

# TIMBERLANE REGIONAL SCHOOL BOARD

ATKINSON, DANVILLE, PLAISTOW, SANDOWN

THURSDAY, JUNE 6, 2019

Regular Meeting - 7:00PM\*

**Dr. Earl Metzler, II, Superintendent**  
**Dr. Roxanne Wilson, Asst. Superintendent**

Superintendent's Office  
30 Greenough Road, Plaistow, NH  
**Shawn O'Neil, Chairman**  
**Jennifer Silva, Vice Chairman**

*\*Note new start time.*

## AGENDA – REVISED

1. **7:00 PM\*** Call to Order – Chair
2. Roll Call – Clerk
3. Pledge of Allegiance
4. Approval of Minutes
  - a. May 16, 2019, May 29, 2019 (3 sets)
5. Student Representative
6. Delegates and Individuals
7. Current Business
  - a. **7:10PM** New School Board Rep – INFORMATIONAL (5 minutes)
  - b. **7:15PM** Summer Projects Update – ACTION (20 minutes)
  - c. **7:35PM** Assessment Update\* – INFORMATIONAL (45 minutes)
  - d. **8:20PM** Staffing Needs Projection – INFORMATIONAL (15 minutes)
  - e. **8:35PM** Part-time Bookkeeper Proposal – ACTION (20 minutes)
  - f. **8:55PM** Tuition Rates – ACTION (10 minutes)
  - g. **9:05PM** Policies (second read) – ACTION (15 minutes)
  - h. **9:20PM** Data Governance Plan\* (first read) – ACTION (30 minutes)
8. **9:50PM** Administrator's Report
9. **9:55PM** Personnel Report
10. **10:00PM** Committee Reports/Reports of the School Board
11. Correspondence Folder
12. Vendor and Payroll Registers
13. **10:05PM** Other Business
14. Non-public (if needed)
15. Future Dates

DATE	MEETING TYPE	LOCATION	TIME
June 20	Regular Board Meeting	SAU	7:00PM

*The MISSION of the Timberlane Regional School District is to engage all students in challenging and relevant learning opportunities, emphasizing high aspirations and personal growth.*

## **ADMINISTRATOR'S REPORT**

*Administrator's Report for June 6, 2019 School Board Meeting*

**1-3. OPEN MEETING** *Self-explanatory.*

**4. APPROVAL OF MINUTES** *(May 16 and May 29 – 3 sets)*

**5-6. STUDENT REP AND DELEGATES AND INDIVIDUALS**

**7. CURRENT BUSINESS**

**a. New School Board Rep – INFORMATIONAL**

*Introduction of the new school board student rep for the 2019-20 school year. (Kyle Duffy of Atkinson).*

**b. Summer Projects Update – ACTION**

*Tom Geary to provide updates to summer projects and Geoff Dowd to present funding options.*

**c. Assessment Update – INFORMATIONAL**

*Christi Michaud to present Tripod Survey results.*

**d. Staffing Needs Projections – INFORMATIONAL**

*Pursuant to policy IIB, Christi Michaud to present anticipated enrollment data for school year 2019-20.*

**e. Part-time Bookkeeper Proposal – ACTION**

*Mr. Dowd to present proposal for the hiring of a part-time bookkeeper to assist the business department as recommended by the Business Consultant.*

**f. Tuition Rates – ACTION**

*Mr. Dowd to present tuition rates for the 2019-20 school year.*

**g. Policies – ACTION**

*Board to review policies KED, IKF, JLC, JLCD, and JLCK second read.*

**h. Data Governance Plan – ACTION**

*Pursuant to RSA 189:66 V, and policy EHAB, school districts are required to have a Data Governance Plan that is to be presented to the school board no later than June 30, 2019. The plan as presented by Ken Henderson shall be considered the first read with second read and adoption at the June 20<sup>th</sup> meeting. Portions of this presentation may need to be conducted in nonpublic session should security details be discussed.*

**8. ADMINISTRATOR'S REPORT – Dr. Wilson to present**

*a. Update on District Activities*

*b. Executive Summaries (banking services)*

**9. PERSONNEL REPORT – Dr. Metzler to present**

**10. COMMITTEE REPORTS/REPORTS OF THE SCHOOL BOARD – Committee Chairs to update board on current initiatives (these topics were combined by the Chair).**

**11. CORRESPONDENCE – All correspondence now forwarded to board members as it comes in.**

**12. VENDOR AND PAYROLL REGISTERS – please be sure to review and sign vendor and payroll registers.**

**13. OTHER BUSINESS – Board members to provide agenda items for future meeting consideration.**

**14. NON-PUBLIC – if needed.**

**15. FUTURE DATES – As indicated.**

## UPCOMING REGULAR MEETING AGENDAS

*This information is provided for informational purposes only. Agenda items are subject to change.  
The official agenda will be distributed one week prior to its scheduled meeting.*

June 20, 2019	
Policies	
Suspension Authorization	
Federal Funding Authorization	
data governance plan	<i>Second Read</i>
Eagle Scout Project Proposal	
First Student Combined Routes	

Back Burner List	
TTA/TSSU Updates	
Instructional Tools/Assessment Reporting	<i>Throughout the year</i>
Treasurer's Report (quarterly)	<i>August/November/February/<del>May</del> June</i>
Strategic Plan Progress Update	<i>September/March</i>
Invite State Reps to Board Meeting	<i>One of board goals</i>
School Calendar Workshop	
TTA Climate Survey	
Budget First Draft	<i>October 3</i>
Goals Work Session	
Community Service/Service Learning Update	
Security Infrastructure Update (nonpublic)	

Timberlane Regional School District  
 Summer Major Projects Update  
 May 31, 2019

Major Summer Projects Planned out of Capital Budget:

Location	Project Title	Estimated	FY 2018-19		FY 2019-20	Comment
			FY 2018-19	w/Addt'l Roofs		
Pollard	Roof Replacements	\$ 175,000.00	\$ 175,000.00	\$ 175,000.00		Total of Roof Replacements: \$393,000
Sandown Central	Roof Replacements	\$ 104,000.00	\$ 104,000.00	\$ 104,000.00		
Atkinson Academy	Roof Replacements	\$ 114,000.00	\$ 114,000.00	\$ 114,000.00		
Pollard	Roof Replacements (Add alternate)	\$ 110,000.00		\$ 110,000.00		Total of all "Add alternate" Roof Replacements: \$264,000
Sandown Central	Roof Replacements (Add alternate)	\$ 64,000.00		\$ 64,000.00		
Atkinson Academy	Roof Replacements (Add alternate)	\$ 90,000.00		\$ 90,000.00		
PAC	Siding Replacement Project	\$ 531,000.00			\$ 531,000.00	Funded by Capital Reserve
District Wide	All Buildings, Gen'l Maintenance, etc.				\$ 50,000.00	General Buiding Summer Maintenance Projects
	<b>Sub Total</b>	<b>\$ 1,188,000.00</b>	<b>\$ 393,000.00</b>	<b>\$ 657,000.00</b>	<b>\$ 581,000.00</b>	
	Budget Available		\$ 200,000.00	\$ 200,000.00	\$ 400,000.00	
	Capital Reserve Contribution				\$ 531,000.00	
	<b>Total Available</b>		<b>\$ 200,000.00</b>	<b>\$ 200,000.00</b>	<b>\$ 931,000.00</b>	
	<b>Total Excess (Deficiency)</b>		<b>\$ (193,000.00)</b>	<b>\$ (457,000.00)</b>	<b>\$ 350,000.00</b>	

**Actions Required:**

- 1a. Encumber \$193,000
- 2a. Transfer \$193,000

<b>From:</b>	100.1100.733 (Gen Ed. New Equip)	\$ 3,900.00
	100.1100.737 (Gen Ed. Repl. Equip)	\$ 10,200.00
	100.1200.733 (Spec. Ed. New Equip)	\$ 4,900.00
	100.2721.519 (Reg. Ed. Transportation)	\$ 74,000.00
	100.2722.519 (Spec. Ed. Transportation)	\$ 100,000.00
<b>To:</b>	100.4600.450 (Building Renovations)	\$ 193,000.00

**- OR -**

- 1b. Encumber \$457,000
- 2b. Transfer \$457,000

<b>From:</b>	100.1100.112 (Reg. Ed. Prof. Salaries)	\$ 100,000.00
	100.1100.733 (Gen Ed. New Equip)	\$ 3,900.00
	100.1100.737 (Gen Ed. Repl. Equip)	\$ 10,200.00
	100.1200.114 (Spec. Ed. Ass't Salaries)	\$ 100,000.00
	100.1200.733 (Spec. Ed. New Equip)	\$ 4,900.00
	100.1200.564 (Tuitions Elem, MS, HS)	\$ 50,000.00
	100.1200.569 (Residential)	\$ 14,000.00
	100.2721.519 (Reg. Ed. Transportation)	\$ 74,000.00
	100.2722.519 (Spec. Ed. Transportation)	\$ 100,000.00
<b>To:</b>	100.4600.450 (Building Renovations)	\$ 457,000.00

**- AND -**

- 3. Waive TRSD Policy DJE "Bidding Requirements"
- 4. Waive TRSD Policy DID "Fixed Assets (Inventories)"
- 5. Make a determination this project is partially "Maintenance & Repair"

Timberlane Regional School District  
 Summer Major Projects Update  
 May 31, 2019

Major Summer Projects Classified as 'Other'

Location	Project Title	Estimated	FY 2018-19	FY 2019-20	Comment
District	Security Camera Upgrades \$323K Max Project Cost; \$64.6K Max Cost to District	\$ 64,000.00	\$ 30,150.00	\$ 33,850.00	This would be Encumbered/Transferred to Grant Category in FY 2018-19; Balance from FY 2019-20
<b>Action Required:</b>	1. Encumber \$30,150 Relating to District Share of Security Installation				
	2. Transfer \$30,150				
			<b>From:</b> 100.2660.737 (Repl. Equipt Safety/Sec)	\$ 13,650.00	
			100.2840.330 (Prof. Services Data Proc)	\$ 16,500.00	
			<b>To:</b> 220.2660.733 (New Equipt Safety/Sec)	\$ 30,150.00	
Middle School	Gym Floor Repair/Sanding	\$ 22,500.00	\$ 22,500.00	100.2640.430	Repair & Maint of Equipment \$39,700 to 100.2620.430 Repair & Maint. Buildings
<b>Action Required:</b>	1. Transfer up to \$46,000				
			<b>From:</b> 100.2620.621 (Dist. Electrict)	\$ 46,000.00	Corrects potential account overage & funds work.
			<b>To:</b> 100.2620.430 (Facilities Rep & Maint)	\$ 46,000.00	
	2. Waive TRSD Policy DJE "Bidding Requirements"				
District	SAU Carpet Replacement	\$ 10,000.00	\$ 10,000.00	100.2620.737	Repl. Equip. Bldg Operation Bal. of \$10K, overage absorbed FY 2019-20
<b>Action Required:</b>	1. Transfer UP TO \$15,000				
			<b>From:</b> 100.2620.621 (Dist. Natural Gas)	\$ 15,000.00	
			<b>To:</b> 100.2620.430 (Facilities Rep & Maint)	\$ 15,000.00	
	2. Waive TRSD Policy DID "Fixed Assets (Inventories)" (Capitalization Threshold)				



# 2019 TRIPOD STUDENT VOICE SURVEY

May, 2019

Timberlane Regional School District

Christi Michaud, Executive Director of Data, Assessment, and Accountability

# What is the Tripod Survey?

- Tripod is a student voice survey - academic in nature and reports on student perspectives about teaching and learning.
- Focused on the 7Cs of Effective Teaching
  - Care, Classroom Management, Clarify, Challenge, Captivate, Confer, and Consolidate
- 2019 March, web-based/online survey, apx. 30 mins.
- One survey is completed for a core class (Math, English, Science, SS) and one for a UA class (Art, Music, etc.)
- Developmentally appropriate questions for each grade range K-2, 3-5, 6-8, and 9-12.

# Tripod Score Reports

## Scores Range: 202 to 398

\*Based on national comparisons

- **Greater than 320** = Above Average
  - **300** = Midpoint/ Average
  - **Less than 280** = Below Average
- 
- Tripod provides teachers with access to their own personal results.
  - Admin. receive school level results only.

# Tripod District Summary 18/19

2018 (\*TRMS 2017) scaled score is followed by **Spring 2019** score in bold.

\*TRMS did not receive normed scaled scores in 2018.

	Care	Confer	Captive	
<b>K-2</b>	326/328	330/326	278/304	
<b>3-5</b>	322/304	274/274	286/280	
<b>TRMS</b>	312/308	324/320	316/312	
<b>TRHS</b>	316/316	330/332	312/312	
	Clarify	Consolidate	Challenge	Classroom Management
<b>K-2</b>	298/302	300/302	312/300	300/284
<b>3-5</b>	284/274	266/264	294/296	298/296
<b>TRMS</b>	322/318	304/294	318/310	340/326
<b>TRHS</b>	320/320	308/310	314/320	314/316

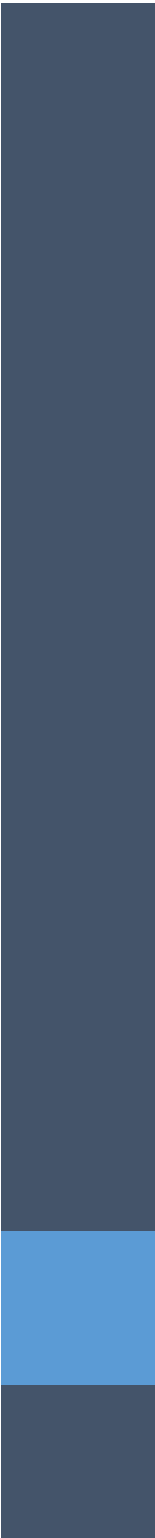
# 2018-2019 Positive Actions

- Positive increases in scaled scores as a result of each school's targeted focus and the changes teachers have made in classrooms/schoolwide.
- Schools identified and focused on at least one 7c area and implemented specific strategies for improvement.
  - Recommendations from Instructional Rounds
  - School-wide roll-outs, Assemblies
  - PLC discussions among teachers
  - Recommendations and feedback

# Data Informed Action Steps

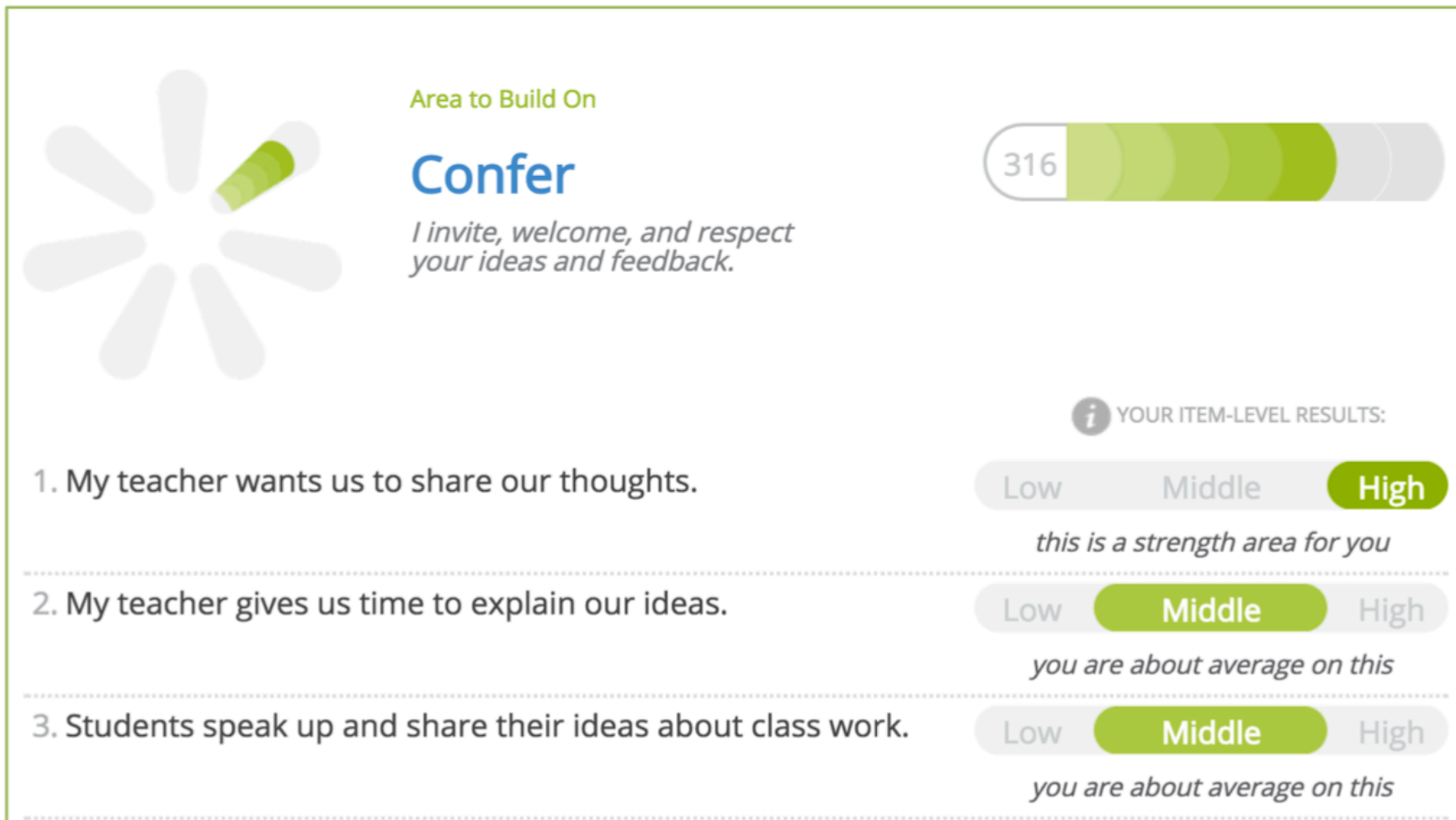
## **Each year's results...**

- Inform teacher's personal goal setting
- Inform school improvement and action planning
- Identify areas for professional learning
- Inform "Problems of Practice" associated with Instructional Rounds performed by SLT and school level teams
- Assist in resource allocation.



