

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

MICHELE CROTEAU
Business Administrator



SAU #39 Board Meeting

Monday, April 13th, 2020 – 7:30 PM

Due to current COVID-19 precautions, board meetings will be conducted via webinar. Use one of the following to tune in

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Webinar ID: 841 062 258

Agenda Item	Time	Desired Action	Backup Materials
Call to Order- Organizational Meeting	7:30 PM	<i>Superintendent, Mr. Adam Steel, to call the Organizational Meeting to order.</i>	None
Call to Order- Regular Meeting	7:35 PM	<i>SAU #39 Board Chair to call the Regular Meeting to order</i>	None
Individual Board Updates	7:35 PM	<i>Board Chairs to give updates on their individual boards</i>	None
Superintendent's Report	7:40 PM	<i>Superintendent Steel to give his Report</i>	Student Services Doc. Social Worker Update
Consent Agenda- Approval	7:50 PM	<i>1. Draft Minutes 03 02 2020 2. Draft Minutes 03 13 2020 3. Unanticipated Revenue \$525 4. Feb 2020 Treasurer's Report</i>	03 02 2020 Draft Minutes 03 13 2020 Draft Minutes Memo Feb 2020 Treasurer's Report
First Reading Policy- DAF	7:50 PM	<i>Board to review Policy DAF- Administration of Federal Grants as a first reading and motion to other boards</i>	Policy DAF
Policy IJL/KEC- Second Reading	7:55 PM	<i>Board to review Policy IJL/KEC as a second reading and motion to move to other boards</i>	Policy IJL/KEC

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Observation Update	8:00 PM	Assistant Superintendent, Ms. Christine Landwehrle, to update the Board on Observations.	Observation Schedule TLE Update
Grading and Reporting Update	8:05 PM	Ms. Landwehrle to provide a Grading and Reporting Update	Grading and Reporting Executive Summary
Superintendent Goals	8:10 PM	Superintendent Steel to provide an update on goals	None
Public Input	8:20 PM		
Non- Public Session	8:25 PM	RSA 91 A:3 II ()	
Meeting Adjourned	8:30 PM		

STUDENT SERVICES UPDATE

As our districts enter week four of remote learning, I have been increasingly proud to be a part of SA 39 and the work that we are doing. The staff has worked collaboratively to ensure that our students' individual education plans are implemented with as much diligence and integrity as possible. Our special educators have utilized technology to continue to connect with students and families. We have been able to continue to provide related services including speech and occupational therapy as well as some small group interventions for students. For our more challenged learners, we have connected directly with parents to provide consultations and supports as well as related services and interventions that can be carried out within student homes. While we are unsure of what the next few months will bring, we will continue to meet at the building level with each department to ensure that we are able to meet the needs of all of our learners. As summer approaches it is certainly our hope that our buildings will reopen. In that event, we are looking forward to reconnecting with your children and utilizing some time during summer months to continue to support student learning by assessing individual needs and remediating any skill deficits that may exist. I look forward to continuing to support the students and families of Amherst and Mont Vernon.

Social Workers

Our district social workers have been collaborating to create opportunities to maintain connections with students and families during our school closure and social distancing period. They have provided students and families with personal check in times and some small group discussion opportunities. They have also created google sites for families to access where they have posted information on a variety of topics including but not limited to self-care while social distancing, coping with anxiety, mindfulness and meditation and an active coping calendar outlining a variety of positive actions students can take during this difficult time. In addition, many hand outs and resources are posted to provide families with information regarding access to area mental health agencies, assistance with food services, navigating remote learning and parent support groups on a variety of topics. Our talented social workers remain available to support all of our students and families during this pandemic.

SAU #39 Board Meeting

Consent Agenda Item #1Monday, March 2nd, 2020

Meeting Minutes- Not Approved

Attendees:

Administrative Team: Adam Steel- Superintendent and Michele Croteau- SAU #39 Business Administrator.

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

Souhegan Cooperative School Board: Jim Manning- Chair, Laura Taylor- Secretary, Steve Coughlan, Amy Facey, and David Chen (via phone).

Mont Vernon School Board: Sarah Lawrence- Chair, Stephen O'Keefe, and Tom Driscoll.

SHS Student Videographer: Shannon Hargreaves

Board Minutes: Danae A. Marotta

Public: Stephanie Grund, 5 Colonel Wilkins Road, and Dwayne Purvis, 145 South Hollis Road.

I. Call to Order

Chair of the SAU #39 Board, Ms. Amy Facey, called the meeting to order at 6:09PM.

II. Public Input I of II

No Public Comment

III. Superintendent's Report

Covid-19/Coronavirus

Superintendent, Mr. Adam Steel, noted that he had sent out a message over the weekend and they are deeply engaged with taking precautions for Covid-19/Coronavirus. He has put together a task force with nurses and other key stakeholders and they meet twice a week. They have had some staff and students that have traveled internationally over the past week for vacation and if they have gone through a level III country, based on the CDC's Travel Guidelines, asked that they stay home for 14 days. It is a less than popular decision but necessary given the risks. They are working with the schools to support those students and staff while they are away.

Second, they are having custodial training this week that SAU #39 Business Administrator, Ms. Michele Croteau, is coordinating. She is also working on securing the necessary supplies needed. They will need some additional custodial support in the short term, and they are working on sourcing that as well. They are tracking daily attendance in all of their schools so that they can look for spikes in attendance. They have some upcoming trips and will follow the CDC's Guidelines down to the last detail. They are still planning on holding Wintercession, with students going to Quebec and Washington D.C. They will support parents if they chose not to

35 send their child. They will provide an activity for them or possibly a refund. They will not be
36 able to refund everyone.

37 He has been connected to DHHS along the way and they have a statewide call tomorrow that he
38 will be attending. His task force is working on preparing for if they have some contingencies if
39 they have to close school for an extended period of time. They will send out a survey to families
40 about the type of internet access they have at home. They are preparing for an asynchronous
41 connection with their students from home.

42 They are even revising their procedures at AMS so that students have the same laptop all school
43 day. At the MVVS, they are looking at how many devices they have in the event that they have
44 to send home a device with each student. At Clark/Wilkins they are going to start to reverse
45 lunch and recess so that students are able to wash their hands. They are also looking at the
46 computer inventory there as well. They are being proactive in the process.

47 Some people have asked if students can be restricted from school. As a Superintendent, he
48 cannot restrict students from school, only the Commissioner from DHHS has the ability to
49 quarantine. He can ask students not to come to school and has the ability to close school there
50 will be additional communication. He then asked for questions

51 Mr. Chen applauded Mr. Steel's safety precautions.

52 Ms. Behm asked if the custodial staff will be checking the soap dispensers on a regular basis.

53 Mr. Steel replied, yes, it will be a part of the training.

54 Ms. Kuzsma asked if C/W parents can send in a device with their child.

55 Superintendent Steel replied that they are not at that point yet.

56 Hiring Update

57 They are on second and third rounds with their SHS Principal search. Next Wednesday, some of
58 the community will be able to meet some of the candidates. They do not have any finalists yet. If
59 any of board members are interested, please let him know.

60 The MVVS Principal position is posted and there are about 10 or 11 applications that have been
61 completed. They have a committee formed and will begin the process of reviewing applications
62 on Thursday. The goal is to bring a candidate to the May meeting.

63 At the SAU level, Ms. Natasha Kolehmainen, Curriculum Administrator, has accepted an
64 Assistant Superintendent position in another district. She started this past July 1st and will be
65 leaving this coming July 1st. Instead of having two positions of Assistant Superintendent and
66 Curriculum Administrator, they will now have two positions. Ms. Landwehrle will focus
67 primarily on the MVVS and C/W. The new person will be at that secondary campus most of the
68 time. They are excited about that realignment and have been speaking about AMS and SHS
69 working more closely with each other. That new position will report to him as well. He has
70 asked for board members that wanted to be involved to let him know and Mr. Coughlan has
71 volunteered.

72 IV. Individual Board Reports

73 Chair of the Amherst School Board, Ms. Elizabeth Kuzsma, noted that AMS was again
74 recognized as a Spotlight School by NELMS (New England League of Middle Schools). They
75 have also hired Mr. John Schuttinger as their new Assistant Principal of AMS effective July 1st.

76 The Board thanked Ms. Kuzsma.

77 Chair of the Mont Vernon School Board, Ms. Sarah Lawrence, commented that they had their
78 Deliberative Session in the beginning of February and have received outstanding winter NWEA
79 Math scores. They also hosted a Math Parent Night, and the kids and parents were very excited.
80 Finally, they have accepted Principal Schuttinger's resignation and wish him the best of luck in
81 his new position at AMS.

82 The Board thanked Ms. Lawrence.

83 Chair of the Souhegan Cooperative School Board, Mr. Jim Manning, added as Superintendent
84 Steel mentioned earlier, they are also in the process of a Principal Search. With everything that is
85 going on they are in need a strong leader. Fang Fest it is an amazing experience and although
86 they had some challenges, it ended on a good note. They have had a lot of discussion on
87 Mastery-Based Learning. Mr. Steel remarked that there are transcripts that are posted on the
88 website. The parent grading an reporting sessions are on Thursday, March 12th at 7:30am,
89 Saturday, March 14th at 9:00am and Thursday, March 19th at 7:30am.

90 The Board thanked Mr. Manning.

91 V. Consent Agenda

92 **Ms. Lawrence motioned to accept the Consent Agenda items 1. Draft Minutes Jan 23rd,**
93 **2020, 2. Jan 2020 Treasurer's Report, and 3. Policy from Jan 2020 Meeting- Policy KFA.**
94 **Ms. Behm seconded the motion. Motion passed.**

95 Ms. Facey asked for further discussion.

96 Mr. Gauthier questioned Mr. Steel regarding the percentage of teacher evaluations that were
97 completed and are in the re-nomination process.

98 Mr. Steel replied that he does not have that number with him at this time and will email it to the
99 Board.

100 **Mr. Manning, Ms. Taylor and Mr. Chen abstained.**

101 Ms. Facey asked Mr. Chen (via phone) if he was alone and if it was unreasonable for him to
102 attend this meeting.

103 Mr. Chen replied, yes, and noted that he is in Colorado.

104 **Roll Call: Kuzsma- Yes, Behm-Yes, Glover- Yes, Grudzien-Yes, Gauthier-Yes, Lawrence-**
105 **Yes, O'Keefe- Yes, Driscoll- Yes, Coughlan-Yes and Facey-Yes.**

106

- 107
- 108 VI. First Reading of Policies- JLCJ, JFABD, and IJL/KEC
- 109 Ms. Facey added that Mr. Coughlan, Mr. Glover and Ms. Lawrence can speak to this Policy as
- 110 they are on the Policy Committee.
- 111 Mr. Gauthier asked about the Concussion Training and if the school offers training.
- 112 Mr. Steel replied that they do have training.
- 113 Mr. Gauthier asked about the reports about concussions to be made available sooner.
- 114 Mr. Coughlan noted that he is the author of that paragraph and to bring constant awareness to the
- 115 Board. He added that sports that you never think can get concussions and even in non-sport
- 116 activities.
- 117 Mr. Gauthier emphasized that it is a big issue.
- 118 Ms. Facey suggested that they add this topic to the September Trello Board.
- 119 Mr. Glover added that they discussed this, and it is for any activity, classroom, recess, or
- 120 practicing for a play.
- 121 Mr. Gauthier asked about policy IJL/KEC Learning Resources Selection and Reconsideration,
- 122 and how is the Reconsideration Committee selected. He wants to make sure that there is a
- 123 diversity of thought.
- 124 Discussion ensued.
- 125 Mr. Coughlan added that this is based on the model that they use for many other committees at
- 126 Souhegan and in the past has not been a problem.
- 127 Mr. Driscoll commented that he is not sure if this is appropriate for the younger grades. He is not
- 128 sure how that would go with picking students to be apart of the process.
- 129 Ms. Lawrence suggested that it go as a second reading.
- 130 **Ms. Taylor motioned to table discussion on IJL/KEC Learning Resources Selection and**
- 131 **Reconsideration. Mr. Driscoll seconded the motion. Motion passed. (4-13)**
- 132 Mr. Glover questioned table for what purpose.
- 133 **Ms. Kuzsma motioned to move Policy JLCJ- Concussions and Head Injuries to the**
- 134 **individual boards. Mr. Manning seconded the motion. The vote was unanimous.**
- 135 **Mr. Driscoll motioned to move Policy JFABD- Admission of Homeless Students to the**
- 136 **individual boards. Ms. Grudzien seconded the motion. The vote was unanimous, motion**
- 137 **passed.**
- 138
- 139 VII. Superintendent SAU Goals

140 Ms. Facey noted that she sent out a Google sheet. The top section is what Superintendent Steel
 141 had filled out and it is based on their criteria for evaluation, below are SAU Board Goals. There
 142 is more time for people to add in items.

