

SCHOOL ADMINISTRATIVE UNIT THIRTY-NINE

Amherst, Mont Vernon, and Souhegan Cooperative School Districts

ADAM A. STEEL
Superintendent of Schools

CHRISTINE M. LANDWEHRLE
Assistant Superintendent

MARGARET A. BEAUCHAMP
Director of Student Services



SAU #39 Board Meeting Agenda

Tuesday April 16, 2019 – 6:00 PM
Souhegan High School Learning Commons
412 Boston Post Road
Amherst, NH 03031

Agenda Item	TIME	Desired Action	Backup Materials
Organizational Meeting Call to Order	6:00 PM	Superintendent Adam Steel to call the Board organizational meeting to order	
Election of School Board Officers, Committee Appointments, & Manifest Appointees	6:00 PM	Election of School Board Officers, Committee Appointments, Manifest Appointees	
Appointments of School District Treasurer	6:05 PM	Board Appointment of School District Treasurer & Deputy Treasurer	
Public Input	6:10 PM		
Boards' Updates	6:15 PM	Each School Board to give an update on their districts– ASD, MVSD, SCSD <i>No Action Needed</i>	
Reconfiguration Committee Update	6:20 PM	Committee update regarding Reconfiguration <i>No Action Needed</i>	
Superintendent's Report	6:25 PM	Superintendent Adam Steel will update the Board	
Consent Agenda	6:35 PM	1. Approve Minutes of January 24, 2019 2. Approve Budget Transfers 3. Q3 Finance Report	Draft Minutes 1/24/2019 Budget Transfers Q3 Finance Report
Policies Review	6:40 PM	1. Approve SAU 39 Policies First Reading 2. Review of Policies to move to Individual Boards	SAU Policies Policies to move

Strategic Planning	6:50 PM	Review of Strategic Planning including Portrait of a Graduate <i>No Board Action Needed</i>	Portrait of a Graduate
Data & Security Update	6:55 PM	Asst. Superintendent, Christine Landwehrle will give the status of data and security in the entire SAU <i>No Board Action Needed</i>	
Non-Public Session		91- A:3 II None Scheduled	
Meeting Adjourned	7:00 PM		

Future School Board Meeting Dates

Date	Day	Time	Meeting Type	Location
May 23, 2019	Thursday	6:00 PM	Regular	Souhegan
June 13, 2019	Thursday	6:00 PM	Regular	Mont Vernon

SAU #39 Board Meeting

Thursday, March 21st, 2019

Meeting Minutes- Not Approved

Administrative Team: Adam Steel- Superintendent, Christine Landwehrle- Assistant Superintendent, Meg Beauchamp- Director of Student Services, and Brad Freeman- Network Administrator.

Amherst School Board: Elizabeth Kuzsma- Chair, Terri Behm- Vice Chair, John Glover- Secretary, Ellen Grudzien and Tom Gauthier.

Souhegan Cooperative School Board: Chair- Jim Manning, Vice Chair- Pim Grondstra, Secretary- Steve Coughlan, Amy Facey, David Chen and Laura Taylor.

Mont Vernon School Board: Sarah Lawrence- Vice Chair, Stephen O'Keefe, and Kim Roberge.

Minute Taker: Danae Marotta

SHS Student Videographer: Shannon Hargreaves

Public: Kelly Schmidt, Amherst NH

I. Call to Order

Ms. Amy Facey called the meeting to order at 6:10PM.

II. Non Public Session

Mr. Steve Coughlan motioned to enter into Non-Public Session RSA 91 A:3 (b) and (c) at 6:11 PM. Motion was seconded by Mr. Pim Grondstra. The vote was unanimous Motion passed.

Ms. Facey called a Roll Call: Kuzsma- Yes, Behm- Yes, Glover- Yes, Grudzien- Yes, Gauthier- Yes, Lawrence- Yes, O'Keefe- Yes, Roberge- Yes, Manning- Yes, Grondstra-Yes, Coughlan-Yes, Facey- Yes, Chen- Yes and Taylor-Yes. Mr. Chen entered at 6:24 PM.

III. Regular Session

The Board resumed Regular Session at 6:33PM.

Superintendent Mr. Adam Steel placed in to nomination Ms. Michele Croteau as SAU #39 Business Administrator from July 1st 2019, with a three-year contract, through June 30th 2022 with a salary of \$115,000. Motioned by Mr. Steven O'Keefe and seconded by Mr. Steve Coughlan. Motion passed (13-0-1) Ms. Laura Taylor abstained.

Ms. Facey mentioned that they are not going to do the Organizational Meeting tonight as there is an RSA that states that they need to wait until April 1st. She then asked for introductions as there are new members on the Board.

IV. Boards' Updates

34 Souhegan Cooperative School Board

35 Chair, of the SCSB, Mr. Jim Manning remarked that the SCSD Budget passed. He then added
36 that he asked Superintendent Steel to start the open the conversation on the FY 21 Budget and
37 look at a 5% reduction, which is \$905,000. It is to start the conversation.

38 Ms. Roberge asked if that was a Board request or a Chair request.

39 Mr. Manning replied, Chair request.

40 The Board thanked Mr. Manning.

41 Amherst School Board

42 Chair, Ms. Elizabeth Kuzsma, discussed that they had their Organizational Meeting. Their
43 Budget and Warrant Articles all failed with the exception of the Special Education funding. The
44 Board has a big year ahead.

45 The Board thanked Ms. Kuzsma.

46 Mont Vernon School Board

47 Vice Chair, Ms. Sarah Lawrence, discussed that their Budget passed and there is a good overall
48 feeling in Mont Vernon. They did not have their Organizational Meeting yet and are looking for
49 an additional Board member, which is posted on the SAU 39 website.

50 The Board thanked Ms. Lawrence.

51 Ms. Facey added that she is on the Board for the NHSBA (New Hampshire School Board
52 Association) and will set it up through Superintendent Steel's Office to get them some Board
53 Member Training.

54 V. Public Input

55 No Public Comment

56 VI. Superintendent's Report

57 Strategic Planning

58 Superintendent Steel added that they will be meeting next week, March 27th at AMS. They will
59 be reviewing the Current State Analysis and Portrait of a Graduate (that's been refined). It will
60 be an important meeting.

61 Data Dashboard Project

62 They have a consultant working with them to help them build a Data Dashboard. The community
63 will be able to see enrollment trends, State wide tests, NWEA results, attendance data, etc.
64 Assistant Superintendent, Ms. Christine Landwehrle, has taken the lead on this project and they
65 will have a few prototypes for the Board soon. A tremendous amount of data has already been
66 collected. For the long term, they see using this for individual learning plans.

67 Ms. Facey asked for the definition of OKR.

68 Superintendent Steel replied Objectives and Key Results, for making sure that they are moving
69 in the right direction. He then referenced the book, "*Measure What Matters*", by John Doerr. He
70 encouraged the Board to read the book to get a better understanding and will be happy to provide
71 them with a copy.

72 Enrollment Projections

73 He then discussed that Amherst Community Member, Mr. Steve Frades, has been working on
74 developing enrollment projections for all three districts. He has met with him several times and
75 has done really great work. He then reviewed his data noting that it is based on a lot of different
76 information.

77 Mr. Gauthier asked if he can use his formula to back test.

78 Mr. Chen added replied, it is how he came up with this data.

79 Ms. Roberge remarked that they cannot have just 8 enrollments at the MVVS with over 24
80 homes in construction.

81 Superintendent Steel then asked if it would be helpful to have Mr. Frades come to a Board
82 meeting.

83 The Board replied, yes.

84 SAU Consolidation Sub-Committee

85 He added that they will be meeting twice monthly from now through October. Ms. Sarah
86 Lawrence was elected Chair. The Committee wanted to have legal counsel along the way. He
87 has contacted Law Firm, Wadeleigh, Starr and Peters, Manchester, NH, and specifically, Mr.
88 Dean Eggert. Their goal is to make recommendations to the SAU Board October the latest, to
89 make it to the March 2020 ballot.

90 To be clear, there are 6 things that will need to happen or else the consolidation process will stop.
91 That is the 3 Boards, Amherst, Mont Vernon and Souhegan, approving to place a warrant on the
92 ballot and then those three warrants passing by the voters.

93 They are public meetings with minutes and agendas posted on their website.

94 Mr. Gauthier asked if everything passes, when will it be effective.

95 Mr. Steel replied, most likely July 1st of 2021, with enough time for a full budget cycle.

96 Ms. Kuzsma asked if they are planning on going to the State first.

97 Mr. Steel replied that consolidating requires DOE approval and that step will be a part of the sub
98 committee's discussions.

99 Mr. Glover remarked that he would like to reconfirm the members, scope and purpose. They
100 have new members and he would like to know what they think on the whole consolidation
101 question.

102 Ms. Roberge added that although she is leaving the Board, does not believe that MV will change
103 their minds on keeping the MVVS as their elementary school.

104 Mr. Steel clarified that a couple of months ago the SAU Board officially commissioned this sub-
105 committee to look at consolidation and to discuss and work out all of the details.

106 Mr. Glover added that it doesn't have to happen right here or right now but would like to know
107 what the new board members think.

108 Ms. Facey added that she is thinking that the new board members need a little background
109 information.

110 Mr. Steel then gave the new members an overview.

111 Mr. Gauthier asked what are the cost savings for consolidating.

112 Superintendent Steel added that it is not really about cost savings, there may be some efficiencies
113 and a possibility to share services. It is about the educational flexibility and benefit for the
114 students.

115 Ms. Grudzien asked if "consolidation" is the right word, because you will still have three
116 districts under the SAU. It is a little deceiving.

117 Ms. Taylor asked if they cannot share services without consolidating.

118 Mr. Steel gave an example for Ms. Taylor.

119 School Start Times

120 He then explained that this is an internal committee of the Superintendent with SHS Athletic
121 Director, Mr. Dan Wyborne as the Chair. The Committee will meet between now and October
122 with final plan presented in time for budgeting process.

123 School Board Meeting Calendar

124 He showed the Board a calendar with the next 16 months planned out.

125 Ms. Kuzsma asked why are they not meeting in April.

126 Ms. Facey suggested a meeting in early May.

127 The Board thanked Superintendent Steel for all the updates.

128 VII. Consent Agenda

129 **Mr. Stephen O'Keefe motioned to accept the Consent Agenda items 1. Draft Minutes of**
130 **January 24, 2019, 2. Approve FY 19 Q3 Consolidated Board Report, 4. Approve SAU**
131 **Budget Transfer#1 and 5. Approve SAU Budget Transfer #2. Mr. Pim Grondstra seconded**
132 **the motion. The vote was unanimous, motion passed.**

133 VIII. Superintendent Evaluation

134 Ms. Facey discussed that they are looking to redo their Superintendent Evaluation Tool. They
135 used it for the first time with Superintendent Steel and had some challenges. Instead of assigning
136 a separate subcommittee, she mentioned it to the Policy Committee and through the NHSBA
137 meeting, she found that the school board of the year had a great rubric that was user friendly. She
138 then asked the Board if they had any objections with having the Policy Committee handle it.

139 There were no Board objections from the Board.

140 The Board thanked Ms. Facey.

141 IX. Data and Security Update

142 Assistant Superintendent, Ms. Christine Landwehrle discussed that a new law was passed around
143 privacy and data security. They did receive a preliminary report from the ATOM Group,
144 (Portsmouth NH) to find gaps and issues that they need to resolve. They are looking on how they
145 might be able to develop different procedures to address those identified gaps.

146 The ATOM Group was onsite yesterday doing a Vulnerability Assessment and that will be the
147 next part of the report that they receive from them.

148 Next, Director of Technology, Mr. Bruce Chakrin and Network Administrator, Mr. Greg
149 Rodriguez are working on a Data Governance Plan.

150 Lastly, they have to do an inventory of all of their student software programs. They are
151 subscribing to Education Frameworks and teachers have been working on getting a list together
152 of the educational programs that they are using. There are a lot of free programs out there that
153 teachers use and they needed to make sure that they got information from everyone across the
154 SAU.

155 Ms. Behm asked about new program/software approval for teachers.

156 Ms. Landwehrle replied that they are not sure at this time, but they want to make sure that it is
157 not interfering with what teachers need to do. They are thinking of making it like a traffic light,
158 Green for good, and so on.

159 Ms. Taylor asked what is the end goal.

160 Ms. Landwehrle replied security and keeping data intact.

161 Mr. O'Keefe asked about the potential cost of all of these changes.

162 Mr. Steel mentioned they did have savings with not having a BA for 9 months.

163 Ms. Landwehrle replied that she will bring more information about costs at the next meeting.

164 Mr. Glover asked what if a teacher brings up a good resource that is not on highly rated on
165 Education Frameworks.

166 Ms. Landwehrle replied that there might be other software that is similar that has greater
167 security.

168 Ms. Taylor asked if this will monitor the commercials that are being shown to the students.

169 Ms. Landwehrle replied that this is not filtering software.

170 Ms. Taylor added that some of the programs that the students are required to use show them
171 commercials before they can use them.

