AGENDA – Wednesday, August 19, 2026

REGIONAL SCHOOL DISTRICT NO. 7
BOARD OF EDUCATION
6:00 p.m.
Newbury Library Media Center

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

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

1.0 CALL TO ORDER

2.0 PUBLIC PORTION

3.0 APPROVAL OF MINUTES

3.1 July 7, 2026, Special BOE Meeting Minutes

4.0 REPORTS

4.1 Principals' Report - R. Cornelius, G. Franklin
4.2 Superintendent's Report – S. LePage
4.3 Director of Finance and Operations – J. Gaskins

5.0 OLD BUSINESS

5.1 Updates
5.2 Discussion and Possible Action on BOE Goals

6.0 NEW BUSINESS

6.1 New Hire Report
6.2 Discussion and First Reading of Policies below:

a. Grievance Procedure for Section 504, Title IX, Title VII Regulations	0525.1
b. Mission Statement	0100
c. Nondiscrimination	0521
d. Medical Reimbursement for Special Education Students	3231
e. Compliance with 504 Regulations	3511
f. *RESCIND:* Operations of School During Covid-19 Pandemic	3516.2
g. Data-Based Information Management System	3520.13
h. Pesticide Application and Integrated Pest Management (IPM) (Replace the Current 3524.14 and 1322)	3524.1
i. Transportation Safety Complaints (replaces 3549.9)	3541.5
j. Free and Reduced Priced Meals	3542

7.0 CORRESPONDENCE

7.1 Letter of Resignation - MS Special Education Teacher - Amy Bardino
7.2 Approval of New Hire - MS Special Education Teacher- Samantha Pine

8.0 OPPORTUNITY FOR THE PUBLIC TO SPEAK ON AGENDA ITEMS

9.0 ADJOURNMENT

Enclosures:

July 7, 2026, BOE Minutes
New Hire Report
BOE Policies for 1st Reading

a. Grievance Procedure for Section 504, Title IX, Title VII Regulations	0525.1
b. Mission Statement	0100
c. Nondiscrimination	0521
d. Medical Reimbursement for Special Education Students	3231
e. Compliance with 504 Regulations	3511
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Letter of Resignation- Amy Bardino

Next Meeting: September 9, 2026 , @ 6:00 p.m. – Newbury Library Media Center
September 23, 2026, @ 6:00 p.m. – Newbury Library Media Center

Members of the public are also welcome to submit comments through publicinput@nwr7.org. These emails will be included during the Public Comment portion of the meeting. Thank you.

REGIONAL SCHOOL DISTRICT NO.7
Newbury Library Media Center
Board of Education Special Meeting
July 7th, 2026- 6:00pm.

MINUTES

DRAFT

PRESENT: Chair Ms. Molly Sexton Read (B), Vice Chair Mr. Rob Jerram (NH), Ms. Terri Kenneson (C), Ms. Deb Bell (N), Ms. Kim Crone (N),Secretary / Treasurer, Mr. Noel Gauthier (NH), Director of Finance & Operations, Mr. James Gaskins, and Superintendent Steven K. LePage.
Absent: Student Representatives, Mia Doyle and Amaya Washington, High School Principal, Mr. Gary Franklin, Middle School Principal, Mr. Ryan Cornelius, Ms. Lisa Fragale (C), Ms. Mimi Duran (B).

1.0 CALL TO ORDER

Molly Sexton Read called the meeting to order at 6:05pm.

2.0 PUBLIC PORTION

None.

3.0 APPROVAL OF MINUTES

3.1 June 24, 2026, Regular Board of Education Meeting

MOTION by Kim Crone, seconded by Noel Gauthier, to **APPROVE** the June 24, 2026, Regular Board of Education meeting minutes, as amended. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

4.0 REPORTS

4.1 Superintendent's Report - S. LePage

- **Board Retreat & Goals:** Superintendent LePage thanked the Board for a productive retreat and goal-setting session. The four draft district goals have been slightly reworked for clarity and are placed under Old Business for review.
- **Matriculation Data:** Followed up on a previous request regarding post-graduation data. Six-year graduation and outcome data from the clearinghouse will be utilized to track student pathways.
- **Hallway Review Committee:** A walkthrough of the high school and middle school took place this morning with five committee members. The committee identified damaged, outdated, or overly busy items for removal or storage to establish a cleaner, collegiate, and branded aesthetic. Notable items include relocating the butterfly artwork by a prominent artist and organizing student activity/club boards within the cafeteria hallway.

- **Communication Norms:** A set of communication guidelines was shared with the administrative team to minimize off-hours noise and establish healthier digital boundaries (e.g., utilizing scheduled emails). A formal presentation will be given to staff before the start of the school year.
- **Key Upcoming Dates:** The Administrative Summit is scheduled for August 18th (location TBD). New staff orientation and the Instructional Leader Summit will follow on August 19th with all teachers returning on August 24th.

4.2 Director of Finance and Operations - J. Gaskins

- **Summer Facilities Projects:**
    - **Bleachers:** The new bleachers have been ordered. Due to a custom red color-matching request, delivery is expected in November. Installation will take approximately seven days, requiring the rescheduling of one or two athletic events.
    - **Flooring & Carpeting:** VCT tile replacement is underway to remove remaining carpet in the counseling, SRO, and math/English offices, as well as one classroom. The trainer's room flooring and cabinetry are being redone, followed by epoxy flooring installation at the athletic entrance.
    - **Server Replacement:** Scheduled to take place from July 20th to July 24th as part of routine tech lifecycle updates.
    - **Painting:** Painting begins in the auxiliary gym tomorrow. Starting July 13th, 12 middle school classrooms will be repainted.
    - **Science Department Fume Hood:** Ordered to comply with the OSHA report; installation will be scheduled upon delivery.
    - **Track Repairs:** Minor root penetration was discovered under a small section of the track. Keith Boyle met with the repair company today to coordinate the maintenance work.
    - **HVAC Units:** Aged-out mini-split air conditioning units in the Vo-Ag library and aqua room are being replaced.
- **Alternative Funding Projects:**
    - A new hot lunch serving station is being purchased using food service program surplus funds.
    - An animal shed with added water and electricity will be installed in the upper paddock on Battistoni Drive, funded through surplus funds.
    - Fire alarm panels are being replaced using grant funding.
- **Budget Update:** As of July 1st, the FY 2025-2026 assessment offset is projected at $793,000 ($28 under the prior year), remaining exactly on target. The FY 2026-2027 budget is currently in excellent standing.

5.0 OLD BUSINESS

5.1 Updates

Included in the Superintendent and Director of Finance reports.

5.2 BOE Goals

The Board reviewed the updated draft of the district goals. A minor grammatical edit was noted by Kim Crone to remove an unnecessary comma in District Goal 3 ("increased authentic career experiences"). Board members are requested to submit any final edits to Superintendent LePage prior to the August 19th meeting, where the goals will be presented for formal adoption.

6.0 NEW BUSINESS

6.1 Review and Discussion of Facilities Condition Assessment Energy Audit

The Board received the draft report from Kaestle Boos Associates and Bureau Veritas last Wednesday.

- **Areas Noted in Poor Condition:** The roof, sidewalks, retaining wall, field drainage, exterior HVAC system, parking lots, and elevator cab.
- **Board Discussion:** Initial review indicates that some estimated costs in the draft are heavily exaggerated (such as a $2M–$4M estimate for the retaining wall, which is structurally intact but experiencing surface deterioration/crumbling of the pre-material block faces).
- **Next Steps:** The report recommends a civil engineering study on site drainage for the athletic fields. The administration will schedule a formal review meeting with the consultants to thoroughly vet the data and refine the pricing estimates before the final version is released.

6.2 2nd Reading and Possible Action of Policies

The Board conducted a second reading of the following updated policies driven by recent legislative shifts:

Discussion: The Board discussed incorporating specific local feedback, clarifying several aspects of the policies including language regarding K-12 designations, and areas for review based on recent legal decisions.

- *a. Health Assessments and Immunizations 5141.3*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5141.3 Health Assessments and Immunizations, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *b. Reporting of Child Neglect 5141.4/R5141.4*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5141.4/R5141.4 Reporting of Child Neglect, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *c. Use of Physical Force 5144.1*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5144.1 Use of Physical Force, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *d. Restraint and Seclusions Law In CT (Appendix)*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5144.1 Use of Physical Force, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *e. Protective Measures Procedures (Appendix) 5144.1 A / 5144.1 C*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Appendix #5144.1A/ 5144.1C Restraint and Seclusions/ Protective Measures Procedures, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *f. Protective Measure Report (Appendix) 5144.1 D*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Appendix #5144.1D Protective Measure Report, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *g. Form #1 Physical Restraint Report Form 5144.1 Form #1*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5144.1 Form #1, Physical Restraint Report Form, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *h. Form #2 Seclusion Report Form 5144.1 Form #2*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5144.1 Form #2, Seclusion Report Form, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *i. Form #3 State Incident Report 5144.1 Form #3*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5144.1 Form #3, State Incident Report, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *j. Sexual Abuse Prevention & Education- Student Opt Out Form 5145.511*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Policy #5145.511 Opt-Out Form, Sexual Abuse Prevention and Education, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

- *k. Title IX 5145.44*

  MOTION by Terri Kenneson, seconded by Kim Crone, to **APPROVE** Title IX 5145.44, as presented. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

7.0 CORRESPONDENCE

None.

8.0 OPPORTUNITY FOR THE PUBLIC TO SPEAK ON AGENDA ITEMS

None.

9.0 ADJOURNMENT

MOTION by Terri Kenneson, seconded by Noel Gauthier, to **ADJOURN** at 6:54 p.m. **AYE:** Ms. Sexton Read, Mr. Jerram, Mr. Gauthier, Ms. Kenneson, Ms. Bell, Ms. Crone. **NAY:** None. **ABSTAIN:** None. **MOTION PASSED.**

REGIONAL SCHOOL DISTRICT NO. 7
NEW HIRE REPORT 2026- 2027 SY

KARA TIERNEY - 1.0 High School English Teacher - Grades 9-12

Replacing Kimberly Russ, who has retired at the end of the 2026 SY
BA in Arts in English and American Studies, University of CT
MA in Curriculum and Instruction, University of CT
High School Teacher Quinebaug Middle College (EASTCONN), South Windsor, CT
Long-term substitute position at South Windsor Public High School (HS English), South Windsor, CT
Long-term substitute position at Stafford Springs Public School (MS Health), Stafford Springs, CT
MA Step 6

COOPER FLEMING- 1.0 High School PE/Health Teacher - Grades 9-12

Replacing Robert Delaney, who resigned his position effective March 20, 2026
BA in Physical Education, Minor in Health, Castleton University, Castleton, VT
PE Teacher, Maple Run Unified School District, St. Albans, VT
Program Leader, Maple Run Unified School District, St. Albans, VT
Long Term Substitute, Greater Rutland County Supervisory Union, Proctor, VT
Division III Wrestling NCAA Qualifier, NCAA NE Regional Wrestling Champion
BA Step 4

AARON (AJ) BUNEL - 1.0 Director of Athletics and Student Affairs

New Position for 2026-2027
BA of Arts: Music, University of CT
MA of Science: Education, University of Bridgeport, Bridgeport, CT
MA of Education: Educational Administration, Lamar University, Beaumont, TX
Assistant Principal at John Trumbull Primary School, Watertown, CT
Athletic Director, Watertown High School, Watertown, CT
Emergency Management Coordinator, Thomaston Public Schools, Thomaston, CT
Music Teacher, Thomaston Public Schools, Thomaston, CT
Athletic Director, Thomaston Public Schools, Thomaston, CT
Advisory Program Director, Thomaston Public Schools, CT
Varsity Boys Basketball Coach, Thomaston Public Schools, Thomaston, CT

REGIONAL SCHOOL DISTRICT NO. 7
NEW HIRE REPORT 2026- 2027 SY

REEGAN BLORE - 1.0 High School English Teacher - Grades 9-12

Replacing Mary Radziewicz, who has resigned the end of the 2026 SY
University of New Hampshire (2022-2023)
BA in Science/Secondary Education in English- Western CT State University (2026)
Student Teaching: Region 1 and Bethel Public Schools
BA Step 1

SAMANTHA PINE - 1.0 Middle School Special Education Teacher - Grades 7-8

Replacing Amy Bardino, who has resigned to work for Shared Services yet still
In the RSD7 Middle School
Eastern CT State University
BA in English and Secondary Education (June 2024)
MA in Special Education (December 2025)
Student Teaching: Thomaston High School
MA Step 1

Mission - Goals - Objectives

Anti-Racism (Confronting Racism in Schools)

The Northwestern Regional District No. 7 Board of Education (Board) rejects all forms of racism as destructive to the Board's mission, vision, values, and goals. The Board is committed to the following principles:

1. Establishing and sustaining a school community that shares the collective responsibility to address, eliminate, and prevent actions, decisions, and outcomes that result from and perpetuate racism.

2. Eliminating inequitable practices and cultivating the unique gifts, talents, and interests of every child to end the predictive value of social or cultural factors, such as race, class, poverty or gender, on student success.

3. Respecting and championing the diversity and life experiences of all community members to support the District's mission, vision, values, goals, and objectives.

4. Acknowledging that racism is often compounded by other forms of discrimination, including, but not limited to, those protective classes referenced in policy 0521, "Nondiscrimination."

Purpose

Personal and institutional racism have historically existed and may continue to exist in the District and community. Combating racism in the schools is a legal and moral imperative.

There is evidence of significant disparities between racial groups in student academic performance, achievement, and participation in academic programs. These include disparities in graduation rates, gifted identification, course participation, special education identification, standardized test scores, and suspension and expulsion rates. Disparities also exist between the racial demographics of the students in the District and the staff hired.

These equity gaps exist because of inequitable access to opportunities that have significant intergenerational effects and perpetuate economic, social, and educational inequity. However, racial inequities were created over time and can be eliminated. Similarly, personal prejudice is learned and can be unlearned. Educators play a vital role in reducing racism and inequity by recognizing the manifestations of racism, creating culturally inclusive learning and working environments, and dismantling educational systems that directly or indirectly perpetuate racism and privilege through teaching, policy, and practice.

The purpose of this policy is to eliminate all forms of racism from the District in conjunction with related Board policies.

Definitions

1. **Anti-Racism:** the practice of identifying, challenging, and changing the values, structures, and behaviors that perpetuate systemic racism.

2. **Individual Racism:** pre-judgment, bias, or discrimination by an individual based on race. Individual racism includes both privately held beliefs, conscious and unconscious, and external behaviors and actions towards others.

3. **Institutional Racism:** means the collective failure of a public or private organization to provide an appropriate and professional service to people because of their race, color, culture or ethnic origin which can be seen or detected in practices, processes, systems, attitudes and behavior. It looks beyond individual acts of prejudice to the systemic biases that may be built into institutions. These systemic biases discriminate against and disadvantage people of color through unwitting prejudice, ignorance, thoughtlessness or racial stereotyping.

[It occurs within institutions and organizations, such as schools, that adopt and maintain policies, practices, and procedures that often unintentionally produce inequitable outcomes for people of color and advantages for white people.]

4. **Structural (or systemic) Racism:** encompasses the history and current reality of institutional racism across all institutions and society. It refers to the history, culture, ideology, and interactions of institutions and policies that perpetuate a system of inequity that is detrimental to communities of color.

(Definitions adapted from the Government Alliance on Race and Equity.)

The intent of this policy is to dismantle the individual, institutional, and structural racism that may exist in the District.

The Board directs the following action:

Leadership and Administration

The Board shall address systemic racism as follows:

1. Develop and conduct a systemic Equity Needs Assessment for the District to identify processes and practices that cause or contribute to inequitable outcomes. The Assessment shall also include an inventory of what equity-related data is currently collected by the District. Following the assessment, strategies will be developed and implemented to address the identified issues.

2. To address disparities in course participation (including AP/honors participation):

   a. All school staff making class recommendations shall provide an explanation for the recommendation to students and/or families.

b. School counselors shall be responsible for educating students and families as equitable partners in the selection process and course sequencing.

c. Middle and high schools will offer opportunities for supplementary coursework, such as summer programs or tutoring during or after school, to students interested in moving to higher level courses.

3. The Board shall implement alternative discipline processes, such as restorative justice, to reduce racial disparities in discipline and suspension and expulsion.

a. To ensure consistency in student discipline, each school shall collect and, at least annually, report data on all disciplinary actions. The data shall include the student's race/ethnicity, gender, socio-economic status, special education, and English Language Learner status, as well as a written explanation of the behavior leading to discipline and the specific corrective action taken.

b. When school administrators determine a student has committed a racist act, the student will be provided the opportunity to learn about the impact of their actions on others through such practices as restorative justice, mediation, role play or other explicit policies or training resources.

Curriculum and Instruction

1. Curriculum and instructional materials for all grades shall reflect cultural and racial diversity and include a range of perspectives and experiences, particularly those of historically underrepresented groups of color.