143 Ms. Grudzien asked if this was from today.

144 Ms. Facey replied, yes.

145 Mr. Steel explained the chart adding this has captured what the Board has asked him to do.

146 Ms. Facey apologized for the abbreviated meeting and they can have more in-depth
 147 conversations at the next meeting.

148 VIII. Strategic Vision and Planning Update

149 Superintendent Steel noted that the SAU Board has adopted a Strategic Vision. He has spent a lot
 150 of time discussing this with various groups in the community and at the Deliberative Sessions.
 151 There is a question about how to move into the operational phase. He has been working with his
 152 team over the last several months and they have sketched out an idea for how they are going to
 153 get it organized.

154 Mr. Steel then displayed a slide noting that on the left are the key things that they want to
 155 improve. The Board will recognize it as they have talked about it and it is in the Superintendent's
 156 Report Card. He explained the cards adding that there are processes for and specific objectives
 157 from each year for the next 4 fiscal years. Further to the right, you can see all the annual
 158 processes, such as enrollment projections. Along with that is the Capital Maintenance Plan and
 159 the need to develop that 5-year budget. The key things are to the right. They are starting to filter
 160 things in until FY' 24. This is a tool to help them keep track.

161 Ms. Taylor inquired about who has access to that specific Trello Board.

162 Mr. Steel explained that it is internal for now. He would like to be as transparent as possible
 163 although there are some things that should not be made public.

164 Mr. Glover commented that it should tie into the strategy.

165 The Board thanked Superintendent Steel.

166 IX. Public Comment II of II

167 Ms. Stephanie Grund, 5 Colonel Wilkins Road, asked if this is the new format for Board
 168 Meetings. She added that it was obvious that it was not enough time for discussion.

169 Ms. Facey replied; no, this is just for tonight.

170 Mr. Dwayne Purvis, 145 South Hollis Road, asked if teachers are putting forth lesson plans in
 171 the event of the school closing due to Covid-19.

172 Mr. Steel replied, right now, no. They are looking at continuing the education process with the
 173 teachers.

174 X. Meeting Adjourned

175 **Ms. Kuzsma motioned to adjourn the meeting at 7:03PM. Mr. Driscoll seconded the**
176 **motion. The vote was unanimous, motion passed.**

177 **Roll Call: Kuzsma- Yes, Behm-Yes, Glover- Yes, Grudzien-Yes, Gauthier-Yes, Lawrence-**
178 **Yes, O’Keefe- Yes, Driscoll- Yes, Coughlan-Yes, Manning- Yes, Taylor-Yes, Facey-Yes,**
179 **and Chen-Yes.**

180

181

Draft

SAU #39 Board

Consent Agenda Item #2

Friday, March 13, 2020

Meeting Minutes- Not Approved

Attendees:

Administrative Team: Adam Steel- Superintendent, Christine Landwehrle- Assistant Superintendent, Michele Croteau- Business Administrator, and Dan Wyborney- SHS Athletics Director.

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

Mont Vernon School Board: Sarah Lawrence- Chair, Peter Eckhoff- Vice Chair, Jessica Hinckley- Secretary (via phone) and Tom Driscoll (via phone).

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

SHS Student Videographer: Shannon Hargraves

Board Minutes: Danae A. Marotta

Public: Delaney Facques, SHS Community Council Liaison, Tony Labranche, 63 Merrimack Road, Amherst, John D'Angelo, 99 Woodland Drive. Amherst, Megan Murray, State Representative for Amherst, 2 Steeple Lane, and Community Members.

I. Call to Order

Chair of the SAU #39 Board, Ms. Amy Facey, called the meeting to order at 4:00PM.

She added that this emergency meeting was called due to the potential disruption in schools due to the health concerns with (Covid- 19) Coronavirus.

II. Discussion

Superintendent, Mr. Adam Steel, added that there are several board members that were not able to be here in person and are attending via phone.

He noted those board members are Mr. David Chen, Mr. George Torres, Mr. Jim Manning and Mr. Tom Driscoll. He asked them if it was unreasonable for them to be here and if they were alone.

The Board Members replied, yes.

Mr. Steel noted that the purpose of this meeting was for the Board to provide him authorization as Superintendent, to make changes to their school calendar and for any disruptions that may

34 occur to their schools as a result of the (COVID- 19) Coronavirus crisis. There is already
35 authority for him to make changes to their school calendar, however, the Board felt that it was
36 important for the community to hear that the Board and administration were all on the same
37 team.

38 They have sent out several communications over the last few weeks regarding the pandemic.
39 Yesterday, they announced that they were restricting the schools to outside agencies and groups.
40 Also, on Monday they have decided that Professional Development as a result of the COVID-19
41 pandemic. He further noted that he is looking for a motion and then will answer any questions.

42 Ms. Facey commented that she was advised by NHSBA (the New Hampshire School Board
43 Association) for each board to make a separate motion rather than making a motion as an SAU
44 Board.

45 **Ms. Elizabeth Kuzsma motioned to authorize the Superintendent to take any actions he**
46 **deems reasonability necessary to address the threat posed by the COVID-19 virus to our**
47 **students, staff, and community including but not limited to, modifying the SAU's Calendar**
48 **and/or the manner of delivery of educational services, and consistent with all applicable**
49 **statutes, rules, and regulations. Ms. Terri Behm seconded the motion.**

50 Ms. Kuzsma noted that Mr. Gauthier questioned if school was disrupted if Superintendent Steel
51 would give parents sufficient time.

52 Mr. Steel replied that he hopes so. There are a few ways that school could be disrupted. First, the
53 Commissioner of the DHHS (Department of Health and Human Services) could declare a Public
54 Health Emergency and close schools. Second, he as Superintendent can make those changes as
55 well as the Governor or the Legislature. It is his hope to give families at least a 24 to 36-hour
56 notice.

57 Mr. Glover asked if the language in the motion was drafted by the administration or NHSBA.

58 Mr. Steel replied, NHSBA.

59 Mr. Glover questioned when does this motion terminate and what are the limits.

60 Mr. Steel replied that he has the ability to make these changes without the Board. They did this
61 because they wanted the community to know that we are all on the same page. There is no
62 expiration to that motion. As it relates to the budget and resources, the school board has
63 oversight. If there were significant expenditures over and beyond what was budgeted, then the
64 Board would be needed to authorize those expenditures.

65 Mr. Chen asked if the motion included school requirements.

66 Mr. Steel replied that the State Board of Education passed an emergency rule yesterday (ED
67 306.18 (a) (7). The State withdrew the previous 5-day limit and 80% participation rate of
68 distance learning.

69 Mr. Torres asked about federal funding for expenditures that are associated.

70 Mr. Steel replied that it is not clear at this point.

71 Ms. Kuzsma re-read the motion.

72 Ms. Taylor inquired if they can limit in any way the modification of the SAU calendar since they
73 are relinquishing control of the calendar. It affects a lot of families in the districts.

74 She asked for the specific RSA to suspend school and the limitation on the motion.

75 Mr. Coughlan added that it expires or reoccurs when COVID- 19 comes around, depending. That
76 is how he is interpreting it.

77 Ms. Facey asked for questions from the board members on the phone.

78 There were no questions.

79 **Ms. Kuzsma called for a roll call on the motion. Kuzsma- Yes, Glover-Yes, Behm- Yes and**
80 **Grudzien- Yes. Motion passed.**

81 **Ms. Sarah Lawrence motioned to authorize the Superintendent to take any actions he**
82 **deems reasonability necessary to address the threat posed by the COVID-19 virus to our**
83 **students, staff, and community including but not limited to, modifying the SAU's Calendar**
84 **and/or the manner of delivery of educational services, and consistent with all applicable**
85 **statues, rules, and regulations. Mr. Steven O'Keefe seconded the motion.**

86 Mr. Eckhoff commented that he has full confidence in Superintendent Steel and his Team. He
87 further stated that Mr. Steel will do what's best for students, faculty, and community and keep
88 them informed that he always has. You can't have an end date on this motion, you can't do that,
89 no one knows what this end date is. He is comfortable with the decisions they will need to make
90 day in and day out. They are in uncharted waters.

91 Ms. Lawrence asked if either Ms. Hinckley or Mr. Driscoll have any questions (via phone).

92 Mr. Driscoll questioned why wouldn't we just add to the motion "for the remainder of the school
93 year" to bound it.

94 Mr. O'Keefe commented that they can consider a motion to rescind that authority to make that at
95 any school board meeting.

96 **Ms. Lawrence called for a Roll Call: Eckhoff- Yes, Lawrence- Yes, O'Keefe- Yes, Hinckley-**
97 **Yes (via phone) and Driscoll-Yes (via phone). Motion passed.**

98 **Mr. Jim Manning motioned to authorize the Superintendent to take any actions he deems**
99 **reasonability necessary to address the threat posed by the COVID-19 virus to our students,**
100 **staff, and community including but not limited to, modifying the SAU's Calendar and/or**
101 **the manner of delivery of educational services, and consistent with all applicable statues,**
102 **rules, and regulations. Mr. David Chen (via phone) seconded the motion.**

103 Mr. Manning asked for discussion.

104 There were no questions or comments.

105 **Mr. Manning called a Roll Call: Grondstra-Yes, Facey-Yes, Coughlan-Yes, Taylor- Yes,**
106 **Chen- Yes (via phone), Torres- Yes (via phone) and Manning- Yes (via phone). Motion**
107 **passed.**

108 Ms. Facey noted that she will open up the discussion for further questions.

109 Mr. O'Keefe mentioned that he understands the regulatory reason why they did this tonight. To
110 create an environment where there is no question about authority, permission, or consent over the
111 next few weeks. He then thanked Superintendent Steel for the effort and the language he has
112 shared. He asked what is his worst-case scenario for students, parents, and faculty members.

113 Mr. Steel responded that the worst-case scenario would be that the school year is significantly
114 disrupted starting next week. Teachers will have to change how they teach and instruct. Moving
115 from direct to remote instruction involves internet, video conferencing, and possibly even paper.
116 It is not as good as being all together in the same room. Definitely a unique challenge. They are
117 investigating the possibility of some special programs remaining open. During a time where the
118 rest of school will be disrupted. For parents, it will be a childcare expectation that they don't
119 normally have. Students will be home and will need supervision.

120 Mr. O'Keefe noted his concern about students on an IEP. He asked if he feels confident with the
121 tools and resources that they need to implement this emergency disruption.

122 Mr. Steel responded that he feels confident as they have been working on this for several weeks
123 now. The only issue that could be of concern is about is a reliable internet and device for
124 families. There might be some expense associated with that and they know that already.

125 Mr. O'Keefe asked if there is a reason why they are not closing immediately rather than
126 deferring and waiting from guidance from the State.

127 Mr. Steel replied that he has been communicating with the DHHS and the Federal Government
128 and they have that decision to make for their own community. Right now, it is his preference that
129 they have at least one more day with their students to get the materials that they need. That may
130 not be possible.

131 Mr. O'Keefe asked about the prospects of extending the school year.

132 Mr. Steel replied that there is a current State Law that prohibits them from extending the school
133 year past June 30th and it would have to be modified. He has not heard of any school districts
134 that are extending. Activities may not happen until the school year has officially ended. He
135 would expect a waiver from the Department of Education, on the number of days and academic
136 hours, but they haven't done that yet.

137 Ms. Grudzien asked about instruction for K-3.

138 Superintendent Steel replied that it's going to be very different for our younger learners.

139 Ms. Grudzien asked about school lunch still being provided. She encouraged the District to put
140 information on the SAU #39 website.

141 Mr. Steel replied that the State of NH has applied for a waiver from the USDA. Right now, they
142 are only allowed to serve food that is eaten on site. They are looking at delivering food to
143 students with that need. Their Food Service Team is meeting on Monday to discuss how they can
144 still prepare, deliver, and provide food to those families in need.

145 Mr. Grondstra noted that the NHSBA sent out guidance today on making decisions. He
146 commented that it was well put together and questioned whether they are using that guidance.

147 Mr. Steel explained that the Federal Government has a guide on school disruption including
148 some of the factors that the NHSBA referenced, one is the attendance rate. Our rate has dropped
149 during the week. That is one of the many factors in the decision weighing process.