172 Mr. Chen asked about the data policies.

173 Ms. Landwehrle replied that she is not going to share some of the audit details in public.

174 The Board thanked Ms. Landwehrle adding that it is a big job.

175 X. Public Input

176 Ms. Kelly Schmidt, Amherst NH, applauded the work on data security noting that it is an
177 emerging field and hard to find employees in that field.

178 Ms. Facey thanked Ms. Schmidt for her comments.

179 Ms. Lawrence added that with Technology Teacher, Mr. John Ranta, it is part of the curriculum.

180 Ms. Schmidt asked if they are doing a phishing campaign along with the penetration tests.

181 Ms. Landwehrle added that they have been working on it and will never ask for their password or
182 other sensitive information.

183 Ms. Kuzsma asked if she can send out that information for the Board.

184 Ms. Landwehrle replied, yes.

185 The Board thanked Ms. Landwehrle.

186 XI. Non-Public Session

187 **Mr. John Glover motioned to enter into Non-Public Session RSA 91 A:3 (c) at 7:35 PM.**
188 **Motion was seconded by Mr. Pim Grondstra. The vote was unanimous Motion passed.**

189 **Ms. Facey called a Roll Call: Kuzsma- Yes, Behm- Yes, Glover- Yes, Grudzien- Yes,**
190 **Gauthier- Yes, Lawrence- Yes, O’Keefe- Yes, Roberge- Yes, Manning- Yes, Grondstra-Yes,**
191 **Coughlan-Yes, Facey- Yes, Chen- Yes and Taylor-Yes.**

192 **Mr. Glover left at 8:16PM.**

193 **Motion to leave nonpublic session and return to public session at 8:29 PM by Mr. Glover**
194 **and second by Ms. Grudzien. Motion passed.**

195 XII. Public Session Reconvened at 8:29PM.

196 **Motion made by Mr. Glover and second by Mr. Coughlan to authorize Adam to take up to**
197 **6% of his salary as a raise for himself for FY20. All in favor and motion passed.**

198 **Motion to adjourn by Ms. Roberge and second by Mr. Grondstra. Motion passed.**

199 XIII. Meeting Adjourned at 8:30PM

**SCHOOL ADMINISTRATIVE UNIT #39
SCHOOL BOARD APPROVED - BUDGET TRANSFER REQUEST**

REQUEST FOR BUDGET TRANSFER NO.:

2019 005

DATE:

4/11/2019

TRANSFER FROM:

TRANSFER TO:

Account Number	Description	Current Approp.	Transfer Amount	Projected Yr. End Exp.
10.2500.111.00.000000	Business Office Admin Salaries	\$259,374	(\$29,241)	\$220,526

Account Number	Description	Current Approp.	Transfer Amount	Projected Yr. End Exp.
10.2321.240.00.000000	Courses & Conferences	\$4,000	\$9,378	\$13,378
10.2321.328.00.000000	Consultant Cost	\$41,000	\$19,307	\$60,307
10.2318.330.00.000000	Legal Expenses	\$15,530	\$556	\$16,086

TOTAL TRANSFERRED FROM:

(\$29,241)

TOTAL TRANSFERRED TO:

\$29,241

JUSTIFICATION:

Three contracted graduate courses for Sup. Certification
School start time consultant and Dashboard consultant
Year-to-date Legal expenses

Dir. of Finance

11-Apr-19

REQUESTOR: DIRECTOR/DATE

APPROVED BY SAU #39 SCHOOL BOARD ON

Adam Steel, Superintendent

School Administrative Unit 39

Consolidated Board Report			From Date: 7/1/2018	
Fiscal Year: 2018-2019			To Date: 3/31/2019	
Account Number / Description	Budget	Activity + Enc	Balance	%
Fund: GENERAL FUND - 10				
1200 / SPECIAL PROGRAMS	\$341,821.00	\$339,803.41	\$2,017.59	0.59%
2300 / SUPPORT SERVICES- GENERAL ADMIN	\$700,418.00	\$728,370.41	(\$27,952.41)	-3.99%
2500 / BUSINESS SUPPORT SERVICES	\$754,639.00	\$686,991.48	\$67,647.52	8.96%
2600 / OPERATION AND MAINTENANCE SERV	\$180,269.00	\$144,784.87	\$35,484.13	19.68%
2800 / SUPPORT SERVICES- CENTRAL	\$158,974.00	\$157,823.39	\$1,150.61	0.72%
3100 / FOOD SERVICE OPERATIONS	\$103,596.00	\$100,765.15	\$2,830.85	2.73%
Total Expenditures	\$2,239,717.00	\$2,158,538.71	\$81,178.29	3.62%

SAU POLICIES – FIRST READ

SAU 39 POLICY

DA - FISCAL MANAGEMENT POLICY

The school board recognizes the important trust it has been given with the responsibility of managing public resources. As trustee of local, state, and federal funds allocated for use in public education, the board will be vigilant in fulfilling its responsibility to see that these funds are used wisely for achievement of the purposes to which they are allocated.

In SAU 39's fiscal management, the board seeks to achieve the following goals:

1. To engage in thorough advance planning, in order to develop budgets and to guide expenditures so as to achieve the greatest educational returns and the greatest contributions to the educational program in relation to dollars expended.
2. To establish levels of funding which will provide high quality education for the district's students.
3. To use the best available process for budget development and management.
4. To provide timely and appropriate information to all staff with fiscal management responsibilities.
5. To establish effective and efficient procedures for accounting, reporting, business, purchasing and delivery, payroll, payment of vendors and contractors, and all other areas of fiscal management.
6. To communicate noteworthy quality improvement and cost-controlling actions to the public and press.

First Reading: April 16, 2019

SAU 39 POLICY

DB – ANNUAL BUDGET

One of the primary goals of the Board is to secure adequate funds to carry out a high-level program of instruction.

The adopted annual budget is the financial outline of the educational program; it is the legal basis for the establishment of tax rates. The annual school budget process is an important function of SAU 39's operations and should serve as a means to improve communications within the school organization and with the residents of the community.

The Superintendent will be responsible for preparing, and presenting to the Board for adoption, the annual budget. The Board expects the Superintendent to work closely with the principal(s), and other school and SAU administrators to satisfy the needs of the schools. The Principals and administrators will confer with appropriate staff in getting budgetary requests and information on requirements.

First Reading: April 16, 2019

SAU 39 POLICY

DBB--FISCAL YEAR

The fiscal year is defined as beginning on the first day of July and ending on the thirtieth day of June following.

First Reading: April 16, 2019

SAU 39 POLICY

DBC – BUDGET PREPARATION

The Superintendent may establish procedures for the involvement of staff in the development of the budget proposal.

The Board will adopt guidelines and a schedule each year for the timely submission of the budget to the Board, and budget advisory committee.

First Reading: April 16, 2019

SAU 39 POLICY

DBF--BUDGET REVIEW/HEARING/ADOPTION

The budget will be made available to the budget advisory committee, the press and the public at the same time the Superintendent presents the budget to the Board. It is the intent of the board to have budget information disseminated so the public and budget advisory committee may review it several weeks prior to any public hearing.

The budget shall be presented through public hearings and adopted as prescribed by the applicable RSAs.

First Reading: April 16, 2019

SAU 39 POLICY

DBI—BUDGET IMPLEMENTATION

The budget serves as the control to direct and limit expenditures. Overall responsibility for this control rests with the superintendent, who will establish the procedures for budget control and reporting throughout SAU 39.

The total amounts which may be expended during the fiscal year for the operations are set forth in the budget. It shall be the practice that funds not be transferred from one account to another; however, it is expected that necessary over-expenditures in certain accounts will be offset by under-expenditures in other accounts (See policy DBJ).

First Reading: April 16, 2019

SAU 39 POLICY

DBJ--TRANSFER OF APPROPRIATIONS

It is the intent of the Board to limit its spending to the amount specified for each functional area. However, transfer of funds between line items will be permitted if deemed necessary to achieve Board policy goals, except that excess funds may not be transferred from the Unemployment Compensation line item.

All such transfers will be in accordance with the requirements of RSA 32:10 and the SAU 39 Business Operations Manual.

RSA 32:10, Transfer of Appropriations
RSA 282-a:71, III, Unemployment Compensation

First Reading: April 16, 2019

SAU 39 POLICY

DC--TAXING AND BORROWING AUTHORITY AND LIMITATION

No funds will be borrowed without the expressed approval of the school district electorate as determined by a vote of the school district at an annual or special school district meeting in accordance with the Municipal Finance Act, RSA Chapter 33.

First Reading: April 16, 2019

SAU 39 POLICY

DD--FUNDING PROPOSALS AND APPLICATIONS

The Superintendent is to apprise the Board of its eligibility for general or program funds and to make recommendations for Board action.

First Reading: April 16, 2019

SAU 39 POLICY

DEA – REVENUES FROM LOCAL TAX SOURCES

The major share of all financial support for the Districts (and therefore the SAU) is raised by taxing property. Most of the financial support of public education, therefore, is subject to a direct vote of the people.

It is the responsibility of the Board to explain the objectives and needs of the schools to appropriate community bodies that have a role in school budget adoption, and to the voters of the Town(s).

The Board, administration, and the professional staff will work with the taxpayers toward the solution of problems in the operational funding of the Schools.

The Board will:

Accept all available state funds to which the District or SAU is entitled by law or through rules of the State Board of Education, and

Accept all funds which are available providing there is a specific need for them and that matching funds required are available.

The Board may accept revenues on a case-by-case basis consistent with its goals, policies, and programs.

First Reading: April 16, 2019

SAU 39 POLICY

DFA – INVESTMENT POLICY

The Board authorizes the Treasurer, working in conjunction with the Superintendent and his/her designee and pursuant to RSA 197:23-a, to invest the funds of the District (or SAU) subject to the following objectives and standards of care.

OBJECTIVES

The three objectives of investment activities shall be safety, liquidity, and yield.

1. **Safety** of principal is the foremost objective in this policy. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital by mitigating credit and interest rate risk. This will be accomplished by limiting the type of the investments and institutions to those stipulated by statute and fully covered by FDIC insurance or collateral approved pursuant to applicable law.
2. **Liquidity** of the investment portfolio shall remain sufficient to meet all operating requirements that may be reasonably anticipated.
3. **Yield.** The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above.

STANDARDS OF CARE

1. **Prudence.** The standard of prudence to be used by the Treasurer and Superintendent, or his/her designee involved in the investment process, shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio.
2. **Ethics and conflicts of interest.** The Treasurer and Superintendent, or his/her designee involved in the investment process, shall refrain from personal business activity that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. The members of the Investment of Funds Committee shall disclose any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial institutions with which they conduct business. They shall also disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officials shall subordinate their personal investment transactions to those of the School District, particularly with regard to the timing of purchases and sales.
3. **Internal Controls.** The Treasurer and Superintendent or his/her designee shall establish a system of internal controls, which shall be documented in writing. The internal controls shall be reviewed by an independent auditor.

The investment of funds will be left to the discretion of a Committee consisting of the Treasurer, the Director of Finance and the Business Administrator without prior approval of the Board. This committee shall be guided by RSA 197:23-a.

SAU 39 POLICY

DFA – INVESTMENT POLICY (continued)

The Board will review the investment policy annually as part of its Budget Assumptions.

First Reading: April 16, 2019

Legal References:

RSA 197:23-a, Treasurer's Duties

RSA 383:22, Public Deposit Investment Pool

SAU 39 POLICY

DG – DEPOSITORY OF FUNDS

All income payable to the school district and all revenue received will be deposited with the school treasurer, who will credit it to the appropriate account.

The treasurer shall have custody of all moneys belonging to SAU 39 and shall pay out the same only upon orders of the school board or upon orders of the 2 or more members of the school board empowered by the school board as a whole to authorize payments.

First Reading: April 16, 2019

SAU 39 POLICY

DGA – AUTHORIZED SIGNATURES

Checks drawn on the general fund or any special fund (with the exception of the activity fund) will require the signature of the school district treasurer or deputy treasurer.

First Reading: April 16, 2019

SAU 39 POLICY

DH - BONDED EMPLOYEES AND OFFICERS

The Board requires that the treasurer and assistant treasurer be bonded. SAU 39 will arrange a public officials bond to cover the treasurer and each assistant, if any, in the amount of \$100,000. It is the practice that any employee who administers student activity money shall be bonded. Any employee who administers funds will be bonded appropriately. SAU 39 will arrange a blanket position bond, including a faithful performance endorsement, in the amount of \$100,000 on all employees who administer funds.

First Reading: April 16, 2019

SAU 39 POLICY

DI – FISCAL ACCOUNTING AND REPORTING

The accounting system will be in conformance with the New Hampshire Financial Accounting Handbook published by the State Department of Education. An adequate system of encumbrance accounting will be maintained.

The following purposes must be satisfied by the accounting system:

1. **Administrative Control:** The financial records must be adequate to guide the making or deferring of purchases, the expanding or curtailing of programs, and the controlling of expenses. Current data should be immediately available and in such form that periodic summaries may be readily made from the data.
2. **Budget Preparation:** The financial records must be adequate to serve as a guide to budget estimates of subsequent years, and to hold expenditures to the amounts appropriated. Accounts are to be kept for each item for which separate budget estimates must be made. An adequate code of expenditure accounts will be used.
3. **Accounting for Stewardship:** The financial records must be adequate to show that those in charge have handled funds within the framework of law and in accordance with Board policy.