# Using Student Voice Data

Classroom level and school wide survey data is reviewed by educators individually and collaboratively with colleagues.



# Using Student Voice Data

- **Based on a classroom level survey results, classroom teachers decides which 7c area to focus on as an opportunity for improvement.**
- **Specific reflection questions help teachers to reflect on their classroom practice.**

## Example: **CONFER**

- *How often do you invite students to share their ideas and opinions in the context of learning activities?*
- *How often do you ask students to answer questions or solve problems together and discuss their responses?*
- *How do you ensure that all students have opportunities to express their views?*
- *How do you model respect for diverse viewpoints?*

# Using Student Voice Data

Teachers review relevant 7Cs indicators of exemplary classrooms.

Example: **CONFER**

RESPECTING PERSPECTIVES	PROMOTING DISCUSSION	INVITING INPUT
The teacher and students work together to create a learning environment that welcomes and values diverse views and opinions	The teacher regularly provides genuine opportunities for students to contribute ideas and opinions as part of the learning process.	The teacher gives students voice in determining aspects of what they learn.
The teacher models respectful ways of communicating.	The teacher incorporates interactive practices such as cooperative learning, reciprocal teaching, collaborative problem solving, and peer feedback.	The teacher seeks students' ideas and feedback about classroom activities and procedures.

# Using Student Voice Data

**Teachers try implementing 1 or 2 new teaching strategies in the classroom.**

Example: **CONFER**

- *Establish and model expectations for respectful classroom exchanges, especially in the context of disagreement. For example, ask students what respectful communication looks like, sounds like, and feels like.*
- *Incorporate small group and whole class discussions into learning activities.*
- *Invite students to share their views about how to structure specific learning activities or how to handle classroom dilemmas.*
- *Ask students to give each other feedback about how their work meets established criteria.*

# Using Student Voice Data

Last step...monitor progress, invite student voice again, discuss challenges and successes with colleagues and administrators.

Data INFORMED Planning = **RESULTS!**

	Care	Confer	Captivate
K-2	326/328	330/326	278/304
3-5	322/304	274/274	286/280
TRMS	312/308	324/320	316/312
TRHS	316/316	330/332	312/312

	Clarify	Consolidate	Challenge	Classroom Management
K-2	298/302	300/302	312/300	300/284
3-5	284/274	266/264	294/296	298/296
TRMS	322/318	304/294	318/310	340/326
TRHS	320/320	308/310	314/320	314/316

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code: IIB</b></p>
<p><b>Adopted: 12-21-89</b>  <b>Revised: 11-19-92, 01-21-93,</b>  <b>07-15-93, 07-21-99,</b>  <b>02-24-05, 06-16-11</b></p>	<p><b>Page 1 of 1</b></p>

**CLASS SIZE**

The Timberlane Regional School Board, in an effort to continue the pursuit of excellence in education already established and recognized, and to more effectively prepare our students, recommends the following class sizes for regular education classes.”

- Kindergarten and Grade 1 ..... Not to exceed 20
- Grades 2 and 3 ..... Not to exceed 23
- Grades 4 and 5 ..... Not to exceed 26
- Grades 6 thru 12 ..... Not to exceed 30

Class sizes as indicated above shall not be exceeded. No new staff will be added to accommodate classes of less than 9 students. Timeline:

Before January 31: The administration will make recommendations to the School Board and Budget Committee at budget time on the number of teachers needed for the next school year based on October 1 enrollment numbers.

Second School Board Meeting in June: The administration will present preliminary September enrollment numbers to the School Board with specific reference to enrollment pressure points.

Third Week in August: The administration will establish a formal school registration period for new enrollees.

Second School Board Meeting in August: The administration will present specific recommendations to the School Board for approval on the number of teachers and classrooms needed for September based on the administrative policy outlined above.

After School Board Meeting in August: If additional students enroll after the second meeting in August and class size policy is exceeded, the administration will seek the approval of the School Board to add teacher assistant help equivalent to one hour per day for each child exceeding the guideline.

Per policy IIB, TRSD Administration presents preliminary September 2019 projected enrollment numbers.

### 19-20 TRSD Anticipated Enrollment Numbers

Grade	SC	AA	DS	PS	SN	TRMS	TRHS
PreK	85	17	16	16	0	0	0
Kind. 1/2	34	20	24	23	0	0	0
Kind. Full	34	38	32	40	0	0	0
1	0	48	32	75	76	0	0
2	0	49	44	73	70	0	0
3	0	45	54	85	76	0	0
4	0	57	32	64	63	0	0
5	0	49	47	85	72	0	0
6	0	0	0	0	0	259	0
7	0	0	0	0	0	293	0
8	0	0	0	0	0	253	0
9	0	0	0	0	0	0	274
10	0	0	0	0	0	0	250
11	0	0	0	0	0	0	280
12	0	0	0	0	0	0	300
<b>Totals/Schools</b>	153	323	281	461	357	805	1104

**3484**

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Atkinson Academy**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Preschool</b>	17	1 (Half-time)	17
<b>Full Day Kindergarten</b>	20	1	20
<b>Half Day Kindergarten</b>	38	1	19 AM 19 PM
<b>Grade 1</b>	48	3	16
<b>Grade 2</b>	49	3	17
<b>Grade 3</b>	45	2	23
<b>Grade 4</b>	57	3	19
<b>Grade 5</b>	49	2	24
<b>Total Enrollment</b>	<b>323</b>	<b>16</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Danville**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Preschool</b>	16	1 (Half-time)	16
<b>Full Day Kindergarten</b>	32	2	16
<b>Half Day Kindergarten</b>	24 (working to move students to full day)	1 (Half-time)	AM only
<b>Grade 1</b>	32	2	16
<b>Grade 2</b>	44	2	22
<b>Grade 3</b>	54	3	18
<b>Grade 4</b>	32	2	16
<b>Grade 5</b>	47	2	24
<b>Total Enrollment</b>	<b>281</b>	<b>15</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Pollard School**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Preschool</b>	16	1 (half-time)	16
<b>Full Day Kindergarten</b>	40	2	20
<b>Half Day Kindergarten</b>	23	1	14/9
<b>Grade 1</b>	75	4	18/19
<b>Grade 2</b>	73	4	18/19
<b>Grade 3</b>	85	4	21/22
<b>Grade 4</b>	64	3	21/22
<b>Grade 5</b>	85	4	21/22
<b>Total Enrollment</b>	<b>461</b>	<b>23</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Sandown Central at TLC**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Preschool</b>	85	5 (1 half-time)	AM/PM
<b>Full Day Kindergarten</b>	34	2	18
<b>Half Day Kindergarten</b>	34	1	17 AM 17 PM
<b>Total Enrollment</b>	<b>153</b>	<b>8</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Sandown North**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Grade 1</b>	68	4	16/17
<b>Grade 2</b>	65	4	16/17
<b>Grade 3</b>	70	4	17/18
<b>Grade 4</b>	73	3	24/25
<b>Grade 5</b>	63	3	21
<b>Total Enrollment</b>	<b>339</b>	<b>18</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Timberlane Regional Middle School**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>	<b># of Teachers</b>	<b>Average Class Size</b>
<b>Grade 6</b>	259	12	21-23
<b>Grade 7</b>	293	12	23-25
<b>Grade 8</b>	253	12	21-23
<b>Total Enrollment</b>	<b>805</b>	<b>36</b>	

**TIMBERLANE REGIONAL SCHOOL DISTRICT**  
**2019-20 Anticipated Enrollment Report**  
*June, 2019 -*

**Timberlane Regional School District Policy**

***Maximum Class Sizes***

<i>Grades K-1</i>	<i>Not to exceed 20</i>
<i>Grades 2-3</i>	<i>Not to exceed 23</i>
<i>Grades 4-5</i>	<i>Not to exceed 26</i>
<i>Grades 6-12</i>	<i>Not to exceed 30</i>

**Department of Education**

***Maximum Class Sizes***

<i>Grades K-2</i>	<i>Not to exceed 25</i>
<i>Grades 3-12</i>	<i>Not to exceed 30</i>

**School Name: Timberlane Regional High School**

	<b>Anticipated Enrollment Fall 2019 (Based on current registrations)</b>
<b>Grade 9</b>	274
<b>Grade 10</b>	250
<b>Grade 11</b>	280
<b>Grade 12</b>	300
<b>Overall Enrollment</b>	<b>1104</b>

# Memo

**To:** Timberlane Regional School Board  
**From:** Geoffrey Dowd   
**CC:** Dr. Earl Metzler  
**Date:** May 31, 2019  
**Re:** Part-Time Business Office Bookkeeper

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Pursuant to our discussion at your last board meeting, attached is a proposed job description for a part time bookkeeper for the Timberlane Regional School District. This proposal has been reviewed and discussed with Mr. Colby.

I would propose 24 hours per week, on a full year basis, at a range of \$27-\$35 per hour. On an annual basis, this would have an impact of between \$32,300 and \$38,754 annually, including our contribution to FICA.

This position would not qualify for NH Retirement System contributions and would not be eligible for health or related benefits.

# TIMBERLANE REGIONAL SCHOOL DISTRICT

*Serving the communities of Atkinson, Danville, Plaistow and Sandown*

**TITLE** PART-TIME BOOKKEEPER

## QUALIFICATIONS

1. Education/Certification: Associates or Bachelor's Degree or equivalent work experience. Hold (or be able to obtain) a valid State of New Hampshire Criminal History Records Check Approval.
2. Special Knowledge/Skills
  - a. Possess strong organizational skills.
  - b. Demonstrated ability to exercise independent judgment, prioritize tasks and work independently with a high degree of accuracy.
  - c. Be team oriented with excellent interpersonal and communication skills.
  - d. Be willing to participate in ongoing in-service training as requested.
  - e. Maintain a high level of ethical behavior and confidentiality of information as required by law.
  - f. Demonstrated computer and technological skills, particularly in Excel.
  - g. Knowledge of information systems and databases, particularly in Infinite Visions.
3. Experience: Demonstrated aptitude or competence for successful fulfillment of assigned performance responsibilities.

## REPORTS TO

Business Administrator

## JOB GOAL

To assist the Business Administrator in the efficient operation of the Business Department as it pertains to bookkeeping for federal, state, and business partnership grants, bookkeeping and monitoring of monthly reporting from the external food service vendor, data entry and validation, support for Free and Reduced Application processing, assist in state and federal reporting, and general accounting for the Timberlane Regional School District.

## PERFORMANCE RESPONSIBILITIES

1. Prepare Finance Dept. budget schedules for federal, state, and local grants based on approval from NH Dept. of Education and other agencies for entry into the General Ledger budget module.
2. Review grant revisions, and update budget schedules to reflect changes.
3. Review and vet monthly grant activity reports and payment reports and resolve differences with grant budget owners.

4. Enter data on monthly food service activity to verify vendor billings; prepare journal entries to record monthly activity to general ledger.
5. Data entry and subsequent verification of vendor order information compared to Finance Dept. approved Purchase Orders.
6. Provide assistance at critical periods for Free and Reduced Application processing.
7. To the extent applicable, assist in federal and state reporting.
8. General Finance Dept. filing and archiving.

Performs other tasks and assumes other responsibilities as assigned by the CFO/Business Administrator.

#### **EQUIPMENT USED**

Computer, printer, calculator, telephone, copy machine, scanner, postage meter, and other pieces of general office equipment.

#### **WORKING CONDITIONS**

Mental Demands: calculating, comparing, editing, problem-solving, evaluating, interpreting, organizing, consulting, analyzing, planning, designing, documenting, specifying, coordinating, implementing, and presenting.

Physical Demands: sitting, standing, climbing stairs, adjusting, connecting, lifting (up to 25 lbs.), bending, keyboarding, pulling, pushing, carrying, writing, walking, operating equipment.

Environmental Conditions: inside, working around moving objects, working alone.

#### **TERMS OF EMPLOYMENT**


Part-time on a consistent year round basis..

#### **EVALUATION**

The basis of evaluation will be the extent to which the performance responsibilities of the job are successfully handled and the extent to which yearly action plans and job goals are met.

NOTE: The above job description reflects the general requirement necessary to describe the principal functions of responsibilities of the job identified and shall not be interpreted as detail description of all work requirements that may be inherent in the job, either at present or in the future.

# Memo

**To:** Dr. Metzler  
**From:** Geoffrey Dowd, CFO / Business Administrator   
**CC:**  
**Date:** May 30, 2019  
**Re:** Timberlane Tuition Rates

---

Listed below are the 2019-20 tuition rates. Please have the Board review and approve these rates at their next meeting.

I have calculated the following rates:

Kindergarten	\$ 8,600
Elementary	\$ 17,300
Middle School	\$ 17,700
High School	\$ 17,600
Special Education*	\$ 35,000

## Previous Tuition Rates

	<u>2018-19</u>	<u>2017-18</u>	<u>2016-17</u>
Kindergarten	\$ 8,600	\$ 8,300	\$ 8,200
Elementary	\$ 17,200	\$ 16,700	\$ 16,500
Middle School	\$ 17,000	\$ 16,500	\$ 15,700
High School	\$ 17,000	\$ 16,300	\$ 15,100
Special Education*	\$ 34,300	\$ 33,000	\$ 31,600

\* Special Education rate does not include costs associated with specialized services, specialized transportation, or one-to-one assistance.