150 Ms. Taylor inquired if they were closing the buildings completely during this time.

151 Mr. Steel replied that they will weigh those factors and consider a balance. The Town of
152 Amherst had a meeting to discuss what places will be open around town. It will be a dynamic
153 situation.

154 Ms. Taylor asked about AP standardized testing and Athletics.

155 Superintendent Steel noted that it is good that they are in between athletic seasons. It is possible
156 that the NHIAA looking to push the season. He then referred to SHS Athletics Director, Mr. Dan
157 Wyborney, in the audience for a comment.

158 Mr. Wyborney remarked that the is expecting that the NHIAA will decide by the end of the
159 weekend.

160 Mr. Steel added that the Department of Ed. is looking at NHSAS testing and SAT testing and
161 how it will work.

162 Mr. O'Keefe noted that for the Town of Mont Vernon residents there are resources. First, is the
163 Welfare Department and Neighbor to Neighbor; with Comcast there are discounted rates for
164 internet service. The Town of Mont Vernon has a Health Officer and suggested that residents
165 check his website for a health status. He encouraged residents to stay tuned to the SAU #39
166 Facebook page and Twitter.

167 He then thanked Superintendent Steel and his team for their efforts and the information he is
168 sharing today and online over the past few weeks. It is good to know that this in the front of his
169 mind and they are ready to make a decision.

170 III. Public Comment

171 Mr. Tony Labranche, 63 Merrimack Road, Amherst, questioned what education will look like
172 online for students.

173 Superintendent Steel replied that will look different for every school and ages. Expectations will
 174 be finalized on Monday, it will most likely be an asynchronous method. Attendance will be
 175 completed the best that it can happen.

176 Mr. John D'Angelo, 99 Woodland Dr, Amherst, Board of Selectman Liaison commented that
 177 there is an emergency meeting Monday afternoon to coordinate town and school. They want to
 178 make sure we aren't working cross purposes.

179 Ms. Megan Murray, State Representative for Amherst, 2 Steeple Lane, commented that she is
 180 here on behalf of NH State Representative, Ms. Shannon Chandley, that could not be here. She
 181 is here to listen to the Administration and Board and provide any resources that they can.

182 Mr. O'Keefe inquired about keeping track of the expenses and being reimbursed for them. He
 183 then asked about freezing the budget.

184 Superintendent Steel replied that SAU #39 Business Administrator, Ms. Michele Croteau, is
 185 already taking care of that. They are not buying anything else for the school year at this time.

186 He noted that there are two questions from online participants.

187 First, what is the likelihood that the planned 6th grade Ecology Trip will be rescheduled.

188 Mr. Steel replied that the NHDOE recommended no out of state field trips. It is highly likely it
 189 will be canceled or rescheduled.

190 A second question online is what is likelihood that school will be disrupted.

191 He responded that it is highly likely that school will be disrupted.

192 Ms. Facey then thanked Superintendent Steel and his team for all of their work during this time.

193 Mr. Steel added that there was another question about if they will they be given step by step
 194 directions on how to support their child at home.

195 He then replied, yes.

196 IV. Meeting Adjourned

197 **Ms. Kuzsma motioned to adjourn the meeting at 4:46pm. Ms. Terri Behm seconded the**
 198 **motion. Kuzsma- Yes, Glover-Yes, Behm- Yes, Grudzien- Yes, Grondstra-Yes, Facey-Yes,**
 199 **Coughlan-Yes, Taylor- Yes, Chen- Yes (via phone), Torres- Yes (via phone), Manning- Yes**
 200 **(via phone), Eckhoff- Yes, Lawrence- Yes, O'Keefe- Yes, Hinckley- Yes (via phone) and**
 201 **Driscoll-Yes (via phone) motion passed.**

202

203

204

205

Consent Agenda Item #3

MEMO



School Administrative Unit 39
1 School Street
P.O. Box 849
Amherst, NH 03031
Phone: 603-673-2690
Fax: 603-672-1786

Date: 03/26/2020
To: Adam Steel, Superintendent of Schools
From: Sarah Jardim-Lee, Accountant
Re: Unanticipated Revenue

Unanticipated revenue of \$525.00 has been received by SAU 39 this month.

Requested Board Actions

1. Motion: To accept unanticipated revenue of \$525.00 from HealthTrust to be used for teacher and staff wellness programs. These funds shall be accepted into the General Fund.

HealthTrustHealth Account
PO BOX 617
CONCORD, NH 03302-0617**Citizens Bank**
New Hampshire
011401533**665230**DATE
Jan 13, 2020AMOUNT
\$525.00Pay Five Hundred Twenty Five Dollars and 00 CentsTO THE
ORDER
OF **SAU #39**
PO Box 849
1 School Street
Amherst, NH 03031-0849**HealthTrust**

Health Account

665230

Vendor ID 15013	Vendor SAU #39	Check Date 01/13/2020		
Voucher Number 90301743	Invoice Number WCOORD-1194	Description WCOORD-1194	Document Date 01/10/2020	Amount \$525.00

TOTALS: \$525.00**HealthTrust**

Health Account

665230

Vendor ID 15013	Vendor SAU #39	Check Date 01/13/2020		
Voucher Number 90301743	Invoice Number WCOORD-1194	Description WCOORD-1194	Document Date 01/10/2020	Amount \$525.00

TOTALS: \$525.00

Carrie James

From: Kerry Horne <khorne@healthtrustnh.org>
Sent: Friday, December 6, 2019 12:28 PM
To: Carrie James
Subject: RE: Coordinator Checks

Hi Carrie,

I am not going to be delivering the Biometric Screening posters on Tuesday as my schedule has changed. I have two meetings in Milford on the 17th so I am planning to stop by in the afternoon. Thanks! Kerry

From: Carrie James <cjames@sprise.com>
Sent: Tuesday, December 3, 2019 1:37 PM
To: Kerry Horne <khorne@healthtrustnh.org>
Subject: RE: Coordinator Checks

****External email: Use caution****

Hi – let's go with:

- SAU #39 \$525
- Amherst School District \$1400
- Mont Vernon School District \$525
- Souhegan School District \$700

Thanks so much!!! See you on the 10th.
Carrie

Carrie James, SHRM-SCP | Director of Human Resources | SAU 39
603-673-2690 x 2101 | PO Box 849 | 1 School Street | Amherst, NH 03031

From: Kerry Horne <khorne@healthtrustnh.org>
Sent: Tuesday, December 3, 2019 11:27 AM
To: Carrie James <cjames@sprise.com>
Subject: Coordinator Checks

Hi Carrie,

I hope you are well! I am preparing for the next round of Wellness Coordinator check processing. Last year the checks for the district were:

- SAU #39 \$600
- Amherst School District \$1,200
- Mont Vernon School District \$600
- Souhegan School District \$600

This year the district will have \$3,150 to divide between locations. Please let me know how much for each location. Also – just a heads up that next Tuesday the 10th I plan to come by and drop off Biometric Screening posters. Thanks ☺ Kerry

SCHOOL ADMINISTRATIVE UNIT #39

TOWN OF AMHERST, NH

Treasurer Report

Consent Agenda Item #4

February-2020

School Administrative Unit #39		
Town of Amherst, NH		
Monthly Report of the Treasurer		
as of 2/29/2020		
Cash on hand	2/1/2020	\$415,598.69
Deposits		\$537,693.03
AP-PR		(\$174,910.65)
Balance on hand	2/29/2020	\$778,381.07

Filename: 2020-02-SAU39 Treasurer Report.xlsx
Month 2/1/2020

SAU#39
Monthly Reconciliation Report
Combined Accounts

February-20	Peoples United	Peoples United	TOTAL
	*1191	*760	
	Cash Management	Municipal Checking	
2/29/2020	\$823,917.70	\$10,000.00	\$833,917.70
Deposits in Transit: (add)			
Outstanding Checks: (subtract)			
a) Accounts Payable		\$(5,933.56)	
b) Payroll		\$(49,603.07)	
c) Payroll Direct Deposit & IRS			
Total Outstanding		\$(55,536.63)	\$(55,536.63)
Reconciled Book Balance			\$778,381.07
Balance from Treasurer's Journal			\$778,381.07
Difference			-

School Administrative Unit #39

Town of Amherst, NH

Treasurer's Cash Journal

Date	Deposits Description	Deposit Total	Date	Expenditures Description	Amount	Balance
2/1/2020	Beginning Balance					\$415,598.69
2/10/2020	Deposit: MVSD, SCSD, Misc	\$258,554.37	2/4/2020	Payroll Direct Deposit pp16 v6200	(\$40,974.79)	\$633,178.27
2/19/2020	Deposit: MVSD, ASD, NH Food Programs	\$75,141.07	2/4/2020	Payroll Direct Deposit pp16 v6201	(\$5,265.03)	\$703,054.31
2/28/2020	Deposit: SCSD, ASD, NH Food Programs	\$143,415.91	2/18/2020	Payroll Direct Deposit pp17 v6204	(\$41,174.24)	\$805,295.98
			2/18/2020	Payroll Direct Deposit pp17 v6205	(\$5,262.01)	\$800,033.97
			2/6/2020	Payroll IRS pp16 v6203	(\$7,987.94)	\$792,046.03
			2/20/2020	Payroll IRS pp17 v6207	(\$8,048.96)	\$783,997.07
			2/7/2020	Payroll 457 pp16 v6202	(\$1,983.96)	\$782,013.11
			2/21/2020	Payroll 457 pp17 v6206	(\$1,983.84)	\$780,029.27
			2/6/2020	Payroll v16 ck400453-400453	(\$184.70)	\$779,844.57
			2/20/2020	Payroll v17 ck400465-400465	(\$282.82)	\$779,561.75
			2/6/2020	Payroll pp16 v6199 ck400454-400454	(\$559.56)	\$779,002.19
			2/20/2020	Payroll pp17 v6208 ck400466-400467	(\$1,243.97)	\$777,758.22
			2/27/2020	Payroll v6209 ck400468-400469	(\$49,320.25)	\$728,437.97
						\$728,437.97
						\$728,437.97
						\$728,437.97
			2/13/2020	A/P v1725 ck400455-400464	(\$10,638.58)	\$717,799.39
						\$717,799.39
2/29/2020	Heartland Payment Services	\$60,398.28				\$778,197.67
						\$778,197.67
2/29/2020	Interest - Cash Management	\$183.40				\$778,381.07
						\$778,381.07
						\$778,381.07
2/29/2020	Ending Balances	\$537,693.03			(\$174,910.65)	\$778,381.07
				Payroll Direct Deposit	(\$112,680.77)	
				Payroll	(\$51,591.30)	
				AP	(\$10,638.58)	

SAU39 Treasurer's Report
Unreconciled Check Register

Uncleared Transactions
SAU39 Checking 0760

Num	Date	Payee	C Memo	Category	Amount
Expense Categories					
Payroll Ded					
400468	2/27/2020	HEALTHTRUST, INC.	6209 Payroll Ded		(\$28,934.95)
400469	2/27/2020	NEW HAMPSHIRE RETIREMENT SYSTEM	6209 Payroll Ded		(\$20,385.30)
Total Payroll Ded					(\$49,320.25)
Payroll					
400465	2/20/2020	Marotta, Danae A.	17 Payroll		(\$282.82)
Total Payroll					(\$282.82)
Expense!					
400246	9/12/2019	MOULTON'S MARKET	1715 Expense!		(\$208.86)
400375	12/12/2019	SHRED-IT USA LLC	1721 Expense!		(\$45.43)
400384	1/3/2020	AMHERST GARDEN CENTER	1722 Expense!		(\$76.50)
400418	1/16/2020	LANDWEHRLE, CHRISTINE	1723 Expense!		(\$3,126.00)
400440	1/30/2020	MONT VERNON SCHOOL DISTRICT	1724 Expense!		(\$826.77)
400445	1/30/2020	SOULE, LESLIE, KIDDER, SAYWARD	1724 Expense!		(\$950.00)
400458	2/13/2020	FOOD FOR SCHOOLS	1725 Expense!		(\$700.00)
Total Expense!					(\$5,933.56)
Total Expense Categories					(\$55,536.63)
Grand Total					(\$55,536.63)

AMHERST, MONT VERNON, SOUHEGAN, and SAU39 POLICY FIRST READING

DAF – ADMINISTRATION OF FEDERAL GRANTS

Category: Priority/Required by Law

Related Policies: DI, DID, DJ, DJC, DJE, DJF & DK

See also: ADB, EFAA, EHB, JICI & JRA

This Policy includes “sub-policies” relating to specific provisions of the Uniform Administrative Requirements for Federal Awards issued by the U.S. Office of Budget and Management. Those requirements, which are commonly known as Uniform Grant Guidance (“UGG”), are found in Title 2 of the Code of Federal Regulations (“CFR”) part 200. The sub-policies include:

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NOTICE: Notwithstanding any other policy of the District, all funds awarded directly or indirectly through any Federal grant or subsidy programs shall be administered in accordance with this Policy, and any administrative procedures adopted implementing this Policy.