2. All curriculum materials shall be examined for racial bias. Where materials reflect racial bias, teachers utilizing the materials will acknowledge the bias and communicate it to students and parents.

3. The Board shall implement an anti-racist curriculum and provide educational resources for students at every grade level.

4. Student in-class and extra-curricular programs and activities shall be designed to provide opportunities for cross-cultural and cross-racial interactions to foster respect for cultural and racial diversity.

Training

1. All staff shall be trained in this anti-racism policy.

2. All teachers and administrators shall be trained in cultural awareness and/or culturally responsive teaching practices. Culturally responsive teaching practices shall be incorporated into Board approved appraisal systems, including the teacher appraisal system and the administrator performance appraisal.

3. All staff shall be trained about racism and about how racism produces inequitable practices and outcomes.

Policy Communication

1. Each school shall post a public statement against racism in a location visible to students, staff, and visitors entering the school. The District will also post a public statement in high traffic locations at its main offices and on the District website.

2. The public statement shall read: "Northwestern Regional District No. 7 is committed to establishing and sustaining an equitable community that achieves the District's equity mission to end the predictive value of race and ensure each individual students' and staff members' success. The Board of Education rejects all forms of racism as destructive to its mission, vision, values, and goals."

3. The Board shall establish a committee of students to promote equity and diversity and to serve as leaders and spokespersons within their schools.

4. This policy shall be included in student handbooks provided to students and families.

5. This policy shall be posted on the District website and the website of each school.

Policy Enforcement

1. Staff shall collect, review, and provide an annual report to the Board on data regarding racial disparities in areas including, but not limited to, student achievement, enrollment, suspension/discipline, graduation rates, and gifted identification. The report shall also include evidence of growth in each area outlined by the anti-racism policy (i.e., communication, leadership and administration, curriculum and instruction). The written reports shall also be made available to the public, to the student diversity committee, and to school equity teams.

2. The Superintendent or his/her designee shall be responsible for implementation and evaluation of District strategies for implementation. Adequate resources shall be made a part of the District's budget.

3. The District shall ensure there are various means for students and staff to report racism and other forms of discrimination.

(cf. 0521 - Nondiscrimination)
(cf. 0523 - Equity and Diversity)
(cf. 0524 - Hate Crimes and Bias Incidents in Schools)
(cf. 4111 - Recruitment and Selection)
(cf. 4111.1/4211.1 - Affirmative Action)
(cf. 4118.11 - Nondiscrimination)
(cf. 4118.113/4218.113 - Harassment)

(cf. 4118.3 - District Minority Recruitment Plan)
(cf. 4131 - Staff Development)
(cf. 5131.911 - Bullying/Safe School Climate Plans)
(cf. 5144.12 - Restorative Justice Approach to Discipline)
(cf. 5144.5 - Progressive Discipline and Promoting Positive Social Behavior)
(cf. 5145.4 - Nondiscrimination)
(cf. 5145.5 - Sexual Harassment)
(cf. 5145.51 - Peer Sexual Harassment)
(cf. 5145.52 - Harassment)
(cf. 5145.53 - Transgender and Non-Conforming Youth)
(cf. 5145.54 - Civility)
(cf. 6115 - Ceremonies and Observances)
(cf. 6121 - Nondiscrimination)
(cf. 6121.1 - Equal Educational Opportunity)
(cf. 6141.21 - Religions in the Public Schools)
(cf. 6141.22 - Religious Accommodations)
(cf. 6144 - Teaching about Controversial Issues)

Legal Reference: Connecticut General Statutes

46a 60 Discriminatory employment practices prohibited.

10-15c Discrimination in public schools prohibited. School attendance by five-year olds.

10-153 Discrimination on account of marital status.

17a-101 Protection of children from abuse.

Connecticut State Board of Education "Position Statement on Culturally Responsive Education," adopted May 4, 2011.

Title VII, Civil Rights Act, 42 U.S.C. 2000e, et seq.

29 CFR 1604.11, EEOC Guidelines on Sex Discrimination.

Title IX of the Educational Amendments of 1972, 20 U.S.C. 1681 et seq.

34 CFR Section 106.8(b), OCR Guidelines for Title IX.

Definitions, OCR Guidelines on Sexual Harassment, Fed. Reg. Vol 62, #49, 29 CFR Sec. 1606.8 (a0 62 Fed Reg. 12033 (March 13, 1997) and 66 Fed. Reg. 5512 (January 19, 2001).

Section 8525, ESEA as amended by the Every Student Succeeds Act.

Title II of the Genetic Information Nondiscrimination Act of 2008.

Policy adopted:

Mission - Goals - Objectives

Anti-Racism (Confronting Racism in Schools)

The purpose of this administrative regulation is to eliminate all forms of racism in the _____ School District, as detailed in policy #0525.1.

The following procedures will be implemented throughout the District (See policy for definitions):

1. The following public statement will be posted in all District facilities and on the district and school websites. In all locations it will be posted in a high traffic location, visible to students, staff and visitors.

   The public statement shall read:

   "_____ Schools is committed to establishing and sustaining an equitable community that achieves the District's equity mission to end the predictive value of race and ensure each individual students' and staff members' success. The Board of Education rejects all forms of racism as destructive to its mission, vision, values, and goals."

   Alternate Statement:

   "The _____ School District rejects all forms of racism. Racism in any form will not be tolerated in this school. _____ Schools are committed to the mission of increasing cultural respect by cultivating greater understanding of concepts of diversity, inclusion, equity, implicit bias, white privilege, white supremacy, and systemic racism."

   This statement shall also be included in the student handbooks provided to students and families and shall be translated into other languages and be made available for families with limited English proficiency, if and when needed.

2. The District shall establish an organization or committee of students to promote equity and diversity and to serve as leaders and spokespersons within the schools and the District.

3. The District shall proactively seek to recruit and hire diverse faculty and staff to their schools.

4. The District shall develop a systemic approach to assessing and monitoring institutional climate, ensuring that implicit bias and its potential consequences are understood, and that people of diverse backgrounds feel welcomed and respected.

5. The District shall implement alternative disciplinary processes, such as restorative justice, to reduce racial disparities in discipline and in situations involving suspension and expulsion.

6. When school administrators determine a student has committed a racial act, the student will be provided the opportunity to learn about the impact of their actions on others through such practices as restorative justice, mediation, role play, or other policies or training resources.

7. All curriculum within the District shall:

a. reflect cultural and racial diversity and include a range of perspectives and experiences, particularly those of historically underrepresented groups of color.

b. be examined for racial bias. Where materials reflect racial bias, teachers utilizing the materials will acknowledge the bias and communicate it to students and parents.

8. The District will implement an anti-racist curriculum and provide educational resources for students at every grade level.

9. Categories of racist behavior include, but are not limited to:

a. using words or phrases in humor or aggression related to another person's color, ethnicity, or religion;

b. physical assault against a person or group because of color, ethnicity or religion;

c. racist graffiti;

d. provocative behavior, e.g. racist badges or insignia;

e. bringing racist materials, such as racist leaflets, into school;

f. verbal abuse and threats, including name calling, insults, and racist jokes;

g. incitement of others to behave in a racist way;

h. racist comments in the course of discussion in lessons;

i. ridiculing of an individual or group for cultural differences;

j. refusal to cooperate with others because of their ethnic origins;

k. posting any racist comments online.

10. No member of the staff should ignore any form of racist behavior anywhere in the school. It should be immediately explained why such behavior is unacceptable.

Regulation approved:

Mission-Goals-Objectives

Mission Statement

Northwestern Regional is a comprehensive public middle school-high school. We serve the total regional community with emphasis on middle school and high school students. Our educational program promotes cognitive, personal, and social development in a safe learning environment. We seek to empower students to be independent lifelong learners and contributors in a changing society. To accomplish this, we must seek the necessary resources to:

- Provide a safe, nurturing and academically challenging learning environment.
- Provide students and staff with opportunities to reach their full potential.
- Prepare students to become productive, lifelong learners.
- Instill in our students a curiosity and love for learning which embraces the arts and the world around them.
- Improve student learning by holding staff accountable for providing the most effective learning environment and using the most effective teaching strategies.
- Prepare students with the skills and competencies outlined within our Vision of a Graduate, teaching and supporting students in their development as an:
    - Effective Communicator and Collaborator
    - Critical Thinker and Problem Solver
    - Persistent and Adaptable Thinker
    - Emotionally-Intelligent Individual
    - Passionate, Empowered Learner
    - Civic-Minded Citizen

Policy adopted:

Mission-Goals-Objectives

Nondiscrimination

The Board of Education, in compliance with federal and state law, affirms its policy of equal educational opportunity for all students and equal employment opportunity for all persons.

Nondiscrimination in School and Classroom Practices

It is the policy of the District to provide equal opportunity for all students to achieve their maximum potential through the programs offered in all District schools regardless of race, color, age, creed, religion, gender, sexual orientation, gender identity or expression, ancestry, national origin, disability, or status as a victim of domestic violence.

The District shall provide to all students without discrimination, course offerings, counseling, assistance, employment, athletics and extracurricular activities. The District shall provide equal access to the Boy Scouts and other designated youth groups. The District shall make reasonable accommodations for identified physical and mental impairments that constitute disabilities, consistent with federal and state statutes and regulations.

Students and third parties who have been subject to discrimination are encouraged to promptly report such incidents to the District's Compliance Officer.

All complaints of discrimination shall be investigated promptly. Corrective action must be taken when allegations are substantiated. Confidentiality of all parties shall be maintained, consistent with the District's legal and investigative obligations.

Neither reprisals nor retaliation shall occur as a result of good faith charges of discrimination.

Nondiscrimination in Employment/Contract Practices

It is the Board's policy to provide all persons equal access to all categories of employment in this District regardless of race, color, age, creed, religion, gender, gender identity or expression, sexual orientation, ancestry, national origin, status as a victim of domestic violence, marital status, mental or physical disability, genetic information, status as a Veteran or any other basis prohibited by Connecticut state and/or federal laws. The District shall make reasonable accommodations for identified physical and mental impairments that constitute disabilities, consistent with federal and state statutes and regulations.

Employees and third parties who have been subject to discrimination are encouraged to promptly report such incidents to the District's Compliance Officer.

All complaints of discrimination shall be investigated promptly. Corrective action must be taken when allegations are substantiated. Confidentiality of all parties shall be maintained, consistent with the District's legal and investigative obligations.

Neither reprisals nor retaliation shall occur as a result of good faith charges of discrimination.

Delegation of Responsibility

In order to maintain a program of nondiscrimination practices that is in compliance with applicable laws and regulations, the Board designates the Superintendent as the District's Compliance Officer.

The Compliance Officer shall publish and disseminate this policy and complaint procedure annually to students, parents, employees and the public. Nondiscrimination statements shall include the position, office address and telephone number of the Compliance Officer.

The Compliance Officer is responsible to monitor the implementation of nondiscrimination procedures in the areas listed.

School and Classroom Practices:

1. **Curriculum and Materials:** Review curriculum guides, textbooks and supplementary materials for discriminatory bias.

2. **Training:** Provision of training for students and staff to identify and alleviate problems of nondiscrimination.

3. **Student Access:** Review of programs, activities and practices to ensure that all students have equal access and are not segregated except when permissible by law or regulation.

4. **District Support:** Assure that like aspects of the school program receive like support as to staffing, compensation, facilities, equipment and related matters.

5. **Student Evaluation:** Review of tests, procedures and guidance and counseling materials for stereotyping and discrimination.

Employment/Contract Practices

1. Development of position qualifications, job descriptions and essential job functions.

2. Recruitment materials and practices.

3. Procedures for screening, interviewing and hiring.

4. Promotions.

5. Disciplinary actions, up to and including terminations.

6. The Board allows the mandatory human trafficking awareness training to be provided in any format, including but not limited to, video presentation.

The Building Principal or his/her designee shall be responsible to complete the following duties when receiving a complaint of discrimination:

1. Inform the student, employee or third party of the right to file a complaint and the complaint procedures.

2. Inform the student complainant that he/she may be accompanied by a parent/guardian during all steps of the complaint procedure.

3. Notify the complainant and the accused of the progress at appropriate stages of the procedure.

4. Refer the complainant to the Compliance Officer if the Building Principal is the subject of the complaint.

Complaint Procedure -Student/Employee/Third Party

Step 1 - Reporting

A student, employee or third party who believes he/she has been subject to conduct that constitutes a violation of this policy is encouraged to report the incident immediately to the Building Principal.

A school employee who suspects or is notified that a student has been subject to conduct that constitutes a violation of this policy shall immediately report the incident to the Building Principal.

If the Building Principal is the subject of the complaint, the student, employee or third party shall report the incident directly to the Compliance Officer.

The complainant is encouraged to use the report form available from the Building Principal, but oral complaints shall be acceptable.

Step 2 - Investigation

Upon receiving a complaint of discrimination, the Building Principal shall immediately notify the Compliance Officer, who shall then authorize the Building Principal to investigate the complaint, unless the Building Principal is the subject of the complaint or is unable to conduct the investigation.

The investigation may consist of individual interviews with the complainant, the accused and others with knowledge relative to the incident. Other information and materials relevant to the investigation may also be evaluated.

The obligation to conduct this investigation shall not be negated by the fact that a criminal investigation is pending or has been concluded.

Step 3 - Investigative Report

The Building Principal shall prepare a written report within fifteen (15) days, unless additional time to complete the investigation is required. The report shall include a summary of the investigation, a determination of whether the complaint has been substantiated as factual and whether it is a violation of this policy, and a recommended disposition of the complaint.

Copies of the report shall be provided to the complainant, the accused and the Compliance Officer.

Step 4 - District Action

If the investigation results in a finding that the complaint is factual and constitutes a violation of this policy, the District shall take prompt, corrective action to ensure that such conduct ceases and will not reoccur.

Disciplinary actions, in the case of students, shall be consistent with the school disciplinary practices, Board policies, administrative regulations, and state and federal laws.

Disciplinary actions, in the case of employees and third parties, shall be consistent with the Board policies, administrative regulations, state and federal laws, and applicable collective bargaining unit agreements.

Step 5 - Appeal Procedure

The complainant, if not satisfied with a finding of no violation of the policy or with the corrective action recommended in the investigative report, he/she may submit a written appeal to the Compliance Officer within fifteen (15) days.

The Compliance Officer shall review the investigation and the investigative report and may also conduct an investigation.

The Compliance Officer shall prepare a written response to the appeal within fifteen (15) days. Copies of the response shall be provided to the complainant, the accused and the Building Principal who conducted the initial investigation.

(cf. 4000.1 - Title IX)

(cf. 4111 - Recruitment and Selection)

(cf. 4111.1/4211.1 - Affirmative Action)

(cf. 4118.11/4218.11 - Nondiscrimination)

(cf. 4118.112/4218.112 - Sex Discrimination and Sexual Harassment in the Workplace)

(cf. 4118.113/4218.113 - Harassment)

(cf. 5145.4 - Nondiscrimination)

(cf. 5145.5 - Sexual Harassment)

(cf. 5145.51 - Peer Sexual Harassment)

(cf. 5145.52 - Harassment)

(cf. 5145.6 - Student Grievance Procedure)

(cf. 6121 - Nondiscrimination)

(cf. 6121.1 - Equal Educational Opportunity)

Legal Reference: Title VII, Civil Rights Act, 42 U.S.C. 2000e, et seq.

29 CFR 1604.11, EEOC Guidelines on Sex Discrimination.

Title IX of the Educational Amendments of 1972, 20 U.S.C. 1681 et seq.

Title IX Final Rule, May 6, 2020

Boy Scouts of America Equal Access Act

34 CFR Section 106.8(b), OCR Guidelines for Title IX.

Definitions, OCR Guidelines on Sexual Harassment, Fed. Reg. Vol 62, #49, 29 CFR Sec. 1606.8 (a0 62 Fed Reg. 12033 (March 13, 1997) and 66 Fed. Reg. 5512 (January 19, 2001)

The Americans with Disabilities Act as amended by the ADA Amendments Act of 2008

Meritor Savings Bank. FSB v. Vinson, 477 U.S. 57 (1986)

Faragher v. City of Boca Raton, No. 97-282 (U.S. Supreme Court, June 26,1998)

Gebbser v. Lago Vista Indiana School District, No. 99-1866, (U.S. Supreme Court, June 26,1998)

Davis v. Monro County Board of Education, No. 97-843, (U.S. Supreme Court, May 24, 1999.)