# TIMBERLANE POLICY COMMITTEE RECOMMENDATIONS TO THE SCHOOL BOARD

## SECOND READ/ADOPTION

- 1 **KED FACILITIES OR SERVICES – GRIEVANCE PROCEDURE (SECTION 504)** (NHSBA language, updated legal references, new 1st paragraph by SLT, and replacement of the term *handicapped* with newer language, approved by PC)
  - 2 **IKF HIGH SCHOOL GRADUATION** (Last updated in 2013, numerous changes made relative to credit requirement for each type of diploma and to address SB 157 relative to national and state history and government, approved by SLT and PC)
  - 3 **JLC STUDENT HEALTH SERVICES** (last updated in 2011, SLT recommends one slight change regarding the reference to another policy as that policy was repealed and now references another- JLCE, approved by SLT and PC)
  - 4 **JLCD ADMINISTERING MEDICATION TO STUDENTS** (Last updated in 2011; new language addresses newly required references to epinephrine; JLCD-R updated by SLT and included as informational, approved by SLT and PC)
  - 5 **JLCK SPECIAL PHYSICAL HEALTH NEEDS OF STUDENTS** (Required policy not on books; NHSBA language proposed and approved by SLT and PC)
-

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code: KED</b></p>
<p><b>Adopted: 08-18-83</b>  <b>Reaffirmed: 08-08-91</b>  <b>Reaffirmed: 02-24-05</b>  <b>Reaffirmed: 01-31-13</b>  <b>Revised:</b></p>	<p><b>Page 1 of 2</b></p>

**~~PUBLIC COMPLAINTS ABOUT FACILITIES OR SERVICES~~FACILITIES OR SERVICES – GRIEVANCE PROCEDURE (SECTION 504)**  
Grievance Procedure

*A recipient that employs fifteen or more persons shall adopt grievance procedures that incorporate appropriate standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part. Such procedures need not be established with respect to complaints from applicants for employment or from applicants for admission to postsecondary educational institutions.*

1. Any qualified ~~handicapped person or persons~~*individual with a disability* who feels subject to discrimination with respect to Section 504 of the Rehabilitation Act of 1973 have the right to file a formal grievance.
2. Any qualified ~~handicapped person, or persons, who have~~*individual with a disability who has* a grievance, shall discuss it first with the appropriate building Principal in an attempt to resolve the matter informally at that level.
3. If, as a result of the discussion, the matter is not resolved to the satisfaction of the aggrieved party within five (5) school days, the aggrieved party shall set forth the grievance in writing to the Principal. The Principal shall communicate his/*her* decision to the aggrieved party in writing within five (5) days of receipt of the written grievance.
4. The aggrieved party, no later than five (5) school days after receipt of the Principal's decision, may appeal the Principal's decision to the *District* Section 504 Coordinator. The appeal to the Coordinator must be made in writing reciting the matter submitted to the Principal and the aggrieved party's dissatisfaction with decisions previously rendered. The Coordinator shall meet with the aggrieved party to attempt to resolve the matter as quickly as possible, but within a period not to exceed five (5) school days. The Coordinator shall communicate his decision in writing to the aggrieved party and the principal not later than five (5) school days after the meeting.
5. If the grievance is not resolved to the aggrieved party's satisfaction, the aggrieved party, no later than five (5) school days after receipt of the Coordinator's decision may submit a written request for a hearing with the local School Board regarding the alleged discrimination through the Superintendent of Schools. The hearing will be held within thirty (30) calendar days of the written request. The School Board must provide the aggrieved party with a written decision on the appeal within ten (10) calendar days after the hearing.

**KED - PUBLIC COMPLAINTS/FACILITIES/SERVICES**

<b>Timberlane Regional School District</b>	<b>Policy Code: KED</b>
<b>Adopted: 08-18-83</b> <b>Reaffirmed: 08-08-91</b> <b>Reaffirmed: 02-24-05</b> <b>Reaffirmed: 01-31-13</b> <b>Revised:</b>	<b>Page 2 of 2</b>

6. Between the date the aggrieved party requests the hearing and the date the hearing is held, the aggrieved party and the School District may continue to negotiate. If the School District and aggrieved party agree on a mutual solution to the alleged discrimination, the hearing would be canceled.
  
7. The decision of the ~~local~~ School Board is final pending any further legal recourse as may be described in current local district, state, or federal statutes pertaining to Section 504 of the Rehabilitation Act of 1973.

Legal References:

*Section 504 of the Rehabilitation Act of 1973*  
*34 C.F.R. § 104.7(b), Adoption of Grievance Procedures*

<b>Timberlane Regional School District</b>	<b>Policy Code: IKF</b>
<b>Adopted: 01-01-83</b> <b>Revised: 05-02-91</b> <b>Reaffirmed: 02-24-05</b> <b>Revised: 01-03-08</b> <b>Revised: 12-19-13</b> <b>Revised:</b>	<b>Page 1 of 5</b>

## HIGH SCHOOL GRADUATION

### Option 1 – Standard Diploma

A minimum of 22 credits are required for graduation with a standard diploma, as follows:

<i>Required Subjects</i>	<i>Credit(s)</i>
<i>Fine Arts Education – Art, Music or Drama</i>	$\frac{1}{2}$
<del>Technology</del> <i>Digital Literacy</i>	$\frac{1}{2}$
English – Freshman English, World Literature or World Studies, American Literature or American Studies, Senior English Semester Courses	4
Mathematics <i>Geometry 1 credit required, Algebra II 1 credit required including Algebra credit that can be earned through sequential, integrated, or applied program</i>	3 3, including algebra credit that can be earned through a sequential, integrated, or applied program (Must be enrolled in a math intensive course each year of high school- see open elective below)
Physical Science <i>1 credit required, Biology 1 credit required, and Science Elective 1 credit required</i>	<del>1</del> 3
<del>Life Sciences</del>	1
<del>Science – Biological or Physical Sciences</del>	1
Social Studies – <del>Government Today</del> , <i>Studies in Civics and Economics</i> , World History or World Studies, <del>American</del> <i>US History</i> or American Studies	3
Health $\frac{1}{2}$ <i>credit required, Physical Education 1 credit required, additional PE or Health <math>\frac{1}{2}</math> credit required</i>	$\frac{1}{2}$ 2
<del>Physical Education/Wellness</del>	<del>1</del> $\frac{1}{2}$
Open Electives 1 required elective must be an approved math intensive course.	6
Total	22

<b>Timberlane Regional School District</b>	<b>Policy Code: IKF</b>
<b>Adopted: 01-01-83</b> <b>Revised: 05-02-91</b> <b>Reaffirmed: 02-24-05</b> <b>Revised: 01-03-08</b> <b>Revised: 12-19-13</b> <b>Revised:</b>	<b>Page 2 of 5</b>

Option 2 – Technical Diploma

A minimum of 23 credits are required for graduation with a technical diploma, as follows:

<i>Required Subjects</i>	<i>Credit(s)</i>
<i>Fine Arts Education – Art, Music or Drama</i>	$\frac{1}{2}$
<i>Digital Literacy Technology</i>	$\frac{1}{2}$
English – Freshman English, World Literature or World Studies, American Literature or American Studies, Senior English Semester Courses	4
Mathematics <i>Geometry 1 credit required, Algebra II 1 credit required including Algebra credit that can be earned through sequential, integrated, or applied program</i>	3,3, <i>including algebra credit that can be earned through a sequential, integrated, or applied program (Must be enrolled in a math intensive course each year of high school- see below.)</i>
Physical Science <i>1 credit required, Biology 1 credit required, and Science Elective 1 credit required</i>	<del>1</del> 3
<i>Social Studies – Studies in Civics and Economics, World History or World Studies, US History or American Studies</i> <del>Social Studies – Government Today, Economics, World History or World Studies, American History or American Studies</del>	3
<i>Health <math>\frac{1}{2}</math> credit required, Physical Education 1 credit required, additional PE or Health <math>\frac{1}{2}</math> credit required</i> <del>Health Education</del>	<del>1</del> 2
Course in Area of Concentration <i>1 required credit must be an approved math intensive course from Open Elective or Course in Area of Concentration.</i>	3 $\frac{1}{2}$ - 5 $\frac{1}{2}$ – Total of 7 credits when combined with Open Electives (See Below)
Open Electives <i>1 required credit must be an approved math intensive course from Open Elective or Course in Area of Concentration.</i>	3 $\frac{1}{2}$ - 1 $\frac{1}{2}$ – Total of 7 credits when combined with Course in Area of Concentration (See Above)

<b>Timberlane Regional School District</b>	<b>Policy Code: IKF</b>
<b>Adopted: 01-01-83</b> <b>Revised: 05-02-91</b> <b>Reaffirmed: 02-24-05</b> <b>Revised: 01-03-08</b> <b>Revised: 12-19-13</b> <b>Revised:</b>	<b>Page 3 of 5</b>

Total	23
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Option 3 – Scholastic Diploma

A minimum of 25 credits are required for graduation with a scholastic diploma, as follows:

<i>Required Subjects</i>	<i>Credit(s)</i>
<i>Fine Arts Education – Art, Music or Drama</i>	1
<i>Technology Digital Literacy</i>	½
English – Freshman English, World Literature or World Studies, American Literature or American Studies, Senior English Semester Courses	4
Mathematics <i>Geometry 1 credit required, Algebra II 1 credit required including Algebra credit that can be earned through sequential, integrated, or applied program</i>	<del>3</del> 3
4 <sup>th</sup> year may be a <i>Math or Science/Math Intensive course</i>	1
<i>Physical Science 1 credit required, Biology 1 credit required, and Science Elective 1 credit required</i> Physical Sciences	<del>1</del> 3
<i>Social Studies – Studies in Civics and Economics, World History or World Studies, US History or American Studies</i> Social Studies—Government Today, Economics, World History or World Studies, American History or American Studies	3
<i>Health ½ credit required, Physical Education 1 credit required, additional PE or Health ½ credit required</i> Health Education	½2
<i>Physical Education/Wellness</i>	1½
World Languages – <del>French, German or Spanish</del>	3

<b>Timberlane Regional School District</b>	<b>Policy Code: IKF</b>
<b>Adopted: 01-01-83</b> <b>Revised: 05-02-91</b> <b>Reaffirmed: 02-24-05</b> <b>Revised: 01-03-08</b> <b>Revised: 12-19-13</b> <b>Revised:</b>	<b>Page 4 of 5</b>

(Three <i>courses of years of</i> same language)	
Open Electives	4 ½
Total	25

The Board may approve other academic requirements for graduation.

***Earning of Credit***

In accordance with policy IK and ILBAA, *students can earn course credit with prior approval of the principal or designee by demonstrating mastery of the required coursework and material. Mastery is defined as "a high level of demonstrated proficiency with regard to a competency." Student assessment of mastery is the responsibility of the building principal.*

*€Credit will be awarded upon demonstration of mastery of the required course competencies and credit is awarded if a student is able to demonstrate learning experience in compliance with the district-specified curriculum and assessment standards.*

*Course work completed by middle school students serves as criteria for placement at the high school. However, students may earn high school credit after completion of their 8<sup>th</sup> grade school year by successfully completing TRHS course offered during the summer or through an alternative setting in accordance with Policy IMBC – Alternative Credit Options.*

*Students in 7<sup>th</sup> or 8<sup>th</sup> grade may earn credit towards high school graduation through advanced coursework in accordance with policy IMBD High School Credit for 7<sup>th</sup>/8<sup>th</sup> Coursework.*

***Alternative Credit Options***

*The Superintendent may approve the granting of credit earned through alternative methods outside of regular classroom-based instruction. Such alternative methods of instruction may include extended learning opportunities, online education/virtual learning, alternative learning plans, or others approved by the Superintendent or designee. Awarding of credits to be applied toward high school graduation requirements will be determined by the high school Principal on a case-by-case basis. Such credit will be granted pursuant to the provisions of Policy IMBC, Alternative Credit Options and other applicable Board policies*

***Alternative Learning Plans***

*As an alternative to satisfying the provisions of this policy and related State requirements, students may also graduate from high school and obtain either a high school diploma or its equivalent by participating in an alternative learning plan or program. The provisions of Policy IHBI, Alternative Learning Plans, shall apply in such an event.*

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code:     IKF</b></p>
<p><b>Adopted:     01-01-83</b>  <b>Revised:     05-02-91</b>  <b>Reaffirmed: 02-24-05</b>  <b>Revised:     01-03-08</b>  <b>Revised:     12-19-13</b>  <b>Revised:</b></p>	<p><b>Page 5 of 5</b></p>

***Early Graduation***

*The Board supports early graduation as a means to earn a high school diploma. Parent/guardian involvement for students under the age of 18 is required. The high school principal shall approve such requests if he/she determines that all state and local graduation requirements will be met and that early graduation is related to career and/or educational plans of the student making the request. Upon approval by the high school principal, the minimum 4-unit requirement per year for enrolled students shall be waived and the student shall be awarded a high school diploma provided that all other requirements have been met in accordance with policy IKFA.*

Legal References:

*NH Code of Administrative Rules, Section Ed 306.27(ad), Early Graduation  
RSA 189:11, Instruction in National and State History and Government*

**AWARDING OF CREDIT**

See policy IK, Earning of Credit.

**ALTERNATIVE CREDIT OPTIONS**

See policy IMBC, Alternative Credit Options.

**ALTERNATIVE LEARNING PLANS**

See policy IHBI, Alternative Learning Plans.

**EARLY GRADUATION**

See policy IKFA, Early Graduation

**HIGH SCHOOL CREDIT FOR 7<sup>TH</sup> AND 8<sup>TH</sup> GRADE COURSEWORK**

See policy IMBD, High School Credit for 7<sup>th</sup> and 8<sup>th</sup> Grade Coursework

**HIGH SCHOOL GRADUATION COMPETENCIES**

See policy ILBAA, High School Graduation Competencies

Legal Reference:

*NH Code of Administrative Rules, Section Ed. 306.04(a)(14), Policy Development  
NH Code of Administrative Rules, Section Ed. 306.14(f), Basic Instructional Standards  
NH Code of Administrative Rules, Section Ed. 306.27(d, m), Required Subjects and Unit of Credit for High School Graduation*

**NHSBA Note, September 2016: Amendments to this Sample Policy are necessary due to the passage of SB 157, which amends RSA 189:11. These legislative amendments require school districts to develop a local competency assessment in the area of National and State History and government.**

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code: JLC</b></p>
<p><b>Adopted: 01-01-83</b>  <b>Reaffirmed: 06-06-91</b>  <b>Revised: 05-02-96</b>  <b>Revised: 02-24-05</b>  <b>Revised: 11-17-11</b>  <b>Revised:</b></p>	<p><b>Page 1 of 2</b></p>

## **STUDENT HEALTH SERVICES**

The Board may appoint a school nurse to function in the school health program and to provide school health services. A school nurse shall be a registered professional nurse licensed in New Hampshire. The Board may employ or contract with a Licensed Practical Nurse (LPN) or a Licensed Nursing Assistant (LNA) to work under the direct supervision of the school Registered Nurse (RN).

Responsibilities of the school nurse include, but are not limited to: providing direct health care to students and staff; providing leadership for the provision of health services; promoting a healthy school environment; promoting health; serving in a leadership role for health policies and programs; and serving as a liaison between school personnel, family, community, and health care providers. Additionally, the school nurse is responsible for developing procedures to address and meet special physical health needs of students. Such procedures may be developed and implemented on a case-by-case basis.

All injuries or illnesses occurring during the school day are to be reported to the school nurse or the building principal. Students attending school during the extended day, night, or summer school programs, or any other time when the school nurse is not in the building, are to report to the supervising adult. The school nurse, principal or designee will notify parents/guardians before a student who is injured or ill is permitted to go home. Students will not be allowed to leave school without first notifying either the school nurse or principal of his/her injury or illness. Additionally, parent/guardian notification and authorization is necessary before any student will be released from school due to injury or illness.

Emergency medical care will be provided pursuant to the guidelines of Board Policy [EBBC/JLCE](#).

Any pupil who is required to take prescribed medication during the school day will do so consistent with the provisions of Department of Education Rule 311.02. Clarifications of these provisions are in Board Policy JLCD and Appendix JLCD-R.

In addition to the provisions of this policy, the school nurse is responsible for the oversight of other school services, including but not limited to: assessing and responding to student health needs, maintaining accurate health records, screening for vision, hearing and BMI according to national recommendations, participating on 504 and IEP teams (if requested), health promotion, disease and injury prevention initiatives, student wellness, and other responsibilities and services as dictated by law or Board policy.

<b>Timberlane Regional School District</b>	<b>Policy Code: JLC</b>
<b>Adopted: 01-01-83</b> <b>Reaffirmed: 06-06-91</b> <b>Revised: 05-02-96</b> <b>Revised: 02-24-05</b> <b>Revised: 11-17-11</b> <b>Revised:</b>	<b>Page 2 of 2</b>

**Legal References:**

*RSA 200:27, School Health Services*

*RSA 200:29, School Nurse*

*RSA 200:31, School Health Personnel*

*RSA 326-B, Nurse Practice Act*

*NH Code of Administrative Rules, Section Ed 306.12(b), School Health Services*

*NH Code of Administrative Rules, Section Ed 311, School Health Services*

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code: JLCD</b></p>
<p><b>Adopted: 07-99</b>  <b>Revised: 02-24-05</b>  <b>Revised: 04-03-08</b>  <b>Revised: 11-17-11</b>  <b>Revised:</b></p>	<p><b>Page 1 of 2</b></p>

## ADMINISTERING MEDICATION TO STUDENTS

The Superintendent shall be responsible for establishing specific procedures to protect and control medications administered in schools. Such procedures are found in Appendix JLCD-R.

