. 1 et seq
18 Pa. C.S.A. 5903
Counterman v. Colorado, 600 U.S. 66, 143 S. Ct. 2106, 216 L. Ed. 2d 775 (2023)
Hatchard v. Westinghouse Broadcasting, 516 Pa. 184, 532 A.2d 346 (1987)

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

903-AR-0. REQUEST TO **COMMENT** AT BOARD MEETING

_____ School District Board of Education

Date you wish to speak before the Board: _____

Topic of commentary: _____

_____

Name: _____ **Phone Number**: _____

_____

{ } Municipality: _____

{ } Address: _____

Name of organization you represent, if any: _____

_____

☐ } **By checking this box, I am acknowledging that I am authorized to or have been requested to speak on behalf of the above organization.**

I am commenting tonight as a:

☐ **Resident** ☐ **Taxpayer**

☐ **Other, please explain.** _____

☐ **By checking this box, I am acknowledging that I understand and agree to comply with the procedures for public comment as contained in Policy 903. Public Comment in Board Meetings.**

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

903-AR-1. **PRESIDING OFFICER STATEMENT**

Prior to the period provided for public comment during the meeting, the presiding officer shall make a statement providing direction and establishing expectations for public comment, which will include the following:

We have come to the portion of the meeting providing an opportunity for public comment. The Board will follow the procedures established in Policy 903. Public Comment in Board Meetings, which is accessible through the district's website and copies of which are available on the counter in the entryway.

This time is designated for district residents and taxpayers to comment on the items listed for action or deliberation on tonight's agenda.

All individuals wishing to comment this evening must have signed in on the sheet provided and completed the information specified on the sign-in sheet.

Each commenter will preface their comments by announcement of their name, municipality, and if applicable, group affiliation.

Comments by public participants are their own and should not be assumed to be the statements of the school district or any of its directors, agents, employees or representatives.

Book	Policy Manual
Section	900 Community
Title	Public Attendance at School Events
Code	904
Status	Active
Adopted	October 7, 2019

Purpose

The Board welcomes the public at activities and events sponsored by the school district, but the Board also acknowledges its duty to maintain order and preserve school facilities and health and safety during such events. This policy establishes conditions, restrictions and procedures to regulate public attendance and conduct at school and school-sponsored activities.

Definition

For purposes of this policy, tobacco product encompasses not only tobacco but also vaping products including electronic cigarettes (e-cigarettes). **Tobacco products**, for purposes of this policy and in accordance with law, shall be defined to include the following:[1][2]

1. Any product containing, made or derived from tobacco or nicotine that is intended for human consumption, whether smoked, heated, chewed, absorbed, dissolved, inhaled, snorted, sniffed or ingested by any other means, including, but not limited to, a cigarette, cigar, little cigar, chewing tobacco, pipe tobacco, snuff and snus.

2. Any electronic device that delivers nicotine or another substance to a person inhaling from the device, including, but not limited to, electronic nicotine delivery systems, an electronic cigarette, a cigar, a pipe and a hookah.

3. Any product containing, made or derived from either:

    a. Tobacco, whether in its natural or synthetic form; or

    b. Nicotine, whether in its natural or synthetic form, which is regulated by the United States Food and Drug Administration as a deemed tobacco product.

4. Any component, part or accessory of the product or electronic device listed in this definition, whether or not sold separately.

The term **tobacco product** does not include the following:[1][2]

1. A product that has been approved by the United States Food and Drug Administration for sale as a tobacco cessation product or for other therapeutic purposes where the product is marketed and sold solely for such approved purpose,

as long as the product is not inhaled.

2. A device, included under the definition of tobacco product above, if sold by a dispensary licensed in compliance with the Medical Marijuana Act. *Federal law requires the district to maintain a drug-free environment, at which marijuana of any kind is prohibited.*[3][4]

Authority

The Board has the authority to prohibit at a school event the attendance of any individual whose conduct may constitute a disruption. The Superintendent or designee and building principal may limit attendance to designated areas or may limit the number of attendees to school events when necessary to protect the health and safety of students, staff and the public, in accordance with Board-approved health and safety plans and guidance from state and local officials.