The Vietnam Era Veterans' Readjustment Act of 1974, as amended, 38U.S.C. §4212

Title II of the Genetic Information Nondiscrimination Act of 2008

Connecticut General Statutes

46a-51 Definitions (as amended by PA 17-127, PA 21-2 and PA 22-82)

46a-58 Deprivation of rights. Desecration of property. Placing of burning cross or noose on property. Penalty. (as amended by PA 17-127 and PA 22-82)

46a-60 Discriminatory employment practices prohibited. (as amended by PA 17-127 and PA 21-69 and PA 22-82)

10-15c Discrimination in public schools prohibited. School attendance by five-year olds. (Amended by P.A. 97-247 to include "sexual orientation" and P.A. 11-55 to include "gender identity or expression")

10-153 Discrimination on account of marital status. (as amended by PA 11-55 to include "gender identity or expression")

17a-101 Protection of children from abuse.

Meacham v. Knolls Atomic Power Laboratory 128 S.Ct. 2395, 76 U.S.L.W. 4488 (2008)

Federal Express Corporation v. Holowecki 128 S.Ct. 1147, 76 U.S.L.W. 4110 (2008)

Kentucky Retirement Systems v. EEOC 128 S.Ct. 2361, 76 U.S.L.W. 4503 (2008)

Sprint/United Management Co. v. Mendelsohn 128 S.Ct. 1140, 76 U.S.L.W. 4107 (2008)

Bostock v. Clayton County, Georgia, 140 S.Ct. 1731, 2020 WL3146686 (June 15, 2020)

Policy adopted:

REPORT FORM FOR COMPLAINTS OF DISCRIMINATION

Complainant: _____

Home Address: _____

Home Phone: _____

School building: _____

Date of Alleged Incident(s): _____

Alleged harassment was based on: (Check all that apply.)

[ ] Race [ ] Color [ ] National Origin [ ] Gender Identity or Expression

[ ] Gender [ ] Disability [ ] Religion [ ] Status as a Veteran

[ ] Ancestry [ ] Age [ ] Sexual Orientation [ ] Status as a Victim of Domestic Violence

Name of person you believe violated the District's nondiscrimination policy:

_____

If the alleged discrimination was directed against another person, identify the other person:

_____

Describe the incident as clearly as possible, including any verbal statements (i.e., threats, derogatory remarks, demands, etc.) and any actions or activities. Attach additional pages if necessary:

_____

_____

_____

_____

_____

When and where incident occurred:

_____

List any witnesses who were present: _____

_____

This complaint is based on my honest belief that _____ has discriminated against me or another person. I certify that the information provided in this complaint is true, correct and complete to the best of my knowledge.

_____ _____

Complainant's Signature Date

_____ _____

Received By Date

Business and Non-Instructional Operations

Medical Reimbursement for Special Education Students

The Board of Education (Board) will seek Medicaid reimbursement for eligible medically related services* provided to Medicaid eligible special education students in accordance with federal and state law. The Board shall enroll as a provider in the state medical assistance program, participate in the Medicaid School Based Child Health Program administered by the Department of Social Services, and submit billable service information electronically to the Department of Social Services, or its billing agent.* The Board may enter into an agreement with a third party or another board of education to comply with these requirements, The Board realizes that such third-party vendor agreements to provide that cost for the above services paid from, and contingent on receipt of sufficient funds from, grants the Department of Social Services makes to boards of education based on Medicaid claims for special education services provided to District students.

*****The Northwestern Regional District No. 7 Board of Education, having a student population of less than one thousand students, may conduct a cost benefit analysis in a form prescribed by the Commissioner of Social Services to determine whether the cost to participate in the medical assistance program exceeds the revenue that would be generated for the Board. The Board, if exempted from the requirements of this policy after such cost benefit analysis, shall complete and submit such analysis to the Commissioner of Social Services every three years in order to remain exempt.

The Board, as required, will determine a child's Medicaid enrollment status, and will provide written notification to the parent/guardian of the student before accessing the student's or parent's or guardian's public benefits or insurance for the first time and prior to the one-time parental or guardian consent and annually thereafter.

The Board will provide written notification to all parents and guardians of children who are Medicaid eligible and currently receiving School Based Child Health (SBCH) services under an individualized education plan (IEP) prior to obtaining parental consent and prior to the continuation of billing Medicaid for the services. The Board will obtain parental consent from all parents and guardians who are Medicaid eligible and receiving SBCH services under an IEP, in order to access their public benefits or insurance to pay for services under the IDEA.

**Note: Districts can bill for health-related services that are outlined in the student's IEP. In general, services for which a school district may bill Medicaid are: audiologist services, evaluation and testing, nursing services, occupational therapy, physical therapy, speech therapy, psychological services and social work services.*

Legal Reference: Connecticut General Statutes

10-76d Duties and powers of boards of education to provide special education programs and services. State agency placements; apportionment of costs. (as amended by June 2017 Special Session PA

17-2, Sec. 51 and PA 18-182)

42 CFR Parts 431, 433 and 440, Medicaid Program; Elimination of Reimbursement Under Medicaid for School Administration Expenditures and Costs Related to Transportation of School-Age Children Between Home and School

5.299, The Medicare, Medicaid & SCHIP Extension Act of 2007

34 C.F.R. §300.154(d) - Individuals with Disabilities Act (IDEA)-Part B, related to parental consent to access public benefits or insurance

Policy adopted:

Business and Non-Instructional Operations

Medical Reimbursement for Special Education Students

The Board of Education (Board) will seek Medicaid reimbursement for eligible medically related services provided to Medicaid eligible special education students in accordance with federal and state law. The services for which the Board may bill Medicaid include audiologist services, evaluation and testing, nursing services, occupational therapy, physical therapy, speech therapy, psychological services and social work services.

The Board will utilize the following procedures:

1. The Board of Education will determine, for each student who requires special education services and for each student who is referred to special education, if that child is eligible for Medicaid.

2. The Board will obtain a one-time written consent form the parent or guardian, after providing the written notification described below, before accessing the student's or the parent's or guardian's public benefits or insurance for the first time. This consent must specify the following:

A. The personally identifiable information that may be disclosed (such as records or information about the services that may be provided to a particular student);

B. The purpose of the disclosure (such as billing for services);

C. The agency to which the disclosure may be made (such as Medicaid); and

D. That the parent or guardian understands and agrees that the District may access the student's, or the parent's or guardian's public benefits or insurance to pay for the services.

3. The Board will provide written notification to the student's parents or guardians before accessing the student's or the parent's or guardian's public benefits or insurance for the first time and prior to obtaining the one-time parental or guardian consent and annually thereafter. The written notification must explain all of the protections available to parents and guardians under Part B of the Individuals with Disabilities Act, as described in 34 C.F.R. §300.154(d)(2) (v) to ensure that parents or guardians are fully informed of their rights before the District can access their or their child's public benefits or insurance to pay for services under the IDEA. The notice must be written in language understandable to the general public and in the native language of the parent or guardian or other mode of communication used by the parent or guardian, unless it is clearly not feasible to do so.

4. If any child is eligible for Medicaid, but not a current Medicaid recipient, the Board will request and assist the parent or guardian of that child with applying for Medicaid.

5. If any child is eligible for Medicaid, the Board will request that the parent or guardian of the child give written permission to allow the Board to request Medicaid reimbursements for eligible health related special education costs.

A. If written permission is received, the Board will submit claims to Medicaid through the State Department of Administrative Services for reimbursement of any health related cost.

B. If written permission is denied, the Board will terminate its efforts to secure Medicaid reimbursements otherwise applicable to the child.

6. Whether the parent or guardian refuses or gives consent to the Board to access Medicaid, reimbursement is strictly optional.

7. Whether the parent or guardian refuses or gives consent to the Board to access Medicaid reimbursement, the child will receive all special education services to which he/she is entitled without delay, at no cost to the parent or guardian.

8. The Board will provide written notification to all parents and guardians of children who are Medicaid eligible and currently receiving School Based Child Health (SBCH) services under an individualized education plan (IEP) prior to obtaining parental consent and prior to the continuation of billing Medicaid for the services. After such a date, the Board will obtain parental consent from all parents and guardians who are Medicaid eligible and receiving SBCH services under an IEP, in order to access their public benefits or insurance to pay for services under the IDEA.

A. The written notification shall be provided prior to the student's planning and placement team (PPT) meeting.

B. The parent or guardian shall complete and sign the consent form at the PPT meeting.

C. Once the district obtains this one-time consent, it is not required to obtain any further parental or guardian consent in the future. However, written notification must be provided annually.

*The Board of Education, having a student population of less than one thousand students, may conduct a cost benefit analysis in a form prescribed by the Commissioner of Social Services to determine whether the cost to participate in the medical assistance program exceeds the revenue that would be generated for the Board. The Board, if exempted from the requirements of this

policy after such cost benefit analysis, shall complete and submit such analysis to the Commissioner of Social Services every three years in order to remain exempt.

Legal Reference: Connecticut General Statutes

10-76d Duties and powers of boards of education to provide special education programs and services. State agency placements; apportionment of costs. (as amended by P.A. 99-279 An Act Concerning Programs and Modifications Necessary to Implement the Budget Relative to the Department of Social Services and PA 18-182.

42 CFR Parts 431, 433 and 440, Medicaid Program; Elimination of Reimbursement Under Medicaid for School Administration Expenditures and Costs Related to Transportation of School-Age Children Between Home and School

5.299, The Medicare, Medicaid & SCHIP Extension Act of 2007

34 C.F.R. §300.154(d) - Individuals with Disabilities Act (IDEA) Part B, related to parental consent to access public benefits or insurance

Regulation approved:

Business and Non-Instructional Operations

Compliance with 504 Regulations

It is the policy of the Northwestern Regional District No. 7 School System to comply with all aspects of the Section 504 regulations of the Rehabilitation Act of 1973. Section 504 prevents discrimination against otherwise qualified individuals with disabilities in programs and activities operated by the school system.

No otherwise qualified individual with disabilities shall, solely by reason of her or his disability, as defined in Section 706(8) of the Rehabilitation Act, be denied the benefits of, or be subjected to discrimination under any program or activity conducted by the Northwestern Regional District No. 7 School System.

The district has a responsibility to follow the procedural requirements of Section 504 to afford each student a free, appropriate education, which includes procedures for pre-placement evaluation, placement procedures and procedural safeguards. Additionally, Section 504 addresses placement in the LRE for both academic and nonacademic settings. The district also recognizes that there may be some impaired students who are not eligible for Special Education services under IDEA but who have documented disabilities and eligible for services and protection from discrimination under the Section 504 definitions and regulations.

In order to ensure that the Northwestern Regional District No. 7 School System does not discriminate in providing equal access to programs and services on the basis of disability, the following definitions, requirements and procedures are provided.

Definitions:

Disability means limitation in performance from a physiological (physical or mental) abnormality which substantially limits one or more major life activity, has a record of such an impairment, is regarded as having such an impairment.

Physical or Mental Impairment means (i) any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting one or more body system; (ii) any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness and specific reaming disabilities.

Major Life Activity means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

Appropriate Education means the provision of regular or special education and related aids and services that are designed to meet the individual educational needs of people with disabilities as adequately as the needs of non-disabled persons. Implementation of an individualized education plan developed in accordance with the Individuals With Disabilities Act is one means of meeting this standard.

Committee of Knowledgeable People means persons knowledgeable about the child, the meaning of evaluation data, and programming options. (A properly constituted Planning and Placement Team of Student Assistance Team would meet this definition.)

Requirements:

1. Northwestern Regional District No. 7 Public Schools annually locate and identify qualified persons with disabilities residing in the district who are not receiving a public education.

2. Notification of the school system's legal requirements is provided to persons with disabilities and their parents or guardians.

3. Provision of educational services in a setting with persons who are not handicapped, to the maximum extent appropriate to the needs of the students with disabilities. The school system shall make reasonable accommodations to allow a disabled student to be placed in the regular education environment unless it is demonstrated that the education of the person in the regular environment with the use of supplementary aids and services, cannot be achieved satisfactorily.

4. Provide pre-placement evaluation consistent with that required under IDEA.

5. Ensure that placement decisions are carefully considered by a group of persons knowledgeable about the child, the meaning of the evaluation data and program options.

6. Provide periodic reevaluation of students found eligible for services.

7. Develop procedural safeguards consistent with that required under IDEA.

8. Ensure access to non-academic and extracurricular services and activities in such a manner as to afford students with disabilities an opportunity for participation in such services and activities. The "Committee of Knowledgeable People", e.g. PPT shall consider the impact of any modifications on other non-handicapped classmates.

9. Ensure the availability of procedures for filing a grievance with the school district over an alleged violation of Section 504 regulations.

10. Identify at least one person to coordinate compliance and identification procedures.

Procedures:

1. **Identification and Notification:** The Office of Special Services annually conducts child find activities to identify any person between the ages of 0-21 who is, or may be in need of special services. Notification is accomplished by communication through the media, direct mailing to social service agencies and dissemination to staff. (See Appendix #1 for Notification form)

2. **Least Restrictive Environment:** Each committee of knowledgeable people (Student Assistance Team, Planning and Placement Team or other appropriate group) is aware of the

district practice to ensure students are educated with their non-disabled peers as often as possible and in the most appropriate way. All programs are developed with this requirement in mind.

3. **Evaluation:** Referrals for evaluation are made by the Planning and Placement Team (PPT). All statutory requirements for evaluation are adhered to closely. The evaluation period will be the same as for referrals under IDEA (45 days).

4. **Placement/Program Development:** Each PPT will reconvene at the conclusion of the evaluation to consider evaluation results, determine eligibility and develop appropriate programming. A written service plan is developed and maintained by the primary service provider. The plan is reviewed and/or updated throughout the school year as the child's needs warrant. All students who have undergone special education evaluations are automatically considered for eligibility under Section 504, i.e. for students who are not eligible for Special Education under IDEA, the PPT may consider eligibility under Section 504. Discussions of eligibility must be included in the record of the PPT meeting, including clearly delineated recommendations. (See Appendix #2 for Section 504 Service Plan.)

5. **Periodic Reevaluation:** All students receiving services under Section 504 are reevaluated at least every three years following procedures promulgated under IDEA and covered in this manual Special Services.

6. The Special Services Supervisor will be identified as the 504 Coordinator for the Northwestern Regional District No. 7 School System. This individual will convene a Committee of Knowledgeable People (PPT) to address 504 referrals.

7. **Grievance Procedures:** Students, parents or other individuals in the school district may register complaints regarding accessibility and other 504 regulations through the grievance procedures noted in Appendix #3.

(cf. - 5145 - Statement of Non-Discrimination)

Legal Reference: Connecticut General Statutes

10-15c Discrimination in public schools prohibited

Title IX of the Education Amendments of 1972, 20 U.S.C. 1681 et. seq.

Section 504, U.S. Rehabilitation Act, 1973, 29 U.S.C. 791

NOTE: Forms relative to this Policy are available at:

1. Superintendent's Office
2. Principal's Office
3. Special Services Office

Policy adopted:

OPERATIONS OF SCHOOLS WHILE ADDRESSING COVID-19

The District understands that it has numerous important obligations during this COVID-19 pandemic. Our highest priority is protecting the health and safety of the District's students and their families, the District's employees and their families, and our communities while at the same time providing full-time in-person learning in our schools for our students. All decisions about following these recommendations will be made in consultation with local health officials and other State and local authorities who can help assess the current level of mitigation needed based on levels of COVID-19 community transmission and the capacities of the local public health and healthcare systems, among other relevant factors. Safety is our number one priority and the District is acting with the best of intentions in our efforts to offer robust learning opportunities to our students.

The Centers for Disease Control and Prevention ("CDC") is the primary source of reliable information for the latest medical developments and guidance on effective preventative practices. The CDC regularly posts updates and guidance on COVID-19 related matters. https://www.cdc.gov/coronavirus/2019-ncov/ The District has consulted CDC guidance in developing these protocols and will continue to do so in considering changes to it.
In addition, the District is complying to the greatest extent possible with guidance from the State of Connecticut (https://portal.ct.gov/Coronavirus), including the State Department of Educationand its "Adapt, Advance, Achieve" guidelines for the fall of 2021, and the State Department of Public Health. This includes implementing appropriate social distancing strategies in school settings, personal protection via the wearing of masks/appropriate face covering as may be needed or required, and the regular cleaning of our facilities. We are also expecting all persons to follow basic hygienic precautions and we are appropriately screening the health of students and staff (including but not limited to asking that persons showing symptoms of COVID-19 not come to school), and we will provide appropriate training and reminders to all on these protocols.

These protocols are being adopted in order to 1) temporarily amend and supersede those inconsistent District policies (and any provisions thereof) that are being temporarily suspended during the current pandemic, and 2) supplement "its "Safe Return to In-Person Instruction and Continuity of Services Plan Template." In light of rapidly evolving scientific understanding of COVID-19, the District must be flexible in order to respond to changing laws, regulations and guidance being issued at the federal, state, and local levels. In keeping with the need for such flexibility, the District may, in its sole discretion and as it deems necessary, modify these protocols in particular circumstances, consistent with the law, and hereby authorizes the Superintendent of Schools to make such modifications. In the event of conflict between any official governmental requirements and these protocols, the governmental requirement will control. Employees and students are expected to comply with these protocols (along with other District policies and rules) and may be subject to discipline for any violations.