Prescription medication should not be taken during school hours if is possible. Medication is to be administered by the school nurse, principal or other designee. Medication will be administered in school only after the following information has been received and filed in the student's health record: ~~This includes self-carrying medications such as epinephrine auto injectors and inhalers:~~

1. A written statement from the licensed prescriber detailing the method of taking the medication, dosage, and the time schedule of the medication.
2. A written authorization from the parent/guardian indicating the desire that the school nurse administer the prescribed medication to the student.

~~For Over the Counter acetaminophen or ibuprofen:~~

- ~~1. A written authorization from the parent/guardian on the Student Emergency information form indicating the desire that the school administer this medication to the student.~~

All medication should be delivered to appropriate school personnel by the parent/guardian or other adult ~~provided that the nurse is notified in advance by the parent/guardian of the delivery and the quantity of the prescription medication being delivered.~~ All prescription medication must be delivered and contained in its original pharmacy container. The school nurse is directed to keep such medications in a locked cabinet or refrigerator. No more than a 30-day supply will be kept and maintained by the school. The school nurse will contact the parent/guardian regarding any unused medication. Such medication shall be picked up by parent/guardian within ten days after its use is discontinued. If the parent/guardian does not pick up the medication within ten days, the school nurse may dispose of the unused medication and record as such in the student's health record file. The school nurse is responsible for keeping accurate records regarding the administration of medication to students.

Students may possess and self-administer an epinephrine auto-injector if the student suffers from potentially life-threatening allergies. ~~The Both the~~ student's parent/guardian and physician/prescriber must authorize such self-possession and self-administration. ~~The school nurse must also be in agreement with this authorization.~~ If a student finds it necessary to use his/her auto-injector, s/he shall immediately report to nearest

<p><b>Timberlane Regional School District</b></p>	<p><b>Policy Code: JLCD</b></p>
<p><b>Adopted: 07-99</b>  <b>Revised: 02-24-05</b>  <b>Revised: 04-03-08</b>  <b>Revised: 11-17-11</b>  <b>Revised:</b></p>	<p><b>Page 2 of 2</b></p>

supervising adult. The school nurse or building principal may maintain at least one epinephrine auto-injector, provided by the student, *in a locked cabinet* in the nurse’s office or other suitable location. Additionally, students may possess and self-administer a metered dose inhaler or a dry powder inhaler to alleviate or prevent asthmatic symptoms, auto-injectors for severe allergic reactions, and other injectable medications necessary to treat life-threatening allergies. ~~The~~ *Both the* student's parent/guardian and physician/prescriber must authorize such self-possession and self-administration.

Students shall not share any prescription or over the counter medication with another student. Notice of this prohibition will be provided in the student handbooks. Students acting in violation of this prohibition will be subject to discipline consistent with applicable Board policies.

This policy shall extend to any school-sponsored activity, event or program.

In addition to the provisions set forth herein, the school nurse and principal are responsible for ensuring the provisions of Ed.311.02, Medication During the School Day, are followed.

*The school nurse or other designated personnel may administer other medications to students in emergency situations, provided such personnel has all training as is required by law. Such medication may also be administered in emergency situations if a student's medical action plan has been filed and updated with the school district to the extent required by law. The district will maintain all necessary records relative to the emergency administration of medication and will file all such reports as may be required.*

**Statutory/Administrative Reference:**

- [RSA 200:40-b, Glucagon Injections](#)
- [RSA 200:42, Possession and Use of Epinephrine Auto-Injectors Permitted](#)
- [RSA 200:43, Use of Epinephrine Auto-Injectors](#)
- [RSA 200:44, Availability of Epinephrine Auto-Injectors](#)
- [RSA 200:44-a, Anaphylaxis Training Required](#)
- [RSA 200:45, Pupil Use of Epinephrine Auto-Injectors Immunity](#)
- [RSA 200:46, Possession and Self-Administration of Asthma Inhalers Permitted](#)
- [RSA 200:47, Use of Asthma Medications by Pupils – Immunity](#)
- [RSA 200:54, Supply of Bronchodilators, Spacers or Nebulizers](#)
- [RSA 200:55, Administration of Bronchodilator, Space or Nebulizer](#)
- [NH Code of Administrative Rules – Section ED. 311.02\(d\); Medication During School Day](#)
- [NH Code of Administrative Rules – Section ED. 306.12\(b\)\(2\)Special Physical Health Needs of Students](#)

**Appendix JLCD-R**

***NHSBA Note, September 2016: Amendments to this Sample Policy are necessary due to the passage of SB 25, which adds a new statute, RSA 200:44-a, relative to pupil use of epinephrine; and SB 322, which amends RSA 200 by adding RS 200:53, :54, :55, :56 and :57, relative to the use of bronchodilators, spacers and nebulizers in school. Paragraph 6 of this Sample Policy is added to the requirements of new legislation. Additions to Legal References are made, as well.***

<b>Timberlane Regional School District</b>	<b>Procedure Code: JLCD-R</b>
<b>Adopted: 07-99</b> <b>Revised: 02-24-05</b> <b>Revised: 11-17-11</b> <b>Revised: 04-17-19</b>	<b>Page 1 of 3</b>

## **ADMINISTERING MEDICATION TO STUDENTS**

### **A. Written Authorizations**

In order for prescription medications to be given at the school, the following shall occur:

- (1) The school nurse shall ensure that a written statement from the licensed prescriber containing the following be file in the student's health record:
  - a. The student's name;
  - b. The name and signature of the licensed prescriber and contact numbers;
  - c. The name, route and dosage of medication;
  - d. The frequency and time of medication administration or assistance;
  - e. The date of the order; and
  - f. A diagnosis, if not a violation of confidentiality;
- (2) The school nurse shall ensure that there is written authorization by the parent and/or guardian that contains:
  - g. The parent and/or guardian's printed name and signature;
  - h. A list of all medications the student is currently receiving, if not a violation of confidentiality or contrary to the request of the parent, guardian or student that such medication be documented; and
  - i. Approval to have the school nurse administer the medication, the student to possess and self-administer and/or the principal or his designee assist the student with taking the medication; and
- (3) The school nurse shall ensure the authorization or other accessible documentation contains:
  - a. The parent and/or guardian's home and emergency phone number(s); and
  - b. Persons to be notified in case of a medication emergency in addition to the parent or guardian and licensed prescriber.

### **B. Delivery of Medication to School**

<p><b>Timberlane Regional School District</b></p>	<p><b>Procedure Code: JLCD-R</b></p>
<p><b>Adopted: 07-99</b>  <b>Revised: 02-24-05</b>  <b>Revised: 11-17-11</b>  <b>Revised: 04-17-19</b></p>	<p><b>Page 2 of 3</b></p>

- (1) A parent, guardian or a parent/guardian-designated, responsible adult shall deliver all medication to be administered by school personnel to the school nurse or other responsible person designated by the school nurse as follows:
- (2) The prescription medication shall be in a pharmacy or manufacturer labeled container;
- (3) The school nurse or other responsible person receiving the prescription medication shall document the quantity of the prescription medication delivered; and
- (4) The medication may be delivered by other adult(s), provided, that the nurse is notified in advance by the parent or guardian of the delivery and the quantity of prescription medication being delivered to school is specified.
- (5) All medications shall be stored in their original pharmacy or manufacturer labeled containers and in such manner as to render them safe and prevent loss of efficacy. A single dose of medication may be transferred from this container to a newly labeled container for the purposes of field trips or school sponsored activities.

**C. Recording Provisions**

- (1) Each school will document the following information regarding medication taken by each student electronically (secured) and hardcopy:
  - (a) Date and time of administration;
  - (b) Name of medication prescribed;
  - (c) Name of licensed prescriber;
  - (d) Signature or initials of adult present;
  - (e) Other comments.
- (2) Each school shall keep a bound book with consecutively numbered pages, in which shall be recorded in ink, the medication taken by a student and will show: the date, time of administration, the kind and quantity of medicinal preparation, the name of the prescribing physician, and the signature or initials of adult present.
- (3) If student refuses to take or spills medication, or medication is lost or has run out, such shall be recorded.

<b>Timberlane Regional School District</b>	<b>Procedure Code: JLCD-R</b>
<b>Adopted: 07-99</b> <b>Revised: 02-24-05</b> <b>Revised: 11-17-11</b> <b>Revised: 04-17-19</b>	<b>Page 3 of 3</b>

- (4) Recording cannot be altered; if an error occurs, a line is to be drawn through the entry and correct data recorded in line below and signed.
- (5) Such a record shall be available to representatives from the State Division of Public Health and/or State Department of Education.
- (6) Each record should be kept in a designated place for a period of time consistent with the New Hampshire Department of Education’s records retention schedule.

**D. Student Health Records**

Physicians' written orders and the written authorization of parents or guardians should be filed with the student's cumulative health record and kept for a period of time as determined by the New Hampshire Department of Education’s Records Retention Schedule. Health records concerning students who receive special education services should be retained as long as the student is in a special education program and there is district liability for the education of the student.

An appropriate summary completed at least once every school year for each medication prescribed and taken should become part of the student's health record.

The State law forbids any child for any reason to take medication without written permission of the child's Parent or legal Guardian. Permission slips are available in the Nurse's office.

PARENTAL REQUEST FOR GIVING PRESCRIBED MEDICATION AT SCHOOL SHALL INCLUDE:

- Student’s Name
- Name of Medication
- Druggist/Pharmacist
- Prescribed By (Doctor’s Name)
- Period for Taking Medication

(Not more than one month of prescribed medicine may be stored in school.)

The medication will be delivered directly to the School Nurse, Principal or designated staff member by the parent or guardian, if possible.

The medication will be delivered in a container properly labeled with the student's name, the physician's name, the date of original prescription, name and strength of medication and directions for taking by the student.

<b>Timberlane Regional School District</b>	<b>Policy Code: JLCK</b>
<b>Adopted:</b>	<b>Page 1 of 1</b>

## **SPECIAL PHYSICAL HEALTH NEEDS OF STUDENTS**

The School District will meet the special physical health needs of all students, consistent with state and federal law. The school board recommends that all pupils participate in developmentally appropriate daily physical activity, exercise, or physical education as a way to minimize the health risks created by chronic inactivity, childhood obesity, and other related health problems. The School District will encourage developmentally appropriate daily physical activity, exercise, or physical education through curriculum, athletics, and other school programs.

Legal References:

*RSA 189:11-a, V*

*NH Department of Education Administrative Rule Ed 306.04(a)(2022), Meeting the Special Physical Health Needs of Students*


**NOTE: Required policy not on the books. NHSBA sample language.**



# TRSD Data Governance Plan

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School Board Presentation  
June 6, 2019



# Background on the New Law (Student and Teacher Information Protection and Privacy)

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- Effort to improve data privacy and security in NH schools.
- HB1612 was signed into law on June 18, 2018 and became RSA 189:66.
- Data Governance Plan based on DOE established minimum standards must be presented to school board for approval by June 30, 2019.
- NH DOE enlisted Daniel Dister (CISO) to help develop specifications around the law in December.
- Minimum privacy and security standards finally released by NH DOE in April.

# Requirements of Governance Plan

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- Establish minimum standards for privacy and security of student and employee data based on best practices.
- Inventory of software applications, digital tools and extensions as well as a review of all these to ensure they meet or exceed the minimum standards.
- A requirement for service providers to meet or exceed the minimum standards.
- Policies and procedures for access to data and protection of privacy for students and staff.
- A response plan for any breach of information.
- Plan is updated annually and presented to the school board.

# Data Governance Plan Framework

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- Template derived from similar plans throughout the nation. Used by many districts in New Hampshire.
- The plan is a roadmap to where we want to go.
- NH DOE CISO - “This is a 3-4 year process to become totally compliant.”
- Renewed each year being sure to include any changes in laws and/or requirements.

# Data Governance Plan

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- Introduction
- Data Lifecycle
- Critical Incident Response Plan
- Appendices

# Introduction

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- Data Governance Team
- Purpose
- Scope
- Regulatory Compliance
- Data User Compliance

# Data Lifecycle

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- Identifying Need & Assessing Systems for District Requirements
- Acquisition and Creation
- Management and Storage
- Security/Protection
- Usage and Dissemination
- Archival and Destruction

# Critical Incident Response

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- Business Continuity
- Disaster Recovery
- Data Breach Response

# Appendices

- A. Definitions
- B. Laws, Statutory, and Regulatory Security Requirements
- C. Digital Resource Acquisition and Use
- D. Data Security Checklist
- E. Data Classification Levels
- F. Securing Data at Rest and Transit
- G. Physical Security Controls
- H. Asset Management
- I. Virus, Malware, Spyware, Phishing and SPAM Protection
- J. Account Management Data Access Roles and Permissions
- K. Password Security
- L. Technology Disaster Recovery Plan
- M. Data Breach Response Plan

# Next Steps

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- Asking approval at next board meeting.
- Plan will be reviewed on a ongoing basis.
- Renewed Annually.
- Technology Committee and SLT will be responsible for input and guidance.

# Questions

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Timberlane Regional School District



# Data Governance Manual

Timberlane Regional School District

2019

***DRAFT***

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## **Introduction**

The Timberlane Regional School District is committed to protecting our students' and staffs' privacy through maintaining strong privacy and security protections. The privacy and security of this information is a significant responsibility and we value the trust of our students, parents, and staff.

The Timberlane Regional School District's Data Governance Manual includes information regarding the data governance team, data and information governance, applicable School Board policies, District procedures, as well as applicable appendices and referenced supplemental resources.

This manual outlines how operational and instructional activity shall be carried out to ensure the District's data is accurate, accessible, consistent, and protected. The document establishes who is responsible for information under various circumstances and specifies what procedures shall be used to manage and protect it. Definitions of terminology can be found in Appendix A: Definitions.

The Timberlane Regional School District's Data Governance Manual shall be a living document. To make the document flexible, details are outlined in the appendices and referenced supplemental resources. This document and any future modifications to this document will be posted on the District's website.

### ***Data Governance Team***

The Timberlane Regional School District's Data Governance team consists of the following positions: Superintendent, Assistant Superintendent, Business Administrator, Facilities Director, Human Resources Manager, Director of Student Services and Special Education, Student Services Coordinator, Director of Curriculum and Professional Learning, Director of Assessment and Accountability, and the Director of Technology. Members of the Data Governance Team will act as data stewards for all data under their direction. The Director of Technology will act as the Information Security Officer (ISO), with assistance from members of the full Technology team. The Business Administrator is the district's alternate ISO and will assume the responsibilities of the ISO when the ISO is not available. All members of the district administrative team will serve in an advisory capacity as needed.

### ***Purpose***

The School Board recognizes the value and importance of a wide range of technologies for a well rounded education, enhancing the educational opportunities and achievement of students. The Timberlane Regional School District provides its faculty, staff, and administrative staff access to technology devices, software systems, network and Internet services to support research and education. All components of technology must be used in ways that are legal, respectful of the rights of others, and protective of juveniles and that promote the educational objectives of Timberlane Regional School District.

To that end, the district must collect, create and store confidential information. Accurately maintaining and protecting this data is important for efficient district operations, compliance with laws mandating confidentiality, and maintaining the trust of all district stakeholders. All persons who have access to district data are required to follow state and federal law, district policies and procedures, and other rules created to protect the information.

It is the policy of the Timberlane Regional School District that data or information in all its forms--written, electronic, or printed--is protected from accidental or intentional unauthorized modification, destruction or disclosure throughout its life cycle. This protection includes an appropriate level of security over the equipment, software, and practices used to process, store, and transmit data or information. All staff and authorized district contractors or agents using confidential information will strictly observe protections put

into place by the district.

## *Scope*

The data security policy, standards, processes, and procedures apply to all students and staff of the district, contractual third parties and agents of the district, and volunteers who have access to district data systems or data. This policy applies to all forms of Timberlane Regional School District data and information, including but not limited to:

- Speech, spoken face to face, or communicated by phone or any current and future technologies.
- Hard copy data printed or written.
- Communications sent by post/courier, fax, electronic mail, text, chat and/or any form of social media.
- Data stored and/or processed by any electronic device, including servers, computers, tablets, mobile devices.
- Data stored on any type of internal, external, or removable media or cloud based services.
- The terms data and information are used separately, together, and interchangeably throughout the policy, the intent is the same.
- Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device may be referred to as systems, assets or resources.
- All involved systems and information are considered assets of the Timberlane Regional School District and shall be protected from misuse, unauthorized manipulation, and destruction.