Financial records will provide the following information:

1. **For each account in the budget:** the appropriation, appropriation transfers, expenditures, encumbrances, and unencumbered balance.
2. **For each purchase order:** the name of vendor, description of the item involved, approval of the Business Administrator and designated approver, the amounts, the call for bids if required, and an abstract of the bids received. Purchase order sets will be pre-numbered and each set accounted for.
3. **For each purchase:** the purchase order information, plus the record of receipt and condition of goods, the invoice and the record of payment.
4. **For each income account:** the budget estimate, the estimates as revised periodically, the receipts to date, and the balance anticipated.
5. Reimbursement of expenditures will be credited to the appropriate previously expended account within the same fiscal year, or to Refund of Prior Year Expenditure in the next fiscal year.

First Reading: April 16, 2019

SAU 39 POLICY

DIA –FUND BALANCES

Government Accounting Standards Board (GASB) 54 Fund Balance Reporting and Governmental Fund Definitions shall be complied with as follows:

The policy shall only apply to governmental funds.

The following Fund Types will be used in reporting activity in governmental funds using the definitions provided by GASB Statement No. 54: General Fund, Special Revenue Fund, Capital Project Fund and Permanent Fund. All fund types may or may not be reported in any given reporting period, based on actual activity.

Fund balance shall be reported in the following categories using the definitions provided by GASB Statement No. 54: Nonspendable, Restricted, Committed, Assigned and Unassigned amounts. Fund balances shall only be used or returned in accordance with applicable New Hampshire law and/or Governmental Standards Board Statement 54 (GASB 54)

First Reading: April 16, 2019

Legal References:

RSA 32, Municipal Budget Law

RSA 33, Municipal Finance Act

RSA 35, Capital Reserve Funds

Governmental Standards Board Statement 54 (GASB 54)

SAU 39 POLICY

DIAM – BOARD REVIEW AND SIGNING OF MANIFESTS

The shall designate two of its members at the annual organizational meeting in March, or when required by change in membership, to review and sign each manifest and thereby attest to the review (See Policy DG).

Any questions or concerns the board reviewers may have concerning a manifest will be brought to the immediate attention of the business office.

First Reading: April 16, 2019

SAU 39 POLICY

DID – FIXED ASSETS & DURABLE GOODS INVENTORIES

To serve the functions of conservation and control, a running inventory of fixed assets which exceed \$10,000 in purchase price and with a useful service life in excess of 5 years (excluding software licenses) will be maintained by the Superintendent's office.

An inventory of durable goods for each school (and the SAU) will be maintained. Changes in durable goods inventory will be maintained on an ongoing basis and shared with the Superintendent's office. Inventories shall be reviewed periodically for accuracy. Discrepancies shall be investigated.

First Reading: April 16, 2019

EHAA - COMPUTER SECURITY, E-MAIL AND INTERNET COMMUNICATIONS

Category: Priority/Required by Law

See also EGA

SAU 39 has established this policy with regard to access and disclosure of electronic data composed, stored, sent, or received by employees using SAU 39 computer system. This policy is designed to protect the safety and security of the SAU 39's computer systems including e-mail and Internet use.

SAU 39 intends to enforce the rules set forth below and reserves the right to change these rules at any time.

1. The computer hardware system, software and e-mail system are owned by SAU 39, and all messages or data composed, stored, sent, or received using the system are and remain the private property of SAU 39. They are not the property of the employee.
2. The computer and e-mail system is to be used for business purposes only. Personal business is unauthorized and should not be conducted on the system.
3. The electronic mail system may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job related solicitations.
4. SAU 39 prohibits discriminatory, harassing, or offensive materials in any form of media. Among those which are considered offensive are any messages which contain sexual implications, racial slurs, gender-specific comments, or any other comments that offensively address someone's age, sexual orientation, religious or political beliefs, national origin, or disability.
5. The electronic mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization.
6. SAU 39 reserves, and intends to exercise without prior notice, the right to read, review, audit, intercept, access or disclose any and all information on an employee's computer system or messages created, received or sent over the electronic mail system for any purpose, even if coded or passworded.
7. The confidentiality of any message or data should not be assumed. Even when a message is erased, it is still possible to retrieve and read that message. The use of passwords for security does not guarantee confidentiality, or that SAU 39 will not retrieve it. All passwords must be disclosed to the computer administrator.
8. Any communications created, sent, or retrieved using e-mail may be read by individuals other than the intended recipient.
9. Notwithstanding SAU 39's right to retrieve and monitor any e-mail messages, such messages should be treated as confidential by other employees and accessed only by the

intended recipient. Employees are not authorized to retrieve or read any e-mail that is not sent to them. Any exception to this policy must receive prior approval by the Superintendent.

10. Any employee who violates this policy or uses the computer system or electronic mail system for improper purposes shall be subject to discipline up to and including discharge.

11. SAU 39 has the authority to terminate or limit access to any program at any time.

12. Personal disks cannot be used on the system unless pre-authorized by the computer coordinator.

13. SAU 39 will take all necessary measures to maintain student privacy relative to SAU 39's website, online information and storage of student personally identifiable information, as required by state and federal law.

First Reading: April 16, 2019

SAU 39 Policy

EHAB - DATA GOVERNANCE AND SECURITY

Category: Priority/Required by Law

Related Policies EHAA, EHB, GBEBD, GBEF, IHBH, JICJ, JICL, JICM, KD, & KDC

To accomplish SAU 39's mission and comply with the law, the SAU 39 must collect, create and store information. Accurately maintaining and protecting this data is important for efficient SAU 39 operations, compliance with laws mandating confidentiality, and maintaining the trust of the SAU 39's stakeholders. All persons who have access to SAU 39 data are required to follow state and federal law, SAU 39 policies and procedures, and other rules created to protect the information.

The provisions of this policy shall supersede and take precedence over any contrary provisions of any other policy adopted prior to the date of this policy.

A. Definitions

Confidential Data/Information - Information that the SAU 39 is prohibited by law, policy or contract from disclosing or that the SAU 39 may disclose only in limited circumstances. Confidential data includes, but is not limited to, personally identifiable information regarding students and employees.

Critical Data/Information - Information that is determined to be essential to SAU 39 operations and that must be accurately and securely maintained to avoid disruption to SAU 39 operations. Critical data is not necessarily confidential.

B. Data and Privacy Governance Plan - Administrative Procedures.

1. Data Governance Plan. The Superintendent, in consultation with the SAU 39 Information Security Officer ("ISO") (see paragraph C, below) shall create a Data and Privacy Governance Plan ("Data Governance Plan"), to be presented to the Board no later than June 30, 2019. Thereafter, the Superintendent, in consultation with the ISO, shall update the Data Governance Plan for presentation to the Board no later than June 30 each year.

The Data Governance Plan shall include:

- (a) An inventory of all software applications, digital tools, and extensions. The inventory shall include users of the applications, the provider, purpose, publisher, privacy statement, and terms of use;
- (b) A review of all software applications, digital tools, and extensions and an assurance that they meet or exceed minimum standards set by the New Hampshire Department of Education;
- (c) Policies and procedures for access to data and protection of privacy for students and

staff including acceptable use policy for applications, digital tools, and extensions used on District hardware, server(s) or through the District network(s);

(d) A response plan for any breach of information; and

(e) A requirement for a service provider to meet or exceed standards for data protection and privacy.

2. Policies and Administrative Procedures. The Superintendent, in consultation with the ISO, is directed to review, modify and recommend (policies) create (administrative procedures), where necessary, relative to collecting, securing, and correctly disposing of SAU 39 data (including, but not limited to Confidential and Critical Data/Information, and as otherwise necessary to implement this policy and the Data Governance Plan. Such policies and/or procedures will may or may not be included in the annual Data Governance Plan.

C. Information Security Officer.

The Director of Technology is hereby designated as the SAU 39's Information Security Officer (ISO) and reports directly to the Superintendent or designee. The ISO is responsible for implementing and enforcing SAU 39's security policies and administrative procedures applicable to digital and other electronic data, and suggesting changes to these policies, the Data Governance Plan, and procedures to better protect the confidentiality and security of SAU 39's data. The ISO will work with the both SAU 39 and building level administrators and Data managers (paragraph E, below) to advocate for resources, including training, to best secure the SAU 39's data.

The Network Administrator is the SAU 39's alternate ISO and will assume the responsibilities of the ISO when the ISO is not available.

D. Responsibility and Data Stewardship.

All SAU 39 employees, volunteers and agents are responsible for accurately collecting, maintaining and securing SAU 39 data including, but not limited to, Confidential and/or Critical Data/Information.

E. Data Managers.

All SAU 39 administrators are data managers for all data collected, maintained, used and disseminated under their supervision as well as data they have been assigned to manage in the SAU 39's data inventory. Data managers will monitor employee access to the information to ensure that confidential information is accessed only by employees who need the information to provide services to the SAU 39 and that confidential and critical information is modified only by authorized employees. Data managers will assist the ISO in enforcing SAU 39 policies and procedures regarding data management.

F. Confidential and Critical Information.

SAU 39 will collect, create or store confidential information only when the Superintendent or designee determines it is necessary, and in accordance with applicable law. SAU 39 will provide access to confidential information to appropriately trained SAU 39 employees and volunteers only when the SAU 39 determines that such access is necessary for the performance of their duties. SAU 39 will disclose confidential information only to authorized SAU 39

contractors or agents who need access to the information to provide services to SAU 39 and who agree not to disclose the information to any other party except as allowed by law and authorized by the SAU 39.

SAU 39 employees, contractors and agents will notify the ISO or designee immediately if there is reason to believe confidential information has been disclosed to an unauthorized person or any information has been compromised, whether intentionally or otherwise. The ISO or designee will investigate immediately and take any action necessary to secure the information, issue all required legal notices and prevent future incidents. When necessary, the Superintendent, ISO or designee is authorized to secure resources to assist SAU 39 in promptly and appropriately addressing a security breach.

Likewise, SAU 39 will take steps to ensure that critical information is secure and is not inappropriately altered, deleted, destroyed or rendered inaccessible. Access to critical information will only be provided to authorized individuals in a manner that keeps the information secure.

SAU 39 staff, volunteers, contractors and agents who are granted access to critical or confidential information/data are required to keep the information secure and are prohibited from disclosing or assisting in the unauthorized disclosure of such confidential or critical data/information. All individuals using confidential and critical data/information will strictly observe all administrative procedures, policies and other protections put into place by the District including, but not limited to, maintaining information in locked rooms or drawers, limiting access to electronic files, updating and maintaining the confidentiality of password protections, encrypting and redacting information, and disposing of information no longer needed in a confidential and secure manner.

G. Using Online Services and Applications.

SAU 39 staff members are encouraged to research and utilize online services or applications to engage students and further the SAU 39's education mission. SAU 39 employees, however, are prohibited from installing or using applications, programs or other software, or online system/website, that either stores, collects or shares confidential or critical data/information, until the ISO approves the vendor and the software or service used. Before approving the use or purchase of any such software or online service, the ISO or designee shall verify that it meets the requirements of the law, Board policy, and the Data Governance Plan, and that it appropriately protects confidential and critical data/information. This prior approval is also required whether or not the software or online service is obtained or used without charge.

H. Training.

The ISO will provide appropriate training to employees who have access to confidential or critical information to prevent unauthorized disclosures or breaches in security. All school employees will receive annual training in the confidentiality of student records, and the requirements of this policy and related procedures and rules.

I. Data Retention and Deletion.

The ISO or designee shall establish a retention schedule for the regular archiving and deletion of data stored on SAU 39 technology resources. The retention schedule should comply with, and be

incorporated into the data/record retention schedule established under Policy EHB and administrative procedure EHB-R, including but not limited to, provisions relating to Litigation and Right to Know holds as described in Policy EHB.

J. Consequences

Employees who fail to follow the law or SAU 39's policies or procedures regarding data governance and security (including failing to report) may be disciplined, up to and including termination. Volunteers may be excluded from providing services to SAU 39. SAU 39 will end business relationships with any contractor who fails to follow the law, SAU 39 policies or procedures, or the confidentiality provisions of any contract. In addition, SAU 39 reserves the right to seek all other legal remedies, including criminal and civil action and seeking discipline of an employee's teaching certificate.

SAU 39 may suspend all access to data or use of SAU 39 technology resources pending an investigation. Violations may result in temporary, long-term or permanent suspension of user privileges. SAU 39 will cooperate with law enforcement in investigating any unlawful actions. The Superintendent or designee has the authority to sign any criminal complaint on behalf of SAU 39.

Any attempted violation of SAU 39's policies, procedures or other rules will result in the same consequences, regardless of the success of the attempt.