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IN-PERSON CLASSES

Full-time in-person classes shall continue as long as the District's schools can continue to comply with 1) the requirements set out in these protocols, 2) CDC guidelines, as may be revised from time to time, and 3) those guidelines issued by the State Departments of Education ("SDE") and Public Health ("DPH"). The Superintendent (after consultation with state and local health official and the Board of Education) is authorized to limit and suspend in-person classes at any

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time due to health and safety risks, and as may be directed by state and federal orders. The Superintendent will provide appropriate notice to parents and the community at large (and the SDE) of these decisions and shall notify employees of their obligations with respect to performing their duties (whether in the schools/workplace, or remotely), consistent with any applicable collective bargaining agreements or contracts.

All decisions regarding the level of programming (and the extent of in person programming) will be made based upon 1) consultation with state and local public health officials, 2) full consideration of applicable state and federal health and safety guidance, and 3) an assessment of the current medical health conditions and the levels of risk of spread of the virus (whether "low", "moderate" or "high"). The key is HEALTH AND SAFETY FIRST, while maintaining full-time in-person learning whenever possible.

In exercising its lawful discretion, and based upon prevailing health conditions and governmental orders, the District reserves its rights to, among other things:

a) revise school schedules so as to comply with applicable guidance for a safe school and safe workplace, and reduce the risk of exposure to COVID-19;
b) create class and school day schedules that better provide for social distancing, including placing students in static groupings or "cohorts" to the extent appropriate or needed;
c) use technology so that classroom learning taking place in the school may be transmitted to those who are not in school on a particular day due to quarantine obligations;
d) modify physical education, sports, arts, and music programs as may be necessary to control the spread of COVID-19;
e) limit/cancel extracurricular activities, and limit use of such facilities, including fields, gyms, and locker rooms;
f) limit access to the schools at times when classes are not in session;
g) properly insure the District, its facilities, its programs and maintain appropriate policies and protocols to minimize liability, and/or
h) take such other actions necessary to promote students' and staff safety.

RESCIND

BASIC HYGIENE

It cannot be over-emphasized that basic precautionary health measures (including cleaning, hygiene, sneezing/coughing etiquette, wearing mask/face covering and encouraging those who are sick to stay home) must be implemented by all employees and students. The District will strictly enforce these important safety requirements, and those who violate these requirements may be disciplined.

The best strategy remains the most obvious. Whether at school or at home, everyone should follow the CDC guidelines for preventing transmission of COVID-19 including:

- staying at home when you are sick and when you have reason to believe you may have symptoms or may have been exposed to COVID-19
- frequent hand washing with warm, soapy water (for at least 20 seconds), especially after using the restroom, and/or using hand sanitizer frequently,

- avoiding close contact with others (including maintaining three feet distance from other individuals wherever possible),
- wearing an appropriate face covering or mask at all times;
- enhanced cleaning and disinfecting of surfaces , and
- using appropriate cough and sneeze etiquette (i.e., covering your mouth whenever you sneeze or cough - even if alone in an office, classroom or hallway), and

The District shall maintain adequate supplies to support healthy hygiene behaviors, including soap, hand sanitizer with at least 60% ethyl alcohol or 70% isopropyl alcohol , paper towels, tissues, and no-touch/foot pedal trash cans. The District will make hand sanitizer available at all school entrances, in all rooms, and at all high contact areas.

The school administration shall communicate those cleaning and hygiene protocols recommended by the CDC. The District will place posters encouraging basic sanitary practices and how to "stop the spread" at entrances to the schools and in other areas where they are likely to be seen to help stop the spread of COVID-19 and shall continue to reinforce such practices, with appropriate training and signage.

REVISED

PERSONAL PROTECTION (INCLUDING MASKS AND FACE COVERINGS)

Cloth face coverings (including masks) are meant to protect other people in case the wearer is unknowingly infected, as many people carry COVID-19 but do not have symptoms. Face coverings are essential in times when physical distancing is difficult. The District recognizes that face coverings may be challenging for students (especially younger students) to wear in all-day settings such as a school. Nevertheless, unless meeting one of the exceptions listed below, **all students and school personnel must always wear a face mask** (or other cloth material covering both the mouth and nose) **while in a school building or a school bus**. This requirement also applies to parents dropping off or picking up children or any other visitor to the school buildings. The requirement to wear masks inside of school buildings applies for all times when students are present. As an example, fully vaccinated custodians or office staff do not need to wear a mask when in a school building on a weekend or after hours when students are not present inside the building.

Information should be provided to staff and students on proper use, removal, and washing (and/or disposal) of cloth face coverings, which is available from the CDC. https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html. The schools will provide 1) masks to students or staff members who does not have one, and 2) appropriate and safe receptacles for the disposal of masks, coverings and other personal protective equipment. **All masks and face cloth coverings must cover both the mouth and nose and comply with state and federal guidance (and school policies) covering dress/attire**.

The following individuals are exempt from this requirement per CDC and state guidelines:

1) Anyone who has trouble breathing, or anyone who is unconscious, incapacitated, or otherwise unable to remove the mask without assistance;
2) Anyone who has a medical condition making it unsafe to wear a mask, in accordance with SDE guidance;
3) Children under the age of two;
4) To the extent that a student or an employee may be eating or drinking in places where such activity is permitted by the District and these guidelines, provided that appropriate social distancing can be maintained and masks are removed for only as long as necessary to eat or drink;
5) As may be appropriate, and as permitted by law, students with medical conditions, behavioral issues and disabilities and who cannot wear a mask safely or continuously, with the District considering alternatives (for example, extra distancing, extra protective equipment) to protect staff and students;
6) Continuous wearing of masks or face coverings is not required in outdoor spaces; and/or
7) Fully vaccinated teachers may remove their masks when they are engaged in instruction at the front of the classroom in which students are seated and masked.

From 2020-2021 SDE guidance: The schools shall provide for and schedule age appropriate and safe mask breaks consistent with health and safety guidelines, and only where appropriate social distancing can be maintained. Such mask breaks may include: 1) outdoor breaks, 2) breaks in large rooms, and 3) breaks in classrooms where appropriate social distancing can be maintained. With respect to indoor mask breaks, students and/or staff should always stay apart three feet or more in well-ventilated areas and everyone should face in the same direction. During these breaks, students may talk (where permitted by the teacher); however, students must avoid loud talking, yelling, or singing. Generally, such mask breaks should be no more than 15 minutes.

MEDICAL EXEMPTION: ***From Executive Order #13A***-According to the latest guidance, use of masks (or cloth face coverings) is not required for anyone "for whom doing so would be contrary to his or her health or safety because of a medical condition, behavioral condition, or disability, or anyone under the age of 2 years." Any person who declines to so wear a mask because of a medical condition, behavioral condition, or disability shall be exempt from any requirement to wear masks if (**AND only if**) the person provides written documentation that the person is qualified for the exemption from a licensed or certified medical provider, psychologist, marriage and family therapist, professional counselor, social worker, or behavior analyst, the Department of Developmental Services or other state agency that provides or supports services for people with emotional, intellectual or physical disabilities, or a person authorized by any such agency. This documentation does not specifically have to name or describe the condition that qualifies the person for the exemption.

From 2021-2022 SDE guidance: The exemption for wearing a mask in the schools due to a medical condition is limited. Current SDE guidance provides that medical contraindications to the wearing of masks are generally limited to individuals suffering from severe chronic obstructive pulmonary disease ("COPD") such as might be seen with cystic fibrosis, severe emphysema, heart failure, or significant facial burns that would cause extreme pain or interfere with the healing of a skin graft. In accordance with current guidance, mild or intermittent respiratory or other common conditions such as asthma, cardiovascular diseases, kidney disease, or other similar conditions are generally not considered contraindications to the wearing of face coverings and will not justify an exemption from the mask mandate.

REVISED

SPECIAL EDUCATION AND SECTION 504 STUDENTS*:* The District understands that it is possible that students with disabilities may not be able to tolerate or comply well with mask wearing in school. The District will assess, on an individualized basis, the appropriate accommodations for students with disabilities who are unable to wear a mask, especially recognizing that students and staff involved with certain special education activities (e.g., speech therapy or where lip reading **or visibility of the mouth is required)** may need to be exempted from wearing a mask intermittently. In cases where an exception is requested based upon a disability, a Planning and Placement Team or Section 504 meeting may be held to consider possible programming revisions or appropriate accommodations.

Generally, the fact that a student with a disability may be unable to consistently wear a mask in school is not a basis for their exclusion from school. In cases where close contact between educators and students is highly likely (such as when interacting with students with disabilities who may not be able to wear mask and/or cannot adequately socially distance), the District will provide educators with masks and face shields, and as may be necessary, medical grade masks and disposable gowns. In addition, the District may use other mitigation strategies such as maximizing distancing, moving activities outdoors or to a well-ventilated space, and/or the use of **face shields or other** physical barriers in order to further protection students and staff.

Students who do not wear a mask and do not qualify for an exemption will be refused admission into the schools and will be marked as an unexcused absence. In addition, the District reserves the right to take disciplinary action against those persons (whether students or staff) who violate these commands.

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SOCIAL DISTANCING AND PHYSICAL SPACING/SETUP

The District is implementing protocols for social distancing in its schools. Social distancing means avoiding large gatherings and maintaining distance (approximately three feet) from others. Wherever possible, such distancing must be maintained between persons, with heightened social distancing in situations where students cannot wear masks (i.e., during lunch periods) and there might be a heightened risk of exposure (e.g., during musical activities). It is especially important that appropriate face coverings be worn in the few cases where such distancing is not possible.

The only times when distancing may not be possible should be when staff members are:

-Accommodating students with special health care needs or disabilities who may require direct contact (e.g. assisting with toileting or ambulation).
-Conducting health assessments or screenings (e.g. taking temperature or listening to lung sounds by the school nurse).
-Where necessary to enforce discipline or order (to the extent permitted and/or required by law).
-Where unavoidable congregation or the school facility set up makes social distancing impossible.

To ensure appropriate social distancing, our schools will select mitigation strategies based on feasibility given the unique space and needs of the school as recommended by CDC's "Guidance for COVID-19 Prevention in Kindergarten-12 Schools" and state guidelines. Examples of these

mitigation strategies that may be utilized, as feasible and whenever/to the extent required by prevailing safety and health conditions

–Rearrange student desks to maximize the space between students. Space seating/desks to be at least three feet apart where ever feasible or practicable, in light of our facilities and classroom design. If practicable, the District may explore the use of other (larger) spaces in the schools for classes (such as gymnasiums, the Little Theater and the auditorium), along with other available space. Students will be assigned to specific seats in all classes.
-Whenever possible, turn desks to face in the same direction (rather than facing each other) to reduce transmission caused from virus-containing droplets (e.g., from talking, coughing, sneezing).

The District may limit events at school facilities (including outside usage), after school activities, and extracurricular activities to those that can maintain social distancing and support proper hygiene and may impose restrictions such as prohibiting or limiting attendance and participation. The District reserves the right to cancel all field trips, inter-group events, usage of school facilities by outside and community organizations, and extracurricular activities, upon consultation with medical advisors. Any outside user of District facilities will be required to comply with the District's COVID-19 mitigation measures as set forth in this Policy.

MEALS AND CAFETERIAS

The District shall will continue to follow (and provide meals in accordance with) federal and school nutrition requirements.

STUDENT TRANSPORTATION

Buses may be able to operate to full capacity, provided that:

–Face masks for all are required on bus rides, except among exempt individuals (with such individuals distanced from the remaining students where possible), with such masks provided to those who are not wearing them before boarding.
–Daily cleaning protocols must be utilized to properly clean and disinfect the buses.
-Drivers (and bus monitors, if any) must wear face masks at all times when children are in the bus.
-Hand sanitizer will available for use by students as they board and exit the bus.
-Where appropriate, the opening of windows (even slightly) is encouraged

The District will consult with public health officials in assessing the applicability of (and need for modifications to) these protocols for transportation delivered by vans and other types of vehicles. Students must comply with District policies and these guidelines while receiving transportation.

CLEANING AND DISINFECTING

RESCIND

The District is doing all that it can to eliminate transmission points for COVID-19. The District has taken additional precautions to provide a clean learning environment and workplace, including increasing the frequency of regular cleanings and sanitization of areas that are frequently used. The District shall ensure that a thorough cleaning of the schools take place at least once every school day). The District will also disinfect daily the cafeteria, bathrooms, health offices/isolation rooms and common areas.
The District shall take measures to ensure that all water systems and features (for example, drinking and decorative fountains, if in use) are safe to use after a prolonged facility shutdown to minimize the risk of infections and diseases associated with water.

RESCIND

RESTROOM PROTOCOLS

Bathroom fixtures:
• Optimize ventilation –Should exhaust to outside, negative pressure and optimize fresh air intake.
• Place a trash can and paper towel roll by the bathroom door to allow students and staff to prevent touching the handle with their hands
• Consistent with safety and privacy, keep door to restroom propped open to otherwise prevent contact with door handles.

Cleaning practices:
• Bathrooms should be fully cleaned and disinfected daily, in accordance with CDC disinfecting and cleaning protocols.
• In addition to full cleaning and disinfection daily. These surfaces include: soap and paper towel dispensers, doors within toilet stalls, and toilet handles.
• Place signs reminding students/staff to wash hands before and after using the restroom.

NOTICE AND COMPLIANCE

Compliance Liaison: The Superintendent shall appointed Andy Bakulski as to serve as COVID 19 Health and Safety Compliance Liaison. The Liaison, whose contact information must be publicized, will engage with students, parents, faculty, staff, and administrators to answer questions about the health and safety requirements set out in these protocols and address questions about compliance, and ensure appropriate communications to the District's stakeholders. The Liaison will support the implementation of these requirements in each of the District's schools and programs, as well as the implementation of other school health and safety measures relating to COVID-19 and any additional guidance and up to date relevant information provided by the State Department of Education, the CDC, or any other state or federal agency.

Notices/Communications The District shall post COVID-19 protocols and associated safety guidelines on its website and at the schools in prominent places, along with any changes in its policies, protocols and guidelines. The District shall insure that frequent communication with its stakeholders takes place in order to inform the community of potential changes in its programs and services (and these protocols) in light of changing conditions. Such communications will be made available in manner to be accessible to those with visual and/or hearing impairments.

IN-PERSON LEARNING AND TEMPORARY CLOSURES

The District fully intends and expects to have full time in-person learning. Currently, the District will not be providing remote learning as a substitute for in-person learning; however, the District may offer remote learning for the following limited and rare situations where necessary to provide continued educational opportunities: a) for students who must temporarily be in COVID-19 isolation or quarantine, b) to temporarily address localized COVID-19 outbreaks in a school or at the District-level, and c) in rare and individualized circumstances, for students with elevated risks from COVID-19 exposure due to co-habiting family members with documented vulnerability to COVID-19.

If (and only if) such a COVID-19 outbreak occurs or governmental orders be issued occur so as to mandate some level of District or school-wide remote learning, the District may temporarily assign students to a reduced or split schedule of classes, including splitting between attending school in person and remote learning (for example, by having students alternate between specified days in the class and other days learning remotely). If this is necessary, the District may prioritize in-person learning opportunities and programs for students who require the most learning support. Students most in need of learning support include, but are not limited to:

– Students with special needs/disabilities;
– Students who are English Learners;
– Students who have had limited to no access to devices to engage in virtual distance learning, or;
– Students who otherwise did not access educational materials despite the District's providing the opportunity during prior times of remote learning.

The District will communicate any such decision to temporarily reduce in-person learning to students, parents and employees as soon as practicable; the District will also notify the State Department of Education if it is contemplating such reduction. All distance learning shall comply with all applicable State Department of Education standards.

RESCIND

MEDICAL INQUIRIES AND TESTING

The District reserves the right to make reasonable medical inquiries of its students and its employees (including vaccination status) in order to address the risk of transmission of COVID-19, consistent with state and federal law and any obligation to safeguard privacy rights. While not required or mandated at all times, the District reserves the right to measure employees' and students' temperatures upon entry to or while at the schools, especially where health conditions dictate such measures (for example, where there is an increased risk of spread or there are diagnosed cases). When conducting temperature screening, the screener should 1) use touchless or disposable (preferred) or oral thermometers with single-use disposable covers or adequate disinfection between individual uses, and 2) wear a face mask and face shield.

The District reserves the right to inquire about symptoms associated with COVID-19, recent contact with other persons, recent travel, and vaccination status. The District reserves the right to require such other testing and/or make such other inquiries as it deems necessary to monitor and control potential and actual exposure of its employees and students to COVID-19, as may be permitted by law and as conditions may dictate, especially where one is out sick, shows symptoms of COVID-19 or may have been exposed to COVID-19 (and depending upon one's vaccination

status). Among other lawful purposes, such inquiries may be made to confirm the employee's need for an absence, to confirm whether an absence relates to COVID-19, and/or to determine when it is appropriate for an employee or student to return to school.