## *Regulatory Compliance*

The district will abide by any law, statutory, regulatory, or contractual obligations affecting its data systems (see Appendix B: Laws, Statutory, and Regulatory Security Requirements). The Timberlane Regional School District complies with the [NH Minimum Standards for Privacy and Security of Student and Employee Data](#) established in April, 2019. The Timberlane Regional School District complies with all other applicable regulatory acts including but not limited to the following:

- Children’s Internet Protection Act ([CIPA](#))
- Children’s Online Privacy Protection Act ([COPPA](#))
- Family Educational Rights and Privacy Act ([FERPA](#))
- Health Insurance Portability and Accountability Act ([HIPAA](#))
- Payment Card Industry Data Security Standard ([PCI DSS](#))
- Protection of Pupil Rights Amendment ([PPRA](#))
- Individuals with Disabilities in Education Act ([IDEA](#))
- New Hampshire State RSA - Student and Teacher Information Protection and Privacy

[NH RSA 189:65](#) Definitions

[NH RSA 189:66](#) Data Inventory and Policies Publication

[NH RSA 189:67](#) Limits on Disclosure of Information

[NH 189:68](#) Student Privacy

[NH RSA 189:68-a](#) - Student Online Personal Information

- [New Hampshire Minimum Standards for Privacy and Security of Student and Employee Data](#)
- New Hampshire State RSA - Right to Privacy:
  - [NH RSA 359-C:19](#) - Notice of Security Breach - Definitions
  - [NH RSA 359-C:20](#) - Notice of Security Breach Required
  - [NH RSA 359-C:21](#) - Notice of Security Breach Violation

## *Data User Compliance*

The Data Governance Manual applies to all users of Timberlane Regional School District's information including: staff, students, volunteers, and authorized district contractors or agents. All data users are to maintain compliance with School Board Policies and District administrative procedures,, [GBEF](#) (Employee Use of District-Issued Computers, Devices and the Internet, formally GCSA), [GBEF-R](#) (Employee Computer/Device and Internet Responsible Use Rules, formally GCSA-R), [EHAB](#) (Data Governance and Security), [JIJL](#) (Student Use of Computers, Devices and the Internet, formally EGA), [JIJL-R](#) (Student Technology Responsible Use, formally EGA-R) and all policies, procedures, and resources as outlined within this Data Governance Manual and School Board Policy.

A consistently high level of personal responsibility is expected of all users granted access to the district's technology resources. Any violation of district policies or procedures regarding technology usage may result in temporary, long-term or permanent suspension of user privileges. User privileges may be suspended pending investigation into the use of the district's technology resources.

Unless permission has been granted by the ISO or designee, no staff, vendor or other person may remove confidential or critical data from the district's premises or the district's network, remove a device containing confidential or critical data from the district's premises, or modify or copy confidential or critical data for use outside the district. If permission is given, the data may be accessed only on a district-provided device with appropriate security controls or through a secure virtual private network (VPN). When users access confidential or critical data from a remote location, the user must take precautions to ensure that the confidential or critical data is not downloaded, copied or otherwise used in a manner that would compromise the security and confidentiality of the information.

Staff who fail to follow the law or district policies or procedures regarding data governance and security may be disciplined or terminated. Volunteers may be excluded from providing services to the district. The district will end business relationships with any contractor who fails to follow the law, district policies or procedures, or the confidentiality provisions of any contract. In addition, the district reserves the right to seek all other legal remedies, including criminal and civil action and seeking discipline of a staff member's teaching certificate.

The district may suspend all access to data or use of district technology resources pending an investigation. Violations may result in temporary, long-term or permanent suspension of user privileges. The district will cooperate with law enforcement in investigating any unlawful actions. The Superintendent or designee has the authority to sign any criminal complaint on behalf of the district.

Any attempted violation of district policies, procedures or other rules will result in the same consequences, regardless of the success of the attempt.

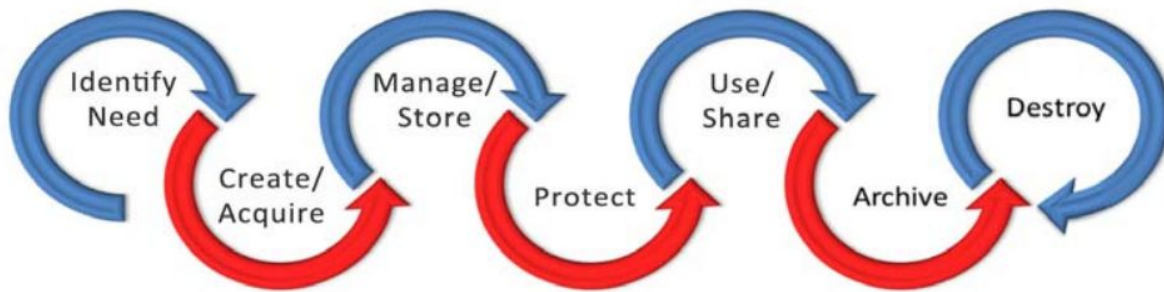
Possible disciplinary/corrective action may be instituted for, but is not limited to, the following:

- Unauthorized disclosure of PII or Confidential Information.
- Sharing your user IDs or passwords with others (exception for authorized technology staff for the purpose of support)

- Applying for a user ID under false pretenses or using another person’s ID or password.
- Unauthorized use of an authorized password to invade student or staff privacy by examining records or information for which there has been no request for review.
- The unauthorized copying of system files.
- Attempting to secure a higher level of privilege without authorization.
- Installation or use of unlicensed software or software not approved for district technological systems.
- The intentional unauthorized altering, destruction, or disposal of district information, data and/or systems. This includes the unauthorized removal of technological systems such as but not limited to: laptops, internal or external storage, computers, servers, backups or other media, that may contain PII or confidential information.
- The introduction of computer viruses, hacking tools or other disruptive or destructive programs.

## Data Lifecycle

Data Governance is necessary at each phase in the data lifecycle. This lifecycle starts at evaluating the need for data collection and ends when the data is destroyed. It is important that appropriate safeguards, policies, procedures and practices are in place for each phase of the data lifecycle.



### *Identifying Need & Assessing Systems for District Requirements*

To accomplish the district’s mission and to comply with the law, the district may need to maintain confidential information, including information regarding students, parents/guardians, staff, applicants for employment and others. The district will collect, create or store confidential information only when the Superintendent or designee determines it is necessary.

### **New Systems**

District staff members are encouraged to research and utilize online services or applications to engage students and further the district's educational mission. However, before any online service or application is purchased or used to collect or store confidential or critical information, including confidential information regarding students or staff, the ISO or designee must approve the use of the service or application and verify that it meets the requirements of the law and School Board policy and appropriately protects confidential and critical information. This prior approval is also required when the services are obtained without charge.

Memorandums of understanding (MOU), contracts, terms of use and privacy policy for any system that creates, collects or uses personally identifiable information (PII), student records or confidential data must be reviewed by the ISO prior to initiation.

All new resources shall be properly evaluated against the following criteria, when applicable:

- Impact on technology environment including storage and bandwidth
- Hardware requirements, including any additional hardware
- License requirements/structure, number of licenses needed, and renewal cost
- Maintenance agreements including cost
- Resource update and maintenance schedule
- Funding for the initial purchase and continued licenses and maintenance
- Evaluate terms of service, privacy policy, and MOU/contract that meet the following criteria:
  - o The district continues to own the data shared, and all data must be available to the district upon request.
  - o The vendor's access to and use of district data is limited; the data cannot be used for marketing, targeted advertising or data mining; and the data cannot be shared with third parties unless allowed by law and authorized by the district. If metadata is collected, it will be protected to the same extent as the district's confidential or critical information.
  - o District data will be maintained in a secure manner by applying appropriate technical, physical and administrative safeguards to protect the data.
  - o The provider will comply with district guidelines for data transfer or destruction when contractual agreement is terminated.
  - o No API will be implemented without full consent of the district.
  - o All data will be treated in accordance to federal, state and local regulations
  - o The provider assumes liability and provides appropriate notification in the event of a data breach.

Note: Exceptions can be made by the ISO when all the criteria cannot be met for a legitimate reason while still meeting all regulatory requirements for use. Parent permission is requested from parents during the yearly online registration process for district vetted and approved applications and tools.

## **Review of Existing Systems**

The District will ensure that data collection is aligned with School Board Policy EHAB. Data systems shall be regularly reviewed to ensure that only necessary data is being transmitted and collected.

Individual student level data is submitted to different approved service providers in order to ensure business operations and instructional services. At times, these imports include PII for staff and student. The District must ensure that each piece of PII is necessary for operations or instruction and that the providers are abiding by their terms of service.

The District will audit data imports annually. These audits should include:

- Review of provider's terms of service to ensure they meet the District's data security requirements.
- Verification that software imports are accurate and pulling correct information.
- Verification that, when applicable, the staff, students and classes included in the imports are still necessary for instructional purposes (only those that need data collected are included in import).
- Determine if the fields included in the imports are still necessary for intended purpose.

## *Acquisition and Creation*

It is the responsibility of the staff requesting to use new digital content to properly vet the resource to ensure that it meets district business objectives, is in line with curriculum or behavioral standards, is age appropriate, is instructionally sound, and is appropriate for the intended use. Digital resources that accompany adopted instructional and/or curriculum materials will be vetted by the Assistant Superintendent, Curriculum Directors/Deans and the ISO, or designee, prior to purchase.

The Timberlane Regional School District, starting in July 2019, will be a member of the New Hampshire Student Data Privacy Alliance (NHSDPA). The NHSDPA is a collaboration of New Hampshire school districts and law counselors that share common concerns around student privacy. This Consortium will help vet new digital resources using collective resources. The goals of this Consortium are:

- Establish a community of stakeholders who have various needs addressed through policy, technology and/or effective practice sharing around effective privacy management,
- Identify projects that have on-the-ground and real-world impact on student data privacy enabling schools, districts, state and vendors find resources, adapt them to their unique context and implement needed protections,
- Development of tools and resources to address operational issues not currently being addressed,
- Leverage partnership organizations working in the privacy space to have their good work utilized and no reinvention of existing work,
- Development of a clearinghouse of student data privacy operational issues and resources to support schools, districts, states and vendors in managing those issues – no matter where the resources originate.

Once the Consortium is operating staff will check a database of approved digital resources to see if it has been approved for meeting or exceeding minimum standards outlined by the state. In the event it does not there will be an approval process where the staff member will submit information about the resource they would like to use on the NH Consortium website. A first level approval would need to be granted by the district in order to make sure that there are no obvious or known issues with the resource and that it passes curriculum related goals. Passing that, the Consortium will contact the vendor in order to process agreements that they will follow all minimum federal and state laws regarding security and privacy. If the provider completes all agreements the resource will be added to the database of vetted resources that are good to use.

## *Management and Storage*

### **Systems Security**

The district will provide access to confidential information to appropriately trained district staff and volunteers only when the district determines that such access is necessary for the performance of their duties. The district will disclose confidential information only to authorized district contractors or agents who need access to the information to provide services to the district and who agree not to disclose the information to any other party except as allowed by law and authorized by the district (School Board Policy EHAB). Therefore, systems access will only be given on an as-needed basis as determined by the data manager and ISO. Further information regarding Electronic Access Security Controls is contained in the

Security/Protection section of this manual.

## **Data Management**

The effective education of students and management of district personnel often require the district to collect information, some of which is considered confidential by law and district policy. In addition, the district maintains information that is critical to district operations and that must be accurately and securely maintained to avoid disruption to district operations.

Data Managers are responsible for the development and execution of practices and procedures that ensure the accuracy and security of data in an effective manner. All district administrators are data managers for all data collected, maintained, used and disseminated under their supervision as well as data they have been assigned to manage. Data managers will:

- ensure that system account creation procedures and data access guidelines appropriately match staff member job function with the data on instructional and operational systems.
- review all staff with custom data access beyond their typical group's access.
- review district processes to ensure that data will be tracked accurately.
- review contracts with instructional and operational software providers to ensure that they are current and meet the district data security guidelines.
- ensure that staff are trained in the district's proper procedure and practices in order to ensure accuracy and security of data.
- assist the ISO in enforcing district policies and procedures regarding data management.

## **Data Classification and Inventory**

Classification is used to promote proper controls for safeguarding the confidentiality of data. Regardless of classification, the integrity and accuracy of all classifications of data are protected. The classification assigned and the related controls applied are dependent on the sensitivity of the data. Data is classified according to the most sensitive detail they include. Data recorded in several formats (e.g., source document, electronic record, report) have the same classification regardless of format (see Appendix E: Data Classification Levels).

The ISO or designee will identify all systems containing district data, such as student information systems, financial systems, payroll systems, transportation systems, food-service systems, email systems, instructional software applications and others. The ISO or designee will identify the data files and data elements maintained in those systems and identify confidential and critical information the district possesses or collects. Once the data files and data elements are identified, the ISO or designee will classify the data as confidential or critical so that those files and the information they contain can be more closely monitored.

The district will create and maintain a data inventory for all information systems containing PII or confidential information. When possible, a data dictionary will be maintained for critical information systems. The data inventory will contain the following elements:

- Data Source
- What data is stored
- Where the data is stored
- Persons assigned to manage the data
- Staff or staff categories that have access to the files
- When the data is collected and received
- How the data is accessed

- Who has access
- Criticality/Sensitivity Rating

## *Security/Protection*

### **Risk Management**

A thorough risk analysis of all Timberlane Regional School District's data networks, systems, policies, and procedures shall be conducted on an bi-annual basis by an external third party or as requested by the Superintendent, ISO or designee. An internal audit of District network security will be conducted annually by District Technology staff. This analysis shall be completed using the risk management steps outlined in the Data Security Checklist (Appendix D). The product of the risk analysis will be referred to as the risk assessment. The risk assessment shall be used to develop a plan to mitigate identified threats and risk to an acceptable level by reducing the extent of vulnerabilities.

### **Security Logs**

The District will maintain a comprehensive list of critical system events that will be logged and monitored to ensure data security. These events will include, but are not limited to, access to critical systems and modification of critical data. When applicable, notifications will be established for critical event triggers.

### **Physical Security Controls**

Technology telecommunication closets are housed in secure locations. Access authorization is assigned through the Director of Technology, Network Administrator and or Director of Facilities. In addition, access to areas in which information processing is carried out shall be restricted to only appropriately authorized individuals (see appendix G: Physical Security Controls).

No technological systems shall be disposed of or moved without adhering to the appropriate procedures (see Appendix H: Asset Management).

### **Inventory Management**

The district shall maintain a process for inventory control in accordance to federal and state requirements and School Board policy. All district technology assets will be maintained in inventory and verified through the regular inventory verification process (see Appendix H: Asset Management).

### **Virus, Malware, Spyware, Phishing and SPAM Protection**

The District uses a multi-layered approach to ensure that all electronic files are appropriately scanned for viruses, malware, spyware, phishing and SPAM. These include, but are not limited to, enterprise virus/malware/ spyware software, group policy, gateways, firewalls, and content filter. Users shall not turn off or disable district protection systems or install other systems (see Appendix I: Virus, Malware, Spyware, Phishing and SPAM Protection).

### **Electronic Access Security Controls**

District staff will only access personally identifiable and/or confidential information if necessary to perform their duties. The district will only disclose this information to authorized district contractors or agents who need access to the information to provide services to the district and who agree not to disclose the information to any other party except as allowed by law. All staff are required to read and acknowledge applicable district

policies via the Faculty Handbook sign-off form annually.

Mechanisms to control access to PII, confidential information, internal information and computing resources include, but are not limited to, the following methods:

- **Identification/Authentication:** Unique user identification (user ID) and authentication are required for all systems that maintain or access PII, confidential information, and/or internal information. Users will be held accountable for all actions performed on the system with their User ID. User accounts and passwords shall not be shared.
- **Authorization:** Access controls are maintained through a partnership between the technology department, human resources (HR) and data managers.

Additionally, only members of the District Technology staff will be granted access to domain level administrator and local machine administrator accounts in order to complete their job functions.

Access security is audited annually or whenever access permission requirements are changed for a particular application/software or when an application/software is no longer necessary.

### **Staff Users**

All new staff accounts are authorized through an HR hiring process (see Appendix J: Account Management). Role-based permissions and security groups are used to establish access to all systems (see Appendix K: Data Access Roles and Permissions). If a staff member requires additional access, a request must be made directly to the ISO with a clear justification for access.