First reading: April 16, 2019

Legal References:

*15 U.S.C. §§ 6501-6506 * Children's Online Privacy Protection Act (COPPA)*
*20 U.S.C. § 1232g * Family Educational Rights and Privacy Act (FERPA)*
*20 U.S.C. § 1232h * Protection of Pupil Rights Amendment (PPRA)*
*20 U.S.C. § 1400-1417 * Individuals with Disabilities Education Act (IDEA)*
*20 U.S.C. § 7926 * Elementary and Secondary Education Act (ESSA)*
*RSA 189:65 * Definitions*
*RSA 186:66 * Student Information Protection and Privacy*
*RSA 189:67 * Limits on Disclosure of Information*
*RSA 189:68 * Student Privacy*
*RSA 189:68-a * Student Online Personal Information*
*RSA 359-C:19-21 * Right to Privacy/Notice of Security Breach*

SAU 39 Policy

EHB - DATA/RECORDS RETENTION

Category: Priority - Required by Law

Related Policies: EH, EHAB, JRA, & JBJ

See also: EHB-R (Records Retention Schedule)

The Superintendent shall develop procedures for a records retention system that is in compliance with RSA 189:29-a and Department of Education regulations, and also addresses retention/destruction of all other records which are not subject to specific statutes or regulations. The procedures should ensure that all pertinent records are stored safely and are stored for such durations as are required by law. The Superintendent shall develop procedures necessary to protect individual rights and preserve confidential information.

This policy shall apply to all SAU 39 records, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

A. Special Education Records.

1. Upon a student's graduation from high school, his or her parent(s)/guardian(s) may request in writing that SAU 39 destroy the student's special education records, including any final individualized education program.
2. The parent(s)/guardian(s) may, at any time prior to the student's twenty-sixth birthday, request, in writing, that the records be retained until the student's thirtieth birthday.
3. Absent any request by a student's parents to destroy the records prior to the twenty-sixth birthday, or to retain such records until the student's thirtieth birthday, SAU 39 shall destroy a student's records and final individualized education program within a reasonable time after the student's twenty-sixth birthday, provided that all such records be destroyed by the student's thirtieth birthday.
4. A permanent record of a student's name, address, and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation. 34 CFR 300.624.
5. SAU 39 shall provide parents/guardians, or where applicable, the adult student, with a written notice of the District's document destruction policies upon the student's graduation with a regular high school diploma or at the transfer of rights, whichever occurs first.
6. SAU 39 shall provide public notice of its document destruction policy at least annually.

B. Litigation Hold.

On receipt of notice from legal counsel representing SAU 39 in that a litigation hold is required, the routine destruction of governmental records, including paper and electronic or digital records, which are or may be subject to the litigation hold shall cease. The destruction of records subject to a litigation hold shall not resume until SAU 39 has

received a written directive from legal counsel authorizing resumption of the routine destruction of those records in accordance with the retention requirements of this policy and the associated procedures.

C. Right-to-Know Request Hold.

On receipt of a Right-to-Know law request to inspect or copy governmental records, the Superintendent shall cease any destruction of governmental records which are or may be the subject of the request. The records shall be retained regardless of whether they are subject to disclosure under RSA Chapter 91-A, the Right-to-Know law. If a request for inspection is denied on the grounds that the information is exempt under this chapter, the requested material shall be preserved for no less than ninety (90) days and until any lawsuit pursuant to RSA 91-A:7-8 has been finally resolved, all appeal periods have expired, and a written directive from legal counsel representing the District authorizing destruction of the records has been received.

First reading: April 16, 2019

Legal References:

- RSA 91-A, Right to Know Law
- RSA 189:29-a, Records Retention and Disposition
- NH Code of Administrative Rules, Section Ed 306.04(a)(4), Records Retention
- NH Code of Administrative Rules, Section Ed 306.04(h), Records Retention
- NH Code of Administrative Rules, Section Ed. 1119.01, Confidentiality Requirements
- 20 U.S.C. 1232g, Family Educational Rights and Privacy Act (FERPA)

Legal References Disclaimer: These references are not intended to be considered part of this policy, nor should they be taken as a comprehensive statement of the legal basis for the Board to enact this policy, nor as a complete recitation of related legal authority. Instead, they are provided as additional resources for those interested in the subject matter of the policy.

SAU 39 Policy

EHB-R-- LOCAL RECORDS RETENTION SCHEDULE

See Board Policy: EHB

Related Policies: EH, EHAB, JRA, and JBJ

The following schedule shall apply to all records obtained, created or maintained by SAU 39, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

A. Special Education Records.

1. Upon a student's graduation from high school, his or her parent(s)/guardian(s) may request in writing that SAU 39 destroy the student's special education records, including any final individualized education program.
2. The parent(s)/guardian(s) may, at any time prior to the student's twenty-sixth birthday, request, in writing, that the records be retained until the student's thirtieth birthday.
3. Absent any request by a student's parents to destroy the records prior to the twenty-sixth birthday, or to retain such records until the student's thirtieth birthday, SAU 39 shall destroy a student's records and final individualized education program within a reasonable time after the student's twenty-sixth birthday, provided that all such records be destroyed by the student's thirtieth birthday
4. A permanent record of a student's name, address, and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation. 34 CFR 300.624.
5. SAU 39 shall provide parents/guardians, or where applicable, the adult student, with a written notice of the SAU 39's document destruction policies upon the student's graduation with a regular high school diploma or at the transfer of rights, whichever occurs first.
6. SAU 39 shall provide public notice of its document destruction policy at least annually.

B. Litigation Hold.

On receipt of notice from legal counsel representing SAU 39 that a litigation hold is required, the routine destruction of governmental records, including paper and electronic records, which are or may be subject to the litigation hold shall cease. The destruction of records subject to a litigation hold shall not resume until the district has received a written directive from the attorney representing the district authorizing resumption of the routine destruction of those records.

C. Right-to-Know Request - Hold.

On receipt of a Right-to-Know law request to inspect or copy governmental records, the Superintendent shall cease any destruction of governmental records which are or may be the subject of the request. The records shall be retained regardless of whether they are subject to disclosure under RSA Chapter 91-A, the Right-to-Know law. If a request for inspection

is denied on the grounds that the information is exempt, the requested material shall be preserved for no less than 90 days and until any lawsuit pursuant to RSA 91-A:7-8 has been finally resolved, all appeal periods have expired, and a written directive from the attorney representing the District authorizing destruction of the records has been received.

D. Electronic Records.

For legal purposes, electronic records and communications are no different than paper documents. The state law on preservation of electronic records, RSA 33-A:5-a Electronic Records, does not explicitly apply to school districts, but does provide guidance: "Electronic records as defined in RSA 5:29, VI and designated on the disposition schedule under RSA 33-A:3-a to be retained for more than 10 years shall be transferred to paper or microfilm, or stored in portable document format/archival (PDF/A) on a medium from which it is readily retrievable. Electronic records designated on the disposition schedule to be retained for less than 10 years may be retained solely electronically if so approved by the Superintendent as the party responsible for the records. The Superintendent is responsible for assuring the accessibility of the records for the mandated period."

Retention Period Schedule.

The following schedule shall apply to all records obtained, created or maintained by SAU 39, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

Note regarding records relating to federal funds (items marked below with	Statute, Rule, or other legal authority – if none listed the retention period is a recommendation	Retention Period
Business Records		
Accident Reports:		
<ul style="list-style-type: none"> Employee 		Term of employment, plus 6 years
<ul style="list-style-type: none"> Student 		Age of majority, plus 6 years
Accounts Receivable	RSA 33-A:3-a	Until audited, plus 1 year
Annual Audit	RSA 33-A:3-a (10 years)	Permanent
Annual Report (District), Warrants, Annual Meeting Minutes, Budgets (District & SAU)	RSA 33-A:3-a	Permanent
Application for Federal Grants	20 U.S.C. 1232f., (three years after the completion of the activity for which the funds are used) other authorities may apply	5 years
Architectural Plans		Permanent
Asbestos Removal		Permanent
Bank Deposit Slips	RSA 33-A:3-a	6 years
Bonds and continuation certificates	RSA 33-A:3-a (expiration plus 2 years)	Permanent
Budget Worksheets		End of budget year, plus 1 year
Cash receipts, disbursement records, checks	RSA 33-A:3-a	Until Audited and at least 6 years after last entry
Child Labor Permits		1 year
Work-study	29 C.F.R. §570.37	3 years from date of enrollment
<ul style="list-style-type: none"> Construction Contracts, Capital projects, fixed assets that require accountability after acquired* 	RSA 33-A:3-a (Life of project/asset)	Life of contract, building, asset plus 20 years
<ul style="list-style-type: none"> Engineering Surveys 		Permanent
<ul style="list-style-type: none"> Unsuccessful bids 	RSA 33-A:3-a (Completion of project, plus one year)	Life of contract plus 3 years
Certified Educator		Permanent
COBRA Notices	42 U.S.C. 300bb-1, <i>et. seq.</i> (3 years) ERISA 29 U.S.C. §1027 (6 years)	6 years from date of issue

Collective Bargaining Agreements		Permanent
Correspondence for		Life of subject matter
Business transactions*		plus 4 years
Correspondence - General		3 years or longer when historic/useful
Correspondence Transitory	RSA 33-A:3-a	As needed for reference
Deeds		Permanent
District Meeting Minutes & Warrant		Permanent
Insurance policies	RSA 33-A:3-a	Permanent
Notes (loan documents)	RSA 33-A:3-a	Until paid, Audited, plus 3 years
Student Activities Records/Accounts	RSA 33-A:3-a (bank deposit slips and statements 6 years)	Until Audited, plus 6 years
Enrollment Reports:		
• Fall Reports A12A (RSA 189:28)		Permanent
• Pupil Registers	RSA 189:27-b	Permanent
• Resident Pupil Membership Forms		14 years
• School Opening Reports		3 years
• Statistical Report A-3 (RSA 189:28)		Permanent
Federal Projects Documents	Review specific project/grant program requirements. 20 U.S.C. 1232f, (three years after the completion of the activity for which the funds are used), other authorities may apply	5 years after submission of final audit report and documentation for expenditures, unless there is an ongoing audit
FICA Reports – monthly		7 years
Fixed Trip Requests/Confirmation		1 year
Fixed Assets Schedule		Permanent/as updated
Form C-2 Unemployment		6 years
Wage Report (DES 100)		6 years
Invoices*	Until Audited, plus 1 year	3 years*
MS-22 Budget Form		6 years

MS-23 Budget Form		6 years
MS-25 Budget Form		Permanent
Minutes of Board Meetings, Board Committees	RSA 91-A:2, II, RSA 33-A:3-a	Permanent
Purchase Orders*		Until Audited, plus 1 year
Request for Payment Vouchers*		Until Audited, plus 1 year
Requisitions*		Until Audited, plus 1 year
Retirement Reports – Monthly		1 year
Time Cards:		
• Bus Drivers	Lab 803.03. Notification and Records no less than 4 years	5 years
• Custodial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Secretarial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Substitute Teachers pay slips	Lab 803.03. Notification and Records no less than 4 years	5 years
Payroll Records	RSA 33-A:3-a Audited, plus 2 year 29 C.F.R. §1627.3 (3 years) ADEA: 29 U.S.C. §626, 29 CFR Part 1602 (2 years from job action); 29 C.F.R § 825.500 FMLA, 29 U.S.C.§2616, 3 years	6 years
Travel Reimbursements*	Until Audit, plus 1 year	3 years*
Treasurer's Receipts – canceled checks		6 years
Treasurer's Report		6 years
Vocational Education:		
• AVI Forms		1 year
• Vocational Center Regional Contracts		20 years

• Federal Vocational Forms*		6 years
Vouchers Manifests*		Until Audit, plus 1 year
Tax Forms:		
• W-2's, 1099 *	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2)(tax advisors say 7 years)	7 years
• W-4 Withholding Exemption Certificate	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
• W-9	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
• 941-E Quarterly Taxes	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
Personnel Records	RSA 33-A:3-a. Retirement or termination, plus 50 years	Term of Employment, plus 50 years
Application for employment - Successful	RSA 33-A:3-a Unsuccessful applicants: current year, plus 3 years.	Term of Employment, plus 50 years
Attendance Records:		
• Leaves	Family Medical Leave Act – 3 years	3 years
• Request for Leaves		1 year
Class Observation Forms		1 year
Criminal Record Check:		
• No criminal record	RSA 189:13-a (Superintendent only)	Destroy immediately after review
• Criminal record	RSA 189:13-a (Superintendent only)	Destroy within 30 days of receipt