The Board accepts federal funds, which are available, provided that there is a specific need for them and that the required matching funds are available. The Board intends to administer federal grant awards efficiently, effectively and in compliance with all requirements imposed by law, the awarding agency and the New Hampshire Department of Education (NHDOE) or other applicable pass-through entity.

This policy establishes the minimum standards regarding internal controls and grant management to be used by the District in the administration of any funds received by the District through Federal grant programs as required by applicable NH and Federal laws or regulations, including, without limitation, the UGG.

The Board directs the Superintendent or his/her designee to develop, monitor, and enforce effective administrative procedures and other internal controls over federal awards as necessary in order to provide reasonable assurances that the District is managing the awards in compliance with all requirements for

AMHERST, MONT VERNON, SOUHEGAN, and SAU39 POLICY

DAF – ADMINISTRATION OF FEDERAL GRANTS

federal grants and awards. Systems and controls must meet all requirements of federal and/or law and regulation and shall be based on best practices.

The Superintendent is directed to assure that all individuals responsible for the administration of a federal grant or award shall be provided sufficient training to carry out their duties in accordance with all applicable requirements for the federal grant or award and this policy.

To the extent not covered by this Policy, the administrative procedures and internal controls must provide for:

1. identification of all federal funds received and expended and their program source;
2. accurate, current, and complete disclosure of financial data in accordance with federal requirements;
3. records sufficient to track the receipt and use of funds;
4. effective control and accountability over assets to assure they are used only for authorized purposes and
5. comparison of expenditures against budget.

DAF-1 ALLOWABILITY

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with all applicable Federal, State and local laws, the associated agreements/assurances, program objectives and the specific terms and conditions of the grant award.

A. Cost Principles: Except whether otherwise authorized by statute, costs shall meet the following general criteria in order to be allowable under Federal awards:

1. Be “necessary” and “reasonable” for proper and efficient performance and administration of the Federal award and be allocable thereto under these principles.
 - a. To determine whether a cost is “reasonable”, consideration shall be given to:
 - i. whether a cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the Federal award;
 - ii. the restraints or requirements imposed by such factors as sound business practices, arm’s length bargaining, Federal, State, local, tribal and other laws and regulations;
 - iii. market prices for comparable goods or services for the geographic area;
 - iv. whether the individuals concerned acted with prudence in the circumstances considering their responsibilities; and

DAF – ADMINISTRATION OF FEDERAL GRANTS

- v. whether the cost represents any significant deviation from the established practices or Board policy which may increase the expense. While Federal regulations do not provide specific descriptions of what satisfied the “necessary” element beyond its inclusion in the reasonableness analysis above, whether a cost is necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the District can demonstrate that the cost addresses an existing need and can prove it.
 - b. When determining whether a cost is “necessary”, consideration may be given to whether:
 - i. the cost is needed for the proper and efficient performance of the grant program;
 - ii. the cost is identified in the approved budget or application;
 - iii. there is an educational benefit associated with the cost;
 - iv. the cost aligns with identified needs based on results and findings from a needs assessment; and/or
 - v. the cost addresses program goals and objectives and is based on program data.
 - c. A cost is allocable to the Federal award if the goods or services involved are chargeable or assignable to the Federal award in accordance with the relative benefit received.
2. Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the Federal award.
 3. Be consistent with policies and procedures that apply uniformly to both Federally-financed and other activities of the District.
 4. Be afforded consistent treatment. A cost cannot be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
 5. Be determined in accordance with generally accepted accounting principles.
 6. Be representative of actual cost, net of all applicable credits or offsets.

The term “applicable credits” refers to those receipts or reductions of expenditures that operate to offset or reduce expense items allocable to the Federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to/or received by the State relate to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate.

DAF – ADMINISTRATION OF FEDERAL GRANTS

7. Be not included as a match or cost-share, unless the specific Federal program authorizes Federal costs to be treated as such.
8. Be adequately documented:
 - a. in the case of personal services, the Superintendent shall implement a system for District personnel to account for time and efforts expended on grant funded programs to assure that only permissible personnel expenses are allocated;
 - b. in the case of other costs, all receipts and other invoice materials shall be retained, along with any documentation identifying the need and purpose for such expenditure if not otherwise clear.

B. Selected Items of Cost: The District shall follow the rules for selected items of cost at 2 C.F.R. Part 200, Subpart E when charging these specific expenditures to a Federal grant. When applicable, District staff shall check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District and program-specific rules, including the terms and conditions of the award, may deem a cost as unallowable and District personnel shall follow those rules as well.

C. Cost Compliance: The Superintendent shall require that grant program funds are expended and are accounted for consistent with the requirements of the specific program and as identified in the grant application. Compliance monitoring includes accounting for direct or indirect costs and reporting them as permitted or required by each grant.

D. Determining Whether A Cost is Direct or Indirect

1. “Direct costs” are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

These costs may include: salaries and fringe benefits of employees working directly on a grant-funded project; purchased services contracted for performance under the grant; travel of employees working directly on a grant-funded project; materials, supplies, and equipment purchased for use on a specific grant; and infrastructure costs directly attributable to the program (such as long distance telephone calls specific to the program, etc.).

2. “Indirect costs” are those that have been incurred for a common or joint purpose benefitting more than one (1) cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

These costs may include: general data processing, human resources, utility costs, maintenance, accounting, etc.

Federal education programs with supplement not supplant provisions must use a restricted indirect cost rate. In a restricted rate, indirect costs are limited to general management costs. General management costs do not include divisional administration that is limited to one (1) component of the District, the governing body of the District, compensation of the

DAF – ADMINISTRATION OF FEDERAL GRANTS

Superintendent, compensation of the chief executive officer of any component of the District, and operation of the immediate offices of these officers.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if **all** the following conditions are met:

- a. Administrative or clerical services are integral to a project or activity.
- b. Individuals involved can be specifically identified with the project or activity.
- c. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency.
- d. The costs are not also recovered as indirect costs.

Where a Federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap shall include all direct administrative charges as well as any recovered indirect charges.

Effort should be given to identify costs as direct costs whenever practical, but allocation of indirect costs may be used where not prohibited and where indirect cost allocation is approved ahead of time by NHDOE or the pass-through entity (Federal funds subject to 2 C.F.R Part 200 pertaining to determining indirect cost allocation).

- E. **Timely Obligation of Funds:** Obligations are orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period.

The following are examples of when funds are determined to be “obligated” under applicable regulation of the U.S. Department of Education:

When the obligation is for:

1. Acquisition of property – on the date which the District makes a binding written commitment to acquire the property.
2. Personal services by an employee of the District – when the services are performed.
3. Personal services by a contractor who is not an employee of the District – on the date which the District makes a binding written commitment to obtain the services.
4. Public utility services – when the District received the services.
5. Travel – when the travel is taken.
6. Rental of property – when the District uses the property.

DAF – ADMINISTRATION OF FEDERAL GRANTS

7. A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 C.F.R. Part 200, Subpart E – Cost Principles – on the first day of the project period.

F. Period of Performance: All obligations must occur on or between the beginning and ending dates of the grant project. This period of time is known as the period of performance. The period of performance is dictated by statute and will be indicated in the Grant Award Notification (“GAN”). As a general rule, State-administered Federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many Federal education grants, the period of performance is twenty-seven (27) months. This maximum period includes a fifteen (15) month period of initial availability, plus a twelve (12) month period of carry over. For direct grants, the period of performance is generally identified in the GAN.

In the case of a State-administered grant, obligations under a grant may not be made until the grant funding period begins or all necessary materials are submitted to the granting agency, whichever is later. In the case of a direct grant, obligations may begin when the grant is substantially approved, unless an agreement exists with NHDOE or the pass-through entity to reimburse for pre-approval expenses.

For both State-administered and direct grants, regardless of the period of availability, the District shall liquidate all obligations incurred under the award not later than forty-five (45) days after the end of the funding period unless an extension is authorized. Any funds not obligated within the period of performance or liquidated within the appropriate timeframe are said to lapse and shall be returned to the awarding agency. Consistently, the District shall closely monitor grant spending throughout the grant cycle.

DAF-2 CASH MANAGEMENT AND FUND CONTROL

Payment methods must be established in writing that minimize the time elapsed between the drawdown of federal funds and the disbursement of those funds. Standards for funds control and accountability must be met as required by the Uniform Guidance for advance payments and in accordance with the requirements of NHDOE or other applicable pass-through-entity.

In order to provide reasonable assurance that all assets, including Federal, State, and local funds, are safeguarded against waste, loss, unauthorized use, or misappropriation, the Superintendent shall implement internal controls in the area of cash management.

The District’s payment methods shall minimize the time elapsing between the transfer of funds from the United States Treasury or the NHDOE (pass-through entity) and disbursement by the District, regardless of whether the payment is made by electronic fund transfer, or issuance or redemption of checks, warrants, or payment by other means.

The District shall use forms and procedures required by the NHDOE, grantor agency or other pass-through entity to request payment. The District shall request grant fund payments in accordance with the provisions of the grant. Additionally, the District’s financial management systems shall meet the standards for fund control and accountability as established by the awarding agency.

DAF – ADMINISTRATION OF FEDERAL GRANTS

The Superintendent or his/her designee is authorized to submit requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as deemed appropriate when electronic transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

When the District uses a cash advance payment method, the following standards shall apply:

- A. The timing and amount of the advance payment requested will be as close as is administratively feasible to the actual disbursement for direct program or project costs and the proportionate share of any allowable indirect costs.
- B. The District shall make timely payment to contractors in accordance with contract provisions.
- C. To the extent available, the District shall disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.
- D. The District shall account for the receipt, obligation and expenditure of funds.
- E. Advance payments shall be deposited and maintained in insured accounts whenever possible.
- F. Advance payments will be maintained in interest bearing accounts unless the following apply:
 - 1. The District receives less than \$120,000 in Federal awards per year.
 - 2. The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances.
 - 3. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
 - 4. A foreign government or banking system prohibits or precludes interest bearing accounts.
- G. Pursuant to Federal law and regulations, the District may retain interest earned in an amount up to \$500 per year for administrative costs. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (“PMS”) through an electronic medium using either Automated Clearing House (“ACH”) network or a Fedwire Funds Service payment. Remittances shall include pertinent information of the payee and nature of payment in the memo area (often referred to as “addenda records” by Financial Institutions) as that will assist in the timely posting of interest earned on Federal funds.

DAF – ADMINISTRATION OF FEDERAL GRANTS

DAF-3 **PROCUREMENT**

All purchases for property and services made using federal funds must be conducted in accordance with all applicable Federal, State and local laws and regulations, the Uniform Guidance, and the District's written policies and procedures.

Procurement of all supplies, materials equipment, and services paid for from Federal funds or District matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, District policies, and procedures.

The Superintendent shall maintain a procurement and contract administration system in accordance with the USDOE requirements (2 CFR 200.317-.326) for the administration and management of Federal grants and Federally-funded programs. The District shall maintain a contract administration system that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall also conform to the provisions of the District's documented general purchase Policy DJ.

The District avoids situations that unnecessarily restrict competition and avoids acquisition of unnecessary or duplicative items. Individuals or organizations that develop or draft specifications, requirements, statements of work, and/or invitations for bids, requests for proposals, or invitations to negotiate, are excluded from competing for such purchases. Additionally, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis shall be made to lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

Contracts are awarded only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration is given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. No contract is awarded to a contractor who is suspended or debarred from eligibility for participation in federal assistance programs or activities.

Purchasing records are sufficiently maintained to detail the history of all procurements and must include at least the rationale for the method of procurement, selection of contract type, and contractor selection or rejection; the basis for the contract price; and verification that the contractor is not suspended or debarred.

To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

- A. **Competition**: All procurement transactions shall be conducted in a manner that encourages full and open competition and that is in accordance with good administrative practice and sound business judgement. In order to promote objective contractor performance and eliminate unfair competitive advantage, the District shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids or requests for proposals from competition for such procurements.