### **Contractors/Vendors**

Access to contractors/vendors is governed through the same process using School Board Policy EHAB. All contractor/vendor access must be approved by HR and the ISO. All contractors doing business on district premise must also pass a background check unless other security measures are addressed in a vendor contract. All contractors/vendors accessing district data will be considered on premise users. Once the approval has been obtained, the technology department will create the account, only granting access to the server/application that the contractor/vendor supports.

### **Password Security**

The District will enforce secure passwords for all systems within their control (see Appendix L: Password Security). When possible, the district will utilize Single Sign On (SSO) or LDAP/Active Directory Integration to maintain optimal account security controls.

### **Concurrent Sessions**

When possible, the district will limit the number of concurrent sessions for a user account in a system.

### **Remote Access**

Access into the District's network from outside is strictly prohibited without explicit authorization from the ISO. Remote access will be granted through virtual private network (VPN) connection through the district's network VPN appliance; no other method of remote access shall be granted without explicit authorization from the ISO. PII, confidential information and/or Internal Information that is stored or accessed remotely shall maintain the same level of protection as information stored and accessed within District's network.

In the event that VPN access is needed by a contractor/vendor, access must be approved by the ISO. The ISO or designee will establish the contractor account, only granting access to the server/application that the contractor/vendor supports.

All VPN accounts will be reviewed at least annually.

## **Securing Data at Rest and Transit**

District data security applies to all forms of data, including data stored on devices, data in transit and data stored on additional resources. All district external hard drives will be maintained in inventory and verified through the regular inventory verification process. Regular transmission of student data to internal and external services is managed by the technology department using a secure data transfer protocol.

Users must ensure that they are securely storing their data. Guidelines have been established for Cloud Storage and File Sharing, External Storage Devices, and File Transmission Practices. (see Appendix F: Securing Data at Rest and Transit). These guidelines are outlined in the following section.

### ***Usage and Dissemination***

A consistently high level of personal responsibility is expected of all users granted access to the district's technology resources. All district staff, volunteers, contractors and agents who are granted access to critical and confidential information are required to keep the information secure and are prohibited from disclosing or assisting in the unauthorized disclosure of confidential information. All individuals using confidential and critical information will strictly observe protections put into place by the district including, but not limited to, maintaining information in locked rooms or drawers, limiting access to electronic files, updating and maintaining the confidentiality of password protections, encrypting and redacting information, and disposing of information in a confidential and secure manner.

All users are responsible for the security and integrity of the data they create, store or access. Users are expected to act as good stewards of data and treat data security and integrity with a high degree of responsibility and priority. Users must follow all guidelines outlined with Board policies, specifically Employee and Student Technology Usage (GBEF, GBEF-R, JICL, JICL-R), Data Governance and Security (EHAB), and Student Records (JRA, JRA-R).

District staff, contractors and agents will notify the ISO or designee immediately if there is reason to believe confidential information has been disclosed to an unauthorized person or any information has been compromised, whether intentionally or otherwise.

## **Data Storage and Transmission**

All staff and students that log into a district owned devices will be provided with several options for data storage and transmission. Staff and students will need to ensure that they are securely storing their data. Staff and students will be able to store data on the local device. It is important to note that this data is not a part of the district's continuity plan, and thus will not be backed up by the district's backup solution. Staff and students may also have a mapped personal folder. This folder acts as a redirection of document and desktop folders to district file servers. Access to these files is restricted to the folder's owner (staff or student who is assigned) and district enterprise administrator accounts. Staff and students using Chromebook devices have limited local storage capabilities. Chromebook users are to store data online within their GSuite for Education Drive account.

### **Cloud Storage and File Sharing**

The term "Cloud Storage" is used to define all types of remote server storages accessed by users through the internet. All staff and students are provided with a Google GSuite for Education account that provides unlimited storage. Users are responsible for all digital content on their district provided Google GSuite for Education Drive (see Appendix F: Securing Data at Rest and Transit).

## **File Transmission Practices**

Staff are responsible for securing sensitive data for transmission through email or other channels. Staff should not transmit files labeled classified, confidential, or restricted through email or third party file transfer services without district approval. When possible, staff should de-identify or redact any PII or confidential information prior to transmission. Regular transmission of student data to services such as a single sign on provider is managed by the technology department using a secure data transfer protocol (see Appendix F: Securing Data at Rest and Transit).

## **Credit Card and Electronic Payment**

Users of systems that process electronic payments, including but not limited to processing credit card information, must adhere to strict guidelines regarding the protection of payment information and cardholder data. These users are responsible for adhering to the appropriate level of PCI compliance when handling such data (see Appendix F: Securing Data at Rest and Transit).

## **Mass Data Transfers**

Downloading, uploading or transferring PII, confidential information, and internal information between systems shall be strictly controlled. Requests for mass download of, or individual requests for, information for research or any other purposes that include PII shall be reviewed and approved by the Superintendent or designee. All other mass downloads of information shall be approved by the ISO and include only the minimum amount of information necessary to fulfill the request.

## **Printing**

When possible, staff should de-identify or redact any PII or confidential information prior to printing. PII and confidential information shall not be downloaded, copied or printed indiscriminately or left unattended and open to compromise.

## **Oral Communications**

Staff shall be aware of their surroundings when discussing PII and confidential information. This includes, but is not limited to, the use of cellular telephones in public areas. Staff shall not discuss PII or Confidential Information in public areas if the information can be overheard. Caution shall be used when conducting conversations in: semi-private rooms, waiting rooms, corridors, elevators, stairwells, cafeterias, restaurants, or public areas.

## **Training**

The district shall create and maintain a data security training program. This program will consist of the following:

- Training for all staff on technology policies and procedures, including confidentiality and data privacy.
- Additional training for new instructional staff on federal regulations and the use of digital resources and student electronic records.
- Training for all instructional staff on federal regulations and the use of digital resources and student electronic records.
- Training for district administration on federal regulations, data privacy and security.
- All training or professional learning that includes the use of data systems shall include data security.

## *Archival and Destruction*

Once data is no longer needed, the ISO or designee will work with the data managers to ensure that it is appropriately destroyed. Special care will be taken to ensure that confidential information is destroyed appropriately and in accordance with law. Confidential paper records will be destroyed using methods that render them unreadable, such as shredding. Confidential digital records will be destroyed using methods that render the record unretrievable.

### **District Data Destruction Processes**

The district will regularly review all existing data stored on district provided storage for the purposes of ensuring data identification and appropriate destruction. Data destruction processes will align with School Board Policy EHB and EHB-R. District data managers will regularly review systems and data to ensure that data that is no longer needed is destroyed. The following exceptions will be made:

- Data in an active litigation hold will be maintained until the conclusion of the hold.
- Student GSuite for Education account will be maintained for one school year after the student's final date of attendance.
- Staff GSuite for Education accounts will be suspended after the final work day, unless HR or the ISO approves a district administrator to maintain access.

### **Asset Disposal**

The district will maintain a process for physical asset disposal in accordance to School Board Policy DN. The district will ensure that all assets containing PII, confidential, or internal information are disposed of in a manner that ensures that this information is destroyed (see Appendix H: Asset Management).

## **Critical Incident Response**

Controls shall ensure that the District can recover from any damage to or breach of critical systems, data, or information within a reasonable period of time. Each school, department, or individual is required to report any instances immediately to the ISO or designee for response to a system emergency or other occurrence (for example, fire, vandalism, system failure, data breach and natural disaster) that damages/breaches data or systems.

## *Business Continuity*

The District's administrative procedure EHB-R, delineates the timeline for data retention for all district data. The District will maintain systems that provide near-line and off-site data backup. These systems shall allow for the full recovery of critical systems in the event of a disaster. The district will test near-line and off-site backups of critical systems quarterly.

## *Disaster Recovery*

The District's Technology Disaster Recovery Plan outlines critical staff, responsibilities, and processes in the event of a disaster or critical data loss. The District shall maintain a list of all critical systems and data, including contact information. The Technology Disaster Recovery Plan shall include processes that enable the District to continue operations and efficiently restore any loss of data in the event of fire, vandalism, natural

disaster, or critical system failure (see Appendix M: Disaster Recovery Plan).

## ***Data Breach Response***

New Hampshire's data breach law (RSA 359-c:19, 20, 21) is triggered when a School District computer system is breached and personal information is acquired without authorization in a way that compromises the security or confidentiality of the information. The law requires a school district experiencing a breach to conduct a good faith and reasonably prompt investigation to determine the likelihood that personal information was, or will be, misused. The Data Breach Response Plan enables the District to respond effectively and efficiently to a data breach involving personally identifiable information (PII) as defined by NH Law, confidential or protected information (ie-FERPA), district identifiable information and other significant cybersecurity incident. The Data Breach Response Plan shall include processes to validate and contain the security breach, analyze the breach to determine scope and composition, minimize impact to the users, and provide notification (see Appendix N: Data Breach Response Plan).

## **Appendix A - Definitions**

**Confidentiality:** Data or information is not made available or disclosed to unauthorized persons.

**Confidential Data/Information:** Information that the district is prohibited by law, policy or contract from disclosing or that the district may disclose only in limited circumstances. Confidential data includes, but is not limited to, personally identifiable information (PII) regarding students and staff.

**Critical Data/Information:** Information that is determined to be essential to district operations and that must be accurately and securely maintained to avoid disruption to district operations. Critical data is not necessarily confidential.

**Data:** Facts or information. Data can be in any form; oral, written, or electronic.

**Data Breach, Breach of Security or Breach:** A security incident in which there was unauthorized access to and unauthorized acquisition of personal information maintained in computerized form that compromises the security, confidentiality or integrity of the information.

**Data Integrity:** Data is current, accurate and has not been altered or destroyed in an unauthorized manner.

**Data Management:** The development and execution of policies, practices, and procedures in order to manage the accuracy and security of district instructional and operational data in an effective manner.

**Data Owner:** User responsible for the creation of data. The owner may be the primary user of that information or the person responsible for the accurate collection/recording of data. Ownership does not signify proprietary interest, and ownership may be shared. The owner of information has the responsibility for:

- knowing the information for which she/he is responsible.
- determining a data retention period for the information according to Board policy and state statute.
- ensuring appropriate procedures are in effect to protect the integrity, confidentiality, and availability of the data used or created.
- reporting promptly to the ISO the loss or misuse of data.
- initiating and/or implementing corrective actions when problems are identified.

- following existing approval processes for the selection, budgeting, purchase, and implementation of any digital resource.

**Information Security Officer:** The Information Security Officer (ISO) is responsible for working with the Superintendent, Data Governance Team, data managers, data owners, and users to develop and implement prudent security policies, procedures, and controls. The ISO will oversee all security audits and will act as an advisor to:

- data owners for the purpose of identification and classification of technology and data related resources.
- systems development and application owners in the implementation of security controls for information on systems, from the point of system design through testing and production implementation.

**Systems:** Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device, whether hosted by the district or provider.

**Security Incident:** An event that 1) actually or potentially jeopardizes the confidentiality, integrity or availability of an information system or the information the system processes, stores or transmits, or 2) constitutes a violation or imminent threat of violation of security policies, security procedures or acceptable-use policies.

**Personally Identifiable Information (PII):** Any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, State Assigned Student Identification, date and place of birth, mother's maiden name, or biometric records and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

**Risk:** The probability of a loss of confidentiality, integrity, or availability of information resources.

**User:** The user is any person who has been authorized to read, enter, print or update information. A user of data is expected to:

- access information only in support of their authorized job responsibilities.
- comply with all data security procedures and guidelines.
- keep personal authentication confidential (user IDs, passwords, secure cards, PINs, access codes).
- report promptly to the ISO the loss or misuse of data.
- follow corrective actions when problems are identified.

## Appendix B - Laws, Statutory, and Regulatory Security Requirements

**CIPA:** The Children’s Internet Protection Act was enacted by Congress to address concerns about children’s access to obscene or harmful content over the Internet. CIPA imposes certain requirements on schools or libraries that receive discounts for Internet access or internal connections through the E-rate program. Schools subject to CIPA have two additional certification requirements: 1) their Internet safety policies shall include monitoring the online activities of minors; and 2) as required by the Protecting Children in the 21st Century Act, they shall provide for educating minors about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, and cyberbullying awareness and response. <https://www.fcc.gov/consumers/guides/childrens-internet-protection-act>

**COPPA:** The Children’s Online Privacy Protection Act regulates operators of commercial websites or online services directed to children under 13 that collect or store information about children. Parental permission is required to gather certain information.

<https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>

**FERPA:** The Family Educational Rights and Privacy Act applies to all institutions that are recipients of federal aid administered by the Secretary of Education. This regulation protects student information and accords students specific rights with respect to their data.

<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

**HIPAA:** The Health Insurance Portability and Accountability Act applies to organizations that transmit or store Protected Health Information (PHI). It is a broad standard that was originally intended to combat waste, fraud, and abuse in health care delivery and health insurance, but is now used to measure and improve the security of health information as well.

<https://www.hhs.gov/hipaa/index.html>

**IDEA:** The Individuals with Disabilities in Education Act (IDEA) is a law that makes available a free appropriate public education to eligible children with disabilities throughout the nation and ensures special education and related services to those children.

<https://sites.ed.gov/idea/>

**PCI DSS:** The Payment Card Industry Data Security Standard was created by a consortium of payment brands including American Express, Discover, MasterCard, and Visa. It covers the management of payment card data and is relevant for any organization that accepts credit card payments.

[www.pcisecuritystandards.org](http://www.pcisecuritystandards.org)

**PPRA:** The Protection of Pupil Rights Amendment affords parents and minor students’ rights regarding our conduct of surveys, collection and use of information for marketing purposes, and certain physical exams.

<https://www2.ed.gov/policy/gen/guid/fpco/ppra/index.html>

**New Hampshire State RSA 189:65-189:68:** Student and Teacher Information Protection and Privacy as defined by the following sections:

- [NH RSA 189:65](#) Definitions
- [NH RSA 189:66](#) Data Inventory and Policies Publication
- [NH RSA 189:67](#) Limits on Disclosure of Information
- [NH 189:68](#) Student Privacy
- [NH RSA 189:68-a](#) Student Online Personal Information

[New Hampshire Minimum Standards for Privacy and Security of Student and Employee Data](#)

[New Hampshire Minimum Standards - FAQ's](#)

**New Hampshire State RSA Chapter 359-C Right to Privacy:**

- [NH RSA 359-C:19](#) Notice of Security Breach - Definitions
- [NH RSA 359-C:20](#) Notice of Security Breach Required
- [NH RSA 359-C:21](#) Notice of Security Breach Violation

## Appendix C - Digital Resource Acquisition and Use

The purpose of the Digital Resource Acquisition and Use process is to:

- ensure proper management, legality and security of information systems,
- increase data integration capability and efficiency,
- and minimize malicious code that can be inadvertently downloaded.

### New Resource Acquisition

Staff will be required to complete steps outlined under the staff section of the District's website. An online request is required for any new digital resources that either has an associated cost or collects staff or student data. All staff must adhere to the following guidelines regarding digital resource acquisition:

- Contracts for any system that creates, collects or uses personally identifiable information (PII), student records or confidential data must be reviewed by the ISO prior to initiation. Staff should speak with their building Technology Integrator before using ANY new app/online tool with students and seek their assistance with the evaluation/vetting process. This includes any online tool that a student interacts with where they may be creating content and/or any site that requires any student login.
- It is the responsibility of the staff requesting to use new digital content to properly vet the resource to ensure that it meets district business objectives, is in line with curriculum or behavioral standards, is age appropriate, is instructionally sound, and is appropriate for the intended use.
- Digital resources that accompany adopted instructional and/or curriculum materials will be vetted by the appropriate Assistant Superintendent, Curriculum Directors/Deans and the Director of Technology, or designee, prior to purchase.

All new resources shall be properly evaluated against the following criteria, when applicable:

- Impact on technology environment including storage and bandwidth
- Hardware requirements, including any additional hardware
- License requirements/structure, number of licenses needed, and renewal cost
- Maintenance agreements including cost
- Resource update and maintenance schedule
- Funding for the initial purchase and continued licenses and maintenance
- Evaluate terms of service, privacy policy, and MOU/contract that meet the following criteria:
  - o The district continues to own the data shared, and all data must be available to the district upon request.
  - o The vendor's access to and use of district data is limited; the data cannot be used for marketing, targeted advertising or data mining; and the data cannot be shared with third parties unless allowed by law and authorized by the district. If metadata is collected, it will be protected to the same extent as the district's confidential or critical information.
  - o District data will be maintained in a secure manner by applying appropriate technical, physical and administrative safeguards to protect the data.
  - o The provider will comply with district guidelines for data transfer or destruction when contractual agreement is terminated.
  - o No API will be implemented without full consent of the district.
  - o All data will be treated in accordance to federal, state and local regulations
  - o The provider assumes liability and provides appropriate notification in the event of a data

breach.