Civil Rights Forms, Discrimination claims, accommodation under ADA, information used for EEO-5 report, EEO-5 report	29 C.F.R. §1602.40; 42 U.S.C. 12117; 42 U.S.C. § §§ 2000e-8-2000e-12; 42 U.S.C. § 2000ff-6; (final disposition, 2 years, 3 years)	6 years
Deferred Compensation plans	RSA 33-A:3-a	7 years
Dues Authorization	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Employment test papers with results	29 C.F.R. §1627.3	One year from date of personnel action
Evaluations	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
HIPPA Documentation	RSA 33-A:3-a. – Personnel record HIPPA: 45 C.F.R. §164,316(b) & .530(j) – 6 years. HITECH 42 U.S.C. §17938	Term of Employment, plus 50 years
Labor-PELRB actions	RSA 33-A:3-a	Permanent
Labor Negotiations	RSA 33-A:3-a	Permanent
Legal Actions - lawsuits	RSA 33-A:3-a	Permanent
Medical Benefits Application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Medical exams, Physical examinations used for personnel action	29 C.F.R. §1627.3(One year from date of personnel action) RSA 33-A:3-a. – Personnel record 29 C.F.R. §1910.1020 (term of employment plus 30 years)	Term of Employment, plus 50 years
Oaths of Office	RSA 33-A:3-a Term, plus 3 years	Permanent
Promotion, demotion, transfer, selection for training, layoff, recall, or discharge	29 C.F.R. §1627.3 (1 year from date of action) RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Recruitment Documents	29 C.F.R. §1627.3	One year from date of personnel action
Re-employment Letter of Assurance	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Retirement application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years

School Bus Driver Drug Tests – positive results & records of administration of test	49 C.F.R. §382.401; 49 C.F.R. § 40.333	5 years
School Bus Driver Drug tests – negative & cancelled	49 C.F.R. §382.401	1 year
Separation from Employment Form/Letter	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Settlement agreements, even if in anticipation of a lawsuit	RSA 91-A:4, VI (10 years)	Permanent
Staff Development Plan	Term of Employment, plus 50 years	Term of Employment, plus 50 years
Substitute Teacher Lists		7 years
Student Records:		
Applications for Free/Reduced Lunch		6 years
Assessment Results	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Attendance	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Disciplinary Records		Term of Enrollment, plus 3 years
Early Dismissal		1 year
Emergency Information Form		1 year/as updated
Grades	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Health and Physical Records		Term of Enrollment, plus 3 years
Immunization Record		Term of Enrollment, plus 3 years

Log of requests for access to education records	FERPA 20 U.S.C. §1232g (b)(4)(A)	As long as the education record is retained
Medical Reports		Term of Enrollment, plus 3 years
Registration Form		Term of Enrollment, plus 3 years
Student Handbook		1 copy of each edition, Permanent
Transcripts	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Internal Records:		
Child Abuse Reports/Allegations		Permanent
Criminal Investigation		Permanent
Personnel Investigations		Permanent
Sexual Harassment		Permanent
Records Management, transfer to storage or disposal	RSA 33-A:3-a (summary report of what category of records, for what range of dates, was put in storage or destroyed)	Permanent
Vehicle maintenance	RSA 33-A:3-a	Life of vehicle, plus 3 years

NHSBA APPENDIX		
EHB-R		
LOCAL RECORDS RETENTION SCHEDULE		
Type	Local/State Record Recommended	State/Federal Mandated Retention
Business Records		
Accident Reports		
Employee	6 years or term of employment	
Student	6 years after age of majority	
Annual Audit	Permanent	
Annual Report (District)	Permanent	
Application for Federal Grants	6 Years	6 Years
Architectural Plans	Permanent	
Engineering Surveys	Permanent	
Asbestos Removal	Permanent	
Bank Deposit Slips	Keep until Audit	
Bond Issue Materials	Permanent	
Child Labor Permits	1 year	
Contracts	1 year	
Certified Educator	Permanent	
Collective Bargaining Agreements	Permanent	
Correspondence for Business	4 years	
Deeds	Permanent	
District Meeting Minutes & Warrant	Permanent	
*Enrollment Reports		
Resident Pupil Membership Forms	14 year	
Fall Reports A-12-A (RSA 189:28)	Permanent	
*Pupil Registers (RSA 189:27-b)	Permanent	
School Opening Reports	3 years	
Statistical Report A-3 (RSA 189:28)	Permanent	
*Federal Projects Documents	6 Years	6 Years
FICA Reports - monthly	6 years	
Quarterly Form 941	6 years	
Fixed Trip Requests/Confirmation	1 year	
Fixed Assets Schedule	Permanent/as updated	
Form C-2 Unemployment	6 years	
Invoices	Until audit	
MS-22 Budget Form	6 years	
MS-23 Budget Form	6 years	
MS-25 Budget Form	6 years	
Minutes of Board Meetings	Permanent	
Purchase Orders	Until audit	
Request for Payment Vouchers	Until audit	
Requisitions	Until audit	
*Retirement Reports	1 year	
Monthly		
Student Activities Records/Accounts	Until audit	
Time Cards	6 Years	
Bus Drivers	5 years	
Custodial	5 years	
Secretarial	5 years	
Substitute Teachers pay slips	5 years	
Travel Reimbursements	Until audit	
Treasurer's Receipts		
Cancelled checks	6 years	
Treasurer's Report	6 years	
Vocational Education		
AVI forms	1 year	
Vocational Center Regional Contracts	20 years	
Federal Vocational Forms	6 Years	6 Years
Vouchers Manifests	Until audit	
*W-2's Yearly	6 Years	6 Years
*W-4 Withholding Exemption Certificate	6 Years	6 Years
*W-9	6 Years	6 Years
*941-E Quarterly Taxes	6 Years	6 Years

Type	Local/State Record Recommended	
Personnel Records		
Application, including Criminal Records	Term of Employment	
Attendance Records	Permanent	
Leaves	1 year	
Requests for Leaves	1 year	
Class Observation Forms	1 year	
Criminal Record Check	Term of Employment	
*Civil Rights Forms	6 years	
Dues Authorization	Term of Employment	
Evaluations	Term of Employment	
HIPAA Documentation	6 years	
Medical Benefits Application	Term of Employment	
Medical Examinations	Term of Employment	
Re-employment Letter of Assurance	1 year	
Retirement application	Term of Employment	
Separation from Employment	Permanent	
Form/Letter	6 years	
Staff Development Plan	Term of Employment	
Student Records		
Disciplinary Records	Term of Enrollment	
Early Dismissal	1 year	
Emergency Information Form	1 year	
Health and Physical Records, including Immunization Record	Term of Enrollment	
Medical Reports	Term of Enrollment	
Registration Form	Term of Enrollment	
*Applications for Free Lunch	6 years	
Transcripts	Permanent	
Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
Personnel Investigations	Permanent	
Sexual harassment	Permanent	
Special Education Records		
At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

NHSBA APPENDIX		
EHB-R		
LOCAL RECORDS RETENTION SCHEDULE		
Type	Local/State Record Recommended	State/Federal Mandated Retention
Business Records		
Accident Reports		
Employee	6 years or term of employment	
Student	6 years after age of majority	
Annual Audit	Permanent	
Annual Report (District)	Permanent	
Application for Federal Grants	6 Years	6 Years
Architectural Plans	Permanent	
Engineering Surveys	Permanent	
Asbestos Removal	Permanent	
Bank Deposit Slips	Keep until Audit	
Bond Issue Materials	Permanent	
Child Labor Permits	1 year	
Contracts	1 year	
Certified Educator	Permanent	
Collective Bargaining Agreements	Permanent	
Correspondence for Business	4 years	
Deeds	Permanent	
District Meeting Minutes & Warrant	Permanent	
*Enrollment Reports		
Resident Pupil Membership Forms	14 year	
Fall Reports A-12-A (RSA 189:28)	Permanent	
*Pupil Registers (RSA 189:27-b)	Permanent	
School Opening Reports	3 years	
Statistical Report A-3 (RSA 189:28)	Permanent	
*Federal Projects Documents	6 Years	6 Years
FICA Reports - monthly	6 years	
Quarterly Form 941	6 years	
Fixed Trip Requests/Confirmation	1 year	
Fixed Assets Schedule	Permanent/as updated	
Form C-2 Unemployment	6 years	
Invoices	Until audit	
MS-22 Budget Form	6 years	
MS-23 Budget Form	6 years	
MS-25 Budget Form	6 years	
Minutes of Board Meetings	Permanent	
Purchase Orders	Until audit	
Request for Payment Vouchers	Until audit	
Requisitions	Until audit	
*Retirement Reports	1 year	
Monthly		
Student Activities Records/Accounts	Until audit	
Time Cards	6 Years	
Bus Drivers	5 years	
Custodial	5 years	
Secretarial	5 years	
Substitute Teachers pay slips	5 years	
Travel Reimbursements	Until audit	
Treasurer's Receipts		
Cancelled checks	6 years	
Treasurer's Report	6 years	
Vocational Education		
AVI forms	1 year	
Vocational Center Regional Contracts	20 years	
Federal Vocational Forms	6 Years	6 Years
Vouchers Manifests	Until audit	
*W-2's Yearly	6 Years	6 Years
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*W-9	6 Years	6 Years
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Type	Local/State Record Recommended	
Personnel Records		
Application, including Criminal Records	Term of Employment	
Attendance Records	Permanent	
Leaves	1 year	
Requests for Leaves	1 year	
Class Observation Forms	1 year	
Criminal Record Check	Term of Employment	
*Civil Rights Forms	6 years	
Dues Authorization	Term of Employment	
Evaluations	Term of Employment	
HIPAA Documentation	6 years	
Medical Benefits Application	Term of Employment	
Medical Examinations	Term of Employment	
Re-employment Letter of Assurance	1 year	
Retirement application	Term of Employment	
Separation from Employment	Permanent	
Form/Letter	6 years	
Staff Development Plan	Term of Employment	
Student Records		
Disciplinary Records	Term of Enrollment	
Early Dismissal	1 year	
Emergency Information Form	1 year	
Health and Physical Records, including Immunization Record	Term of Enrollment	
Medical Reports	Term of Enrollment	
Registration Form	Term of Enrollment	
*Applications for Free Lunch	6 years	
Transcripts	Permanent	
Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
Personnel Investigations	Permanent	
Sexual harassment	Permanent	
Special Education Records		
At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

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Staff Development Plan	Term of Employment	
Student Records		
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Registration Form	Term of Enrollment	
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Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
Personnel Investigations	Permanent	
Sexual harassment	Permanent	
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At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

SAU 39 Policy

ADB/GBEC - DRUG-FREE WORKPLACE & DRUG-FREE SCHOOLS

Related Policy: JICH

A. Drug-Free Workplace

1. All SAU 39 workplaces are drug- and alcohol-free. All employees and contracted personnel are prohibited from:
 - a. Unlawfully manufacturing, dispensing, distributing, possessing, using, or being under the influence of any controlled substance or drug while on or in the workplace, including employees possessing a "medical marijuana" card.
 - b. Distributing, consuming, using, possessing, or being under the influence of alcohol while on or in the workplace.
2. For purposes of this policy, a "controlled substance or drug" means and includes any controlled substance or drug defined in the Controlled Substances Act, 21 U.S.C. § 812(c), or New Hampshire Controlled Drug Act RSA 318-B.
3. For purposes of this policy, "workplace" shall mean the site for the performance of work, and will include at a minimum any SAU 39 building or grounds owned or operated by SAU 39, any school-owned vehicle, and any other school-approved vehicle used to transport students to and from school or school activities. It shall also include off-school property during any school-sponsored or school-approved activity, event or function such as a field trip or athletic event where students are under the jurisdiction, care or control of SAU 39.
4. As a condition of employment, each employee and all contracted personnel will:
 - a. Abide by the terms of this policy respecting a drug- and alcohol-free workplace, including any administrative rules, regulations or procedures implementing this policy; and
 - b. Notify his or her supervisor of his or her conviction under any criminal drug statute, for a violation occurring on District premises or while performing work for the District, no later than five (5) days after such conviction.
5. In order to make employees aware of dangers of drug and alcohol abuse, SAU 39 will endeavor to:
 - a. Provide each employee with a copy of SAU 39 drug- and alcohol-free workplace policy;
 - b. Post notice of SAU 39 drug- and alcohol-free workplace policy in a place where other information for employees is posted;
 - c. Establish a drug-free awareness program to educate employees about the dangers of drug abuse and drug use in the work place, the specifics of this policy, including, the consequences for violating the policy, and any information about available drug and alcohol counseling, rehabilitation, reentry, or other employee-assistance programs.

B. SAU 39 Action Upon Violation of Policy

An employee who violates this policy may be subject to disciplinary action; up to and including termination of employment. Alternatively, the Board may require an employee to

successfully complete an appropriate drug- or alcohol-abuse, employee-assistance rehabilitation program.

The Board will take disciplinary action with respect to an employee convicted of a drug offense in the workplace, within thirty (30) days of receiving notice of a conviction. Should SAU 39 employees or contracted personnel be engaged in the performance of work under a federal contract or grant, or under a state contract or grant, the Superintendent will notify the appropriate state or federal agency from which SAU 39 receives contract or grant moneys of an employee/contracted personnel's conviction, within ten (10) days after receiving notice of the conviction.

The processes for disciplinary action shall be those provided generally to other misconduct for the employee/contractor personnel as may be found in applicable collective bargaining agreements, individual contracts, School Board policies, contractor agreements, and or governing law. Disciplinary action should be applied consistently and fairly with respect to employees of SAU 39 and/or contractor personnel as the case may be.

C. Drug-Free School Zone

Pursuant to New Hampshire's "Drug-Free School Zone" law (RSA Chapter 193-B), it is unlawful for any person to manufacture, sell prescribe administer, dispense, or possess with intent to sell, dispense or compound any controlled drug or its analog, within a "drug-free school zone". The Superintendent is directed to assure that SAU 39 is and remains in compliance with the requirements of RSA 193-B, I, and N.H. Ed. Part 316 with respect to establishment, mapping and signage of the drug-free zone around each school of SAU 39.