DAF – ADMINISTRATION OF FEDERAL GRANTS

Some of the situations considered to be restrictive of competition include, but are not limited to, the following:

1. unreasonable requirements on firms in order for them to qualify to do business;
2. unnecessary experience and excessive bonding requirements;
3. noncompetitive contracts to consultants that are on retainer contracts;
4. organizational conflicts of interest;
5. specification of only a “brand name” product instead of allowing for an “or equal” product to be offered and describing the performance or other relevant requirements of the procurement; and/or
6. any arbitrary action in the procurement process.

Further, the District does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless (1) an applicable Federal statute expressly mandates or encourages a geographic preference; (2) the District is contracting for architectural and engineering services, in which case geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

To the extent that the District uses a pre-qualified list of persons, firms or products to acquire goods and services, the pre-qualified list must include enough qualified sources as to ensure maximum open and free competition. The District allows vendors to apply for consideration to be placed on the list as requested.

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

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

The Board will not approve any expenditure for an unauthorized purchase or contract.

- C. Procurement Methods:** The District shall utilize the following methods of procurement:

1. Micro-purchases

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000. To the extent practicable, the District shall distribute micro-purchase equitably among qualified suppliers. Micro-purchases may be

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made without soliciting competitive quotations if the Superintendent considers the price to be reasonable. The District maintains evidence of this reasonableness in the records of all purchases made by this method.

2. Small Purchases (Simplified Acquisition)

Small purchase procedures provide for relatively simple and informal procurement methods for securing services, supplies, and other property that does not exceed the competitive bid threshold of \$250,000. Small purchase procedures require that price or rate quotations shall be obtained from an adequate number of qualified sources.

3. Sealed Bids

Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment which amounts to \$250,000 and when the Board determines to build, repair, enlarge, improve, or demolish a school building/facility the cost of which will exceed \$250,000.

a. In order for sealed bidding to be feasible, the following conditions shall be present:

- i. a complete, adequate, and realistic specification or purchase description is available;
- ii. two (2) or more responsible bidders are willing and able to compete effectively for the business; and
- iii. the procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

b. When sealed bids are used, the following requirements apply:

- i. Bids shall be solicited in accordance with the provisions of State law and DJE. Bids shall be solicited from an adequate number of qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised.
- ii. The invitation for bids will include product/contract specifications and pertinent attachments and shall define the items and/or services required in order for the bidder to properly respond.
- iii. All bids will be opened at the time and place prescribed in the invitation for bids; bids will be opened publicly.
- iv. A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts may only be used to determine the low bid when prior experience indicates that such discounts are usually taken.

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- v. The Board reserves the right to reject any and all bids for sound documented reason.
- vi. Bid protests shall be handled pursuant to the process set forth in DAF-3.I.

4. Competitive Proposals

Procurement by competitive proposal, normally conducted with more than one sources submitting an offer, is generally used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method.

If this method is used, the following requirements apply:

- a. Requests for proposals shall be publicized and identify all evaluation factors and their relative importance. Any response to the publicized requests for proposals shall be considered to the maximum extent practical.
- b. Proposals shall be solicited from an adequate number of sources.
- c. The District shall use its written method for conducting technical evaluations of the proposals received and for selecting recipients.
- d. Contracts shall be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

5. Noncompetitive Proposals

Procurement by noncompetitive proposals allows for solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- a. the item is available only for a single source;
- b. the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- c. the Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District; and/or
- d. after solicitation of a number of sources, competition is determined to be inadequate.

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D. Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms:

The District must take necessary affirmative steps to assure that minority businesses, women’s business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

E. Contract/Price Analysis: The District shall perform a cost or price analysis in connection with every procurement action in excess of \$250,000 (i.e., the Simplified Acquisition/Small Purchase limit), including contract modifications. (See 2 CFR 200.323(a)). A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the District shall come to an independent estimate prior to receiving bids or proposals.

When performing a cost analysis, the District shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor’s investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

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

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Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiently. Therefore, the District sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls, and otherwise performs in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- G. Suspension and Disbarment:** The District will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. All purchasing decisions shall be made in the best interests of the District and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the District shall consider such factors as (1) contractor integrity; (2) compliance with public policy; (3) record of past performance/ and (4) financial and technical resources.

The Superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The District is subject to and shall abide by the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR Part 180.

Suspension is an action taken by the District that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended. (See 2 CFR Part 180 Subpart G).

Debarment is an action taken by the Superintendent to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR chapter 1). A person so excluded is debarred. (See 2 CFR Part 180 Subpart H).

The District shall not subcontract with or award sub-grants to any person or company who is debarred or suspended. For contracts over \$25,000 the District shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management ("SAM"), which maintains a list of such debarred or suspended vendors at www.sam.gov (which replaced the former Excluded Parties List System or EPLS); or collecting a certification from the vendor. (See 2 CFR Part 180 Sub part C).

Documentation that debarment/suspension was queried must be retained for each covered transaction as part of the documentation required under DAF-3, paragraph J. This documentation should include the date(s) queried and copy(ies) of the SAM result report/screen shot, or a copy of the or certification from the vendor. It should be attached to the payment backup and retained for future audit review.

H. Additional Requirements for Procurement Contracts Using Federal Funds:

1. For any contract using Federal funds under which the contract amount exceeds the upper limit for Simplified Acquisition/Small Purchases (see DAF-3.C.2), the contract must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and must provide for sanctions and penalties. (See 2 CFR 200, Appendix II(A)).

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2. For any contract using Federal funds under which the contract amount exceeds \$10,000, it must address the District's authority to terminate the contract for cause and for convenience, including the manner by which termination will be effected and the basis for settlement. (See 2 CFR 200, Appendix II(B)).
3. For any contract using Federal funds under which the contract amount exceeds \$150,000, the contract must include clauses addressing the Clean Air Act and the Federal Water Pollution Control Act. (See 2 CFR 200, Appendix II(G)).
4. For any contract using Federal funds under which the contract exceeds \$100,000, the contract must include an anti-lobbying clause, and require bidders to submit Anti-Lobbying Certification as required under 2 CFR 200, Appendix II (J).
5. For each contract using Federal funds and for which there is no price competition, and for each Federal fund contract in which a cost analysis is performed, the District shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of the contractor's past performance, and industry profit rates in the surrounding geographical area for similar work. (See 2 CFR 200.323(b)).

- I. Bid Protest:** The District maintains the following protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency.

A bidder who wishes to file a bid protest shall file such notice and follow procedures prescribed by the Request For Proposals (RFPs) or the individual bid specifications package, for resolution. Bid protests shall be filed in writing with the Superintendent within seventy-two (72) hours of the opening of the bids in protest.

Within five (5) days of receipt of a protest, the Superintendent shall review the protest as submitted and render a decision regarding the merits of the protest and any impact on the acceptance and rejection of bids submitted. Notice of the filing of a bid protest shall be communicated to the Board and shall be so noted in any subsequent recommendation for the acceptance of bids and awarding of contracts.

Failure to file a notice of intent to protest, or failure to file a formal written protest within the time prescribed, shall constitute a waiver of proceedings.

- J. Maintenance of Procurement Records:** The District shall maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and records regarding disbarment/suspension queries or actions. Such records shall be retained consistent with District Policy EHB and District Administrative Procedures EHB-R.

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DAF-4 **PROCUREMENT – ADDITIONAL PROVISIONS PERTINENT TO FOOD SERVICE PROGRAM**

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

- A. Mandatory Contract Clauses:** The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts:
1. Allowable costs will be paid from the nonprofit school food service account to the contractor net of all discounts, rebates and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority;
 2. The contractor must separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the nonprofit school food service account) and the amount that is unallowable (cannot be paid from the nonprofit school food service account); or
 3. The contractor must exclude all unallowable costs from its billing documents and certify that only allowable costs are submitted for payment and records have been established that maintain the visibility of unallowable costs, including directly associated costs in a manner suitable for contract cost determination and verification;
 4. The contractor's determination of its allowable costs must be made in compliance with the applicable departmental and program regulations and Office of Management and Budget cost circulars;
 5. The contractor must identify the amount of each discount, rebate and other applicable credit on bills and invoices presented to the school food authority for payment and individually identify the amount as a discount, rebate, or in the case of other applicable credits, the nature of the credit. If approved by the state agency, the school food authority may permit the contractor to report this information on a less frequent basis than monthly, but no less frequently than annually;
 6. The contractor must identify the method by which it will report discounts, rebates and other applicable credits allocable to the contract that are not reported prior to conclusion of the contract; and
 7. The contractor must maintain documentation of costs and discounts, rebates and other applicable credits, and must furnish such documentation upon request to the school food authority, the state agency, or the department.
- B. Contracts with Food Service Management Companies:** Procedures for selecting and contracting with a food service management company shall comply with guidance provided by the NHDOE, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts.

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C. **“Buy American” Requirement:**

Under the “Buy American” provision of the National School Lunch Act (the “NSLA”), school food authorities (SFAs) are required to purchase, to the maximum extent practicable, *domestic commodity or product*. As an SFA, the District is required to comply with the “Buy American” procurement standards set forth in 7 CFR Part 210.21(d) when purchasing commercial food products served in the school meals programs. This requirement applies whether the District is purchasing the products directly or when the products are purchased by third parties on the District’s behalf (e.g., food service management companies, group purchasing cooperatives, shared purchasing, etc.).

Under the NSLA, “*domestic commodity or product*” is defined as an agricultural commodity or product that is produced or processed in the United States using “*substantial*” agricultural commodities that are produced in the United States. For purposes of the act, “*substantial*” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States.

1. **Exceptions:** The two main exceptions to the Buy American requirements are:
 - a) The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
 - b) Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.
2. **Steps to Comply with Buy American Requirements:** In order to help assure that the District remains in compliance with the Buy American requirement, the Superintendent or his/her designee shall
 - a) Include a Buy American clause in all procurement documents (product specifications, bid solicitations, requests for proposals, purchase orders, etc.);
 - b) Monitor contractor performance;
 - c) Require suppliers to certify the origin of the product;
 - d) Examine product packaging for identification of the country of origin; and
 - e) Require suppliers to provide specific information about the percentage of U.S. content in food products from time-to-time.

DAF-5 CONFLICT OF INTEREST AND MANDATORY DISCLOSURES

The District complies with the requirements of State law and the Uniform Guidance for conflicts of interest and mandatory disclosures for all procurements with federal funds.

Each employee, board member, or agent of the school system who is engaged in the selection, award or administration of a contract supported by a federal grant or award and who has a potential conflict of interest must disclose that conflict in writing to the Superintendent or his/her designee, who, in

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turn, shall disclose in writing any such potential conflict of interest to NHDOE or other applicable pass-through-entity.

A conflict of interest would arise when the covered individual, any member of his/her immediate family, his/her partner, or an organization, which employs or is about to employ any of those parties has a financial or other interest in or received a tangible personal benefit from a firm considered for a contract. A covered individual who is required to disclose a conflict shall not participate in the selection, award, or administration of a contract supported by a federal grant or award.

Covered individuals will not solicit or accept any gratuities, favors, or items from a contractor or a party to a subcontractor for a federal grant or award. Violations of this rule are subject to disciplinary action.

The Superintendent shall timely disclose in writing to NHDOE or other applicable pass-through-entity, all violations of federal criminal law involving fraud, bribery, or gratuities potentially effecting any federal award. The Superintendent shall fully address any such violations promptly and notify the Board with such information as is appropriate under the circumstances (e.g., taking into account applicable disciplinary processes).

DAF-6 INVENTORY MANAGEMENT - EQUIPMENT AND SUPPLIES PURCHASED WITH FEDERAL FUNDS

Equipment and supplies acquired (“property” as used in this policy DAF-6) with federal funds will be used, managed, and disposed of in accordance with applicable state and federal requirements. Property records and inventory systems shall be sufficiently maintained to account for and track equipment that has been acquired with federal funds. In furtherance thereof, the following minimum standards and controls shall apply to any equipment or pilferable items acquired in whole or in part under a Federal award until such property is disposed in accordance with applicable laws, regulations and Board policies:

- A. **“Equipment” and “Pilferable Items” Defined:** For purposes of this policy, “equipment” means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of \$5,000, or the capitalization level established by the District for financial statement purposes. “Pilferable items” are those items, *regardless of cost*, which may be easily lost or stolen, such as cell phones, tablets, graphing calculators, software, projectors, cameras and other video equipment, computer equipment and televisions.
- B. **Records:** The Superintendent or his/her designee shall maintain records that include a description of the property; a serial number or other identification number; the source of the funding for the property (including the federal award identification number (FAIN)); who holds title; the acquisition date; the cost of the property; the percentage of the federal participation in the project costs for the federal award under which the property was acquired; the location, use, and condition of the property; and any ultimate disposition data, including the date of disposition and sale price of the property.