The Board prohibits gambling and the possession and use of controlled substances prohibited by state or federal law, alcoholic beverages and weapons on school premises.[5][6]

Attendees shall be informed of the district's health and safety rules through announcements and posting of appropriate signage. Health and safety rules must be followed prior to entry and while attendees are in school buildings and on school property, in accordance with Board policy, district procedures, the Board-approved health and safety plans and guidance from state and local officials.[7]

Tobacco and Vaping Products

The Board prohibits use of tobacco and vaping products, **including** e-cigarettes, by any persons at any time in a school building; on school buses or other vehicles that are owned, leased or controlled by the school district; or on property owned, leased or controlled by the school district.[2][8]

This policy does not prohibit possession of tobacco **products** by members of the public of legal age at school or school-sponsored activities.

The Board deems it to be a violation of this policy for an individual in attendance at school or a school-sponsored activity to furnish a tobacco **product** to a minor.[1]

Delegation of Responsibility

A schedule of fees for attendance at school events shall be prepared by the Superintendent or designee and adopted by the Board.

The Superintendent shall ensure that this policy is posted on the district's publicly accessible website.[9]

Reports

Annual School Safety and Security Incidents *Report –*

The Superintendent shall annually, by July 31, report all incidents of prohibited possession, use or sale of tobacco **products** by any person on school property to the **PA Department of Education** on the required form.**[10][11]**[12]

Law Enforcement Incident Report –

In accordance with state law and regulations, the procedures set forth in the memorandum of understanding with **law** enforcement and Board policies, the Superintendent or designee may report to the **law enforcement agency** that has jurisdiction over the school's property, the use or sale of tobacco **products** by any person in a school building; on a school bus or other vehicles that are owned, leased or controlled by the school district; or on any property owned leased or controlled by the school district.[1][2]**[10][11]**[12][13][14]

Guidelines

Free Admittance

The Board directs the Superintendent to develop and implement programs in order to provide free admittance to selected school events for senior citizens who are district residents, as well as district personnel.

Service Animals

Individuals with disabilities may be accompanied by their service animals while on district property for events that are open to the general public in accordance with Board policy and state and federal laws and regulations.[15][16][17]

Legal
1. 18 Pa. C.S.A. 6305
2. 18 Pa. C.S.A. 6306.1
3. 20 U.S.C. 7118
4. Pol. 351
5. 24 P.S. 511
6. 24 P.S. 775
7. Pol. 705
8. 20 U.S.C. 7973
9. 24 P.S. 510.2
10. 24 P.S. 1306.2-B
11. 24 P.S. 1319-B
12. Pol. 805.1
13. 22 PA Code 10.2
14. 22 PA Code 10.22
15. 28 CFR 35.136
16. 43 P.S. 953
17. Pol. 718
35 P.S. 637.1 et seq
20 U.S.C. 7971 et seq
28 CFR Part 35

PUBLIC BEHAVIOR AT SCHOOL EVENTS

The district expects mutual respect, civility and orderly conduct by all individuals attending school events on district property.

Expected Behavior

Individuals attending school events on district property will not:

1. Injure, threaten, harass or intimidate a district employee, sports official or coach or any other person.

2. Act in an unsafe manner that could threaten the health or safety of others.

3. Use vulgar or obscene language or gestures.

4. Fight, strike or injure another person.

5. Damage, deface or threaten to damage district property.

6. Damage, deface or threaten to damage another individual's property.

7. Engage in any activity that violates any federal or state law or regulation or any local policy, regulation or ordinance.

8. Violate any Board policy, district administrative regulation or health and safety rules.

9. Use any tobacco product or vaping product, **including** electronic cigarettes, as defined in Board policy.

10. Consume, possess, distribute or be under the influence of alcoholic beverages or controlled substances prohibited by state or federal law.

11. Possess or use weapons or dangerous devices prohibited by the district.

12. Impede, delay, disrupt or interfere with any school activity or event, including using cellular telephones in a disruptive manner.

13. Enter upon any portion of district or school premises at any time for purposes other than those that are lawful and authorized by the Board.

14. Operate a motor vehicle in a risky manner, in excess of posted traffic signage, or in violation of an authorized district employee's directive.

15. Engage in any risky behavior, such as roller skating, roller blading or skateboarding.

16. Fail to obey the directive of an authorized district employee, security officer, school police officer, School Resource Officer (SRO) or local law enforcement official.

As circumstances warrant, the administrator in charge will take appropriate action, including warning the person in violation, requesting the person to immediately leave district property, contacting law enforcement officials and seeking to deny future admission to school events.

Refusal to leave school grounds when requested to do so by district employees or event officials constitutes the criminal offense of defiant trespass and may result in arrest and prosecution.

Continuation or escalation of prohibited behavior after a warning will result in ejection from the event premises.