D. Implementation and Review

- a. The Superintendent is directed to promulgate administrative procedures and rules necessary and appropriate to implement the provisions of this policy.
- b. In order to maintain a drug-free workplace, the Superintendent will perform a biennial review of the implementation of this policy. The review shall be designed to (i) determine and assure compliance with the notification requirements of section A.5.a, b and d; (ii) determine the effectiveness of programs established under paragraph A.5.c above; (iii) ensure that disciplinary sanctions are consistently and fairly enforced; and (iv) and identify any changes required, if any.

First reading: April 16, 2019

Legal References:

- 41 U.S.C. §101, et. Seq. - *Drug-free workplace requirements for Federal contractors, and Federal grant recipients*
- *RSA Chapter 193-B Drug Free School Zones*
- *N.H. Admin. Code, Ed. Part 316*

SCHOOL BOARD DISTRICT POLICIES REVIEW

EHAB - DATA GOVERNANCE AND SECURITY

Category: Priority/Required by Law

Related Policies EHAA, EHB, GBEBD, GBEF, IHBH, JICJ, JICL, JICM, KD, & KDC

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

The provisions of this policy shall supersede and take precedence over any contrary provisions of any other policy adopted prior to the date of this policy.

C. Definitions

Confidential Data/Information - Information that the District is prohibited by law, policy or contract from disclosing or that the District may disclose only in limited circumstances. Confidential data includes, but is not limited to, personally identifiable information regarding students and employees.

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

D. Data and Privacy Governance Plan - Administrative Procedures.

1. Data Governance Plan. The Superintendent, in consultation with the District Information Security Officer ("ISO") (see paragraph C, below) shall create a Data and Privacy Governance Plan ("Data Governance Plan"), to be presented to the Board no later than June 30, 2019. Thereafter, the Superintendent, in consultation with the ISO, shall update the Data Governance Plan for presentation to the Board no later than June 30 each year.

The Data Governance Plan shall include:

- (d) An inventory of all software applications, digital tools, and extensions. The inventory shall include users of the applications, the provider, purpose, publisher, privacy statement, and terms of use;
- (e) A review of all software applications, digital tools, and extensions and an assurance that they meet or exceed minimum standards set by the New Hampshire Department of Education;
- (f) Policies and procedures for access to data and protection of privacy for students and

staff including acceptable use policy for applications, digital tools, and extensions used on District hardware, server(s) or through the District network(s);

(f) A response plan for any breach of information; and

(g) A requirement for a service provider to meet or exceed standards for data protection and privacy.

2. Policies and Administrative Procedures. The Superintendent, in consultation with the ISO, is directed to review, modify and recommend (policies) create (administrative procedures), where necessary, relative to collecting, securing, and correctly disposing of District data (including, but not limited to Confidential and Critical Data/Information, and as otherwise necessary to implement this policy and the Data Governance Plan. Such policies and/or procedures will may or may not be included in the annual Data Governance Plan.

G. Information Security Officer.

The Director of Technology is hereby designated as the District's Information Security Officer (ISO) and reports directly to the Superintendent or designee. The ISO is responsible for implementing and enforcing the District's security policies and administrative procedures applicable to digital and other electronic data, and suggesting changes to these policies, the Data Governance Plan, and procedures to better protect the confidentiality and security of District data. The ISO will work with the both District and building level administrators and Data managers (paragraph E, below) to advocate for resources, including training, to best secure the District's data.

The Network Administrator is the District's alternate ISO and will assume the responsibilities of the ISO when the ISO is not available.

H. Responsibility and Data Stewardship.

All District employees, volunteers and agents are responsible for accurately collecting, maintaining and securing District data including, but not limited to, Confidential and/or Critical Data/Information.

I. Data Managers.

All District administrators are data managers for all data collected, maintained, used and disseminated under their supervision as well as data they have been assigned to manage in the District's data inventory. Data managers will monitor employee access to the information to ensure that confidential information is accessed only by employees who need the information to provide services to the District and that confidential and critical information is modified only by authorized employees. Data managers will assist the ISO in enforcing District policies and procedures regarding data management.

J. Confidential and Critical Information.

The District will collect, create or store confidential information only when the Superintendent or designee determines it is necessary, and in accordance with applicable law. The District will provide access to confidential information to appropriately trained District employees and volunteers only when the District determines that such access is necessary for the performance of their duties. The District will disclose confidential information only to authorized District

contractors or agents who need access to the information to provide services to the District and who agree not to disclose the information to any other party except as allowed by law and authorized by the District.

District employees, contractors and agents will notify the ISO or designee immediately if there is reason to believe confidential information has been disclosed to an unauthorized person or any information has been compromised, whether intentionally or otherwise. The ISO or designee will investigate immediately and take any action necessary to secure the information, issue all required legal notices and prevent future incidents. When necessary, the Superintendent, ISO or designee is authorized to secure resources to assist the District in promptly and appropriately addressing a security breach.

Likewise, the District will take steps to ensure that critical information is secure and is not inappropriately altered, deleted, destroyed or rendered inaccessible. Access to critical information will only be provided to authorized individuals in a manner that keeps the information secure.

All District staff, volunteers, contractors and agents who are granted access to critical or confidential information/data are required to keep the information secure and are prohibited from disclosing or assisting in the unauthorized disclosure of such confidential or critical data/information. All individuals using confidential and critical data/information will strictly observe all administrative procedures, policies and other protections put into place by the District including, but not limited to, maintaining information in locked rooms or drawers, limiting access to electronic files, updating and maintaining the confidentiality of password protections, encrypting and redacting information, and disposing of information no longer needed in a confidential and secure manner.

J. Using Online Services and Applications.

District staff members are encouraged to research and utilize online services or applications to engage students and further the District's education mission. District employees, however, are prohibited from installing or using applications, programs or other software, or online system/website, that either stores, collects or shares confidential or critical data/information, until the ISO approves the vendor and the software or service used. Before approving the use or purchase of any such software or online service, the ISO or designee shall verify that it meets the requirements of the law, Board policy, and the Data Governance Plan, and that it appropriately protects confidential and critical data/information. This prior approval is also required whether or not the software or online service is obtained or used without charge.

K. Training.

The ISO will provide appropriate training to employees who have access to confidential or critical information to prevent unauthorized disclosures or breaches in security. All school employees will receive annual training in the confidentiality of student records, and the requirements of this policy and related procedures and rules.

L. Data Retention and Deletion.

The ISO or designee shall establish a retention schedule for the regular archiving and deletion of data stored on District technology resources. The retention schedule should comply with, and be

incorporated [by reference] into the data/record retention schedule established under Policy EHB and administrative procedure EHB-R, including but not limited to, provisions relating to Litigation and Right to Know holds as described in Policy EHB.

J. Consequences

Employees who fail to follow the law or District policies or procedures regarding data governance and security (including failing to report) may be disciplined, up to and including termination. Volunteers may be excluded from providing services to the District. The District will end business relationships with any contractor who fails to follow the law, District policies or procedures, or the confidentiality provisions of any contract. In addition, the District reserves the right to seek all other legal remedies, including criminal and civil action and seeking discipline of an employee's teaching certificate.

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

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

Legal References:

*15 U.S.C. §§ 6501-6506 * Children's Online Privacy Protection Act (COPPA)*
*20 U.S.C. § 1232g * Family Educational Rights and Privacy Act (FERPA)*
*20 U.S.C. § 1232h * Protection of Pupil Rights Amendment (PPRA)*
*20 U.S.C. § 1400-1417 * Individuals with Disabilities Education Act (IDEA)*
*20 U.S.C. § 7926 * Elementary and Secondary Education Act (ESSA)*
*RSA 189:65 * Definitions*
*RSA 186:66 * Student Information Protection and Privacy*
*RSA 189:67 * Limits on Disclosure of Information*
*RSA 189:68 * Student Privacy*
*RSA 189:68-a * Student Online Personal Information*
*RSA 359-C:19-21 * Right to Privacy/Notice of Security Breach*

EHB - DATA/RECORDS RETENTION

Category: Priority - Required by Law

Related Policies: EH, EHAB, JRA, & JBJ

See also: EHB-R (Records Retention Schedule)

The Superintendent shall develop procedures for a records retention system that is in compliance with RSA 189:29-a and Department of Education regulations, and also addresses retention/destruction of all other records which are not subject to specific statutes or regulations. The procedures should ensure that all pertinent records are stored safely and are stored for such durations as are required by law. The Superintendent shall develop procedures necessary to protect individual rights and preserve confidential information.

This policy shall apply to all district records, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

A. Special Education Records.

7. Upon a student's graduation from high school, his or her parent(s)/guardian(s) may request in writing that the District destroy the student's special education records, including any final individualized education program.
8. The parent(s)/guardian(s) may, at any time prior to the student's twenty-sixth birthday, request, in writing, that the records be retained until the student's thirtieth birthday.
9. Absent any request by a student's parents to destroy the records prior to the twenty-sixth birthday, or to retain such records until the student's thirtieth birthday, the District shall destroy a student's records and final individualized education program within a reasonable time after the student's twenty-sixth birthday, provided that all such records be destroyed by the student's thirtieth birthday.
10. A permanent record of a student's name, address, and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation. 34 CFR 300.624.
11. The District shall provide parents/guardians, or where applicable, the adult student, with a written notice of the District's document destruction policies upon the student's graduation with a regular high school diploma or at the transfer of rights, whichever occurs first.
12. The District shall provide public notice of its document destruction policy at least annually.

B. Litigation Hold.

On receipt of notice from legal counsel representing the District in that a litigation hold is required, the routine destruction of governmental records, including paper and electronic or digital records, which are or may be subject to the litigation hold shall cease. The destruction of records subject to a litigation hold shall not resume until the District has

received a written directive from legal counsel authorizing resumption of the routine destruction of those records in accordance with the retention requirements of this policy and the associated procedures.

C. Right-to-Know Request Hold.

On receipt of a Right-to-Know law request to inspect or copy governmental records, the Superintendent shall cease any destruction of governmental records which are or may be the subject of the request. The records shall be retained regardless of whether they are subject to disclosure under RSA Chapter 91-A, the Right-to-Know law. If a request for inspection is denied on the grounds that the information is exempt under this chapter, the requested material shall be preserved for no less than ninety (90) days and until any lawsuit pursuant to RSA 91-A:7-8 has been finally resolved, all appeal periods have expired, and a written directive from legal counsel representing the District authorizing destruction of the records has been received.

Legal References:

- *RSA 91-A, Right to Know Law*
- *RSA 189:29-a, Records Retention and Disposition*
- *NH Code of Administrative Rules, Section Ed 306.04(a)(4), Records Retention*
- *NH Code of Administrative Rules, Section Ed 306.04(h), Records Retention*
- *NH Code of Administrative Rules, Section Ed. 1119.01, Confidentiality Requirements*
- *20 U.S.C. 1232g, Family Educational Rights and Privacy Act (FERPA)*

Legal References Disclaimer: These references are not intended to be considered part of this policy, nor should they be taken as a comprehensive statement of the legal basis for the Board to enact this policy, nor as a complete recitation of related legal authority. Instead, they are provided as additional resources for those interested in the subject matter of the policy.

EHB-R-- LOCAL RECORDS RETENTION SCHEDULE

See Board Policy: EHB

Related Policies: EH, EHAB, JRA, and JBJ

The following schedule shall apply to all records obtained, created or maintained by the District, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

A. Special Education Records.

7. Upon a student's graduation from high school, his or her parent(s)/guardian(s) may request in writing that the District destroy the student's special education records, including any final individualized education program.
8. The parent(s)/guardian(s) may, at any time prior to the student's twenty-sixth birthday, request, in writing, that the records be retained until the student's thirtieth birthday.
9. Absent any request by a student's parents to destroy the records prior to the twenty-sixth birthday, or to retain such records until the student's thirtieth birthday, the District shall destroy a student's records and final individualized education program within a reasonable time after the student's twenty-sixth birthday, provided that all such records be destroyed by the student's thirtieth birthday.
10. A permanent record of a student's name, address, and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation. 34 CFR 300.624.
11. The District shall provide parents/guardians, or where applicable, the adult student, with a written notice of the District's document destruction policies upon the student's graduation with a regular high school diploma or at the transfer of rights, whichever occurs first.
12. The District shall provide public notice of its document destruction policy at least annually.

B. Litigation Hold.

On receipt of notice from legal counsel representing the District that a litigation hold is required, the routine destruction of governmental records, including paper and electronic records, which are or may be subject to the litigation hold shall cease. The destruction of records subject to a litigation hold shall not resume until the district has received a written directive from the attorney representing the district authorizing resumption of the routine destruction of those records.