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- C. **Inventory**: No less than once every two years, the Superintendent or his/her designee shall cause a physical inventory of all equipment and pilferable items must be taken and the results reconciled with the property records at least once every two years. Except as otherwise provided in this policy, inventories shall be conducted consistent with Board Policy DID.
- D. **Control, Maintenance and Disposition**: The Superintendent shall develop administrative procedures relative to property procured in whole or in part with Federal funds to:
1. prevent loss, damage, or theft of the property; Any loss, damage, or theft must be investigated;
 2. to maintain the property and keep it in good condition; and
 3. to ensure the highest possible return through proper sales procedures, in those instances where the District is authorized to sell the property.

DAF-7 TRAVEL REIMBURSEMENT – FEDERAL FUNDS

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

For purposes of this policy, “travel costs” shall mean the expenses for transportation, lodging, subsistence, and related items incurred by employees and school officials who are in travel status on official business as a federal grant recipient.

School officials and district employees shall comply with applicable Board policies and administrative regulations established for reimbursement of travel and other expenses.

The validity of payments for travel costs for all district employees and school officials shall be determined by the Superintendent of his/her designee.

Travel costs shall be reimbursed on a mileage basis for travel using an employee’s personal vehicle and on an actual cost basis for meals, lodging and other allowable expenses, consistent with those normally allowed in like circumstances in the district’s non-federally funded activities, and in accordance with the district’s travel reimbursement policies and administrative regulations.

Mileage reimbursements shall be at the rate approved by the Board or Board policy for other district travel reimbursements. Actual costs for meals, lodging and other allowable expenses shall be reimbursed only to the extent they are reasonable and do not exceed the per diem limits established by Board policy, or, in the absence of such policy, the federal General Services Administration for federal employees for locale where incurred.

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

In addition, for any costs that are charged directly to the federal award, the Superintendent or his/her designee shall maintain sufficient records to justify that:

- A. Participation of the individual is necessary to the federal award.

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- B. The costs are reasonable and consistent with Board policy.

DAF-8 ACCOUNTABILITY AND CERTIFICATIONS

All fiscal transactions must be approved by the Superintendent or his/her designee who can attest that the expenditure is allowable and approved under the federal program. The Superintendent and his/her designee submits all required certifications.

DAF-9 TIME-EFFORT REPORTING / OVERSIGHT

The Superintendent will establish sufficient oversight of the operations of federally supported activities to assure compliance with applicable federal requirements and to ensure that program objectives established by the awarding agency are being achieved. The District will submit all reports as required by federal or state authorities.

As a recipient of Federal funds, the District shall comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Section 200.430 of the Code of Federal Regulations requires certification of effort to document salary expenses charged directly or indirectly against Federally-sponsored projects. This process is intended to verify the compensation for employment services, including salaries and wages, is allocable and properly expended, and that any variances from the budget are reconciled.

A. Compensation: Compensation for employment services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits, which are addressed in 2 CFR 200.431 Compensation – fringe benefits. Costs of compensation are allowable to the extent that they satisfy the specific requirements of these regulations, and that the total compensation for individual employees:

1. is reasonable for the services rendered, conforms to the District's established written policy, and is consistently applied to both Federal and non-Federal activities; and
2. follows an appointment made in accordance with the District's written policies and meets the requirements of Federal statute, where applicable.

B. Time and Effort Reports: Time and effort reports shall:

1. be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated;
2. be incorporated into the official records of the District;
3. reasonably reflect the total activity for which the employee is compensated by the District, not exceeding 100% of the compensated activities;

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4. encompass both Federally assisted and other activities compensated by the District on an integrated basis;
5. comply with the District's established accounting policies and practices;
6. support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one (1) Federal award, a Federal award and non-Federal award, an indirect cost activity and a direct cost activity, two (2) or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity.

The District will also follow any time and effort requirements imposed by NHDOE or other pass-through entity as appropriate to the extent that they are more restrictive than the Federal requirements. The Superintendent or his/her designee is responsible for the collection and retention of employee time and effort reports. Individually reported data will be made available only to authorized auditors or as required by law.

DAF-10 GRANT BUDGET RECONCILIATION

Budget estimates are not used as support for charges to Federal awards. However, the District may use budget estimates for interim accounting purposes. The system used by the District to establish budget estimates produces reasonable approximations of the activity actually performed. Any significant changes in the corresponding work activity are identified by the District and entered into the District's records in a timely manner.

The District's internal controls include a process to review after-the-fact interim charges made to a Federal award based on budget estimates and ensure that all necessary adjustments are made so that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

DAF-11 SUB-RECIPIENT MONITORING AND MANAGEMENT

When entering agreements involving the expenditure or disbursements of federal grant funds, the District shall determine whether the recipient of such federal funds is a "contractor" or "subrecipient", as those terms are defined in 2 CFR §200.23 and §200.93, respectively. See also guidance at 2 CFR §200.330 "Subrecipient and contractor determinations". Generally, "subrecipients" are instrumental in implementing the applicable work program whereas a "contractor" provides goods and services for the District's own use. Contractors will be subject to the District's procurement and purchasing policies (e.g., *DAF-3* relative to federal grant funds, *DJE* relative to bidding requirements for non-federal money projects, etc.). Subrecipients are subject to this Policy.

Under the UGG, the District is considered a "pass-through entity" in relation to its subrecipients, and as such requires that subrecipients comply with applicable terms and conditions (flow-down provisions). All subrecipients of Federal or State funds received through the District are subject to the same Federal and State statutes, regulations, and award terms and conditions as the District.

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A. Sub-award Contents and Communication.

In the execution of every sub-award, the District will communicate the following information to the subrecipient and include the same information in the sub-award agreement.

1. Every sub-award will be clearly identified and include the following Federal award identification:
 - a) Subrecipient name
 - b) Subrecipient's unique ID number (DUNS)
 - c) Federal Award ID Number (FAIN)
 - d) Federal award date
 - e) Period of performance start and end date
 - f) Amount of federal funds obligated
 - g) Amount of federal funds obligated to the subrecipient
 - h) Total amount of the Federal award
 - i) Total approved cost sharing or match required where applicable
 - j) Project description responsive to FFATA
 - k) Name of Federal awarding agency, pass through entity and contact information
 - l) CFDA number and name
 - m) Identification of the award is R&D
 - n) Indirect cost rate for the Federal award
2. Requirements imposed by the District including statutes, regulations, and the terms and conditions of the Federal award.
3. Any additional requirements the District deems necessary for financial or performance reporting of subrecipients as necessary.
4. An approved indirect cost rate negotiated between subrecipient and the Federal government or between the pass-through entity and subrecipient.
5. Requirements that the District and its auditors have access to the subrecipient records and financial statements.
6. Terms and conditions for closeout of the sub-award.

B. Subrecipient Monitoring Procedures.

The Superintendent is responsible for having all the District project managers monitor subrecipients. The District will monitor the activities of the subrecipient to ensure the sub-award is used for authorized purposes. The frequency of monitoring review will be specified in the sub-award and conducted concurrently with all invoice submission.

Subrecipient monitoring procedures include:

1. At the time of proposal, assess the potential of the subrecipient for programmatic, financial, and administrative suitability.

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2. Evaluate each subrecipient's risk of noncompliance prior to executing a sub-award. In doing so, the District will assess the subrecipient's:
 - a) Prior experience with the same or similar sub-awards.
 - b) Results of previous audits and single audit (if applicable).
 - c) New personnel or new or substantially changed systems.
 - d) The extent and results of Federal awarding agency monitoring.
3. Confirm the statement of work and review any non-standard terms and conditions of the sub-award during the negotiation process.
4. Monitor financial and programmatic progress and ability of the subrecipient to meet objectives of the sub-award. To facilitate this review, subrecipients are required to submit sufficient invoice detail and a progress report. The District project managers will encourage subrecipients to submit regular invoices.
5. Invoices and progress reports will be date stamped upon receipt if received in hard copy. A record of the date of receipt will be maintained for those invoices sent electronically.
6. In conducting regular oversight and monitoring, the District project managers will:
 - a) Verify invoices that include progress reports.
 - b) Review progress reports to ensure project is progressing appropriately and on schedule.
 - c) Compare invoice to agreement budget to ensure eligibility of costs and that costs do not exceed budget.
 - d) Review invoice to ensure supporting documentation is included and invoices costs are within the scope of work for the projects being invoiced.
 - e) Obtain report, certification and supporting documentation of local (non-federal)/in-kind match work from the subrecipient.
 - f) Review subrecipient match tasks for eligibility.
 - g) Initial the progress report and invoice confirming review and approval prior to payment.
 - h) Raise any concerns to the Superintendent or his/her designee.
7. The Superintendent or his/her designee, upon recommendation from the project's manager, will approve the invoice payment and will initial invoices confirming review and approval prior to payment.
8. Payments will be withheld from subrecipients for the following reasons:
 - a) Insufficient detail to support the costs billed;
 - b) Unallowable costs;
 - c) Ineligible costs; and/or

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- d) Incomplete work or work not completed in accordance with required specifications.
- 9. Verify every subrecipient is audited in accordance with 2 CFR §200 Subpart F – Audit Requirements.

C. Subrecipient Project Files. Subrecipient project files will contain, at a minimum, the following:

- a) Project proposal
- b) Project scope
- c) Progress reports
- d) Interim and final products
- e) Copies of other applicable project documents as required, such as copies of contracts or MOUs

D. Audit Requirements.

All subrecipients are required to annually submit their audit and Single Audit report to the District for review to ensure the subrecipient has complied with good accounting practices and federal regulations. If a deficiency is identified, the District will:

- 1. Issue a management decision on audit findings pertaining to the Federal award.
- 2. Consider whether the results of audits or reviews indicate conditions that necessitate adjustments to pass through entity's own records.

E. Methodology for Resolving Findings.

The District will work with subrecipients to resolve any findings and deficiencies. To do so, the District may follow up on deficiencies identified through on-site reviews, provision of basic technical assistance, and other means of assistance as appropriate.

The District will only consider taking enforcement action against non-compliant subrecipients in accordance with 2 CFR 200.338 when noncompliance cannot be remedied. Enforcement may include taking any of the following actions as appropriate:

- a) Temporarily withhold cash payments pending correction of the deficiency
- b) Disallow all or part of the cost of the activity or action not in compliance.
- c) Wholly or partly suspend or terminate the sub-award.
- d) Initiate suspension or debarment proceedings.
- e) Withhold further Federal awards for the project or program.
- f) Take other remedies that may be legally available.

Legal References:

42 USC 1751 – 66 National School Lunch Act

2 C.F.R. Part 180

2 C.F.R. Part 200

200.0 - 200.99; 200.305; 200.313(d); 200.317-.326; 200.403-.406; 200.413(a)-(c); 200.430; 200.431; 200.458; 200.474(b)

DAF – ADMINISTRATION OF FEDERAL GRANTS

200 Appendix II
7 CFR Part 210
210.16; 210.19; 210.21; 215.14a; 220.16

IJL/KEC – LEARNING RESOURCES SELECTION AND RECONSIDERATION

See also: IJL/KEC-R

Part 1: Selection of Learning Resources

I. Objectives

Learning resources, including library and instructional materials, are selected by the school district to implement, enrich, and support the educational program. Materials will serve both the breadth of the curriculum and the needs and interests of the faculty and students. The district is obligated to provide a wide range of resources on all levels of difficulty and in a variety of formats, with diversity of appeal, and representing the presentation of many different points of view.

The objective of the Library and/or Information Center is to make available to students and faculty a collection of materials that will enrich and support the curriculum and meet the needs of the students and faculty served.

II. Responsibility for Selection

While the selection of materials involves many people, including administrators, teachers, students, and community residents, the responsibility for coordinating and recommending the selection and purchase of library media materials rests with the Library Media Specialist, as delegated by the school board, the governing body legally responsible. The responsibility for selecting instructional materials rests with the Superintendent or designee, as delegated by the School Board.