Behavior that is unlawful or in violation of Board policy or administrative regulations may result in immediate ejection of the person in violation from the event premises.

Disruptive behavior by a group when individual persons cannot be identified may result in the ejection of offending areas of spectator seating.

A district employee may request identification from any individual on district grounds and in district buildings. Refusal to provide such information may result in a request to leave district property.

An employee involved in an incident with an attendee at a school event will complete an incident report and submit it to the building principal or immediate supervisor, who will report the incident to the Superintendent.

Crowd Control

A designated administrator will be assigned responsibility for monitoring and supervising the orderly conduct of students and spectators attending school events on district property. Crowd control procedures may include the following:

1. The administrator will ensure that enough authorized district personnel are assigned to provide adequate supervision.

2. The administrator may request law enforcement officials to be present if the administrator anticipates the crowd may pose a behavior or safety problem and may direct the placement of the officers.

3. The admissions gate and/or entrances will be regulated, and admission will be limited to eligible students, spectators and other authorized attendees. No one under the influence of alcohol or controlled substances prohibited by state or federal law will be admitted.

4. If a disturbance occurs, the administrator will determine if the event needs to be concluded, and the administrator may close the event and direct those in attendance to immediately leave school grounds.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

904-AR-0. ADMISSION TO SCHOOL EVENTS

Members of the public are encouraged to attend school events on district property, including competitive or exhibition sport contests and games, productions such as plays and musicals, and choral and band performances.

Attendance at school events may require payment of a Board-approved admission fee.

Senior Citizen Passes

Applicants for a senior citizens pass must be at least 60 years of age or older and a resident of the district.

Applicants must apply at the district administration office and provide their name, address, telephone number and proof of age. Each approved individual will be given one (1) card/pass, which is not transferable.

Senior citizens passes may be used for free general admission to any district home athletic events excluding playoffs, selected plays and musical productions, adult education programs, and other approved district programs.

For an event where the sale of tickets is limited by seat capacity, the senior citizen must present the pass for a free ticket prior to the performance date. Without a reserved seat, there will be no assurance of a seat.

For participation in an adult education program, the senior citizen must present the pass at the time of registration for the program. The cost of books and materials will be the responsibility of the participant.

Availability of the senior citizens pass program will be publicized in district newsletters, on the district website, at senior citizens organizations, and in local newspapers.

Book	Policy Manual
Section	900 Community
Title	School Visitors
Code	907
Status	Active
Adopted	October 7, 2019

Authority

The Board welcomes and encourages interest in district educational programs and other school-related activities. The Board recognizes that such interest may result in visits to school by parents/guardians, adult residents, educators and other officials. To ensure order in the schools and to protect students and employees, it is necessary for the Board to establish policy governing school visits.[1]

Delegation of Responsibility

The Superintendent or designee and building principal have the authority to prohibit the entry of any individual to a district school, in accordance with Board guidelines and state and federal law and regulations.

The Superintendent or designee shall develop administrative regulations to implement this policy and control access to school buildings and school classrooms.

The Superintendent or designee shall also be authorized to establish administrative regulations that will:

1. Encourage visitors to observe our schools.
2. Provide appropriate hospitality for visitors.
3. Channel expressions of approval as well as constructive criticism to the Board.
4. Ensure that such visits will enhance the effect of the educational program rather than hinder it.

Guidelines

Persons wishing to visit a school should make arrangements in advance with the school office in that building.

Upon arrival at the school, visitors must register at the office where they will sign in and sign out and receive a badge. Visitors will be asked to present a valid form of identification (i.e., driver's license) prior to being admitted into the school building.

After the start of the school day, only one (1) entrance shall be used by visitors to the school. All other entrances shall be locked.

All staff members shall be responsible for requiring a visitor demonstrate that s/he has registered at the school office and received authorization to be present for the purpose of conducting business.

No visitor may confer with a student in school without the approval of the principal.

Should an emergency require that a student be called to the school office to meet a visitor, the principal or designee shall be present during the meeting.

Failure to comply with this policy shall result in more limited access to the school as determined by the building principal, consistent with Board policies, administrative regulations, school rules and federal and state law and regulations.

Classroom Visitations

Parents/Guardians may request to visit their child's classroom, but the request must be made prior to the visit, in accordance with established administrative regulations.[1][2]

The building principal or program supervisor must grant prior approval for the visit, and shall notify the classroom teacher prior to the visit.