C. Right-to-Know Request - Hold.

On receipt of a Right-to-Know law request to inspect or copy governmental records, the Superintendent shall cease any destruction of governmental records which are or may be the subject of the request. The records shall be retained regardless of whether they are subject to disclosure under RSA Chapter 91-A, the Right-to-Know law. If a request for inspection

is denied on the grounds that the information is exempt, the requested material shall be preserved for no less than 90 days and until any lawsuit pursuant to RSA 91-A:7-8 has been finally resolved, all appeal periods have expired, and a written directive from the attorney representing the District authorizing destruction of the records has been received.

E. Electronic Records.

For legal purposes, electronic records and communications are no different than paper documents. The state law on preservation of electronic records, RSA 33-A:5-a Electronic Records, does not explicitly apply to school districts, but does provide guidance: "Electronic records as defined in RSA 5:29, VI and designated on the disposition schedule under RSA 33-A:3-a to be retained for more than 10 years shall be transferred to paper or microfilm, or stored in portable document format/archival (PDF/A) on a medium from which it is readily retrievable. Electronic records designated on the disposition schedule to be retained for less than 10 years may be retained solely electronically if so approved by [Superintendent as the party] responsible for the records. The Superintendent is responsible for assuring the accessibility of the records for the mandated period."

Retention Period Schedule.

The following schedule shall apply to all records obtained, created or maintained by the District, irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..

Note regarding records relating to federal funds (items marked below with	Statute, Rule, or other legal authority – if none listed the retention period is a recommendation	Retention Period
Business Records		
Accident Reports:		
<ul style="list-style-type: none"> Employee 		Term of employment, plus 6 years
<ul style="list-style-type: none"> Student 		Age of majority, plus 6 years
Accounts Receivable	RSA 33-A:3-a	Until audited, plus 1 year
Annual Audit	RSA 33-A:3-a (10 years)	Permanent
Annual Report (District), Warrants, Annual Meeting Minutes, Budgets (District & SAU)	RSA 33-A:3-a	Permanent
Application for Federal Grants	20 U.S.C. 1232f., (three years after the completion of the activity for which the funds are used) other authorities may apply	5 years
Architectural Plans		Permanent
Asbestos Removal		Permanent
Bank Deposit Slips	RSA 33-A:3-a	6 years
Bonds and continuation certificates	RSA 33-A:3-a (expiration plus 2 years)	Permanent
Budget Worksheets		End of budget year, plus 1 year
Cash receipts, disbursement records, checks	RSA 33-A:3-a	Until Audited and at least 6 years after last entry
Child Labor Permits		1 year
Work-study	29 C.F.R. §570.37	3 years from date of enrollment
<ul style="list-style-type: none"> Construction Contracts, Capital projects, fixed assets that require accountability after acquired* 	RSA 33-A:3-a (Life of project/asset)	Life of contract, building, asset plus 20 years
<ul style="list-style-type: none"> Engineering Surveys 		Permanent
<ul style="list-style-type: none"> Unsuccessful bids 	RSA 33-A:3-a (Completion of project, plus one year)	Life of contract plus 3 years
Certified Educator		Permanent
COBRA Notices	42 U.S.C. 300bb-1, <i>et. seq.</i> (3 years) ERISA 29 U.S.C. §1027 (6 years)	6 years from date of issue

Collective Bargaining Agreements		Permanent
Correspondence for		Life of subject matter
Business transactions*		plus 4 years
Correspondence - General		3 years or longer when historic/useful
Correspondence Transitory	RSA 33-A:3-a	As needed for reference
Deeds		Permanent
District Meeting Minutes & Warrant		Permanent
Insurance policies	RSA 33-A:3-a	Permanent
Notes (loan documents)	RSA 33-A:3-a	Until paid, Audited, plus 3 years
Student Activities Records/Accounts	RSA 33-A:3-a (bank deposit slips and statements 6 years)	Until Audited, plus 6 years
Enrollment Reports:		
• Fall Reports A12A (RSA 189:28)		Permanent
• Pupil Registers	RSA 189:27-b	Permanent
• Resident Pupil Membership Forms		14 years
• School Opening Reports		3 years
• Statistical Report A-3 (RSA 189:28)		Permanent
Federal Projects Documents	Review specific project/grant program requirements. 20 U.S.C. 1232f, (three years after the completion of the activity for which the funds are used), other authorities may apply	5 years after submission of final audit report and documentation for expenditures, unless there is an ongoing audit
FICA Reports – monthly		7 years
Fixed Trip Requests/Confirmation		1 year
Fixed Assets Schedule		Permanent/as updated
Form C-2 Unemployment		6 years
Wage Report (DES 100)		6 years
Invoices*	Until Audited, plus 1 year	3 years*
MS-22 Budget Form		6 years

MS-23 Budget Form		6 years
MS-25 Budget Form		Permanent
Minutes of Board Meetings, Board Committees	RSA 91-A:2, II, RSA 33-A:3-a	Permanent
Purchase Orders*		Until Audited, plus 1 year
Request for Payment Vouchers*		Until Audited, plus 1 year
Requisitions*		Until Audited, plus 1 year
Retirement Reports – Monthly		1 year
Time Cards:		
• Bus Drivers	Lab 803.03. Notification and Records no less than 4 years	5 years
• Custodial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Secretarial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Substitute Teachers pay slips	Lab 803.03. Notification and Records no less than 4 years	5 years
Payroll Records	RSA 33-A:3-a Audited, plus 2 year 29 C.F.R. §1627.3 (3 years) ADEA: 29 U.S.C. §626, 29 CFR Part 1602 (2 years from job action); 29 C.F.R § 825.500 FMLA, 29 U.S.C.§2616, 3 years	6 years
Travel Reimbursements*	Until Audit, plus 1 year	3 years*
Treasurer's Receipts – canceled checks		6 years
Treasurer's Report		6 years
Vocational Education:		
• AVI Forms		1 year
• Vocational Center Regional Contracts		20 years

• Federal Vocational Forms*		6 years
Vouchers Manifests*		Until Audit, plus 1 year
Tax Forms:		
• W-2's, 1099 *	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2)(tax advisors say 7 years)	7 years
• W-4 Withholding Exemption Certificate	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
• W-9	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
• 941-E Quarterly Taxes	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
Personnel Records	RSA 33-A:3-a. Retirement or termination, plus 50 years	Term of Employment, plus 50 years
Application for employment - Successful	RSA 33-A:3-a Unsuccessful applicants: current year, plus 3 years.	Term of Employment, plus 50 years
Attendance Records:		
• Leaves	Family Medical Leave Act – 3 years	3 years
• Request for Leaves		1 year
Class Observation Forms		1 year
Criminal Record Check:		
• No criminal record	RSA 189:13-a (Superintendent only)	Destroy immediately after review
• Criminal record	RSA 189:13-a (Superintendent only)	Destroy within 30 days of receipt

Civil Rights Forms, Discrimination claims, accommodation under ADA, information used for EEO-5 report, EEO-5 report	29 C.F.R. §1602.40; 42 U.S.C. 12117; 42 U.S.C. § §§ 2000e-8-2000e-12; 42 U.S.C. § 2000ff-6; (final disposition, 2 years, 3 years)	6 years
Deferred Compensation plans	RSA 33-A:3-a	7 years
Dues Authorization	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Employment test papers with results	29 C.F.R. §1627.3	One year from date of personnel action
Evaluations	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
HIPPA Documentation	RSA 33-A:3-a. – Personnel record HIPPA: 45 C.F.R. §164,316(b) & .530(j) – 6 years. HITECH 42 U.S.C. §17938	Term of Employment, plus 50 years
Labor-PELRB actions	RSA 33-A:3-a	Permanent
Labor Negotiations	RSA 33-A:3-a	Permanent
Legal Actions - lawsuits	RSA 33-A:3-a	Permanent
Medical Benefits Application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Medical exams, Physical examinations used for personnel action	29 C.F.R. §1627.3(One year from date of personnel action) RSA 33-A:3-a. – Personnel record 29 C.F.R. §1910.1020 (term of employment plus 30 years)	Term of Employment, plus 50 years
Oaths of Office	RSA 33-A:3-a Term, plus 3 years	Permanent
Promotion, demotion, transfer, selection for training, layoff, recall, or discharge	29 C.F.R. §1627.3 (1 year from date of action) RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Recruitment Documents	29 C.F.R. §1627.3	One year from date of personnel action
Re-employment Letter of Assurance	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Retirement application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years

School Bus Driver Drug Tests – positive results & records of administration of test	49 C.F.R. §382.401; 49 C.F.R. § 40.333	5 years
School Bus Driver Drug tests – negative & cancelled	49 C.F.R. §382.401	1 year
Separation from Employment Form/Letter	RSA 33-A:3-a. – Personnel record	Term of Employment, plus 50 years
Settlement agreements, even if in anticipation of a lawsuit	RSA 91-A:4, VI (10 years)	Permanent
Staff Development Plan	Term of Employment, plus 50 years	Term of Employment, plus 50 years
Substitute Teacher Lists		7 years
Student Records:		
Applications for Free/Reduced Lunch		6 years
Assessment Results	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Attendance	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Disciplinary Records		Term of Enrollment, plus 3 years
Early Dismissal		1 year
Emergency Information Form		1 year/as updated
Grades	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Health and Physical Records		Term of Enrollment, plus 3 years
Immunization Record		Term of Enrollment, plus 3 years

Log of requests for access to education records	FERPA 20 U.S.C. §1232g (b)(4)(A)	As long as the education record is retained
Medical Reports		Term of Enrollment, plus 3 years
Registration Form		Term of Enrollment, plus 3 years
Student Handbook		1 copy of each edition, Permanent
Transcripts	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Internal Records:		
Child Abuse Reports/Allegations		Permanent
Criminal Investigation		Permanent
Personnel Investigations		Permanent
Sexual Harassment		Permanent
Records Management, transfer to storage or disposal	RSA 33-A:3-a (summary report of what category of records, for what range of dates, was put in storage or destroyed)	Permanent
Vehicle maintenance	RSA 33-A:3-a	Life of vehicle, plus 3 years

EHAA - COMPUTER SECURITY, E-MAIL AND INTERNET COMMUNICATIONS

Category: Priority/Required by Law

See also EGA

The District has established this policy with regard to access and disclosure of electronic data composed, stored, sent, or received by employees using the District computer system. This policy is designed to protect the safety and security of the District's computer systems including e-mail and Internet use.

The District intends to enforce the rules set forth below and reserves the right to change these rules at any time.

10. The computer hardware system, software and e-mail system are owned by the District, and all messages or data composed, stored, sent, or received using the system are and remain the private property of the District. They are not the property of the employee.
11. The computer and e-mail system is to be used for business purposes only. Personal business is unauthorized and should not be conducted on the system.
12. The electronic mail system may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job related solicitations.
13. The District prohibits discriminatory, harassing, or offensive materials in any form of media. Among those which are considered offensive are any messages which contain sexual implications, racial slurs, gender-specific comments, or any other comments that offensively address someone's age, sexual orientation, religious or political beliefs, national origin, or disability.
14. The electronic mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization.
15. The District reserves, and intends to exercise without prior notice, the right to read, review, audit, intercept, access or disclose any and all information on an employee's computer system or messages created, received or sent over the electronic mail system for any purpose, even if coded or passworded.
16. The confidentiality of any message or data should not be assumed. Even when a message is erased, it is still possible to retrieve and read that message. The use of passwords for security does not guarantee confidentiality, or that the District will not retrieve it. All passwords must be disclosed to the computer administrator.
17. Any communications created, sent, or retrieved using e-mail may be read by individuals other than the intended recipient.
18. Notwithstanding the District's right to retrieve and monitor any e-mail messages, such messages should be treated as confidential by other employees and accessed only by the

intended recipient. Employees are not authorized to retrieve or read any e-mail that is not sent to them. Any exception to this policy must receive prior approval by the Superintendent.

14. Any employee who violates this policy or uses the computer system or electronic mail system for improper purposes shall be subject to discipline up to and including discharge.

15. The District has the authority to terminate or limit access to any program at any time.

16. Personal disks cannot be used on the system unless pre-authorized by the computer coordinator.

17. The District will take all necessary measures to maintain student privacy relative to the District's website, online information and storage of student personally identifiable information, as required by state and federal law.