The District reserves the right to require all staff and students to be screened for any observable illness or symptoms, including cough or respiratory distress, and to confirm temperature below **100.4** degrees Fahrenheit. School administrators may use examples of screening methods in applicable CDC guidance for screening students and staff. Such screening shall be done safely, respectfully, as well as in accordance with any applicable privacy laws or regulations.

Staff and students should self-assess daily for symptoms prior to coming to school. Staff and students should self-report symptoms or exposures to the school nurse. Each school shall create a communication system for staff and families for self-reporting of symptoms and notification of exposures and closures, while respecting the confidentiality of any information that may be reported.

In addition, the District shall have contact tracing in place to enable efficient tracing within the school community in the event of a positive case. The District shall actively monitor staff and student absenteeism to identify trends that would suggest spread of illnesses such as COVID-19, and code such absences accordingly. In addition, the schools (via the nurses) will monitor the types of illnesses and symptoms among students.

In addition to the health office, schools must identify an isolation room or area for a) separating anyone who exhibits symptoms consistent with COVID-19 and b) holding students who exhibit such symptoms until a parent or guardian arrives.

Confidentiality of Medical Information

Medical information (including vaccination status, to the extent possible) will be kept confidential as required by law. The District will treat all student and employee-provided medical information as confidential medical records. The District will maintain the confidentiality of such information to the most reasonable extent possible, in compliance with applicable laws and regulations, including but not limited to the Americans with Disabilities Act and the Family Educational Rights and Privacy Act, as may be applicable. If necessary, medical information may be shared in limited circumstances and subject to appropriate controls to those persons who have a legitimate need to know including but not limited to District administration, first aid and safety personnel, and government officials, as required by law or other relevant guidance.

RESPONSE TO COVID-19 INCIDENT

If a staff member or student is suspected to be sick, or has been diagnosed with COVID-19, the school may notify families and staff about the exposure while maintaining the confidentiality of the sick staff member or student, to the most reasonable extent possible, and consistent with the Americans with Disabilities Act and other applicable federal and state privacy laws. The District will also notify public health officials, as required by law, including but not limited to Conn. Gen. Stat. §10-210, which requires that 1) a school notify the local director of health whenever any child

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(or staff) shows symptoms of a communicable disease, and 2) any such child be excluded from attendance at school and not be permitted to return without permission of the director of health.

Sick staff members and children should not to return until they have met the current operative CDC criteria for discontinuing home isolation. Depending upon one's vaccination status and the operative CDC (and state) guidance, staff or students with signs or symptoms of COVID-19 may be required to return to school only after a documented negative COVID-19 test result or a note from a healthcare provider clearing them to safely return to the school program. See "Staying Home When Ill," below.

In addition, the District shall inform those who have had close contact to a person diagnosed with COVID-19 to stay home (where applicable, dependent upon vaccination status) and self-monitor for symptoms and to follow CDC guidance if symptoms develop, while respecting the privacy rights of all as required by law. If a person does not have symptoms, they should still follow appropriate CDC guidance for home isolation, as may be amended and based upon vaccination status. See "Staying Home When Ill," below.

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Students (but not staff or other persons) within a classroom setting (not on buses or in other non-classroom settings) do not need to be considered close contacts if they are not within 3 feet of a known COVID-19 case for 15 minutes or more (cumulative over a 24-hour period), provided:
– contact between students happened exclusively inside a 7-12 school **classroom** (e.g., no additional contact in a cafeteria, on a bus, during sports, outside of school, etc.)
– both parties were wearing a well-fitting mask consistently and correctly during the entire duration of their contact
– the student who is considered to be a close contact remains asymptomatic

Fully vaccinated students and staff who have had close contact with a known COVID-19 case but have no symptoms
– do not have to quarantine away from school or extracurricular activities (such as sports)
– should be tested 3-5 days after exposure but can continue with activities until such time as they receive a positive test
– should wear a mask when in public or otherwise engaged in activities with individuals outside of their household until they receive a negative test (or for 14 days with no test)

Students and staff who are either unvaccinated, not fully vaccinated, or for whom vaccination status is unknown should follow current guidance for quarantine and testing prior to returning to school or other activities after close contact with a known case

While it is the intent of the District to maintain full-time in person learning during the school year, any emergency /temporary decision to limit, suspend or close a program or school for some or all participants as a result of a COVID-19 case shall be made by the Superintendent or his/her designee, upon consultation with public health officials, and based upon applicable guidance. This initial short-term dismissal allows time for local health officials to gain a better understanding of the COVID-19 situation impacting the school. This allows the Superintendent, in consultation with the local health department, to determine appropriate next steps, including whether an extended dismissal duration is needed to stop or slow the further spread of COVID-19.

Decisions regarding the scope of the closure (e.g., quarantining for specific students, a cohort, a part of or all of a program, a single school, multiple schools, the full district) and duration of school dismissals will be made on a case-by-case basis using the most up-to-date information about COVID-19 and the specific cases in the community, along with consultation with public health officials. During school dismissals, the District shall also cancel extracurricular group activities and school-based afterschool programs.

Decisions on which, if any, staff should be allowed in the school should be made in collaboration with the local health department. The Superintendent shall work with local health officials following a temporary closure to determine when students and staff can safely return to schools.

Medical Professional: The Superintendent must ensure that a nurse or other medical professional is available to each school in the District to manage positive and suspected cases. Nurses and other healthcare providers should use Standard and Transmission-Based Precautions when caring for sick people, including those with COVID-19.

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STAYING HOME WHEN ILL

Employees and students often report to school even though they feel ill. While they may have the best of intentions, *it is especially critical at the present time that employees and students not report to school when they are ill and/or experiencing any of the following symptoms*:

- Fever (i.e., temperature at or above **100.4** degrees Fahrenheit)
- cough
- sore throat
- runny or stuffy nose
- body aches
- headache
- chills
- respiratory issues
- loss of taste or smell
- gastrointestinal issues such as nausea, diarrhea and vomiting
- fatigue
- any other symptom(s) noted by the CDC or other public health officials as being associated with COVID-19.

Employees and students who report to school with these symptoms or become ill at school (including having a fever) will be sent home. The District will also require employees and students to remain home if they are sick with (or are known or suspected to have been exposed to) COVID-19, or if the District otherwise believes they pose a threat to the safety and health of others. Notwithstanding the foregoing, the early return of employees and students (and the avoidance/cessation of quarantining and isolation) may be permitted based upon vaccination and symptom status, consistent with applicable/current guidelines.

Guidelines For Employees Who Have Been Diagnosed With COVID-19 or Who Have Been In Close Proximity To A Person With Symptoms Of (Or Who Has Been Diagnosed With) COVID-19

In addition to immediately notifying their supervisor, such employees should:

- Not go to work;
- Consult their healthcare providers; and
- If symptomatic, follow CDC-recommended steps with respect to isolation (including isolation from persons within their homes), remaining at home, and returning to work.

Employees who are well but who have a sick family member at home with COVID-19 (or a presumed case of COVID-19 awaiting test results) should also follow CDC-recommended precautions and not report to work.

Employees exposed to or who have had COVID-19 may not return to work until the CDC criteria to discontinue home isolation are met, along with any other requirements imposed by the employee's healthcare providers and/or state and local health departments. Notwithstanding the foregoing, the early return of employees (and the avoidance/cessation of quarantining and isolation) may be permitted based upon vaccination and symptom status, consistent with applicable current guidelines.

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LEAVES OF ABSENCE FOR EMPLOYEES

An employee who has been assigned work, whether at the District's facilities or at home, but is unable to perform it for reasons related to the COVID-19 pandemic, may be entitled to a paid or unpaid leave of absence, consistent with any applicable collective bargaining agreements, contracts or District policies. All employees should review the District's policies on leave (including family and medical leave). Employees should contact Human Resources should they have any questions or to request such leave.

EMPLOYEE OFFSITE MEETINGS AND TRAVEL

When offsite in-person duties must be performed, employees must 1) inform their supervisors before leaving the facilities, 2) wear a face covering during all interactions, 3) adhere to social distancing guidelines (even in transit and during any offsite meeting), and 4) follow basic hygienic measures as described above (including bringing with them and using hand sanitizer while in transit and at any such off-site locations/events).

Any employee who will be traveling out of state or internationally for any reason (business or personal) must inform their direct supervisor ahead of time, consistent with any obligations under District policy or applicable collective bargaining agreements. (A sample form for this purpose is attached as Appendix B and may be used in a manner consistent with any applicable collective bargaining agreement.) The District may require employees who travel out of state or internationally for any reason to stay home for a period of time consistent with CDC/state guidance(as updated) upon return. Quarantining of employees shall be determined on a case-by-case basis and based on an individualized assessment of the risk to the health and safety of others (including but not limited to vaccination and symptom status). These determinations will be made based on factors such as the location(s) visited by the employee, the length of time of the visit, the means of travel and the circumstances of the visit, the employee's vaccination status, and as further health, medical and scientific guidance becomes available.

VISITORS TO DISTRICT/SCHOOL FACILITIES

Depending upon prevailing conditions, the District reserves the right to control access to its facilities by external visitors, including prohibiting entry into its facilities for all visitors, permitting visitors by appointment only (for example, as may be necessary to attend a PPT meeting where a parent objects to remote participation), or limiting the number of visitors at any particular time, as may be permitted by law. As permitted by law, visitors to the schools may be screened to limit the risk of exposure to our employees and students. Screenings may include, but are not limited to, interviewing visitors about their current health, vaccination status, and recent travel history, taking temperatures at points of entry, and filling out additional forms or other paperwork. Even if not screened by the District, visitors should self-assess/self-screen for symptoms prior to entering District facilities. In addition, visitors will be required to comply with posted safety and hygiene requirements, including but not limited to washing their hands with soap and water and/or hand sanitizer at the point of entry to the facility, and maintaining appropriate social distancing measures at all times (including by and between visitors and employees). **All visitors must wear a mask or face covering at all times while on District premises, consistent with these protocols**.

ANTI-HARASSMENT AND NON-DISCRIMINATION

The District has numerous policies prohibiting harassment and discrimination in the schools for both its employees and its students. The District will continue to fully comply with its obligation to provide reasonable accommodations to employees with disabilities, as required by state and federal law. These policies remain in effect during the COVID-19 outbreak, and employees should review District policies for additional information. Such policies provide procedures for requesting such accommodations and filing complaints of unlawful discrimination, harassment and retaliation. The District is committed to taking all actions necessary to provide a safe school with a welcoming and harassment free environment and an equal employment opportunity for all.

SPECIAL STUDENT POPULATIONS AND STUDENT NEEDS

The District shall continue to carry out its legal obligations (whether during times of in-person, blended or remote learning) for 1) students with disabilities, including the provision of special education and related services and/or accommodations, and 2) and English Learners, in accordance with applicable federal and state guidance.

If full time in-person learning should ever be temporarily limited, the District may prioritize in-person learning opportunities and programs for students who require the most learning support.

The District understand that as students are returned to the classroom after an absence (especially for those students who have not recently taken part in or attended in-person learning), they will need to be reengaged. As such, the District will conduct assessments and use available data to ensure that students are appropriately transitioned back into the schools. Each school will assess students through methods such as universal screenings, evaluations, parent and student interviews/discussions, observations, and other data collection practices to individualize student programming. If necessary, a PPT meeting may be held for students with special needs. The District may modify the content of instruction upon return to in-person instruction as it may deem

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appropriate, including the review of prior content and differentiation of instruction. In addition, the District remains committed to providing appropriate supports.

The District understands that the time away from school may also present social and emotional challenges. In addition to its programs of counseling, the District reiterates its commitment to its policies to address particularized needs and challenges, especially for those most impacted by the pandemic. Without limiting the scope of this commitment, the District understands its obligations to address (and report) possible abuse and neglect, in accordance with its policies and state law. These trainings, programs and obligations will remain in place whether the schools are providing in-person instruction, a blended program, or distance learning.

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APPENDIX A

Employee Health Assessment Certification

This form must be completed and returned to Human Resources for approval prior to entry/reentry to any District facility.

Name: _____ District Facility to be entered: _____

Please answer the following questions by circling Yes or No.

Have you experienced any of the following symptoms in the last 14 days? Yes or No

- Fever
- Chills
- Repeated shaking with chills
- Muscle pain
- Runny or stuffy nose
- Headache
- Fatigue
- Sore throat
- Recent loss of taste or smell
- Body aches
- Cough
- Respiratory issues
- Gastrointestinal issues
- Any other symptom noted by the CDC or other public health officials as being associated with COVID-19

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Have you ever had close contact with anyone who was sick with COVID-19? Yes or No

In the last 14 days, have you traveled to any area with clusters of COVID-19? Yes or No

In the last 14 days, have you traveled internationally? Yes or No

In the last 14 days, have you been a visitor to a nursing home, hospital or other high-risk congregate setting? Yes or No

In the last 14 days, have you engaged in interstate travel on a plane, train, bus, or cruise ship? Yes or No

_____ _____

Signature Date

Note: Providing false information on this form may result in discipline or termination of employment.

Access may be denied to employees who answer "yes" to certain questions.

Confidentiality of Medical Information

Medical information will be kept confidential as required by law. We will treat all employee medical information (including information with respect to contact tracing) as confidential medical records. We will maintain the confidentiality of such information to the maximum extent possible, in compliance with applicable laws and regulations. If necessary, medical information may be shared in limited circumstances and subject to appropriate controls, to those persons who have a legitimate need to know including but not limited to first aid and safety personnel, and government officials, as required by law or other relevant guidance.

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Appendix B

Pre-Travel Disclosure Form

This form must be submitted to Human Resources prior to any interstate or international travel.

First Name: _____ Last Name: _____

Home Address: _____

Home Phone #: _____ Cell Phone #: _____

Travel Destination: _____

Dates of Travel (Departure and Return): _____

Please answer the following questions by circling yes or no.

1. Will you be traveling to any area with clusters of COVID-19 and/or a state designated as "high risk" by the Governor? *yes or no*

2. Will you be traveling on a plane, train, bus, or cruise ship? *yes or no*

3. Are you fully vaccinated against COVID-19? yes or no

_____ _____

Signature Date

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Business and Non-Instructional Operations

Data-Based Information and Management Systems

Student Data Protection and Privacy/Cloud-Based Issues

The Board of Education (Board) may, pursuant to this policy, enter into a contract with a third party for either or both of the following purposes:

1. To provide services, including Cloud-based services, for the digital storage, management, and retrieval of student records.

2. To provide digital educational software that authorizes a third-party provider of digital educational software to access, store, and use student records in accordance with the contractual provisions listed below.

The Board when entering into a contract with a contractor for purposes listed above, shall ensure the contract includes, but is not limited to the following:

1. A statement that student records, student information and student generated content continues to be the property of and under the control of the Board. (They are not the property of, or under the control of a software or electronic service contractor.)

2. A description of the means by which the Board may request the deletion of any student information, student records or student-generated content in the possession of the contractor that is not (a) otherwise prohibited from deletion or required to be retained under state or federal law, or (b) stored as a copy of a disaster recovery storage system and that is (i) inaccessible to the public, and (ii) unable to be used in the normal course of business by the contractor, provided the Board of Education may request the deletion of any such student information, student records or student-generated content if such copy has been used by the operator to repopulate data following a disaster recovery.

3. A statement that the contractor will not use student information, student records, or student-generated content for any purposes except those the contract authorizes.

4. A description of the procedures by which a student, parent or legal guardian, of a student may review personally identifiable information (PII) contained in the student's record, student information or student-generated content and correct erroneous information, if any in such student material.

5. A statement that the contractor shall take actions designed to ensure the security and confidentiality of student records, student information, and student-generated content.

6. A description of the procedures that a contractor will follow for notifying the Board, in compliance with C.G.S. 10-234dd when there has been an unauthorized release, disclosure or acquisition of student information, student records or student-generated content.

7. A statement that a student's records, student information, or student-generated content shall not be retained or available to the contractor upon expiration of the contract between the contractor and the Board of Education except a student, parent or legal guardian of a student may choose to independently establish or maintain an electronic account with the contractor after the expiration of such contract for the purpose of storing student-generated content. (e.g., essays, research papers, portfolios, creative writing, music, audio files, or photographs, but not standardized assessment responses.)

8. A statement that the contractor and the Board shall ensure compliance with the federal Family Educational Rights and Privacy Act (FERPA), 20 USC 1232g.

9. A statement that Connecticut laws shall govern the rights and duties of all parties to the contract, (contractor and the Board).

10. A statement that if any provision of the contract or the application of the contract is held invalid by a court of competent jurisdiction, the invalidity does not affect other provisions of the contract which can be given effect without the invalid provision or application.

11. A prohibition against the contractor using personally identifiable information contained in student records to engage in advertising or for any other purposes other than those authorized pursuant to the contract.