Parents/Guardians shall be limited to one (1) class period per month, per child in the school for classroom visitations, in order to minimize disruption of the classroom schedule and the educational program. Parental participation in classroom activities or programs such as room parents, back-to-school events, and chaperones for field trips shall not constitute a classroom visit for purposes of this policy.

The building principal or program supervisor and classroom teacher have the authority to ask a visitor to leave if the visitor disrupts the classroom routine, educational program or daily schedule, or if a visitor violates Board policy. Failure to leave when asked or repeated, documented disruptions may result in loss of classroom visitation privileges.

Under exceptional circumstances and upon request of the building principal, program supervisor, classroom teacher or parent/guardian, the Superintendent may authorize additional or longer classroom visits by a parent/guardian.

Military Personnel

Members of the active and retired Armed Forces, including the National Guard and Reserves, shall be permitted to:[3][4]

1. Visit and meet with district employees and students when such visit is in compliance with Board policy and district procedures.

2. Wear official military uniforms while on district property.

Legal

1. 24 P.S. 510

2. 22 PA Code 14.108

3. 24 P.S. 2402 (Military Uniform)

4. Pol. 250

Pol. 000

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

907-AR-0. SCHOOL VISITORS

The district encourages parents/guardians, professional educators and others who have legitimate interests pertaining to district students and the district's educational program to visit the schools.

Visitors are defined as any person other than an enrolled student or district employee; and **schools** are defined as school buildings, district property and vehicles used for school purposes.

A staff member may request identification from any person in a school building or on school grounds. Refusal to provide such information is grounds for removal of the person from the school building or district property.

As circumstances warrant, the building principal will take appropriate actions when a visitor is disruptive or refuses to follow Board policy, administrative regulations or established rules. Such action may include requesting the person to immediately leave the premises, contacting law enforcement officials, and preventing future visits to the school by that person.

The district will post notices at all entrances to buildings notifying visitors to report to the main office and meet entry requirements.

School Visitors

Visitors are welcome at schools, provided their presence is not disruptive.

1. Upon arrival at the school, visitors must register at the main office, where they will sign a log, and receive permission, a visitor's badge and instructions. Upon departure, visitors must sign out and return the visitor's badge.

2. Registered visitors must wear a visitor's badge during the time they are in the building, and the badge must be displayed in a clearly visible manner.

3. For special events when large groups of individuals will attend, registration requirements may be altered by the building principal; but visitors must follow school staff's instructions.

4. Staff members are responsible to ensure that visitors in the school have registered and display a visitor's badge.

5. No visitor will confer with a student without approval in advance of the principal.

6. Should an emergency require that a student be called to the main office to meet a visitor, the principal, counselor or nurse will be present during the meeting.

7. Elementary parents/guardians may request to join a student for lunch provided that they follow the established procedures at the respective elementary school.

8. During the school day, a person other than a district student or authorized employee who, without permission, enters and remains on school property will be considered to be trespassing.

9. A visitor at any time of the day who refuses to obey a directive by a district employee not to enter or remain upon school property will be considered to be trespassing.

10. A student not enrolled in the district or accompanied by a parent/guardian is prohibited from visiting schools, unless approved in advance by the principal.

11. Agents and sales personnel must direct all solicitations and communications to the Superintendent or designated administrators or supervisors.

Classroom Visitations

To minimize disruption to the educational program while recognizing the need for classroom visitations by persons other than school officials, these rules will be followed:

1. Classroom visitors will not interfere in any way with classroom instruction or activities during visitations.

2. All requests for classroom visitations must be scheduled with the building principal. Requests must be submitted at least one (1) week prior to the requested date. The date, time, class to be visited, and purpose of the visit must be stated prior to the principal issuing permission.

3. The principal will confer with the classroom teacher to determine a mutually convenient time for the visit. Reasonable attempts will be made to accommodate the requested date and time.

4. A parent/guardian will be limited to one (1) class per marking period or trimester per student to observe their classes.

5. Requests to observe a specific class and/or class period will be limited to a maximum of two (2) parents/guardians per classroom.

6. Visitation will not be allowed during tests or other student examinations or evaluations.

7. The principal or designee reserves the right to accompany any visitor during classroom visitations.

8. Outside agency personnel must schedule observations and visits with the principal or designee at least two (2) days in advance of the requested visit, except in an emergency.

9. When documented disruptions have occurred and, in the judgment of the principal, the possibility exists for a classroom visitation to be disruptive or to interfere with the educational program, the principal may deny permission for a visitation.

Loitering

Staff members will report to the building principal any person loitering in, on or near a school building or school property.