Note: Exceptions can be made by the ISO when all the criteria cannot be met for a legitimate reason while still meeting all regulatory requirements for use. Parent permission is requested from parents during the yearly online registration process for district vetted and approved applications and tools.

### **Approved Digital Resources**

In order to ensure that all digital resources used meet security guidelines and to prevent software containing malware, viruses, or other security risk, digital resources that have been vetted are categorized as Approved or Denied.

- A list of vetted software will be maintained on the District Technology Use and Student Data Privacy website.
- It is the responsibility of staff to submit a request to use a new digital resource if a resource is not listed.
- Digital resources that are denied or have not yet been vetted will not be allowed on district owned devices or used as part of district business or instructional practices.

### **Digital Resource Licensing/Use**

All computer software licensed or purchased for district use is the property of the District and shall not be copied for use at home or any other location, unless otherwise specified by the license agreement.

All staff must adhere to the following guidelines regarding digital resource licensing/use:

- Only approved district resources are to be used.
- District software licenses will be:
  - o kept on file in the technology office.
  - o accurate, up to date, and adequate.
  - o in compliance with all copyright laws and regulations.
  - o in compliance with district, state and federal guidelines for data security.
- Software installed on Timberlane Regional School District systems and other electronic devices will have a current license on file or will be removed from the system or device.
- Resources with or without physical media (e.g. downloaded from the Internet, apps, or online) shall still be properly vetted and licensed, if necessary, and is applicable to this procedure.
- Under no circumstances can staff act as a parental agent when creating student accounts for online resources; resources requiring this permission must be approved at the district level.

## **Appendix D - Data Security Checklist**

A thorough risk analysis of all Timberlane Regional School District data networks, systems, policies, and procedures shall be conducted on an bi-annual basis or as requested by the Superintendent, ISO or designee by an independent third party. The risk analysis will include internal and external vulnerability cybersecurity risk assessments and external penetration testing of the District network. An internal audit of District network security will be conducted annually by District Technology staff.

The Data Security Checklists examine the types of threat that may affect the ability to manage and protect the information resource. The analysis also documents any existing vulnerabilities found within each entity, which could potentially expose the information resource to threats. Finally, the analysis includes an evaluation of the information assets and the technology associated with its collection, storage, dissemination and protection.

From the combination of threats, vulnerabilities, and asset values, an estimate of the risks to the confidentiality, integrity and availability of the information is determined. The product of the risk analysis will be referred to as the risk assessment. The risk assessment shall be used to develop a plan to mitigate identified threats and risk to an acceptable level by reducing the extent of vulnerabilities.

### **Data Security Checklist for District Hosted Systems**

- Inventory and classification of data on system
- Types of potential threats (internal, external, natural, manmade, electronic and non-electronic)
- Physical security of system
- Location within network including network systems protection (firewall, content filter) and if system is externally facing or only allows for district network access
- Access controls including password security (can district password requirements be enforced)
- Authentication methods (LDAP/Active Directory, Single Sign On, District managed account, user managed account)
- Server/system security patch frequency
- Ability to access from mobile devices
- Ability to maintain critical system event logs
- Ability to receive notification for critical system events

### **Data Security Checklist for Provider Hosted Systems**

- Inventory and classification of data on system
- Types of potential threats (internal, external, natural, manmade, electronic and non-electronic)
- Contract, terms of service and privacy policy are current and meet district data security requirements
- Provider has adequate data security measures including data management and incident response
- Ability to ensure proper access controls including password security (can district password requirements be enforced)
- Authentication methods (LDAP/Active Directory, Single Sign On, District managed account, user managed account)
- Server/system security patch frequency
- Ability to access from mobile devices
- Notification practices in the event of a system compromise or security breach

## **Appendix E - Data Classification Levels**

### **Personally Identifiable Information (PII)**

PII is information about an individual maintained by an agency, including:

- Any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records.
- Any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

Unauthorized or improper disclosure, modification, or destruction of this information could violate state and federal laws, result in civil and criminal penalties, and cause serious legal implications.

### **Confidential Information**

Confidential Information is very important and highly sensitive material that is not classified as PII. This information is private or otherwise sensitive in nature and shall be restricted to those with a legitimate business need for access. Examples of confidential information may include: student records, personnel information, key financial information, proprietary information, system access passwords and encryption keys.

Unauthorized disclosure of this information to individuals without a business need for access may violate laws and regulations, or may cause significant consequences for district, its staff, parents, students or other stakeholders. Decisions about the provision of access to this information shall always be cleared through the data manager and/or ISO.

### **Internal Information**

Internal Information is intended for unrestricted use within the district and in some cases within affiliated stakeholders. This type of information is already widely-distributed within the district, or it could be distributed within the organization without advance permission from the information owner. Examples of Internal Information include internal policies and procedures and handbooks.

Unauthorized disclosure of this information to outsiders may not be appropriate due to copyright, legal or contractual provisions.

### **Directory Information**

Directory Information is information contained in an education record of a student that generally would not be considered harmful or an invasion of privacy if disclosed without the consent of a parent or eligible student. The school district designates the following items as directory information:

- Student's name
- Address
- Telephone listing
- Electronic mail address
- Photograph
- Date and place of birth
- Major field of study
- Dates of attendance
- Grade level
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Degrees, honors, and awards received

- The most recent educational agency or institution attended
- Student ID number, user ID, or other unique personal identifier used to communicate in electronic systems but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user
- A student ID number or other unique personal identifier that is displayed on a student ID badge, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user.

This information may only be disclosed as permitted in School Board Policy JRA and JRA-R

## **Public Information**

Public Information must be specifically approved for public release by the Superintendent or appropriate district administrator. Examples of public information may include patron mailings and materials posted to the district's website.

## **Appendix F - Securing Data at Rest and Transit**

All staff and students that log into a district owned device will be provided with several options for data storage and transmission. Staff and students will need to ensure that they are securely storing their data. Staff and students may be able to store data on the local device. It is important to note that this data is not a part of the district's continuity plan, and thus will not be backed up by the district's backup solution. Staff may also have a mapped server based personal folder. This folder acts as a redirection to district file servers. Access to these files is restricted to the folder's owner (staff who is assigned) and district enterprise administrator accounts. Staff and students using Chromebook devices have limited local storage capabilities. Chromebook users are to store their data within their GSuite for Education Drive account.

Confidential and critical information will be saved and maintained in a secure manner using encryption or other password-protected security measures. Likewise, when data is transmitted, the district will use encryption or password-protected security measures.

### **Cloud Storage and File Sharing**

The term "Cloud Storage" is used to define all types of remote server storages accessed by users through the internet. All staff and students are provided with a GSuite Or Office 365 for Education account that provides unlimited storage. Users are responsible for all digital content on their district provided GSuite or Office 365 for Education Drive. When using cloud storage, staff must adhere to the following guidelines:

- Staff and students may not access cloud storage through third party applications outside of approved internet browsers and Google Drive App on Android & iOS on One Drive for Microsoft Office. This will ensure that native operating systems do not replace cloud sharing security.
- Users need to be aware of default sharing settings on folders when they upload files. Users are required to limit sharing files to an as needed basis.
- Staff and students must ensure that any cloud storage providers used are approved by the district and meet district student data and data security standards.
- When exiting the district, students should responsibly copy their content to their own personal storage solution.
- When exiting the district, staff should ensure that they are only copying personal content that they created. Staff are prohibited from copying content that contains confidential information, student records or data.
- Data with personally identifiable information of staff or students may be posted to users' district provided Google Drive or One Drive with appropriate security settings. Users may not post this data to other cloud sharing platforms without consent of district administration.
- Staff should never post any documents labeled classified, confidential, or restricted to any cloud storage including district provided Google Drive or One Drive accounts without district approval.
- All users shall immediately report any cloud storage security problems of the district's technology resources to a teacher or administrator.
- Attempting to gain or gaining unauthorized access to cloud storage or the files of another is prohibited.
- As with other forms of district technology, district staff, students, and other GSuite for Education or One Drive users have no expectation of privacy on data stored on this platform.

The term "File Sharing" is used to define all activities that share access to digital information whether in the cloud or on district administered mapped drives. When file sharing, staff must adhere to the following guidelines:

- Users must abide by all policies and procedures regarding professional conduct and

communication when sharing, reviewing, updating, commenting and re-sharing.

- When sharing content, users must ensure that other users accessing the information in the files have appropriate access to the information based on job function.
- All users shall immediately report any inappropriate sharing of the district's technology resources to an administrator.

## **External Storage Devices**

The term "External Storage Devices" is used to define all portable storage devices (including USB drives, rewritable CD/DVD, memory cards, and external hard drives) used by staff and students. While the district recognizes the advantages for staff and students to maintain information on these devices, users are strongly encouraged to rely on their district provided GSuite for Education Drive account for all storage needs. When using external storage devices, staff must adhere to the following guidelines:

- Users are responsible for all content on external storage devices that have been connected to district technology resources.
- Users must ensure that they will not introduce harmful software including computer viruses, malware, non-district approved software, or hacking tools to district technology resources.
- Users must ensure that the data will remain secure through appropriate encryption or password protection when transferring files containing PII or protected information to an external storage device. Users should only keep the information stored on the external device for the duration of the project, and then promptly remove.
- Staff should never transfer any documents labeled classified, confidential, or restricted to any external storage device.
- Staff should never transfer or create confidential data or student records on personal storage devices.

## **File Transmission Practices**

- Staff are responsible for securing sensitive data for transmission through email or other channels. When possible, staff should de-identify or redact any PII or confidential information prior to transmission.
- Staff should never include a password in any electronic communication unless directed to do so by Technology Staff.
- Staff should not transmit files labeled classified, confidential, or restricted through email or third party file transfer services without district approval.
- Regular transmission of student data to services such the District Library Management system, Food Service Management system and Single Sign On Provider system is managed by the technology department using a secure data transfer protocol. All such services are approved by a district/building administrator and the Director of Technology.

## **Credit Card and Electronic Payment**

Users of systems that process electronic payments, including but not limited to processing credit card information, must adhere to strict guidelines regarding the protection of payment information and cardholder data. These users are responsible for adhering to the following requirements and appropriate level of PCI compliance when handling such data:

- Never store cardholder data on district systems or in written form. All cardholder data may only be entered in secured payment systems approved by the district. Any cardholder data collected in written form must be shredded immediately after entry into approved system.
- The district will never maintain a data system for payment information. All payment information will be stored and processed by a 3rd party accessible through a secure portal.

- Never request cardholder information to be transmitted via email or any other electronic communication system. The district will employ measure to help flag emails that contain this information.
- Payment information shall be entered directly into the approved payment system by individual making payment. If the individual is not able to directly input the payment, designated staff may gain verbal approval for the payment process either in person or via phone (after identification is verified). If verbal payment information is received, that information must be entered directly into the payment system and not written down during the process.
- If payment information is collected via a physical form, that form must be shredded or payment information redacted immediately upon receipt and entry into payment system.

## **Appendix G - Physical Security Controls**

The following physical security controls shall be adhered to:

- Network systems shall be installed in an access-controlled area. The area in and around the computer facility shall afford protection against fire, water damage, and other environmental hazards such as power outages and extreme temperature situations.
- Monitor and maintain data centers' temperature and humidity levels.
- File servers and/or storage containing PII, Confidential and/or Internal Information shall be installed in a secure area to prevent theft, destruction, or access by unauthorized individuals.
- Ensure network systems and network equipment are properly secured to prevent unauthorized physical access and data is properly safeguarded to protect from loss.
- Computers and other systems shall be secured against use by unauthorized individuals. It is the responsibility of the user to not leave these devices logged in, unattended, and open to unauthorized use.
- Monitor and control the delivery and removal of all data-storing technological equipment or systems. Maintain a record of all such items entering or exiting their assigned location using the district approved technology inventory program. No technology equipment regardless of how purchased or funded shall be moved without the explicit approval of the technology department.
- Ensure that technological equipment or systems being removed for transfer to another organization or being designated as surplus property is appropriately sanitized in accordance with applicable policies and procedures (see Appendix I: Asset Management).

## **Appendix H - Asset Management**

Data security must be maintained through the life of an asset, including the destruction of data and disposal of assets. Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device may be referred to as a system, asset or device.

All involved systems and information are assets of the district and are expected to be protected from misuse, unauthorized manipulation, and destruction.

### **Inventory**

All technology devices or systems considered an asset are inventoried by the technology department. This includes, but is not limited to, network appliances, servers, computers, laptops, mobile devices, and external hard drives. The technology department will conduct annual inventory verification of all district devices. It is the responsibility of the technology department to update the inventory system to reflect any in-school transfers, in-district transfers, or other location changes for district technology assets.

### **Disposal Guidelines**

Assets shall be considered for disposal in accordance with state/federal regulations and School Board Policy DN. The following considerations are used when assessing an asset for disposal:

- End of useful life
- Lack of continued need
- Obsolescence
- Wear, damage, or deterioration
- Excessive cost of maintenance or repair
- Salable value

The Director of Technology shall approve disposals of any district technology asset.

### **Methods of Disposal**

Once equipment has been designated and approved for disposal, it shall be handled according to policy [DL \(School Properties Disposal Procedure\)](#).

# **Appendix I - Virus, Malware, Spyware, Phishing and SPAM Protection**

## **Virus, Malware, and Spyware Protection**

Timberlane Regional School District PC desktops, laptops, and file servers are protected using enterprise virus/malware/spyware software. Definitions are updated daily and an on-access scan is performed on all “read” files continuously. A full scheduled scan runs weekly. A full scheduled scan is performed on all servers weekly during non-peak hours. All files and systems are scanned.

## **Internet Filtering**

Student learning using online content and social collaboration continues to increase. The Timberlane Regional School District views Internet filtering as a way to balance safety with learning—letting good content, resources, and connections in while blocking the bad. To balance educational Internet resource and application use with student safety and network security, the Internet traffic from all devices on the district network is routed through the district firewall and content filter. Filtering levels are based on the role of the user, staff or student and student grade level. All sites that are known for malicious software, phishing, spyware, etc. are blocked.

## **Phishing and SPAM Protection**

Email is filtered for viruses, phishing, spam, and spoofing using Google and Office 365 services.

## **Security Patches**

Server patch management is performed regularly. Security patches are applied on an as needed basis. The district utilizes a Microsoft WSUS server (Windows Server Updates Services) to distribute approved updates.

## **Appendix J - Account Management**

Access controls are essential for data security and integrity. The Timberlane Regional School District maintains a strict process for the creation and termination of district accounts. All new staff accounts are authorized through an HR hiring process prior to creation. Role-based permissions are used to establish access to all systems. Access security is audited at least annually or whenever access permission requirements are changed for a particular application/software or when an application/software is no longer necessary.

### **Staff Accounts**

When a staff member is hired by the Timberlane Regional School District, the following process ensures that each staff member has the correct access and permissions to the resources that are required for their position.

- Notification of new staff member is sent from Human Resources to the Technology Department. This notification includes position, building assignment(s), and start date.
- Only after notification has been received from Human Resources, the Technology Department creates user accounts. The user is given access and permissions to the necessary resources based on their position and building assignment(s) (see Appendix K: Data Access Roles and Permissions).
- Any exception to permissions must be approved by the district administrator responsible for the system (data manager) and the Director of Technology.

When a staff member's employment is ended, either by termination or resignation, account permissions are revoked in one of two ways.

- In the event of termination, HR will notify the Technology Department via email or phone call requiring the account to be disabled at once, preventing any further access to district resources.
- In the event of resignation, HR will notify the Technology Department via email indicating the termination date. The account is disabled at the end of business on the termination date, preventing further access to district resources.
- In the event that a user having elevated permissions to any system separates from the district, additional measures are taken to ensure that all elevated accounts to those systems are secure.

### **Local/Domain Administrator Access**

Only members of the District Technology staff will be granted access to domain level administrator and local machine administrator accounts in order to complete their job functions.