III. Criteria for Selection

The following general selection criteria will be used for the selection of library and instructional materials, including electronic, print, and non-print resources, as they apply:

1. Learning resources shall support and be consistent with the general educational goals of the state and the district and the aims and objectives of the school, and specific courses.
2. Learning resources shall be chosen to enrich and support the curriculum and the personal needs of users.
3. Learning resources shall meet high standards of quality in:
 - Literary and artistic excellence
 - Lasting importance or significance to a field of knowledge
 - Contribution to the curriculum and the educational goals of the school
 - Relevance to the interests of students and faculty
 - Favorable reviews found in standard selection sources
 - Favorable recommendations based on a preview examination of materials by professional personnel, adults with special expertise, or students

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- Reputation and significance of the author, producer, and publisher
 - Currency or timeliness of material
 - Contribution to a breadth and diversity of representative viewpoints on controversial issues
 - Contribution to multicultural and pluralistic awareness
 - High degree of potential user appeal
 - Quality, durability, and variety of format
 - Suitability of format and appearance for intended use
 - Value commensurate with cost and/or need
4. Learning resources shall be appropriate for the subject area and for the age, emotional development, ability level, learning style, and social development of the students for whom the materials are selected.
 5. Learning resources shall be designed to provide a background of information that will motivate students and staff to examine their own attitudes and behavior; to comprehend their duties, responsibilities, rights and privileges as participating citizens in our society; and to make informed judgments in their daily lives.
 6. Learning resources shall provide information on opposing sides of controversial issues so that users may develop under guidance the practice of critical analysis.

IV. Procedures for Selection of Learning Sources

1. In selecting learning resources, Library Media Specialist (or designee), Department Heads/Curriculum Coordinators, and other staff members (as appropriate), will evaluate available resources and curriculum needs and will consult reputable, professionally recognized reviewing periodicals, standard catalogs, and other selection aids to help guide the selection.
2. Recommendations for purchase involve administrators, teachers, students, parents, and community members, as appropriate.
3. Gift materials shall be judged by the criteria outlined and shall be accepted or rejected by those criteria.
4. Selection is an ongoing process that should include the removal of materials no longer appropriate and the replacement of lost and worn materials still of educational value.

V. Position on Intellectual Freedom

The district subscribes in principle to the statements of policy on library philosophy as expressed in the American Library Association's Library Bill of Rights, a copy of which is appended to, and made a part of, this policy statement [Appendix A]. In the event that the library or instructional materials are questioned, the principles of intellectual freedom shall be defended.

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Part 2: Reconsideration of Learning Resources

I. Statement of Policy

Despite the quality of the selection process, any resident or employee of the school district may formally challenge learning resources used in the school's educational program on the basis of appropriateness. The procedure concerning challenged materials is outlined below. Its purpose is to provide for a hearing with appropriate action, within the context of the principles of freedom of information, the student's right to access information and the professional responsibility and integrity of the school faculty. No materials shall be removed from the school before the process of review is completed.

II. Request for Informal Reconsideration

Upon receiving a complaint regarding learning resources, it shall be attempted to resolve the issue informally.

1. The Library Media Specialist [or Principal, or other appropriate staff member] shall explain to the questioner the school's selection procedure, criteria, and qualifications of those persons selecting the resource.
2. The Library Media Specialist [or other appropriate staff member] shall explain the particular place the questioned resource occupies in the educational program, its intended educational usefulness, and additional information regarding its use, or refer the party to someone who can identify and explain the use of the resource.
3. If the questioner wishes to file a formal challenge, a copy of the Library and Instructional Materials Selection and Reconsideration Policy and a Request for the Reconsideration of Learning Resources form [IJL/KEC-R] shall be mailed to the party concerned by the Library Media Specialist, along with a letter to the complainant [see Appendix C].

III. Request for Formal Reconsideration

A. Preliminary Procedures

1. Each school will keep on hand and make available the *Request for Reconsideration of Learning Resources* forms [IJL/KEC-R]. All formal objections to learning resources must be made on these forms.
4. *The Request for Reconsideration of Learning Resources* form shall be completed and signed by the questioner before further consideration will be given. The form shall be filed with the principal. If the form is not completed and returned within two weeks, it shall be assumed that the questioner no longer wishes to file a formal complaint [as stated in the letter to complainant, Appendix C].
5. The Superintendent and the school board shall be informed of the formal

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complaint received.

6. The request for reconsideration shall be referred to a reconsideration committee at the school level for reevaluation of the resource.

B. The Reconsideration Committee

1. Upon receipt of a request for formal reconsideration of a learning resource, the reconsideration committee shall arrange to meet within ten working days after the complaint is received.

The reconsideration committee, whose members shall serve a two-year term, will consist of:

- o One member of the school teaching staff, chosen by the school teaching staff
 - o One school administrator, appointed by the administrative team
 - o Two students chosen by the Community Council or equivalent
 - o Two adult community members, appointed by the school board
 - o The Library Media Specialist
2. The reconsideration committee may choose to consult district support staff and/or community persons with related professional knowledge.
 3. The reconsideration committee shall review the challenged resource and judge whether it conforms to the principles of selection outlined in the Library and Instructional Materials Selection and Reconsideration Policy.

C. Resolution

1. The reconsideration committee shall:
 1. Examine the challenged resource
 2. Determine professional acceptance by reading critical reviews of the resource
 3. Weigh values and faults, and form opinions based on the material as a whole rather than on passages or selections taken out of context
 4. Discuss the challenged resource in the context of the educational program
 5. Discuss the challenged item with the individual questioner when appropriate
 6. Prepare a written report
2. The written report shall be discussed with the individual questioner if requested.
3. The Library Media Specialist shall retain the written report, with copies forwarded to the Superintendent, school board, and the principal.
4. Notwithstanding any procedure outlined in this policy, the questioner shall have

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the right to appeal any decision of the reconsideration committee to the school board as the final review panel.

D. Guiding Principles

1. Any resident or employee of the school district may raise objection to learning resources used in the district's educational program, despite the fact that the individuals selecting such resources were duly qualified to make the selection, followed the proper procedure, and observed the criteria for selecting learning resources.
2. The Library Media Specialist should review the selection and objection rules with the teaching staff at least annually. The staff should be reminded that the right to object to learning resources is one granted by policies enacted by the school board.
3. No parent has the right to determine reading, viewing, or listening matter for students other than his or her own children.
4. The district supports the Library Bill of Rights and The Freedom To Read Statement, adopted by the American Library Association [Appendixes A and B]. When learning resources are challenged, the principles of the freedom to read/listen/view must be defended as well.
5. Access to challenged material shall not be restricted during the reconsideration process.
6. A decision to sustain a challenge shall not necessarily be interpreted as a judgment of irresponsibility by the professionals involved in the original selection and/or use of the material.

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Appendix A: Library Bill of Rights

The American Library Association affirms that all libraries are forums for information and ideas, and that the following basic policies should guide their services.

- I. Books and other library resources should be provided for the interest, information, and enlightenment of all people of the community the library serves. Materials should not be excluded because of the origin, background, or views of those contributing to their creation.
- II. Libraries should provide materials and information presenting all points of view on current and historical issues. Materials should not be proscribed or removed because of partisan or doctrinal disapproval.
- III. Libraries should challenge censorship in the fulfillment of their responsibility to provide information and enlightenment.
- IV. Libraries should cooperate with all persons and groups concerned with resisting abridgment of free expression and free access to ideas.
- V. A person's right to use a library should not be denied or abridged because of origin, age, background, or views.
- VI. Libraries that make exhibit spaces and meeting rooms available to the public they serve should make such facilities available on an equitable basis, regardless of the beliefs or affiliations of individuals or groups requesting their use.

© American Library Association Adopted June 18, 1948.
Amended February 2, 1961, and January 23, 1980, inclusion of
"age" reaffirmed January 23, 1996, by the ALA Council.

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Appendix B: The Freedom to Read Statement

The freedom to read is essential to our democracy. It is continuously under attack. Private groups and public authorities in various parts of the country are working to remove or limit access to reading materials, to censor content in schools, to label "controversial" views, to distribute lists of "objectionable" books or authors, and to purge libraries. These actions apparently rise from a view that our national tradition of free expression is no longer valid; that censorship and suppression are needed to avoid the subversion of politics and the corruption of morals. We, as citizens devoted to reading and as librarians and publishers responsible for disseminating ideas, wish to assert the public interest in the preservation of the freedom to read.

Most attempts at suppression rest on a denial of the fundamental premise of democracy: that the ordinary citizen, by exercising critical judgment, will accept the good and reject the bad. The censors, public and private, assume that they should determine what is good and what is bad for their fellow citizens.

We trust Americans to recognize propaganda and misinformation, and to make their own decisions about what they read and believe. We do not believe they need the help of censors to assist them in this task. We do not believe they are prepared to sacrifice their heritage of a free press in order to be "protected" against what others think may be bad for them. We believe they still favor free enterprise in ideas and expression.

These efforts at suppression are related to a larger pattern of pressures being brought against education, the press, art and images, films, broadcast media, and the Internet. The problem is not only one of actual censorship. The shadow of fear cast by these pressures leads, we suspect, to an even larger voluntary curtailment of expression by those who seek to avoid controversy.

Such pressure toward conformity is perhaps natural to a time of accelerated change. And yet suppression is never more dangerous than in such a time of social tension. Freedom has given the United States the elasticity to endure strain. Freedom keeps open the path of novel and creative solutions, and enables change to come by choice. Every silencing of a heresy, every enforcement of an orthodoxy, diminishes the toughness and resilience of our society and leaves it the less able to deal with controversy and difference.

Now as always in our history, reading is among our greatest freedoms. The freedom to read and write is almost the only means for making generally available ideas or manners of expression that can initially command only a small audience. The written word is the natural medium for the new idea and the untried voice from which come the original contributions to social growth. It is essential to the extended discussion that serious thought requires, and to the accumulation of knowledge and ideas into organized collections.

We believe that free communication is essential to the preservation of a free society and a

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creative culture. We believe that these pressures toward conformity present the danger of

limiting the range and variety of inquiry and expression on which our democracy and our culture depend. We believe that every American community must jealously guard the freedom to publish and to circulate, in order to preserve its own freedom to read. We believe that publishers and librarians have a profound responsibility to give validity to that freedom to read by making it possible for the readers to choose freely from a variety of offerings. The freedom to read is guaranteed by the Constitution. Those with faith in free people will stand firm on these constitutional guarantees of essential rights and will exercise the responsibilities that accompany these rights.

We therefore affirm these propositions:

1. *It is in the public interest for publishers and librarians to make available the widest diversity of views and expressions, including those that are unorthodox or unpopular with the majority.*

Creative thought is by definition new, and what is new is different. The bearer of every new thought is a rebel until that idea is refined and tested. Totalitarian systems attempt to maintain themselves in power by the ruthless suppression of any concept that challenges the established orthodoxy. The power of a democratic system to adapt to change is vastly strengthened by the freedom of its citizens to choose widely from among conflicting opinions offered freely to them. To stifle every nonconformist idea at birth would mark the end of the democratic process. Furthermore, only through the constant activity of weighing and selecting can the democratic mind attain the strength demanded by times like these. We need to know not only what we believe but also why we believe it.

2. *Publishers, librarians, and booksellers do not need to endorse every idea or presentation they make available. It would conflict with the public interest for them to establish their own political, moral, or aesthetic views as a standard for determining what should be published or circulated.*

Publishers and librarians serve the educational process by helping to make available knowledge and ideas required for the growth of the mind and the increase of learning. They do not foster education by imposing as mentors the patterns of their own thought. The people should have the freedom to read and consider a broader range of ideas than those that may be held by any single librarian or publisher or government or church. It is wrong that what one can read should be confined to what another thinks proper.

3. *It is contrary to the public interest for publishers or librarians to bar access to writings on the basis of the personal history or political affiliations of the author.*

No art or literature can flourish if it is to be measured by the political views or private lives of its creators. No society of free people can flourish that draws up lists of writers to whom it

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will not listen, whatever they may have to say.

4. *There is no place in our society for efforts to coerce the taste of others, to confine adults to the reading matter deemed suitable for adolescents, or to inhibit the efforts of writers to achieve artistic expression.*

To some, much of modern expression is shocking. But is not much of life itself shocking? We cut off literature at the source if we prevent writers from dealing with the stuff of life. Parents and teachers have a responsibility to prepare the young to meet the diversity of experiences in life to which they will be exposed, as they have a responsibility to help them learn to think critically for themselves. These are affirmative responsibilities, not to be discharged simply by preventing them from reading works for which they are not yet prepared. In these matters values differ, and values cannot be legislated; nor can machinery be devised that will suit the demands of one group without limiting the freedom of others.