The principal may request an unauthorized person to leave or remove him/her from the school premises or area.

If the person does not leave voluntarily or resists removal, the principal will notify law enforcement officials and request assistance.

The principal will immediately notify the Superintendent about the situation.

No. 907-AR-1

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

907-AR-1. VISITORS LOG

NOTE: Visitors are permitted to visit only those areas for which permission has been granted.

DATE	BADGE #	TIME IN	NAME	REASON AND LOCATION OF VISIT	TIME OUT

**Information completed electronically*

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

907-AR-2. INAPPROPRIATE BEHAVIOR BY VISITOR INCIDENT FORM

Complete and submit this report to your building principal or immediate supervisor as soon as possible after the incident.

Date of Incident: _____

Employee's Name: _____

Position/Title: _____

Where did incident occur? (check)

☐ School site ☐ School grounds ☐ School-sponsored event ☐ Central Office
☐ Public site (specify) _____
☐ Other (specify) _____

Describe/Identify individual: _____

_____

Describe individual's actions. (Check the boxes that best categorize the actions, and then describe those actions with specifics. Attach a separate sheet if necessary.)

- ☐ Cursing/Using obscenities.
- ☐ Disrupting or threatening to disrupt school or office operations.
- ☐ Acting in an unsafe manner that could have threatened the health and safety of others.
- ☐ Making a verbal statement, a phone call, or a gesture indicating intent to harm you or to damage school property.
- ☐ Being under the influence of, possessing or distributing alcohol or illegal drugs.
- ☐ Possessing a weapon or dangerous device.
- ☐ Physically attacking you with the intent to harm you or to damage school property.
- ☐ Other (specify) _____

Specifics: _____

Describe your response. (Check the boxes that best categorize your response, and then describe that response with specifics. Attach a separate sheet if necessary.)

- ☐ Informed person(s) of behavior required by Board policy, administrative regulations or school rules.
- ☐ Issued a verbal warning.
- ☐ Asked person(s) to leave school/school event.
- ☐ Called site administrator/designee for assistance.
- ☐ Called law enforcement officials.
- ☐ Other (specify) _____

Specifics: _____

_____ _____
Employee's Signature Date

_____ _____
Building Principal's/Immediate Supervisor's Signature Date

Date report submitted to Superintendent/Designee: _____

Book	Policy Manual
Section	900 Community
Title	Relations with Parents/Guardians
Code	908
Status	Active
Adopted	October 7, 2019

Purpose

The Board believes that the education of students is a joint responsibility that is shared by the parents/guardians. To ensure that the best interests of each student are served in the educational process, a strong program of communication and cooperation between home and school must be maintained, and parental involvement encouraged.[1][2]

Authority

The Board feels that it is the parents/guardians who have the ultimate responsibility for their children's behavior in school, including the behavior of students who have reached the legal age of majority but are, for all practical purposes, under parental authority.[3]

Delegation of Responsibility

During school hours, the Board acts in loco parentis or in place of the parents/guardians, through its designated administrators.[4]

Guidelines

Parents/Guardians are requested to keep the school staff apprised of changes in the home situation that may affect a student's conduct or performance.

The Board directs that the following activities be implemented to encourage parent-school cooperation:

1. Parent-teacher conferences to permit two-way communication between home and school.[5]
2. Open houses in district schools to provide parents/guardians the opportunity to see the school facilities, meet the faculty, and witness school programs.
3. Special events of a cultural, ethnic or topical nature that are initiated by parent groups; involve the cooperative effort of students, staff and parents/guardians; and are of general interest to the schools or community.

The Board believes that parents/guardians have a responsibility to support and encourage their child's career in school through the following actions:

1. Require that students comply with district policies and school rules and regulations and accept responsibility for their behavior.

2. Send students to school with proper attention to their health, personal cleanliness and dress.

3. Maintain an active interest in the student's daily work and provide appropriate supervision for completion of assigned homework.

4. Read, sign and return promptly all communications from school, when requested.

5. Attend conferences for the exchange of information on the student's progress in school.[5]

6. Participate in school activities and special functions.

It shall be the policy of the school district that a child shall not be released from school to the care of the noncustodial parent/guardian unless the custodial parent/guardian consents to the release or the noncustodial parent/guardian presents to the principal a court order authorizing such a release.