The Board of Education may use the uniform student data privacy terms-of-service agreement addendum, developed by the Commission for Educational Technology (CET), in contracts entered into pursuant to C.G.S. 10-234bb. Such amendment shall conform to the requirements for a contract listed above.

Any provision of a contract or the terms-of-service agreement addendum entered into between a contractor and the Board on or after July 1, 2018, that conflicts with the provisions listed above shall be void. Moreover, a contract is void if it lacks any of the above provisions. The Board will give the contractor reasonable notice to amend the contract or the terms-of-service agreement addendum to include the missing provisions.

Any contract entered into on and after July 1, 2018, or the terms-of-service agreement addendum that does not include the provisions listed above shall be void, provided the Board has given reasonable notice to the contractor and the contractor has failed within a reasonable time to amend the contract or the terms-of-service agreement addendum to include the required provisions.

The Board of Education shall maintain and update, as necessary, a website with information relating to all contracts entered into pursuant to this policy. Not later than five business days after executing a contract pursuant to this policy the Board shall post notice of such contract on the Board's website. The notice shall include the contract and (1) state that the contract has been executed and the date that such contract was executed, (2) provide a brief description of the contract and the purpose of the contract, and (3) state what student information, student records or student-generated content may be collected as a result of the contract.

On or before September 1st annually, the Board of Education shall electronically notify students and the parents/guardians of students of the address of the Internet website described in this policy.

The Board of Education and a contractor may include in any contract executed pursuant to this policy, the uniform student data privacy terms-of-service agreement addendum, previously described, to satisfy the requirements of this policy.

The Board of Education is not required to enter into a contract pursuant to this policy if the use of an Internet website, online service or mobile application operated by a consultant or an operator is unique and necessary to implement a child's individualized education program or plan pursuant to Section 504 of the Rehabilitation Act of 1973, as amended from time to time, and such Internet website, online service or mobile application is unable to comply with the provisions of this policy, provided (1) such Internet website, online service or mobile application complies with the Family Educational Rights and Privacy Act of 1974, 20 USC 1232g, as amended from time to time, and the Health Insurance Portability and Accountability Act of 1996, P.L. 104-191, as amended from time to time, (2) the Board of Education can provide evidence that it has made a reasonable effort to (A) enter into a contract with such consultant or operator to use such Internet website, online service or mobile application, and (B) find an equivalent Internet website, online service or mobile application operated by a consultant or an operator that complies with the provisions of this section, (3) the consultant or operator complies with the provisions of section 10-234cc, as amended for such use, and (4) the parent/legal guardian of such child, and, in the case of a child with an individualized education program, a member of the planning and placement team, sign an agreement that (A) acknowledges such parent/legal guardian is aware that such Internet website, online service or mobile application is unable to comply with the provisions of this policy, and (B) authorizes the use of such Internet website, online service or mobile application. The Board of Education shall, upon the request of a child's parent/legal guardian, provide the evidence described above to such parent/legal guardian.

The Board expects that an operator shall implement and maintain security procedures and practices that meet or exceed industry standards and that are designed to protect student information, student records, and student-generated content from unauthorized access, destruction use, modification and disclosure; and delete any student information, student records or student-generated content within a reasonable amount of time if a student, parent/guardian or

Board requests deletion of such student information, student records or student generated content unless:

1. state or federal law prohibits such deletion or otherwise requires the retention of such student information, student records or student-generated content, or

2. a copy of such student information, student records or student-generated content is in the possession of the operator as part of a disaster recovery storage system and is inaccessible to the public and unable to be used in the normal course of business by the operator, provided such student, parent/legal guardian of a student or the Board may request the deletion of any such student information, student records or student-generated content if such copy is used by the operator to repopulate accessible data following a disaster recovery

The Board will utilize the written guidance developed by the Department of Education in consultation with the Commission for Educational Technology concerning the implementation of FERPA and the laws relating to student data privacy. Such written guidance includes, a plain language explanation of how such student data privacy laws are to be implemented, information about the uniform student data privacy terms-of-service agreement addendum, and (3) how such addendum may be incorporated into contracts executed pursuant to section 10-234bb, as amended.

Notice of Breach of Security/Data Breaches

Upon notice of a breach of security by a contractor, the Board shall, not later than two business days after receipt of such notice, notify the students and the parents/legal guardians of the students whose student information, student records, or student-generated content was involved in such breach. The Board shall also, as required, post notice of the breach on its website.

Upon the discovery of a breach of security that results in the unauthorized release of student information, excluding directory information, the contract shall contain the provision that the contractor must notify the Board of such breach without unreasonable delay, and in no case later than thirty (30) days from the discovery of the breach.

Upon the discovery of a breach of security that results in the unauthorized release of directory information, student records, or student-generated content, the contract shall contain the provision that the contractor must notify the Board without unreasonable delay and in no case later than sixty (60) days from the discovery of the breach.

Note: The Board may desire to contract for more prompt notice of a breach of security.

Definitions

1. **"Contractor"** means an operator or consultant that is in possession of or has access to student information, student records or student-generated content as a result of a contract with a local or regional Board **o**f Education**.**

2**. "Operator"** means the operator of an Internet website, online service, online application, (app) or mobile application with actual knowledge that such Internet website, service, or mobile application is used primarily for school purposes and was designed and marketed for school purposes and who collects, maintains or uses student information.

3. **"Consultant**" means a professional who provides non-instructional services, including administrative, planning, analytical, statistical, or research services to a board of education under a contract.

4. **"Student"** means a Connecticut resident enrolled in a preschool program participating in the state-wide public school information system, pursuant to section 10-10a of the general statutes, or enrolled in grades K to 12, inclusive, in a public school, or receiving special education and related services under an individualized education program, or otherwise the responsibility of the Board.

5. **"Deidentified information"** means any information that has been altered to prevent the identification of an individual student.

6. **"Eligible student"** means a student who has reached 18 years of age.

7. **"Student-generated content"** means materials created by a student, including, but not limited to, essays, research reports, portfolios, creative writing, music or other audio files, or photographs. "Student-generated content" does not include student responses to a standardized assessment.

8. **"Student records"** means any information directly related to a student that is maintained by the school district, the State Board of Education or the Department of Education or any information acquired from a student through the use of educational software assigned to the student by a teacher or other district employee.

"Student records" does not mean any of the following:

a. Deidentified information, allowed under the contract to be used by the contractor to improve educational products for adaptive learning purposes and for customizing student learning.

b. Deidentified information, used to demonstrate the effectiveness of the contractor's products in the marketing of such products.

c. Deidentified information, used for the development and improvement of the contractor's products and services.

9. **"Online service"** includes Cloud computing services, which must comply with this policy if they otherwise meet the definition of an operator.

10. **"Student information"** is personally identifiable information regarding a student that in any media or format that is not publicly available that meets any of the following:

a. Is created or provided by a student, or the student's parent or legal guardian, by using an operators' website, online service, or mobile application (app) for school purposes.

b. Is created or provided by an employee or agent of the board of education, to an operator for school purposes.

c. Is gathered by an operator through the operation of the operator's Internet website, online service, or mobile application (app) and identifies a student including but not limited to information in the student's educational record or email account, first and last name, home address, telephone number, date of birth, email address, or other information that allows physical or online contact, discipline records, test results, special education data, juvenile dependency records, grades, evaluations, criminal records, medical records, health records, social security number, biometric information, disabilities, socioeconomic information, food purchases, political affiliations, religious information, text messages, documents, student identifiers, search activity, photos, voice recordings, or behavioral assessments.

11. **"School purposes"** means purposes that customarily take place at the direction of a teacher, or a board of education or aid in the administration of school activities, including, but not limited to, instruction in the classroom, administrative activities, and collaboration among students, school personnel, or parents/legal guardians.

12. **"Targeted advertising"** means presenting an advertisement to a student where the selection of the advertisement is based on student information, student records or student-generated content or inferred from the usage of the operator's Internet website, online service or mobile application by such student. It does not include any advertising to a student on a website that the student accesses at the time or in response to a student's response or request for information or feedback.

The Board, through this policy, places restrictions on an "operator" as defined in this policy. An operator shall not knowingly engage in any of the following activities with respect to their internet website, online service or mobile application:

1. Engage in targeted advertising on the operator's site, service, or application, or on any other Internet website, online service or mobile application;

2. Use student information to create a profile of a student for purposes other than the furtherance of school purposes;

3. Sell student information, unless the sale is part of the purchase, merger, or acquisition of an operator by a successor operator and the operator and the successor operator continue to be subject to the provisions of this policy regarding student information; or

4. Disclose student information, unless the disclosure is made (a) in furtherance of school purposes of the Internet website, online service or mobile application, provided the recipient of the student information uses such student information to improve the operability and functionality of the Internet website, online service or mobile application and complies with this policy; (b) to ensure compliance with federal or state law; (c) in response to a judicial order; (d) to protect the safety of users or others, or the security of the Internet website, online service or mobile application; or (e) to an entity hired by the operator to provide services for the operator's Internet website, online service or mobile application, provided the operator contractually (i) prohibits the entity from using student information for any purpose other than providing the contracted service to, or on behalf of, the operator, (ii) prohibits the entity from disclosing student information provided by the operator to subsequent third parties, and (iii) requires the entity to comply with this policy.

The Board recognizes that an operator may:

1. Use student information (1) to maintain, support, evaluate or diagnose the operator's Internet website, online service or mobile application (app), or (2) for adaptive learning purposes or customized student learning.

2. Use de-identified student information (1) to develop or improve the operator's Internet website, online service or mobile application (app), or other Internet websites, online services or mobile applications owned by the operator, or (2) to demonstrate or market the effectiveness of the operator's Internet website, online service or mobile application.

3. Share aggregated de-identified student information for the improvement and development of Internet websites, online services or mobile applications designed for school purposes.

Nothing in this policy shall be construed to:

1. limit the ability of a law enforcement agency to obtain student information from an operator as authorized by law or pursuant to a court order;

2. limit the ability of a student or the parent or legal guardian of a student to download, transfer or otherwise save or maintain student information;

3. impose a duty upon a provider of an interactive computer service, as defined in 47 USC 230, as amended from time to time, to ensure compliance with this section by third-party information content providers, as defined in 47 USC 230, as amended from time to time;

4. impose a duty upon a seller or provider of online services or mobile applications to ensure compliance with this policy with regard to such online services or mobile applications;

5. limit an Internet service provider from providing a student, parent or legal guardian of a student or local or regional Board of Education with the ability to connect to the Internet;

6. prohibit an operator from advertising other Internet websites, online services or mobile applications that are used for school purposes to parents or legal guardians of students, provided such advertising does not result from the operator's use of student information;

7. apply to Internet websites, online services or mobile applications that are designed and marketed for use by individuals generally, even if the account credentials created for an operator's Internet website, online service or mobile application may be used to access Internet websites, online services or mobile applications that are designed and marketed for school purposes.

The Board, upon determination that a request for directory information is related to school purposes, may disclose directory information to any person requesting such directory information. If the Board determines that a request for directory information is not related to school purposes, the Board shall not disclose such directory information.

(cf. 3520.1 - Information Security Breach and Notification)

(cf. 3520.11 - Electronic Information Security)

(cf. 3520.12 - Data-Based Information Management System Confidentiality Policy)

(cf. 5125 - Student Records)

(cf. 5145.15 - Directory Information)

(cf. 6162.51 - Surveys of Students/Student Privacy)

Legal Reference: Connecticut General Statutes

1-19(b)(11) Access to public records. Exempt records.

7-109 Destruction of documents.

10-15b Access of parents or guardians to student's records.

10-209 Records not to be public.

10-234aa Definitions

10-234bb Contracts between boards of education and contractors re student data. Requirements. (as amended by PA 18-125)

10-234cc Requirements for operators re student data

10-234dd Duties re unauthorized release, disclosure or acquisition of student data (as amended by PA 18-125)

11-8a Retention, destruction and transfer of documents

11-8b Transfer or disposal of public records. State Library Board to adopt regulations.

46b-56(e) Access to Records of Minors.

Connecticut Public Records Administration Schedule V - Disposition of Education Records (Revised 1983).

P.A. 16-189 An Act Concerning Student Privacy

PA 17-200 An Act Making Revisions to the Student Data Privacy Act of 2016

PA 18-125 An Act Concerning Revisions to the Student Data Privacy Act

Federal Family Educational Rights and Privacy Act of 1974 (section 438 of the General Education Provisions Act, as amended, added by section 513 of P.L. 93-568, codified at 20 U.S.C.1232g).

Dept. of Educ, 34 C.F.R. Part 99 (May 9, 1980 45 FR 30802) regs. implementing FERPA enacted as part of 438 of General Educ. Provisions Act (20 U.S.C. 1232g) parent and student privacy and other rights with respect to educational records, as amended 11/21/96.

Protection of Pupil Rights Amendment (PPRA) 20 U.S.C. § 1232g (2014)

Children's Online Privacy Protection Act (COPPA) 15 U.S.C. §§6501 et seq. (2014)

Policy adopted:

Business and Non-Instructional Operations

Hazardous Materials in Schools

Pesticide Management/Pesticide Application

The Board of Education believes that structural and landscape pests can pose significant hazards to people, property, and the environment. Pests are living organisms, such as plants, animals, or microorganisms, that interfere with human uses of the school site. Strategies for managing pest populations will be influenced by the pest species and the degree to which that population poses a threat to people, property, or the environment. Further, the Board also believes that pesticides can pose hazards to people, property, and the environment. The intent of this policy is to ensure the health and safety of students, teachers, staff, and all others using district buildings and grounds.

The goal of this pest management program is to manage pests in order to:

- Reduce any potential human health hazard and/or protect against a significant threat to public safety;
- Prevent loss or damage to school structures or property;
- Prevent pests from spreading in the community or to plant and animal populations beyond the site;
- Enhance the quality of life and provide a safe and healthy learning environment for students, staff, and others.

The school district shall incorporate Integrated Pest Management (IPM) procedures to manage structural and landscape pests and the toxic chemicals used for their control, to alleviate pest problems with the least possible hazard to people, property, and the environment. In addition, staff, students, and the public shall be educated, at least annually, about potential school pest problems and the IPM policies and procedures to be used to achieve the desired pest management objectives. Integrated Pest Management (IPM) is the coordinated use of pest and environmental information with available pest control methods to prevent unacceptable levels of pest damage by the most economical means with the least possible hazard.

IPM procedures will determine when to control pests and whether to use mechanical, physical, chemical, cultural, or biological means. Chemical controls shall be used as a last resort. The Board establishes that the school district shall use pesticides only after considering the full range of alternatives, including no action, based on an analysis of environmental effects, safety, effectiveness, and costs. The Superintendent or his/her designee shall be responsible for implementing Integrated Pest Management (IPM) procedures and coordinating communications with staff responsible for pest control, such as maintenance personnel and custodians, and with hired contractors when utilized by the district to control a pest problem. *The Maintenance*

Supervisor/Head Custodian shall be designated as the IPM supervisor and shall direct and supervise all IPM procedures to be carried out by assigned maintenance and/or custodial staff.

All district employees who use chemicals to control a pest problem must be trained and shall follow all precautions and application regulations. The District will only employ certified pesticide applicators for any necessary and non-emergency pesticide use in school buildings or on school grounds. Contractors hired to do this work shall give evidence of appropriate training and certification in the proper use of pesticides. Pest control contractors shall be utilized, when deemed necessary, to inspect conditions conducive to pest problems and to develop appropriate prevention measures. Pest control contractors will be expected to write recommendations for structural improvements or repairs, as well as for housekeeping and sanitation measures required to reduce or prevent the recurrence of pest problems.

Someone other than a certified pesticide applicator may apply a pesticide in an emergency to eliminate an immediate human health threat when (1) it is impractical to obtain the services of a certified pesticide applicator and (2) a restricted-use pesticide is not used.

Whenever it is deemed necessary to use a chemical substance, the school must provide notification to all parents and staff who have registered for advanced notification, in conformity with state statutes. The District, prior to any application of pesticide within any building or on school grounds, shall provide such notice by electronic mail no later than twenty-four hours prior to the pesticide application. Notices shall also be posted in designated areas at school at least (suggested) forty-eight (48) hours prior to the application.

At the beginning of each school year and upon registration, parents/guardians shall be informed of the District's pest management policy. Those parents/guardians and staff who register a request shall be notified prior to every pesticide application. Parents/guardians who have registered for prior notice shall receive a transmittal of notice by electronic mail no later than twenty-four hours prior to such application. Notice shall be given to school staff who have registered for it by any practicable means.

The notice shall include:

- The name of the active ingredient of the pesticide being applied.
- The target pest.
- The location of the application on school property.
- The date of the application.
- The name of the school administrator or designee who may be contacted for further information.

The Board of Education is required to post notice of pesticide application not less than twenty-four hours prior to the application on or through the (1) home page of the school's website where the application will occur, or in the absence of a school's website, on the District's website; and (2) the primary social media account of the school or Board of Education.