5. *It is not in the public interest to force a reader to accept with any expression the prejudgment of a label characterizing it or its author as subversive or dangerous.*

The ideal of labeling presupposes the existence of individuals or groups with wisdom to determine by authority what is good or bad for the citizen. It presupposes that individuals must be directed in making up their minds about the ideas they examine. But Americans do not need others to do their thinking for them.

6. *It is the responsibility of publishers and librarians, as guardians of the people's freedom to read, to contest encroachments upon that freedom by individuals or groups seeking to impose their own standards or tastes upon the community at large.*

It is inevitable in the give and take of the democratic process that the political, the moral, or the aesthetic concepts of an individual or group will occasionally collide with those of another individual or group. In a free society individuals are free to determine for themselves what they wish to read, and each group is free to determine what it will recommend to its freely associated members. But no group has the right to take the law into its own hands, and to impose its own concept of politics or morality upon other members of a democratic society. Freedom is no freedom if it is accorded only to the accepted and the inoffensive.

7. *It is the responsibility of publishers and librarians to give full meaning to the freedom to read by providing books that enrich the quality and diversity of thought and expression. By the exercise of this affirmative responsibility, they can demonstrate that the answer to a "bad" book is a good one, the answer to a "bad" idea is a good one.*

The freedom to read is of little consequence when the reader cannot obtain matter fit for that reader's purpose. What is needed is not only the absence of restraint, but the positive provision of opportunity for the people to read the best that has been thought and said.

Books are the major channel by which the intellectual inheritance is handed down, and the principal means of its testing and growth. The defense of the freedom to read requires of all

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publishers and librarians the utmost of their faculties, and deserves of all citizens the fullest of their support.

We state these propositions neither lightly nor as easy generalizations. We here stake out a lofty claim for the value of the written word. We do so because we believe that it is possessed of enormous variety and usefulness, worthy of cherishing and keeping free. We realize that the application of these propositions may mean the dissemination of ideas and manners of expression that are repugnant to many persons. We do not state these propositions in the comfortable belief that what people read is unimportant. We believe rather that what people read is deeply important; that ideas can be dangerous; but that the suppression of ideas is fatal to a democratic society. Freedom itself is a dangerous way of life, but it is ours.

© American Library Association

This statement was originally issued in May of 1953 by the Westchester Conference of the American Library Association and the American Book Publishers Council, which in 1970 consolidated with the American Educational Publishers Institute to become the Association of American Publishers. Adopted June 25, 1953; revised January 28, 1972, January 16, 1991, July 12, 2000, by the ALA Council and the AAP Freedom to Read Committee.

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Appendix C

Sample Letter to Complainant

Date:

Dear:

We appreciate your concern over the use of _____ at our School. The school has developed procedures for selecting materials, but realizes that not everyone will agree with every selection made.

To help you understand the selection process, we are sending a copy of the *Library and Instructional Materials Selection and Reconsideration Policy*.

If you are still concerned after you review this material, please complete the *Request for the Reconsideration of Learning Resources* form and return it to me. You may be assured of prompt attention to your request. If I have not heard from you within two weeks from the date listed above, we will assume you no longer wish to file a formal complaint.

Sincerely,

Observation Schedule for Professional Staff

For professional staff members on a continuing contract:

- Minimum of **one formal** observation every three years
- Minimum of **two informal** observations each year *(except in year 3 when a formal observation is done. Only one informal is needed in year 3.)*

For professional staff members on a non-continuing contract:

- In years 1-3 a minimum of **two formal** observations per year *(one formal observation can be replaced with an additional informal observation)*
- In years 4 and 5 a minimum of **one formal** observation per year
- Minimum of **three informal** observations each year *(with the option of a fourth informal observation to replace one formal observation in years 1-3)*

For professional staff members on an improvement plan:

- Minimum of one formal observation per year and a minimum of four informal observations per year with the specific number of formal observations, informal observations, and professional development supports and activities outlined in the improvement plan

All observation cycles will run from March 1st to February 28th

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

MICHELE M. CROTEAU

Business Administrator



To: Adam Steel, Superintendent of Schools

From: Christine Landwehrle, Assistant Superintendent

RE: Teacher Leader Effectiveness Update

April 6, 2020

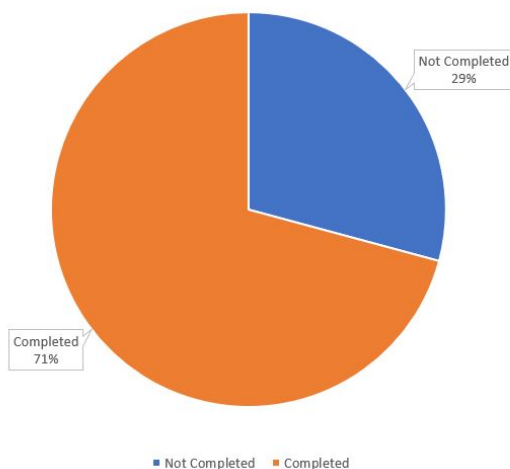
Executive Summary

The Teacher Leader Effectiveness Committee met this summer to review feedback from the leadership team and make recommendations for updates to our teacher evaluation system. Based on this feedback, we updated our observation forms, changed our observation system cycle from a school year cycle to one that runs from March 1st to end of February, and reduced the number of observations for continuing contract teachers from three per year to two.

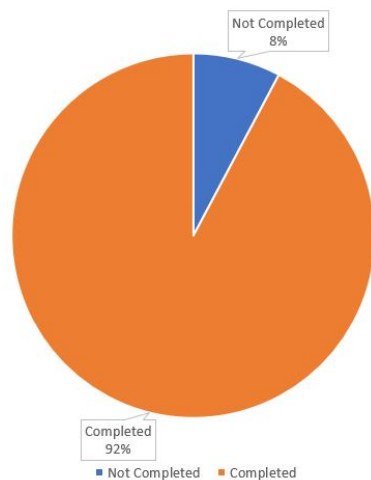
The following is an end of cycle observation update outlining the percent of observations completed and not completed by school. These observation elements include teacher self-assessment, informal observations, and formal observations (including pre and post observation forms). In completing observations, building leadership prioritized formal observations and observations of new staff.

Observations by School

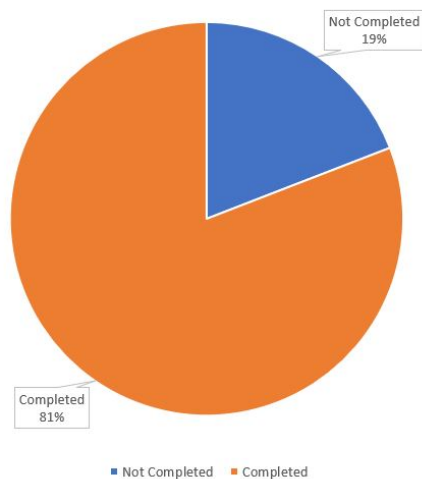
Amherst Middle School Observations Total Assigned Observation Elements = 274



Clark-Wilkins Observations
Total Assigned Observation Elements = 362

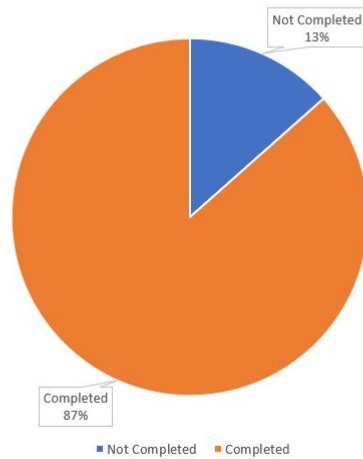


Mont Vernon Village School Observations
Total Assigned Observation Elements = 183



Souhegan High School Observations

Total Assigned Observation Elements = 312



Requested Board Action

1. None: Information only.

Attachments

1. Observation Schedule for Professional Staff

SCHOOL ADMINISTRATIVE UNIT THIRTY-NINE

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Assistant Superintendent

MARGARET A. BEAUCHAMP

Director of Student Services

MICHELE M. CROTEAU

Business Administrator



To: Adam Steel, Superintendent of Schools

From: Christine Landwehrle, Assistant Superintendent

RE: Grading and Reporting Update – SAU Board

Date: April 6, 2020

Executive Summary

Our assessment, grading, and reporting work this school year has focused on teacher training and support, Empower Lead training and support, system customization, and roll out of the student and parent portals. We have also continued working to refine our transcript at the high school level.

Background Information

The SAU-wide Assessment, Grading and Reporting committee was formed in the spring of 2016 to develop a common reporting system K-12 based on academic standards and habits of mind. The committee was tasked with articulating a grading philosophy, aligning our grading system with our competency-based assessment model, and designing a reporting system that effectively communicates to all stakeholders.

Teacher Training

This summer we held Empower (grading and reporting software) training sessions for teachers across the SAU. We focused on expectations for the use of Empower and reviewed key practices including creation of custom gradebooks and playlists. Teachers had supported work time to set up gradebooks and playlists for this coming school year. Amherst Middle School teachers were also trained in how to add resources to Empower to share with colleagues and/or with students.

Using grant funds, we were able to support stipends for Empower Lead teachers at each of our schools. Our Empower Lead teachers were trained for a full day this summer to learn some of the advanced features in Empower and how to troubleshoot issues and support colleagues. Time was also spent developing a roll out plan for the use of Empower with students and with parents. Empower Leads have continued to meet monthly as a SAU-wide team for training and troubleshooting support. In addition, Empower Leads have been able to provide input on teacher needs including training and system customization.

We have continued to support teachers throughout the school year with grading standards-based and using the Empower software system during grade level meetings, late starts, and dedicated time for Empower help.

System Customization

Our student data specialist at the SAU worked this past summer to customize our Empower Learning system so it was ready for parents and students. She inputted additional standards and rubrics into our system and ensured they were clear and easy to understand. Our data specialist has checked our system for consistency throughout and has made updates to ensure both parents and students are able to understand the content and easily navigate the site. She continues to support parents with access and troubleshooting support while also making updates as needed.

Progress Reports

Progress reports for grades K through 9 were printed from Empower for quarter 1 and 2. Our progress report format is the same from K through grade 8 with competencies organized by content area. Our high school report is organized by course and reports out by competency within that course. All progress reports provide information on student progress toward meeting competencies on a 4-point scale along with teacher comments. Progress report formats can be found [here](#) on our website. Due to our remote learning, our progress report format and timeframes may vary from our original grading and reporting schedule.

Student and Parent Access of Empower

Building leadership and Empower Lead teachers developed a roll out plan for student use of Empower this year. We felt it was not developmentally appropriate for kindergarten through fourth grade students to log into Empower on a routine basis to check scores so no roll out plan was developed for those grade levels. For grades 5-8, students were able to access Empower in late September, grade 9 students were introduced in December, and grade 10 students were trained in the system in February. Our Empower Lead teachers supported student roll out by developing a series of activities students completed in class to learn the system. Students were then encouraged to go home and share Empower with their parents.

The parent roll out of Empower began in October with training for our pilot parent users. These parent volunteers were introduced to Empower and trained in the system. They were instrumental in providing input to help inform full scale roll out of Empower. The parent group cautioned us against rolling out too quickly, recommending that students have more time in the system and time to help train parents in the system. We decided to roll out Empower with parents in late January and provided both in-person sessions as well as one-page overviews and videos supporting parents in accessing the system. All parent access information can be found [here](#) on our website.

Transcript

The class of 2023 (current freshman) transcript is posted to our website [here](#). The transcript is similar to our current transcript (for grade 10, 11, and 12 students) except that it includes a weighted GPA and does not include semester scores for completed courses (only final letter grades).

The working draft transcript for the class of 2024 and beyond (including the GPA and letter grade conversion scale) is posted to our website [here](#). Our timeline for feedback on our draft transcript has been impacted due to or remote learning and we are in the processes of revising our feedback timeline.

Future Grading and Reporting Work:

Based on input from teachers, we are beginning to explore other grading and reporting software systems. We have recently formed a committee to review other grading and reporting systems. This committee will evaluate other system to determine if there is a software system that is more user friendly than Empower but would still match our grading and reporting system.

We are developing a summer training and work plan for teachers to support them in enhancing our standards-based grading system. We will be reviewing and revising our target browsers for each content area to ensure we have the correct level of depth for our standards and competencies. We will also be revising our assessment maps to ensure an appropriate amount of level 4 tasks and to map out our common assessments by reporting period.

Requested Board Action

1. None: Information only.