Legal

1. Pol. 917
2. Pol. 918
3. Pol. 235
4. 24 P.S. 1317
5. Pol. 212

Book	School District for PNN+
Section	900 Community
Title	Municipal Government Relations
Code	909 Vol III 2024
Status	Active

Purpose

It is the policy of the Board that school district officials and municipal officials maintain a close and harmonious association. Such liaison is requisite for dealing with school/community concerns and issues in **an efficient** manner while assuring prudent expenditure of tax dollars.

Authority

The Board recognizes that its authority derives directly from the General Assembly, but it also is aware that the municipality and the school district must work together for the welfare of the residents.[1]

The Board, as an independent body, has no statutory relationship to other local governmental bodies. However, the Board may cooperate with local government units and other appropriate organizations in matters that affect district responsibilities. Such organizations may include, but not be limited to, health agencies, public libraries, museums, **law enforcement agencies** and fire departments, township supervisors, borough council, planning commissions and the courts.

In matters affecting the budgets of such agencies, the Board shall neither seek special consideration nor assume costs that properly fall outside its jurisdiction, except as prescribed by law.

The Board advocates joint expenditures of district and municipal or county funds to provide facilities from which the entire community may derive benefits. In accordance with this policy, the Board may, as either opportunity or need arises, and as it is entitled to do by law, enter into joint action agreements with the local municipal governing body in acquiring or leasing, improving, equipping, operating or maintaining such jointly used facilities.[2][3][4][5][6]

Delegation of Responsibility

The Superintendent and each **law enforcement agency** that has jurisdiction over school property shall enter into, and update on a biennial basis, a memorandum of understanding, which shall be developed and executed in accordance with state law and regulations.**[7][8]**[9][10]

To maintain cooperation with the municipality for fiscal and facilities planning, the Superintendent or designee will meet periodically with municipal officials to discuss issues of common interest.

PSBA Revision 6/24 © 2024 PSBA

Legal References
1. PA Const. Art. III Sec. 14
2. 24 P.S. 502
3. 24 P.S. 521
4. 24 P.S. 706
5. 24 P.S. 775
6. 24 P.S. 790
7. 24 P.S. 1306.2-B
8. 24 P.S. 1319-B
9. 22 PA Code 10.11
10. Pol. 805.1
22 PA Code 10.24
35 Pa. C.S.A. 7701
Pol. 613
Pol. 805

Book	Policy Manual
Section	900 Community
Title	Community Engagement
Code	910
Status	Active
Adopted	October 7, 2019

Purpose

The purpose of community engagement is to create a collaborative environment in which students, parents/guardians, families, residents, businesses, and community organizations are encouraged and invited to be involved stakeholders in the school community. Such engagement strengthens broad-based community support for the school district's mission, goals, operations and educational programs.

Definition

Community engagement is defined as an ongoing collaborative process in which the school district works with the public to build understanding, guidance, and active support for the education of students in the community.

Authority

The Board endorses the concept that community engagement is essential for the school district and the community to maintain mutual understanding, respect and trust, and to work together to improve the quality of education for district students. The Board intends, through this two-way communication, to identify the community's concerns, needs and suggestions, and to be responsive to the community through the Board's actions.

The Board also recognizes that the public offers resources of training and experience useful to the schools. The quality of the district's operations and programs can be strengthened when these resources are used in an advisory capacity.

The Board, with assistance from the administration, shall determine the appropriate strategy when utilizing the community engagement process.

The Board, in consultation with the Superintendent, shall identify a team of individuals who will be responsible for developing, implementing and delivering a community engagement program.

After a community engagement process is concluded, the Board shall make the final decision regarding an issue.

The Board shall annually assess the effectiveness of the community engagement program.

Delegation of Responsibility

The Board directs the administration to develop and implement a planned program of community engagement that regularly provides opportunities for students, parents/guardians, families, residents, businesses and community organizations to participate in dialogue and decision-making related to district-wide and school-based issues.

The administration shall develop and use varied, effective communication methods to ensure that all community members receive information about district and school programs and the available opportunities to become actively involved.

Guidelines

Students, parents/guardians and community members must submit to the Superintendent’s office any communications and questions addressed to the Board.

The Board and administration shall give substantial weight to the input received from the community. When evaluating the community's suggestions, the Board and administration will consider the impact on the district's goals, operations, educational programs, and financial resources. Recommendations made by the community shall not reduce the authority or responsibility of the Board, which may accept or reject such recommendations.

The district shall communicate to the community the Board's decision and its rationale regarding an issue involving community engagement.