The District's website must indicate how parents/guardians may register for prior notice of pesticide application.

Not later than March 15 of each year, a notice of applications made since January first of such year, and a listing of such notices for applications made during the period March 15th through December 31st of the preceding calendar year shall be sent through the District's electronic mail notification or alert system. This notification is for those parents/guardians who previously registered for prior notification of pesticide applications.

The District is also required to print the above-mentioned electronic mail notification in the applicable parent handbook. (The law, C.G.S. 10-231c, as amended, does not require the reprinting of the handbook to provide the notification or the development or use of a website, social media account, or electronic mail notification or alert system not already in use or existence prior to October 1, 2015.)

Information regarding pesticides used and areas treated shall be maintained for a period of five years at the school site and available to the public and staff upon request. The district shall establish and maintain accurate records of all chemical use and their location. In addition, records of all pest control actions, including information on indicators of pest activity, can verify the need for action.

Pesticide applications shall be limited to non-school hours and when activities are not taking place.

The application of lawn care pesticides on the grounds of any school with students in grades eight or lower, except on an emergency basis, must be in accordance with an integrated pest management plan (IPM). An emergency application may be made to eliminate a human health threat in any school with students through grade eight as determined by the Superintendent of Schools, subject to applicable Connecticut statutory and regulatory provisions.

Legal Reference: Connecticut General Statutes

10-231b Pesticide applications at schools: Authorized applicators. Exception. (as amended by P.A. 09-56)

10-231c Pesticide applications at schools without an integrated pest management plan. (as amended by June 2015 Special Session PA 15-5)

22a-46 Short title: Connecticut Pesticide Control Act.

22a-54 Pesticide applicators, certification, classification, notice, fees, reciprocity; financial responsibility; aircraft, tree, public employee applicators.

22a-58 Records to be kept by distributors and applicators.

23-61b Licensing for arboriculture; examination; fees; renewal; suspension, revocation. Nonresidents. Records. Pesticides.

P.A. 09-56 An Act Concerning Pesticide Applications At Child Day Care Centers and Schools.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 7 U.S. Code 136 et seq

Policy adopted:

Business and Non Instructional Operations

Hazardous Materials in Schools

Pest Management/Pesticide Application

In determining when to control pests and whether to use mechanical, physical, chemical, cultural or biological means, the District shall follow the principles of Integrated Pest Management (IPM). The Superintendent or his/her designee shall ensure that the District follows Integrated Pest Management procedures so as to use the most appropriate and least toxic method of control.

Procedures shall include the following:

1. The choice of using a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or not feasible. A full range of alternatives, including no action, will be taken.

2. Selected non-chemical pest management methods will be used whenever possible to provide the desired control. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents.

3. The pest and the site of infestation shall be carefully identified. Strategies for managing the pest will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

4. When it is determined that a pesticide must be used, the least hazardous material will be chosen and applied in accordance with EPA registered label directions.

5. Pesticides shall be stored in a secure site not accessible to students or unauthorized staff. Such storage and any disposal of the pesticide shall be in accordance with the EPA-registered label directions.

6. Staff, students, and parents/guardians shall receive information about the District's Integrated Pest Management policy and procedures and notification of any upcoming pesticide treatments. The notice of pending pesticide application must take place not later than twenty-four hours prior to such application by posting the notice either on or through the website of the school where such application will occur or on the District website in the absence of a school website and the primary social media account of the school or District. Also to be posted on the District's website is how parents/guardians may register for prior notice of pesticide applications. Notice of upcoming pesticide treatments shall also be posted in areas designated by the Superintendent or his/her designee.

7. The following records shall be maintained at each school site:

    a. Records of pesticide use at the site for a period of five years.

b. Pest surveillance data sheets that record the number of pests or other indicators of pest populations that verify the need for treatments.

8. Persons applying pesticides shall follow label precautions and shall be trained in the principles and practices of Integrated Pest Management (IPM). Sanitary measures shall be enforced, and buildings shall be regularly cleaned and repaired to prevent infestation, minimize pesticide use, and eliminate routine spraying.

9. Sanitary measures shall be enforced, and buildings shall be regularly cleaned and repaired in order to prevent infestations, minimize the use of pesticides, and eliminate routine spraying.

10. An emergency application of pesticides is defined as when an application of pesticides is necessary to eliminate an immediate threat to human health and where it is impractical to obtain the services of a certified pesticide applicator, provided such emergency application does not involve a restricted use pesticide as defined in CGS 22a-47. Restricted-use pesticides may be used only by certified applicators or under their direct supervision. *(Note: Restricted-use pesticides, classified by the Federal Environmental Protection Agency or the DEP, are those which may present a hazard to the applicator or other people by reason of acute dermal or inhalation toxicity or which may have an unreasonable adverse effect on the environment.)*

11. At the beginning of each school year, the Board of Education shall provide the staff of each school and the parents/guardians of each child enrolled in each school with written guidelines on how the integrated pest management plan is to be implemented and shall provide the parents or guardians of each child enrolled in each school with a statement that shall include a summary of the integrated pest management plan for the school. Such statements and descriptions shall also be provided to the parents/guardians of any child who transfers to a school during the school year.

12. The aforementioned required statement shall indicate to staff, parents, and guardians that they may register for prior notice of school pesticide applications. Further, the emergency notification procedures to be used will be described.

13. Parents/guardians and staff may register for prior notice of pesticide applications. Each school shall maintain a registry of persons requesting such notice. Prior to the application of pesticides within any building or on school grounds, persons who have registered for prior notice shall be notified not less than twenty-four hours prior to any pesticide application by posting the notice either on or through the school's website where the application will occur, or on the District's website if the school does not have one, and the primary social media account of the school or District. The District's website must indicate how parents may register for prior notice of pesticide applications, by any

practicable means, on or before the day that any pesticide application is to take place at a school.

14. The notice shall include the (1) name of the active ingredient of the pesticide to be applied, (2) the target pest, (3) location of the application on school property, (4) date of application, and (5) the name of the school administrator or his/her designee who may be contacted for further information.

15. No application of pesticide may be made in any building or on school grounds during regular school hours or during planned activities at the school except for an emergency application, subject to applicable Connecticut statutory and regulatory provisions.

14. If an emergency application is necessary to eliminate an immediate threat to human health, such application shall not involve a restricted-use pesticide, and no child may enter the area of such application until it is safe to do so according to the provisions on the pesticide label.

15. In cases of an emergency application, prior notice is not necessary except that on or before the day the application is to take place, prior notice is given to those persons who have previously requested such notice.

18. The application of lawn care pesticides on the grounds of schools with students in grades eight or lower must be according to an integrated pest management plan (IPM). Such applications are prohibited except in emergencies. An emergency application may be made to eliminate a human health threat in any school with students through grade eight as determined by the Superintendent of Schools.

19. Annually, not later than March 15, the District is required to send through its electronic mail notification or alert system a listing of notices for application of pesticides made during March 15th through December 31st from the preceding calendar year and those made from January 1st. This electronic mail notification is also to be printed in any applicable parent handbooks or manuals.

Regulation approved:

3524.1 Form 1

NORTHWESTERN REGIONAL DISTRICT NO. 7

Winsted, Connecticut

Pesticide Management Policy

Date _____

The intent of this policy is to ensure that students, employees, and parents/guardians receive adequate notice, in conformity with applicable statutes, prior to pesticide application in school buildings and on school grounds.

The Northwestern Regional District No. 7 Public Schools will:

- Provide notice of planned pesticide application to students, parents/guardians, and employees in the manner* required by law and establish a registry of parents/guardians and staff who want to receive such advance notice.
- Post the areas scheduled to receive pesticide application(s).
- Maintain written records for five years of all pesticide applications.
- Provide continuing instruction to those students who, based upon written medical request, find it necessary to be absent during the period of application.
- Inform parents/guardians and staff of the pesticide management policy.
- Employ only licensed and certified pesticide applicators for any non-emergency pesticide use in school buildings or on school grounds.

* District/school websites, social media accounts

During the past school year, the following pesticides were used or applied at the (insert school name]:

[insert list]

Please return the form below if you wish to be notified in advance of any planned application of pesticides at your school or on your school grounds.

[insert return address]

Please add my name to the pesticide notification registry.

Name:

Address for non emergency notifications:

Method to be used for emergency notifications: (choose only one)

phone:

fax:

e-mail:

other:

3524.1 Form 2

PESTICIDE APPLICATION PLAN

Date of planned application: _____ Day of week: _____

(It is recommended for the application to occur on a weekend or during a vacation period.)

Which pesticide (s) will be used? (Attach MSDSA if available): _____

(Choose for safety and effectiveness.)

Location/size of area(s) to be treated:

_____

Who will do the pest control? (circle one): Staff Contractor

Name (s):

_____

License number (s):

_____

Firm (if applicable):

_____

For interior treatment:

Does the building have active ventilation that can be left on after the application?

_____

If not, who is responsible for opening windows at least six (6) hours before staff and students reenter?

_____

For all applications:

Who will post the building or treated grounds with (1) date of application; (2) pesticide used; and (3) when the area can be used again?

_____

Will pesticides be stored on school grounds? [ ] YES [ ] NO

If "YES" where:

_____

(Read labels carefully!)

Keep all pesticides locked up and away from occupied areas.

Approved by school/district administrator: _____ Date: _____

School nurse: _____ informed: _____

Other (s): _____ informed: _____

Business and Non Instructional Operations

Safety Complaints/Records and Reports

Transportation Complaints

All complaints concerning school transportation safety will be made to the Director of Finance and Operations. The Coordinator will maintain a written record of all such complaints and will conduct appropriate investigations of the allegations.

The Superintendent of Schools of each local or regional school district and the supervisory agent of each nonpublic school shall make a written report of the circumstances of any accident within his jurisdiction and knowledge, involving a motor vehicle and any pedestrian who is a student, which occurs at a designated school bus stop or in the immediate vicinity thereof, to the Commissioner of Motor Vehicles within ten days thereafter on a form prescribed by the Commissioner.

The Superintendent will provide the Commissioner of Motor Vehicles with a copy of the written record of complaints within thirty (30) days of the end of the school year.

Legal Reference: Connecticut General Statutes

10 221c Development of policy for reporting complaints re school transportation safety. Reporting of accidents at school bus stops.

Policy adopted:

Business and Non-Instructional Operations

Food Service

School Lunch Service

Statement of Policy

The Board of Education (Board) recognizes that students require adequate, nourishing food and beverages to grow, learn, and maintain good health. It is the intent of the Board that District schools make a proactive effort to encourage students to make nutritious food choices. The Board directs that students shall be provided with adequate space and a lunch period of not less than 20 minutes for full-day students to eat meals.

The District shall offer nutritious meals to all students without regard to race, color, age, creed, religion, gender, sexual orientation, gender identity or expression, ancestry, national origin, marital status, pregnancy, disability, or any other basis prohibited by Connecticut or Federal law. The District shall ensure full accessibility to the school lunch program among children and families with limited English proficiency (LEP) by providing applications for free/reduced meals in the household's primary language. The District shall make substitutions for students with disabilities who have a signed medical statement from a state-licensed healthcare professional, in accordance with 7 CFR Part 15b.

This service shall be under the supervision of the Food Service Director, who shall be responsible to the Business Manager. The Food Service Director shall be hired in accordance with specific job specifications and be approved by the Board of Education.

Per this policy, the Superintendent shall develop and oversee the implementation of a **FOOD SERVICE PROCUREMENT PLAN & PROCEDURES**. This plan and procedures shall be included in the policy's administrative regulations.

Program Participation

The District shall participate in the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Special Milk Program (SMP). These programs will operate in accordance with the **Healthy, Hunger-Free Kids Act, the USDA's 2024 Final Rule on Child Nutrition Programs**, and applicable state laws. The District's NSLP, SBP, and SMP will operate in accordance with all applicable state laws and regulations to meet dietary specifications.

Student Privacy and Unpaid Meal Debt

In accordance with C.G.S. 10-215 and Public Act 23-101, as applies to all students:

1) The District shall ensure that any student with a negative balance is treated with the same dignity as a student with a positive balance. Under no circumstances shall a student

be required to perform chores to pay for a meal, nor shall they be denied participation in any school-sponsored activity or graduation solely due to unpaid meal debt. No student shall be publicly identified, shamed, or stigmatized for having unpaid meal charges (e.g., via wristbands, hand stamps, or alternative meals).

2) The District shall strictly maintain the confidentiality of students receiving free or reduced-price meals.

3) Communications regarding unpaid meal debt shall be directed to the parent or guardian, not the student.

a) Parents/Guardians shall be notified once the debt reaches the amount of (add the threshold number).

b) When the threshold has been reached, parents/guardians shall be notified by (identify the method of communication).

4) The District shall provide a federally reimbursable meal to any student who requests one, regardless of their ability to pay or status of debt, to prevent "empty tray" incidents.

5) Debt collection efforts shall not involve any collection agencies that use "litigious or aggressive" tactics against families.

Aims & Facilities

Policies governing the operation of the school lunch program shall be as follows:

1. All food sold or served shall meet or exceed the updated USDA standards regarding sodium reduction, whole grains, and limited added sugars.

2. The District shall provide lunches free or at reduced rates to children who qualify under federal income guidelines. The application process shall be proactive and accessible.

3. Cafeteria facilities shall be well-ventilated, attractive, and equipped with modern storage to ensure food safety and minimize waste.

Facilities

Cafeteria facilities, wherever possible, shall include the following:

1. Attractive, well-ventilated dining rooms.

2. A carefully planned, well-equipped kitchen adjacent to each dining area.

3. Adequate storage space so that food and supplies may be purchased in sufficient quantities to take advantage of favorable market conditions.

4. Maintenance, inspection, and repair of equipment so that maximum use is obtained and the danger of accidents to personnel is minimized.

Maintenance of Sanitary Conditions and Financing

Sanitary conditions in all phases of food preparation and serving shall be rigidly maintained at all times. The District shall maintain proper sanitation and health standards in food storage, preparation, and service, in accordance with all applicable state and federal laws, regulations, and requirements.

1. The food service fund shall be a non-profit entity used solely for the improvement or maintenance of the food service program, and financed accordingly:

a. Prices of school lunches shall be determined by the Superintendent in accordance with all prevailing costs of food, supplies, supervision costs, and wages of hourly employees.

b. Costs of food, supplies, salaries and wages of all employees, and other expenses directly incurred in the school lunch program shall be paid out of a separate fund, which shall be maintained under the control of the Business Manager or his/her designee and into which all receipts from sales and federal cash grants shall be paid. This fund shall be subject to annual audit by the District/Town auditor. In compliance with federal law, the District's NSLP (and SBP) shall be non-profit.

c. Office facilities, equipment, heat, light, and power shall be paid out of funds appropriated by the Board of Education.

d. Although the Board believes that the District's nutrition and food services operation should be financially self-supporting, it recognizes, however, that the nutrition program is an essential educational and support activity. Therefore, budget neutrality or profit generation must not take precedence over students' nutritional needs.

2. The Food Service Director shall ensure all "Certified Food Protection Managers (CFPM)" meet Connecticut Department of Public Health requirements and provide training for all food handlers in personal hygiene and sanitation techniques.

3. Cafeteria workers shall meet all state-mandated health and immunization requirements for food handlers.

School Food Safety Inspections/School Food Safety Program

1. The District shall comply with state and federal requirements for conducting cafeteria health and safety inspections and ensuring employee participation in appropriate inspection services and training programs.

2. The District shall obtain two (2) safety inspections per year in accordance with all local, state, and federal laws and regulations and shall post the most recent inspection report and release a copy of the report to members of the public upon request.

3. The District shall comply with federal regulations in developing a food safety program that enables District schools to take systematic action to prevent or minimize the risk of foodborne illness among students.

Farm to School Program & Local Purchasing

The Board shall give preference to "Connecticut-grown" farm products in accordance with C.G.S. 22-38d.

1. Any bid submitted by a service manager company in response for proposal (RFP) or bid solicitation by the Board that is posted to the State Portal and that relates to the Board's school nutrition program shall include information detailing the consistency of such bid with the State's Farm to School Program and the ways in which such bide facilitates the purchase of products from local farmers by the Board. All other factors being equal, the Board shall give preference to the RFP or bid that promotes the purchase of local farm products.

2. Any bidder for food service management must detail how their bid facilitates the purchase of local products.

3. Proof of origin (name and address of the Connecticut farm) is required for any product sold as "Connecticut-grown."

Eligibility & Free Meal Access/Universal Access

The Board complies with all requirements related to its responsibilities to provide free breakfast and lunch to all eligible students and shall use the Community Eligibility Provision (CEP) to the maximum extent possible under law.

Nutritional Standards (USDA Final Rule 2024-2026)

As a participant in the National School Lunch Program (NSLP) or School Breakfast Program (SBP), the Board of Education shall comply with all federal requirements of the **USDA Final Rule 2024-2026** (Child *Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*) and its implementation phases.