### **Remote Access**

Access into the District's network from outside is strictly prohibited without explicit authorization from the ISO. Remote access will be granted through virtual private network (VPN) connection through the district's network VPN appliance; no other method of remote access shall be granted without explicit authorization from the ISO. PII, confidential information and/or Internal Information that is stored or accessed remotely shall maintain the same level of protection as information stored and accessed within District's network.

In the event that VPN access is needed by a contractor/vendor, access must be approved by the ISO. The Network Administrator will establish the contractor account, only granting access to the server/application that the contractor/vendor supports.

All VPN accounts will be reviewed at least annually.

### **Contractors/Vendors**

Access to contractors/vendors is governed through the same process using School Board Policy EHAB. All contractor/vendor access must be approved by HR and ISO. All contractors doing business on district premise

must also pass a background check unless other security measures are addressed in a vendor contract. All contractors/vendors accessing district data will be considered on premise users. Once the approval has been obtained, the technology department will create the account.

## **Appendix K - Data Access Roles and Permissions**

### **Student Information System (SIS)**

Staff are entered into the Timberlane Regional School District's student information system. Only staff whose roles require access are provided accounts for the system. The following minimum information is entered for each staff member:

- Building/Site location
- Status - Active
- Staff Type
- District Email Address
- Primary Alert Phone Number and Cell phone number

Access accounts for the District's SIS are setup based on staff role/position, building and required access to student data and are assigned by the Director of Technology or designee. Teacher accounts are created for all staff responsible for taking student attendance and entering and maintaining grades. Teacher accounts login to the SIS Teacher Portal. Staff assigned a Teacher account only have access to students they teach or provide services to. Administrative accounts are created based on the staff member's role/position and function and further restrictions to data are controlled through security groups. Security groups control access permissions to certain data sets such as attendance, demographic data, grades, discipline etc. and whether the staff member can view or maintain data. Additional page level permissions are assigned to the security groups. PowerSchool administrative accounts log into the SIS Admin Portal.

#### **Security Groups**

- Administrator
- Guidance Staff
- School Administrator
- Administrative Assistant
- School Nurses
- Unassigned - no access

\* A complete list of permissions is kept on file in the technology department.

### **Financial System**

All staff members are entered into the District's financial system for the purpose of staff payroll and HR tracking. Staff access to their individual payroll information is granted through the employee portal. Only staff requiring access are provided accounts for the financial/personnel system.

After basic information and user ID are created, a security role is assigned to the account granting them access to designated areas of the financial system to complete their job responsibilities.

#### **Financial System Security Roles**

- AP/GL (Accounts Payable), General Ledger)
- AP/GL/PR (Accounts Payable, General Ledger, Payroll)
- Full Access
- HR Admin Asst
- HR Director
- HR Review

- IT Processing
- Payroll
- PR/HR (Payroll, Human Resources)
- Principals/Directors
- Remote (Admin Assistants at schools)
- Remote SPED Only

\* A complete list of permissions is kept on file in the technology department.

## **Special Education System**

The State of New Hampshire provides the District access to the NH Special Education Information System (NHSEIS) that houses all student IEP information. Access accounts to NHSEIS is maintained by the District's Director of Special Services office through the MyNHDOE single sign on portal. A user role determines the user's authority and applicable permissions within the NHSEIS system. The established roles are as follows:

- School Administrator
- Provider
- Case Manager
- District IT Administrator
- IEP Team Member
- District Administrator
- SAU System Administrator
- SAU System Staff
- General Ed Teacher
- SAU District Administrator

The following user roles access NHSEIS through the MyNHDOE portal: Case Manager, District Administrator, District IT Administrator, SAU District Administrator, SAU System Administrator, SAU System Staff, and School Administrator. The remaining user roles, Provider, General Ed Teacher and IEP Team Member access NHSEIS through a SAU specific web address.

## **Health Software System**

School District Nurses, Nurse Substitutes and Technology Staff are the only staff members granted access to the District's Health Software system. Technology Staff access is for the purpose of upgrades, and technical support for the use of the system. The medical data that is collected and maintained by the school nurses on the system includes immunizations, conditions, medications, and clinic logs (Time in/out of clinic and action taken). School nurses are the only accounts that can view and maintain medical information.

## **Food Services System**

The District uses a Food Services software management system to track data and perform functions necessary for the efficient operation of the Food Service Program. Food service staff are granted accounts with access to only the parts of the system that are necessary to complete their job functions. Technology Staff access is for the purpose of upgrades, and technical support for the use of the system and cash registers. SAU Staff has access to data to comply with state and federal reporting.

\* A complete list of permissions is kept on file in the technology department.

## Appendix L - Password Security

The District requires the use of strictly controlled passwords for network access and for access to secure sites and information. All passwords to district systems shall meet or exceed the below requirements.

- Passwords shall never be shared with another person.
- When possible, user created passwords should adhere to the same criteria as required for district network access as outlined below.
- Passwords shall never be saved when prompted by any application with the exception of single sign-on (SSO) systems as approved by the Technology Department.
- Passwords shall not be programmed into a computer or recorded anywhere that someone may find and use them.
- When creating a password for secure information or sites, it is important **not** to use passwords that are easily guessed due to their association with the user (i.e. children's names, pets' names, or birthdays).
- Users and staff who have reason to believe a password is lost or compromised must notify the Director of Technology or designee as soon as possible. The technology department will verify the identity of the person requesting the change before resetting the password.
- Passwords will be expired and forced to be changes at least once per calendar year.

District network access to resources managed through Active Directory/Google Accounts:

- Passwords must be "strong," and must be a minimum of 8 characters long, must include at least one uppercase character, one number and one special character (! @ # \$ % & ?)
- Passwords will only be changed in the event the user shares their password with another staff member or they believe their account has been hacked.
- Your password must not be too similar to your username.
- Do not use your district password for any non-district systems.

Where possible, system software should enforce the following password standards:

- Passwords routed over a network shall be encrypted.
- Passwords shall be entered in a non-display field.
- System software shall enforce the changing of passwords and the minimum length.
- System software shall disable the user password when more than five consecutive invalid passwords are given.

# **Appendix M - Technology Disaster Recovery Plan**

## **Objectives**

The primary purpose of the Technology Disaster Recovery Plan (TDRP) is to enable the Timberlane Regional School District (Timberlane Regional) to respond effectively and efficiently to a natural disaster or critical failure of the district's data center and/or core systems. The objectives during a natural disaster or critical failure are the following:

- Minimize the loss or downtime of core systems and access to business critical data.
- Recover and restore the district's critical systems and data.
- Maintain essential technology resources critical to the day to day operations of the district.
- Minimize the impact to the staff and students during or after a critical failure.

## **Planning Assumptions**

The following planning assumptions were used in the development of Timberlane Regional's TDRP:

- There may be natural disasters that will have greater impact than others.
- There will be factors that are beyond the department's control or ability to predict during a disaster.
- There is the possibility of complete loss of the current data center.
- We will have adequate storage to recover systems.
- District data is housed at district data center and backed up in the cloud.
- District data is hosted by 3rd party providers.
- In the event of a critical failure to network infrastructure in the datacenter, District networking may be significantly impacted.

## **Disaster Recovery/Critical Failure Team**

The Timberlane Regional School District has appointed the following people to the disaster recovery/critical failure team:: Director Technology, Business Administrator, Business Operations Coordinator and all Senior Technology Specialists.

In the event the TDRP is activated, overall management of the response is delegated to this team. Their primary responsibilities include:

- Determining the impact of the natural disaster/critical failure.
- Communication of impact and or loss, and updates of progress to the Superintendent.
- Communication of outages and updates to district staff.
- Oversight of the TDRP implementation and restoration of critical systems and data.
- Allocation and management of technology staff during the event.
- Working with manufacturers and/or vendors during the recovery and restoration of critical systems and data.
- Oversight of TDRP implementation debrief.

## **Activation**

The TDRP will be activated in the event of the following:

- A natural disaster has occurred and affects the operation of the District’s data center(s)r. A natural disaster includes but is not limited to the following: tornado, earthquake, lightning, and flood.
- A fire has impacted the data center.
- Water or flooding has impacted the data center.
- Critical system failure.

The Information Security Officer (ISO) will act as the incident response manager (IRM). If the ISO is not able to act as the IRM, a member of the Superintendent’s Leadership Team will assume the role of IRM, with assistance from the IRT.

## **Notification**

The following groups, if affected, will be notified in the event the plan has been activated:

- Superintendent
- Superintendent's Leadership Team
- Technology Staff
- District Staff
- Parents and Students
- Vendors

Information will be disseminated to the above groups through whichever means of communication is available at the time. This could include any one or combination of the following:

- Phone
- Email
- Social Media/Website
- Radio or Television

The TDRP team will work with the Superintendent on which information will be conveyed to each above group and what means will be used.

## **Implementation**

The TDRP team has the following in place to bring the District back online in the least of amount of time possible:

- Maintained spreadsheet listing all server names , physical and virtual, and their function. A hard copy of this document will be secured at the technology office. An electronic version will be housed on Google Drive.
- Maintained secure application to store all system administrator accounts, passwords and vendor contact information. This will be accessible only to applicable Technology Staff who need access to perform their job functions.
- The District’s locally data backup solution includes the use of a daily local backup and off-site file storage. The local backup copy will be sent offsite for storage on a daily basis.
- The District’s cloud based applications will be backed up daily and stored securely off site.

- In the event of a critical system failure, the District can restore that server back to our current environment from the backup solution.

## **Deactivation**

The TDRP team will deactivate the plan once services are fully restored.

## **Evaluation**

An internal evaluation of the Timberlane Regional TDRP response will be conducted. This will entail gathering documentation from the response and feedback from all stakeholders and incorporate into an after action report and corrective action plan. The result will be an update to the TDRP and other emergency response plans as appropriate.

# **Appendix N - Data Breach Response Plan**

## **Objectives**

The purpose of the Technology Data Breach Plan (TDBP) is to enable the Timberlane Regional School District to respond effectively and efficiently to an actual or suspected data breach involving personally identifiable information (PII), confidential or protected information, district identifiable information and other significant cybersecurity incident. The objectives of the TDBP are:

- Convene the Incident Response Team (IRT) as necessary.
- Validate and contain the data security breach.
- Analyze the breach to determine scope and composition.
- Minimize impact to the staff and students after a data breach has occurred.
- Notification of data owners, legal counsel, state/federal agencies and law enforcement as deemed necessary.

## **Planning Assumptions**

The following planning assumptions were used in the development of Timberlane Regional TDBP:

- There may be data breaches that will have greater impact than others.
- There will be factors that are beyond the department's control or ability to predict during a data breach.
- District data is backed up.
- Some District data is hosted by 3rd party providers.

## **Data Breach/Incident Response Team**

Timberlane Regional has appointed the following people to the data breach/incident response team: Director of Technology, Business Administrator, Business Operations Coordinator, Director of Human Resources, Director of Student Services and all Senior Technology Specialist.

In the event the TDBP is activated, overall management of the response is delegated to this team. Their primary responsibilities include:

- Determine the nature of the data compromised and its impact to staff, students and the district itself.
- Communicate impact, the number of affected individuals, the likelihood information will be or has been used by unauthorized individuals and updates of progress to the Superintendent and Business Administrator.
- Coordinate with Superintendent to ensure communication with district staff and or parents as deemed appropriate.
- Oversight of the TDBP implementation and data breach resolution.
- Allocate and manage technology staff resources during the event.
- Work with vendors, 3rd party providers, manufacturers, legal counsel, district data breach insurance provider, state/federal agencies and law enforcement while correcting the data breach and its repercussions.

- Oversight of TDBP implementation debrief.

## **Activation**

The TDBP will be activated in the event of the following:

- A data breach has occurred and affects the district itself. A data breach includes but is not limited to an incident in which sensitive, protected or confidential data has potentially been viewed, stolen or used by an individual unauthorized to do so.
- Personal Health Information (PHI) has been compromised.
- Personally Identifiable Information (PII) has been compromised.
- Confidential or sensitive data has been compromised.
- Network hack/intrusion has occurred.

The Information Security Officer (ISO) will act as the incident response manager (IRM). If the ISO is not able to act as the IRM, a member of the Superintendent's Leadership Team will assume the role of IRM, with assistance from the IRT. The breach response and reporting process will be documented according to state and federal requirements. The Director of Technology will work with the Superintendent to dispense and coordinate the notification and public message of the breach.

## **Notification**

The following groups will, if affected, be notified in the event the plan has been activated:

- Superintendent
- Superintendent's Leadership Team
- Technology Staff
- District Staff
- Parents and Students
- Vendors

Information will be disseminated to the above groups through whichever means of communication deemed appropriate. This could include any one or combination of the following:

- Email
- Social Media/Website
- Radio or Television
- Written Notice
- Phone

The TDBP team will work with district leadership on which information will be conveyed to each above group, timing of that communication and what means will be used.

## **Implementation**

The TDBP team has the following processes in place to contain the data breach in the least of amount of time

possible:

- Data inventory of all systems containing sensitive data. A hard copy of this document will be secured at the technology office. An electronic version will be housed on the Technology Departments Team Drive.
- Data dictionary of all district hosted information systems. A hard copy of this document will be secured at the technology office. Due to non-disclosure agreements, this data may not be available in other locations/formats. The appropriate vendor(s) can be contacted for this information.
- Maintained spreadsheet listing all server names, physical and virtual, and their function. A hard copy of this document will be secured at the technology office. An electronic version will be housed on the Technology Departments Team Drive.
- Maintained secure application to store all system administrator accounts, passwords and vendor contact information. This will be accessible only to applicable Technology Staff who need access to perform their job functions.
- The District's data backup solution includes the use of a backup manager and off-site file storage, which backs up data locally in the datacenter and offsite.

The following will take place during the incident response:

- The members of the IRT will be assembled once a breach has been validated. The IRT will be comprised of the Director of Technology, Business Administrator, Business Operations Coordinator, Director of Human Resources, Director of Student Services and all Senior Technology Specialist. Additional members of the Timberlane Regional School District's administrative team and technology department may be designated to assist on the IRT.
- The IRT will determine the status of the breach, on-going, active, or post-breach. For an active and ongoing breach, the IRT will initiate appropriate measures to prevent further data loss. These measures include, but are not limited to, securing and blocking unauthorized access to systems/data and preserving any and all evidence for investigation.
- The IRT will work with the data managers and data owners to determine the scope and composition of the breach, secure sensitive data, mitigate the damage that may arise from the breach and determine the root cause(s) of the breach to devise mitigating strategies and prevent future occurrences.
- The IRM will work with legal counsel and the Superintendent's Leadership Team to determine appropriate course of action pursuant to state statute. This includes notification of the authorities, and local law enforcement.
- Collaboration between the authorities and the IRT will take place with the IRM. The IRT will work with the proper authorities to make sure any and all evidence is properly handled and preserved.
- On advice from legal counsel, an outside party may be hired to conduct the forensic investigation of the breach. When the investigation has concluded, all evidence will be safely stored, recorded or destroyed (where appropriate).
- All affected data, machines and devices will be identified and removed from the network as deemed appropriate for the investigation. Interviews will be conducted with key personnel and facts of the incident will be documented and the evidence preserved for later examination.
- The IRT will work with the Superintendent's office to outline the notification of the data owners and those affected. Communication will be sent out as directed by legal counsel and advised by the district communications team. The types of communication will include, but not limited to, email,

text message, postal mail, substitute notice and/or phone call.

- The IRM, in conjunction with the IRT, legal counsel and the Superintendent's Leadership Team will determine if notification of affected individuals is necessary. Once the determination is made to notify affected individuals, a letter will be written in accordance with all federal and state statutes, and local procedures. If it is determined that identity theft or other fraud is not reasonably likely to occur as a result of the breach, such a determination shall be documented in writing and filed at the Superintendent's office.

## **Deactivation**

The TDBP team will deactivate the plan once the data breach has been fully contained.

## **Evaluation**

Once the breach has been mitigated an internal evaluation of the Timberlane Regional School District's TDBP response will be conducted. The IRT, in conjunction with the IRM and others that were involved, will review the breach and all mitigation steps to determine the probable cause(s) and minimize the risk of a future occurrence. Feedback from the responders and affected entities may result in an update to the TDBP and other emergency response plans as appropriate. Information security training programs will be modified to include countermeasures to mitigate and remediate previous breaches so that past breaches do not recur. The reports and incident review will be filed with all evidence of the breach.