Legal

24 P.S. 510

Book	Policy Manual
Section	900 Community
Title	News Media Relations
Code	911
Status	Active
Adopted	October 7, 2019

Purpose

Representatives of the local press, radio and TV are an important link in communications between school and community. Maintenance of good working relationships with media representatives is essential to meeting the objectives of the school-community relations program.

Authority

The Board shall have final approval for all procedures regarding relations between the news media and the district.

The Board reserves the right to negotiate for radio broadcasting, televising, filming, or sound recording of any school event by an outside agency. These rights, if sold, shall be contracted under conditions that bring the most favorable terms to the school district.

Delegation of Responsibility

The chief communications representative for the Board shall be the Superintendent.

The communications representative shall be responsible to:

1. Be readily available to media representatives.
2. Keep media representatives informed of all aspects of the school district so that reporting will be done on the basis of a complete and valid overview.
3. Submit and suggest feature stories or articles of interest or relevance.
4. Assist district staff with media relations.
5. Assist various school-related groups in their relations with the news media.
6. Assist the Board in preparing regular and special publications for the public.

Guidelines

Staff members shall not give school information or interviews requested by news media representatives without prior approval of the district's communications representative.

Submission of photographs to news media and permission for news media representatives to photograph district subjects, personnel, or students shall be authorized by the communications representative and the individuals involved or their parents/guardians.

Photographs of a controversial nature, or that are questionable with regard to individual rights of privacy, shall not be sanctioned.

Legal

24 P.S. 510

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

911-AR-0. NEWS MEDIA RELATIONS

The district will cooperate with news media representatives who will cover newsworthy events involving the schools.

The designated Community Relations Coordinator will serve as the clearinghouse for all district press releases to radio, television, and the local press. All media requests for information, interviews, news releases and photographs must be approved by him/her prior to their occurrence.

The district Community Relations Coordinator will serve as a resource for all district staff desiring to present students, programs, events and themselves favorably to the media.

Building principals may receive articles from teachers, may request media coverage, and may prepare news releases regarding the activities and students in their buildings. They will submit such to the Community Relations Coordinator for release.

Staff members and students who are approached by the news media for information, interviews or photographs should refer the media to the Community Relations Coordinator before permitting such.

Coverage of sporting events is a routine media function. One-to-one contact between coaches, athletes and the media are anticipated occurrences and do not require advance notice; however, coaches and players are expected to use prudence and good judgment in their remarks to the media, as they represent the school and the district.

When student or staff photographs are taken or submitted for use by news media, the parent/guardian or individual subject must complete and sign a Publicity Release Form.

<u>Taping/Photographing School Events</u>

Taping and photographing of students or school events for the purpose of resale for personal profit is prohibited.

Taping and photographing of athletic events with student participants is permitted. District staff may designate an area for this purpose.

Taping and photographing of plays, concerts, musical productions, and other performances with student participants is permitted, except when such activity would be in violation of copyright laws. When material is protected by copyright provisions, the district will notify audiences of this prohibition by public address announcement prior to the start of the performance and by a statement of the event's program.

School Board Meetings

News media are invited to attend scheduled Board meetings that are held in public.

The district will provide news media with an agenda for the meeting and press kit, when available.

News media may operate electronic recording devices, cameras and video cameras at a Board meeting but must inform the Board Secretary prior to the meeting.

News media may not disrupt a Board meeting and may not use recording devices or cameras in a manner that will interrupt or intimidate any speaker during a Board meeting.

The Superintendent will direct news media filming the meeting where to stand in the room so as not to block meeting attendees in the audience.

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

911-AR-1. PUBLICITY RELEASE FORM

**Information below completed electronically*

Student Name: _____

School and Grade: _____

Telephone Number: _____

I give my permission for my child to be photographed and/or recorded during school-related activities and events. These images and recordings may be used for district purposes, including, but not limited to:

- Yearbooks
- Displays
- District Publications
- News Media Coverage
- District-Managed Websites, Applications and Social Media Accounts

It is the practice of the district to involve students in activities that are positive and that promote individual self-esteem and cooperation among our students.

Questions or concerns may be directed to: _____
Administrator

_____
Telephone Number

Parent/Guardian
Signature _____ Date _____

Parent/Guardian Name
(Please print) _____

Book	Policy Manual
Section	900 Community
Title	Relations with Educational Institutions
Code	912
Status	Active
Adopted	October 7, 2019

Authority

It is the policy of the Board that lines of communication be maintained by the school district with other districts and institutions that provide programs, training or services not otherwise available to district students and with districts whose resident students are enrolled in programs of this district.