1. The District is committed to ensuring limiting added sugars to less than 10% of calories across the week. (effective July 1, 2027)

2. The District shall implement a phased reduction of sodium levels targeting the most current USDA Sodium Targets as they are phased in through 2027, targeting "Sodium

Target 1 (current baseline)" and "Target 1A (a further 10% reduction for lunch)" as applicable.

Procurement & "Buy American" Updates (Continue to Monitor for Updates)

The Board directs the Superintendent or his/her designee to monitor and follow all procurement procedures, including, but not limited to:

1. **Non-Domestic Cap** limiting non-domestic food purchases to a percentage cap of total commercial food costs.

2. **Local Incentive (CT), allowing access to the CT Local Food for Schools Incentive Program**, which provides matching state funds for purchasing locally grown or raised products. Administrative regulations should prioritize CT-grown produce to trigger these reimbursements.

3. **Protein Innovation complies with Federal rules**, which now allow nuts and seeds to be credited for the full meat/meat alternate component (removing the previous 50% limit), making vegetarian and plant-based menu planning simpler.

The District shall apply the 5% Threshold, which limits non-domestic food purchases to 5% of total commercial food costs.

The Food Service Director shall provide an annual "Local Procurement Report" to the Board of Education to track the efficacy of C.G.S. 22-38d compliance.

Financial & Administrative Management

The Board directs the Superintendent or his/her designee to monitor and follow all financial and administrative management procedures, including, but not limited to:

1. **Paid Lunch Equity (PLE)**, where districts with a positive or zero balance in their nonprofit school food service account as of June 30, 2024, are exempt from federal PLE pricing requirements.

2. **Net Cash Resources**, per federal law, requires the school food service fund not to exceed a three-month average of operating expenditures. If the net cash resources exceed such a limit, the Food Service Director shall be required to submit to the Superintendent a "Plan for Improvement" (e.g., equipment upgrades or improvements in food quality). The Superintendent shall make this plan available to the Board of Education.

3. **Indirect Costs**, charged by the Board of Education to the Food Service Fund shall be documented and consistent with the state-approved indirect cost rate.

4. **Unpaid Debt**, which strictly prohibits "lunch shaming" and specifies that no child can be publicly identified, shamed, or denied a meal due to unpaid charges.

Legal Reference: Connecticut General Statutes

10-215: Lunches, breakfasts, and other feeding programs (As amended by PA 21-46 and PA 23-101 regarding meal debt).

10-215a Nonpublic school and nonprofit agency participation in feeding programs.

10-215b Duties of State Board of Education re feeding programs.

10-215d Regulations re nutrition standards for school breakfasts and lunches. (as amended by PA 16-37)

10-216 Payment of expenses.

State Board of Education Regulations

10-215b-1 School lunch and nutrition programs.

10-215b-11 Requirement for meals.

10-215b-12 Reimbursement payments. (including free and reduced price meals)

10-215d Regulations re nutrition standards for school breakfasts and lunches. (as amended by PA 16-37)

10-221o Lunch periods. Recess. Board to adopt policies addressing limitation of physical exercise

22-38d Farm to school program. (as amended by PA 16-37 and PA 18-73)

Child Nutrition and WIC Reauthorization Act of 2004, 42 U.S.C. Section 1751.

School Lunch and Breakfast Programs 42 U.S.C. Section 1751 et seq.

National Food Service Programs, Title 7 Code of Federal Regulations, 7 CFR Part 210, Part 220, Part 215, Part 245.

42 U.S.C. Sec. 1758(h)/7 CFR Sect 210.13, 220.7 (School Food Safety Inspections).

Federal Register (74 Fed. Reg. 66213) amending federal regulations (7CFR Part 210 and 220).

P.L. 111-296 Healthy, Hunger-Free Kids Act of 2010 (HHFKA), 42 U.S.C. 1751

7 CFR Parts 210 & 220 – Nutrition Standards in the National School Lunch & School Breakfast Programs.

Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Assistance, 7 C.F.R. Part 15b (2001)

Federal Law:

7 CFR Parts 210 and 220, the "Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans" final rule. (89 FR 31962) and 225, and 226: (Updated USDA Nutrition Standards for 2024-2025).

42 U.S.C. 1751 et seq.: Richard B. Russell National School Lunch Act.

USDA Office of the Assistant Secretary for Civil Rights (ASCR) Policy Memo (May 2022): Clarifying prohibitions against discrimination based on gender identity and sexual orientation.

Policy adopted:

Business/Non-Instructional Operations

Food Service

School Lunch Service

Responsibilities and Duties

The lunch program shall be under the direction of the Food Services Director, who will report to the Business Manager/Director of Finance/Chief Finance-Operations Officer. The Food Services Director shall cooperate with building principals in matters essential to the proper functioning of the lunch program and the cafeterias.

Students

Students shall be permitted to bring their own lunches and to purchase beverages and incidental food items. The responsibility for managing student use of the cafeteria shall rest with the building principal.

Nutrition Guidelines and Food Operation

I. Meal Charge & Debt Management Procedures

To ensure compliance with PA 23-101, the following steps shall be taken to manage unpaid meal charges while maintaining student dignity:

1. **Notification Thresholds:**

   • **Level 1 ($10.00 debt)**: An automated email or text message shall be sent to the parent/guardian indicating the negative balance.

   • **Level 2 ($25.00 debt)**: The Food Service Director or designee shall call the parent/guardian to discuss the balance and offer assistance with the Free/Reduced Meal Application.

   • **Level 3 ($50.00 debt)**: A formal letter shall be mailed to the home. The Building Principal or Social Worker may be notified to determine if the family is experiencing a hardship requiring additional district support.

2. **Prohibited Actions:** Staff are strictly prohibited from:

   • Taking a meal away from a student once it has been served.

   • Discussing debt in the presence of other students.

- Using stamps, stickers, or "alternative meals" (e.g., a cold cheese sandwich) to identify debt.

3. Communication: All debt-related communication shall be with the adult household member. If a student asks about their balance, staff shall provide the information discreetly but shall not initiate the conversation.

II. Financial Oversight & "Net Cash Resources"

The Business Manager shall monitor the **Non-Profit School Food Service Account (NSFSA)** to ensure it remains a self-sustaining but non-profit entity.

- At the close of each fiscal quarter, the Business Manager shall calculate the "Three-Month Operating Average."
- If the fund balance exceeds this average, the Food Service Director shall submit a written "Plan for Improvement" to the Superintendent within 30 days. This plan may include, but not be limited to:
  - Purchasing high-efficiency kitchen equipment (steamers, refrigeration).
  - Increasing the frequency of "Connecticut-Grown" fresh produce.
  - Funding professional development for cafeteria staff.
- Any indirect costs charged to the food service fund must not exceed the **Connecticut State Department of Education (CSDE)** approved rate for the current fiscal year.

III. Nutritional Standards & Phase-In (2024–2027)

The Food Service Director shall maintain menus that meet the phased-in **USDA Final Rule** requirements:

Component	Operational Standard
Added Sugars	Limit to < 10% of weekly calories (Targeting full implementation by 2027).
Sodium	Adherence to USDA Target 1 (current) and 1A (effective 2027).
Milk	Only fat-free or 1% milk served; flavored milk must meet sugar limits.

Local Products	A minimum of 10% of total produce spend should target "CT-Grown" to trigger state incentives.

IV. Procurement & the "5% Non-Domestic Cap"

The District shall prioritize the "Buy American" provision as updated in 2024.

1. The Food Service Director shall maintain a "Non-Domestic Food Purchase Log" for any items not grown or processed in the U.S.

2. The total value of these non-domestic items (e.g., bananas, certain spices, or out-of-season fruit) shall not exceed 5% of the total commercial food cost.

3. All RFPs for food service management shall award "bonus points" (not to exceed 10% of the total score) to vendors with a proven track record of sourcing from Connecticut farms.

V. Civil Rights & Accessibility

- The "Parent Letter" and "Free/Reduced Price Meal Application" shall be made available on the district website in English, Spanish, and [Insert Top 3 Local Languages].

- The Food Service Director shall maintain a confidential file of all students requiring dietary substitutions. No substitution shall be made without a **Medical Statement** signed by a state-licensed healthcare professional.

- The USDA "And Justice for All" poster must be displayed in a prominent location in every cafeteria.

VI. Reporting & Audit

The Food Service Director shall provide the Board of Education with an **Annual Nutrition & Finance Report** each September. This report shall include:

1. Percentage of students participating in NSLP/SBP.

2. Total "CT-Grown" expenditure.

3. Total unpaid meal debt and a summary of collection efforts.

4. Confirmation of two (2) successful health inspections per site.

VII. Food Services Procurement Plan and Procedures

1. Purpose and Scope

The purpose of this plan is to provide a framework for ensuring that all procurement for the Northwestern Regional District No. 7 Child Nutrition Programs is conducted in accordance with 2 CFR Part 200 and 7 CFR Parts 210, 220, and 250. This document serves as the district's official written procurement procedures.

2. General Procurement Standards

• **Full and Open Competition**: All procurement transactions will be conducted in a manner that maximizes full and open competition. No restrictive requirements (such as unreasonable bonding or unnecessary experience) shall be used to limit bidding.

• **Responsibility**: The Director of Food Services is responsible for the oversight of all procurement activities and ensures that contractors perform in accordance with the terms of their contracts.

• **Code of Conduct**: No employee, officer, or agent of the District shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest exists. Officers/employees are prohibited from soliciting or accepting gratuities or favors from contractors.

3. Procurement Methods and Thresholds

The district will use the following methods based on the aggregate cost of the goods/services.

A. Micro-Purchases (Up to $15,000)

• Procedure: Purchases may be awarded without soliciting competitive quotes if the price is considered reasonable.

• Requirement: To the extent practicable, the district will distribute micro-purchases equitably among qualified suppliers.

• Documentation: Purchase orders and invoices will be maintained to show price reasonableness and equitable distribution.

B. Small Purchase Procedures ($15,001 to $350,000)

• Procedure: Informal "Small Purchase" procedures will be used.

• Requirement: The Director of Food Services shall obtain a minimum of three (3) written or verbal price/rate quotations from qualified sources.

• Documentation: A Quote Tabulation Sheet will be maintained for every purchase, documenting the vendor name, date, price quoted, and the name of the person providing the quote.

C. Formal Procurement (Above $350,000)

- Procedure: Formal advertising via Invitation for Bids (IFB) or Request for Proposals (RFP).
- Requirement: *Solicitations must be publicly advertised for at least 14 days.
- Price as the Primary Factor: In all RFP evaluations, price must be the primary factor and must be assigned the highest possible weight in the scoring matrix.
- Award: IFBs will be awarded to the lowest responsive and responsible bidder. RFPs will be awarded to the most advantageous proposal, price being the primary factor.

D. Noncompetitive Proposals (Sole Source)

- Procedure: Used only when competition is inadequate, in a public emergency, or with express written authorization from the CSDE.
- Documentation: A written justification for the sole source must be maintained and approved by the Business Manager.

4. Buy American Provision

The District will purchase, to the maximum extent practicable, domestic agricultural commodities or products (over 51% domestic content).

- **Monitoring**: The Director of Food Services will review product labels upon delivery.
- **Exceptions**: Limited to instances where a product is not produced in the U.S. in sufficient quantities or where costs are significantly higher.
- **Documentation**: An Exception Log will be maintained for all non-domestic items (e.g., bananas, pineapples) explaining the reason for the exception.

5. Affirmative Steps for Minority & Women's Businesses (MWBE)

In accordance with 2 CFR 200.321, the District will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including:

1. Placing qualified MWBE firms on solicitation lists.
2. Assuring that MWBE firms are solicited whenever they are potential sources.
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation.

4. Establishing delivery schedules that encourage participation by MWBE firms.

6. Bid Protest Procedures

Any party with a direct financial interest who is aggrieved in connection with the solicitation or award of a contract may file a protest.

1. **Filing**: Protests must be filed in writing to the District Business Manager within five (5) business days of the notice of intent to award.

2. **Review**: The Business Manager will review the protest and issue a written decision within ten (10) business days.

3. **Appraisal**: The decision of the Business Manager is final. Documentation of the protest and its resolution will be shared with the CSDE upon request.

7. Contract Oversight & Records

- **Retention**: All procurement records (solicitations, quotes, scoring sheets, contracts) must be retained for three (3) years plus the current year.

- **Prohibited Contracts**: The District strictly prohibits the use of "cost-plus-a-percentage-of-cost" or "cost-plus-a-percentage-of-income" contracts.

- **Cooperative Purchasing**: If using a GPO or State Contract (DAS), the District will verify that the original solicitation included all federal clauses and was conducted via full and open competition.

General Conditions

I. Food Pricing

Food prices set by the District are communicated to students and parents. District pricing strategies will encourage students to purchase full meals and nutritious items.

II. Communication

Procedures shall be in place to provide families, upon request, with information about the ingredients and nutritional value of the foods served.

III. Modified Meals

The District shall provide substitute foods to students with special dietary requirements upon written parental permission and a medical statement by a certified health professional that identifies the student’s special dietary needs. The medical statement shall state the medical condition or special dietary need that restricts the student’s diet and provide a list of food(s) that may be substituted in place of the lunch or breakfast menu being served.

IV. Cafeteria Environment

Students are provided with adequate time (a minimum of 20 minutes) and space to eat meals in a pleasant and safe environment. School dining areas will be reviewed to ensure:

A. Tables and chairs are the appropriate size for students.

B. Seating is not overcrowded.

C. Students have a relaxed environment.

D. Noise is kept from becoming excessive.

E. Rules for safe behavior are consistently enforced.

F. Tables and floors are cleaned between meal periods.

G. The physical structure of the eating area is in good condition.

H. Appropriate supervision is provided.

V. Resources

The Connecticut State Department of Education's (CSDE) Meal Patterns Web Page shall be consulted regarding meal patterns for NSLP and SBP consistent with the nutrition standards to fulfill the requirements of the Healthy, Hunger-Free Act of 2010 and all subsequent state and federal updates.

VI. Other Foods Offered or Sold

The District recognizes that federal government standards requiring NSLP and SBP meals to be consistent with the applicable Dietary Guidelines for Americans do not apply to competitive foods sold or served outside the food service areas as defined in this regulation. Foods offered in classrooms or during school-sponsored activities, and food and beverages sold as part of approved school fund-raising events, shall meet minimum requirements unless otherwise exempt by law.

Legal Reference: Connecticut General Statutes

10-215: Lunches, breakfasts, and other feeding programs (As amended by PA 21-46 and PA 23-101 regarding meal debt).

10-215a Nonpublic school and nonprofit agency participation in feeding programs.

10-215b Duties of State Board of Education re feeding programs.

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42 U.S.C. Sec. 1758(h)/7 CFR Sect 210.13, 220.7 (School Food Safety Inspections).

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Federal Law:

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(89 FR 31962) and 225, and 226: (Updated USDA Nutrition Standards for 2024-2025).

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USDA Office of the Assistant Secretary for Civil Rights (ASCR) Policy Memo (May 2022): Clarifying prohibitions against discrimination based on gender identity and sexual orientation.

Regulation approved:

REGIONAL SCHOOL DISTRICT NO. 7
BARKHAMSTED, COLEBROOK, NEW HARTFORD, NORFOLK
Post Office Box 656, Winsted, Connecticut 06098

Steven K. LePage
Superintendent of Schools
slepage@nwr7.org

July 14, 2026

Amy Bardino
165 Wallens Street
Winsted, CT 06098

Dear Amy,

I want to thank you for sharing your decision to resign from your position as a Special Education Teacher at Northwestern Middle School, effective 7/11/26. While we are truly grateful for the care and commitment you've shown to our students over the past 9 years, I understand and respect your decision to pursue this new opportunity, right down the hall, as a Shared Services employee. I'm glad you will continue to serve our students in this new capacity!

Therefore, I acknowledge and accept your resignation. This will need to be formally approved by our Board of Education at its August 19 meeting, but it is just a formality and will not pose any issues. Once the Board takes action, we will provide you with formal confirmation and complete the necessary updates to your employment record.

On behalf of the Region 7 School District, I thank you for your commitment as an outstanding special education teacher and wish you continued success in your new position and in all future endeavors.

Warm regards,

Steven K. LePage
Superintendent

Diane Barrett <dbarrett@nwr7.org>

Resignation

Amy Bardino <abardino@nwr7.org> Sat, Jul 11, 2026 at 11:39 AM
To: Diane Barrett <dbarrett@nwr7.org>, Ryan Cornelius <rcornelius@nwr7.org>, Steven LePage <slepage@nwr7.org>

Good morning,

I wanted to officially resign from my middle school Special Education position at Northwestern. I'm excited to be starting my new position as the Structured Literacy teacher in the middle school.

Thank you,
Amy