NHSBA APPENDIX		
EHB-R		
LOCAL RECORDS RETENTION SCHEDULE		
Type	Local/State Record Recommended	State/Federal Mandated Retention
Business Records		
Accident Reports		
Employee	6 years or term of employment	
Student	6 years after age of majority	
Annual Audit	Permanent	
Annual Report (District)	Permanent	
Application for Federal Grants	6 Years	6 Years
Architectural Plans	Permanent	
Engineering Surveys	Permanent	
Asbestos Removal	Permanent	
Bank Deposit Slips	Keep until Audit	
Bond Issue Materials	Permanent	
Child Labor Permits	1 year	
Contracts	1 year	
Certified Educator	Permanent	
Collective Bargaining Agreements	Permanent	
Correspondence for Business	4 years	
Deeds	Permanent	
District Meeting Minutes & Warrant	Permanent	
*Enrollment Reports		
Resident Pupil Membership Forms	14 year	
Fall Reports A-12-A (RSA 189:28)	Permanent	
*Pupil Registers (RSA 189:27-b)	Permanent	
School Opening Reports	3 years	
Statistical Report A-3 (RSA 189:28)	Permanent	
*Federal Projects Documents	6 Years	6 Years
FICA Reports - monthly	6 years	
Quarterly Form 941	6 years	
Fixed Trip Requests/Confirmation	1 year	
Fixed Assets Schedule	Permanent/as updated	
Form C-2 Unemployment	6 years	
Invoices	Until audit	
MS-22 Budget Form	6 years	
MS-23 Budget Form	6 years	
MS-25 Budget Form	6 years	
Minutes of Board Meetings	Permanent	
Purchase Orders	Until audit	
Request for Payment Vouchers	Until audit	
Requisitions	Until audit	
*Retirement Reports	1 year	
Monthly		
Student Activities Records/Accounts	Until audit	
Time Cards	6 Years	
Bus Drivers	5 years	
Custodial	5 years	
Secretarial	5 years	
Substitute Teachers pay slips	5 years	
Travel Reimbursements	Until audit	
Treasurer's Receipts		
Cancelled checks	6 years	
Treasurer's Report	6 years	
Vocational Education		
AVI forms	1 year	
Vocational Center Regional Contracts	20 years	
Federal Vocational Forms	6 Years	6 Years
Vouchers Manifests	Until audit	
*W-2's Yearly	6 Years	6 Years
*W-4 Withholding Exemption Certificate	6 Years	6 Years
*W-9	6 Years	6 Years
*941-E Quarterly Taxes	6 Years	6 Years

Type	Local/State Record Recommended	
Personnel Records		
Application, including Criminal Records	Term of Employment	
Attendance Records	Permanent	
Leaves	1 year	
Requests for Leaves	1 year	
Class Observation Forms	1 year	
Criminal Record Check	Term of Employment	
*Civil Rights Forms	6 years	
Dues Authorization	Term of Employment	
Evaluations	Term of Employment	
HIPAA Documentation	6 years	
Medical Benefits Application	Term of Employment	
Medical Examinations	Term of Employment	
Re-employment Letter of Assurance	1 year	
Retirement application	Term of Employment	
Separation from Employment	Permanent	
Form/Letter	6 years	
Staff Development Plan	Term of Employment	
Student Records		
Disciplinary Records	Term of Enrollment	
Early Dismissal	1 year	
Emergency Information Form	1 year	
Health and Physical Records, including Immunization Record	Term of Enrollment	
Medical Reports	Term of Enrollment	
Registration Form	Term of Enrollment	
*Applications for Free Lunch	6 years	
Transcripts	Permanent	
Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
Personnel Investigations	Permanent	
Sexual harassment	Permanent	
Special Education Records		
At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

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Business Records		
Accident Reports		
Employee	6 years or term of employment	
Student	6 years after age of majority	
Annual Audit	Permanent	
Annual Report (District)	Permanent	
Application for Federal Grants	6 Years	6 Years
Architectural Plans	Permanent	
Engineering Surveys	Permanent	
Asbestos Removal	Permanent	
Bank Deposit Slips	Keep until Audit	
Bond Issue Materials	Permanent	
Child Labor Permits	1 year	
Contracts	1 year	
Certified Educator	Permanent	
Collective Bargaining Agreements	Permanent	
Correspondence for Business	4 years	
Deeds	Permanent	
District Meeting Minutes & Warrant	Permanent	
*Enrollment Reports		
Resident Pupil Membership Forms	14 year	
Fall Reports A-12-A (RSA 189:28)	Permanent	
*Pupil Registers (RSA 189:27-b)	Permanent	
School Opening Reports	3 years	
Statistical Report A-3 (RSA 189:28)	Permanent	
*Federal Projects Documents	6 Years	6 Years
FICA Reports - monthly	6 years	
Quarterly Form 941	6 years	
Fixed Trip Requests/Confirmation	1 year	
Fixed Assets Schedule	Permanent/as updated	
Form C-2 Unemployment	6 years	
Invoices	Until audit	
MS-22 Budget Form	6 years	
MS-23 Budget Form	6 years	
MS-25 Budget Form	6 years	
Minutes of Board Meetings	Permanent	
Purchase Orders	Until audit	
Request for Payment Vouchers	Until audit	
Requisitions	Until audit	
*Retirement Reports	1 year	
Monthly		
Student Activities Records/Accounts	Until audit	
Time Cards	6 Years	
Bus Drivers	5 years	
Custodial	5 years	
Secretarial	5 years	
Substitute Teachers pay slips	5 years	
Travel Reimbursements	Until audit	
Treasurer's Receipts		
Cancelled checks	6 years	
Treasurer's Report	6 years	
Vocational Education		
AVI forms	1 year	
Vocational Center Regional Contracts	20 years	
Federal Vocational Forms	6 Years	6 Years
Vouchers Manifests	Until audit	
*W-2's Yearly	6 Years	6 Years
*W-4 Withholding Exemption Certificate	6 Years	6 Years
*W-9	6 Years	6 Years
*941-E Quarterly Taxes	6 Years	6 Years

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Personnel Records		
Application, including Criminal Records	Term of Employment	
Attendance Records	Permanent	
Leaves	1 year	
Requests for Leaves	1 year	
Class Observation Forms	1 year	
Criminal Record Check	Term of Employment	
*Civil Rights Forms	6 years	
Dues Authorization	Term of Employment	
Evaluations	Term of Employment	
HIPAA Documentation	6 years	
Medical Benefits Application	Term of Employment	
Medical Examinations	Term of Employment	
Re-employment Letter of Assurance	1 year	
Retirement application	Term of Employment	
Separation from Employment	Permanent	
Form/Letter	6 years	
Staff Development Plan	Term of Employment	
Student Records		
Disciplinary Records	Term of Enrollment	
Early Dismissal	1 year	
Emergency Information Form	1 year	
Health and Physical Records, including Immunization Record	Term of Enrollment	
Medical Reports	Term of Enrollment	
Registration Form	Term of Enrollment	
*Applications for Free Lunch	6 years	
Transcripts	Permanent	
Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
Personnel Investigations	Permanent	
Sexual harassment	Permanent	
Special Education Records		
At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

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Asbestos Removal	Permanent	
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Child Labor Permits	1 year	
Contracts	1 year	
Certified Educator	Permanent	
Collective Bargaining Agreements	Permanent	
Correspondence for Business	4 years	
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Time Cards	6 Years	
Bus Drivers	5 years	
Custodial	5 years	
Secretarial	5 years	
Substitute Teachers pay slips	5 years	
Travel Reimbursements	Until audit	
Treasurer's Receipts		
Cancelled checks	6 years	
Treasurer's Report	6 years	
Vocational Education		
AVI forms	1 year	
Vocational Center Regional Contracts	20 years	
Federal Vocational Forms	6 Years	6 Years
Vouchers Manifests	Until audit	
*W-2's Yearly	6 Years	6 Years
*W-4 Withholding Exemption Certificate	6 Years	6 Years
*W-9	6 Years	6 Years
*941-E Quarterly Taxes	6 Years	6 Years

Type	Local/State Record Recommended	
Personnel Records		
Application, including Criminal Records	Term of Employment	
Attendance Records	Permanent	
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Criminal Record Check	Term of Employment	
*Civil Rights Forms	6 years	
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Evaluations	Term of Employment	
HIPAA Documentation	6 years	
Medical Benefits Application	Term of Employment	
Medical Examinations	Term of Employment	
Re-employment Letter of Assurance	1 year	
Retirement application	Term of Employment	
Separation from Employment	Permanent	
Form/Letter	6 years	
Staff Development Plan	Term of Employment	
Student Records		
Disciplinary Records	Term of Enrollment	
Early Dismissal	1 year	
Emergency Information Form	1 year	
Health and Physical Records, including Immunization Record	Term of Enrollment	
Medical Reports	Term of Enrollment	
Registration Form	Term of Enrollment	
*Applications for Free Lunch	6 years	
Transcripts	Permanent	
Attendance	Permanent	
Grades	Permanent	
Assessment Results	Permanent	
Internal Records		
Child Abuse Reports/Allegations	Permanent	
Criminal Investigation	Permanent	
Criminal Records Check		
Unsuccessful/Unfavorable	1 year	
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At a minimum, records for special education students should be kept as long as the student is in a program and there is district liability for the education of the student. Given court decisions that are retroactive, it might be prudent to retain records for at least six (6) years after the termination or completion of the program.		

ADB/GBEC - DRUG-FREE WORKPLACE & DRUG-FREE SCHOOLS

Related Policy: JICH

A. Drug-Free Workplace

1. All District workplaces are drug- and alcohol-free. All employees and contracted personnel are prohibited from:
 - c. Unlawfully manufacturing, dispensing, distributing, possessing, using, or being under the influence of any controlled substance or drug while on or in the workplace, including employees possessing a "medical marijuana" card.
 - d. Distributing, consuming, using, possessing, or being under the influence of alcohol while on or in the workplace.
2. For purposes of this policy, a "controlled substance or drug" means and includes any controlled substance or drug defined in the Controlled Substances Act, 21 U.S.C. § 812(c), or New Hampshire Controlled Drug Act RSA 318-B.
3. For purposes of this policy, "workplace" shall mean the site for the performance of work, and will include at a minimum any District building or grounds owned or operated by the District, any school-owned vehicle, and any other school-approved vehicle used to transport students to and from school or school activities. It shall also include off-school property during any school-sponsored or school-approved activity, event or function such as a field trip or athletic event where students are under the jurisdiction, care or control of the District.
4. As a condition of employment, each employee and all contracted personnel will:
 - c. Abide by the terms of this policy respecting a drug- and alcohol-free workplace, including any administrative rules, regulations or procedures implementing this policy; and
 - d. Notify his or her supervisor of his or her conviction under any criminal drug statute, for a violation occurring on District premises or while performing work for the District, no later than five (5) days after such conviction.
5. In order to make employees aware of dangers of drug and alcohol abuse, the District will endeavor to:
 - d. Provide each employee with a copy of the District drug- and alcohol-free workplace policy;
 - e. Post notice of the District drug- and alcohol-free workplace policy in a place where other information for employees is posted;
 - f. Establish a drug-free awareness program to educate employees about the dangers of drug abuse and drug use in the work place, the specifics of this policy, including, the consequences for violating the policy, and any information about available drug and alcohol counseling, rehabilitation, reentry, or other employee-assistance programs.

E. District Action Upon Violation of Policy

An employee who violates this policy may be subject to disciplinary action; up to and including termination of employment. Alternatively, the Board may require an employee to

successfully complete an appropriate drug- or alcohol-abuse, employee-assistance rehabilitation program.

The Board will take disciplinary action with respect to an employee convicted of a drug offense in the workplace, within thirty (30) days of receiving notice of a conviction. Should District employees or contracted personnel be engaged in the performance of work under a federal contract or grant, or under a state contract or grant, the Superintendent will notify the appropriate state or federal agency from which the District receives contract or grant moneys of an employee/contracted personnel's conviction, within ten (10) days after receiving notice of the conviction.

The processes for disciplinary action shall be those provided generally to other misconduct for the employee/contractor personnel as may be found in applicable collective bargaining agreements, individual contracts, School Board policies, contractor agreements, and or governing law. Disciplinary action should be applied consistently and fairly with respect to employees of the District and/or contractor personnel as the case may be.

F. Drug-Free School Zone

Pursuant to New Hampshire's "Drug-Free School Zone" law (RSA Chapter 193-B), it is unlawful for any person to manufacture, sell prescribe administer, dispense, or possess with intent to sell, dispense or compound any controlled drug or its analog, within a "drug-free school zone". The Superintendent is directed to assure that the District is and remains in compliance with the requirements of RSA 193-B, I, and N.H. Ed. Part 316 with respect to establishment, mapping and signage of the drug-free zone around each school of the District.

G. Implementation and Review

c. The Superintendent is directed to promulgate administrative procedures and rules necessary and appropriate to implement the provisions of this policy.

d. In order to maintain a drug-free workplace, the Superintendent will perform a biennial review of the implementation of this policy. The review shall be designed to (i) determine and assure compliance with the notification requirements of section A.5.a, b and d; (ii) determine the effectiveness of programs established under paragraph A.5.c above; (iii) ensure that disciplinary sanctions are consistently and fairly enforced; and (iv) and identify any changes required, if any.

Legal References:

- *41 U.S.C. §101, et. Seq. - Drug-free workplace requirements for Federal contractors, and Federal grant recipients*
- *RSA Chapter 193-B Drug Free School Zones*
- *N.H. Admin. Code, Ed. Part 316*



SAU 39: Portrait of a Graduate



Knowledge Constructor

Students build a strong foundation in academic content areas and draw on their knowledge to complete new tasks.



Effective Communicator

Students clearly convey information and thoughts to connect and respond to their audience.



Critical Thinker

Students think creatively and analytically to evaluate information and design solutions to complex problems.



Engaged Learner

Students actively monitor and navigate their own learning towards long-term goals and aspirations.



Skilled Collaborator

Students learn to work in teams with diverse perspectives to achieve shared goals.



Confident Global Citizen

Students develop positive attitudes and beliefs about their identities to contribute and find meaning in the world around them.