Delegation of Responsibility

Maintaining cooperative and constructive relationships with other educational institutions shall be the responsibility of the Superintendent or designee, who will establish administrative regulations that enable the district to do so.

Legal

24 P.S. 1332

24 P.S. 1354

Pol. 216

Pol. 307

LAMPETER-STRASBURG SCHOOL DISTRICT

ADMINISTRATIVE REGULATION

APPROVED:

REVISED:

912-AR-0. RELATIONS WITH EDUCATIONAL INSTITUTIONS

The district will use established procedures for maintaining cooperative and constructive relationships with various educational institutions.

Employees will be assigned responsibilities for the following district functions.

Receiving District

In order to receive students from other districts, the district will:

1. Provide annually a complete description of all programs available to students of the sending district.

2. Provide an orientation program for incoming students from sending districts.

3. Assure that behavior and medical issues concerning individual students entering the district have been made known to appropriate staff members.

4. Inform the sending district of any serious discipline problems encountered with students from that district.

Sending District

In order to send students to other districts, the district will:

1. Establish programs to ensure that district students are properly prepared to enter the schools of the receiving district.

2. Establish procedures and information to inform district students about program options in receiving districts.

3. Monitor the progress of district students during their attendance at receiving schools.

Parochial/Private Schools

In order to receive students from parochial and private schools, the district will:

1. Establish student accounting procedures to satisfy district and state requirements in areas of enrollment, attendance, transportation and other special services.

2. Maintain liaison with the administrators of parochial and private school in order to be aware of any planned program or student population changes that could affect the district.

Institutions Of Higher Learning

In order to develop relationships with institutions of higher learning, the district will:

1. Welcome representatives of institutions of higher learning to speak to students interested in attending their institutions upon completion of secondary education.

2. Cooperate in the placement, training and evaluation of student teachers, in accordance with Board policy.

3. Honor all properly documented requests for transcripts and student records in accordance with Board policy.

4. Encourage local institutions to offer college level courses for credit for eligible students.

5. Encourage local institutions to provide relevant graduate level courses for the benefit of district staff.

Pennsylvania School Boards Association
PRINCIPLES FOR GOVERNANCE AND LEADERSHIP

Pennsylvania school boards are committed to providing ***every*** student the opportunity to grow and achieve. Our actions, as elected and appointed board members, ultimately have both short- and long-term impact in the classroom. Therefore, we pledge that we will...

LEAD RESPONSIBLY

- Prepare for, attend and actively participate in board meetings
- Work together with civility and cooperation, respecting that individuals hold differing opinions and ideas
- Participate in professional development, training and board retreats
- Collaborate with the superintendent, acknowledging their role as the 10th member of the board and commissioned officer of the commonwealth

ACT ETHICALLY

- Never use the position for improper benefit to self or others
- Avoid actual or perceived conflicts of interest
- Recognize school directors do not possess any authority outside of the collective board
- Accept that when a board has made a decision, it is time to move forward collectively and constructively

PLAN THOUGHTFULLY

- Implement a collaborative strategic planning process
- Set annual goals that are aligned with comprehensive plans, recognizing the need to adapt as situations change
- Develop a comprehensive financial plan and master facilities plan that anticipates short- and long-term needs
- Allocate resources to effectively impact student success

EVALUATE CONTINUOUSLY

- Make data-informed decisions
- Evaluate the superintendent annually
- Conduct a board self-assessment on a recurring basis
- Focus on student growth and achievement
- Review effectiveness of all comprehensive and strategic plans

COMMUNICATE CLEARLY

- Promote open, honest and respectful dialogue among the board, staff and community
- Acknowledge and listen to varied input from all stakeholders
- Promote transparency while protecting necessary confidential matters
- Set expectations and guidelines for individual board member communication

ADVOCATE EARNESTLY

- Promote public education as a keystone of our commonwealth
- Engage the community by seeking input, building support networks and generating action
- Champion public education by engaging local, state and federal officials

GOVERN EFFECTIVELY

- Establish and adhere to rules and procedures for board operations
- Develop, adopt, revise and review policy routinely
- Align board decisions to policy, ensuring compliance with the PA School Code and other local, state and federal laws
- Remain focused on the role of governance, effectively delegating management tasks to the administration

Represented by the signatures below, adoption of these principles assures the school board and individual school directors adhere to the same principles across our commonwealth.

Adopted on: _____

_____ _____ _____

_____ _____ _____

_____ _____ _____

_____

Updated and Approved by the PSBA Governing Board October 30, 2022