

Public Notice of Meeting
WILTON-LYNDEBOROUGH COOPERATIVE
SCHOOL BOARD MEETING
Tuesday, May 27, 2025
Lyndeborough Central School
6:30 p.m.

Videoconferencing: meet.google.com/iks-kcrp-ybo

Audio: [+1 260-302-1098](tel:+12603021098) PIN: 581 962 692#

All videoconferencing options may be subject to modifications. Please check www.sau63.org for the latest information.

- I. CALL TO ORDER-Dennis Golding-Chair**
- II. PLEDGE OF ALLEGIANCE**
- III. ADJUSTMENTS TO THE AGENDA**
- IV. PUBLIC COMMENTS:** This is the public's opportunity to speak to items on the agenda. In the interest of preserving individual privacy and due process rights, the Board requests that comments (including complaints) regarding individual employees or students be directed to the Superintendent in accord with the processes set forth in School Board Policies KE, KEB and BEDH.
- V. BOARD CORRESPONDENCE**
 - a. Reports**
 - i. Business Administrator's Report
 - ii. Director of Student Support Services Report
 - b. Letters/Information**
 - i. General Assurances
- VI. YTD REPORTING**
- VII. POLICIES-1ST READING**
 - a. GBCD-R-Background Investigation and Criminal History Records Check-Internal Controls**
 - b. IHBA-R-Programs for Pupils with Disability-Section 504-Notice of Parent and Student Rights**
 - c. ADB-Drug Free Workplace and Drug Free Schools**
 - d. JRA-Student Records and Access (FERPA)**
- VIII. ACTION ITEMS**
 - a. Approve Minutes of Previous Meeting**
- IX. COMMITTEE REPORTS**
 - i. Budget Liaison
- X. RESIGNATIONS/APPOINTMENTS/LEAVES**
 - a. Resignation-Amanda Guay-LCS-Aide**
 - b. Appointment-Ben Hoffstetter-District Facilities Manager**
- XI. PUBLIC COMMENTS**
- XII. SCHOOL BOARD MEMBER COMMENTS**
- XIII. NON-PUBLIC SESSION RSA 91-A: 3 II (A) (C)**
 - i. Review the Nonpublic Minutes
 - ii. Negotiations

XIV. ADJOURNMENT

INFORMATION: Next School Board Meeting-June 10, 6:30 PM at WLC

The Wilton-Lyndeborough Cooperative School District does not discriminate on the basis of race, color, religion, national origin, age, sex, handicap, veteran status, sexual orientation, gender identity or marital status in its administration of educational programs, activities or employment practice.



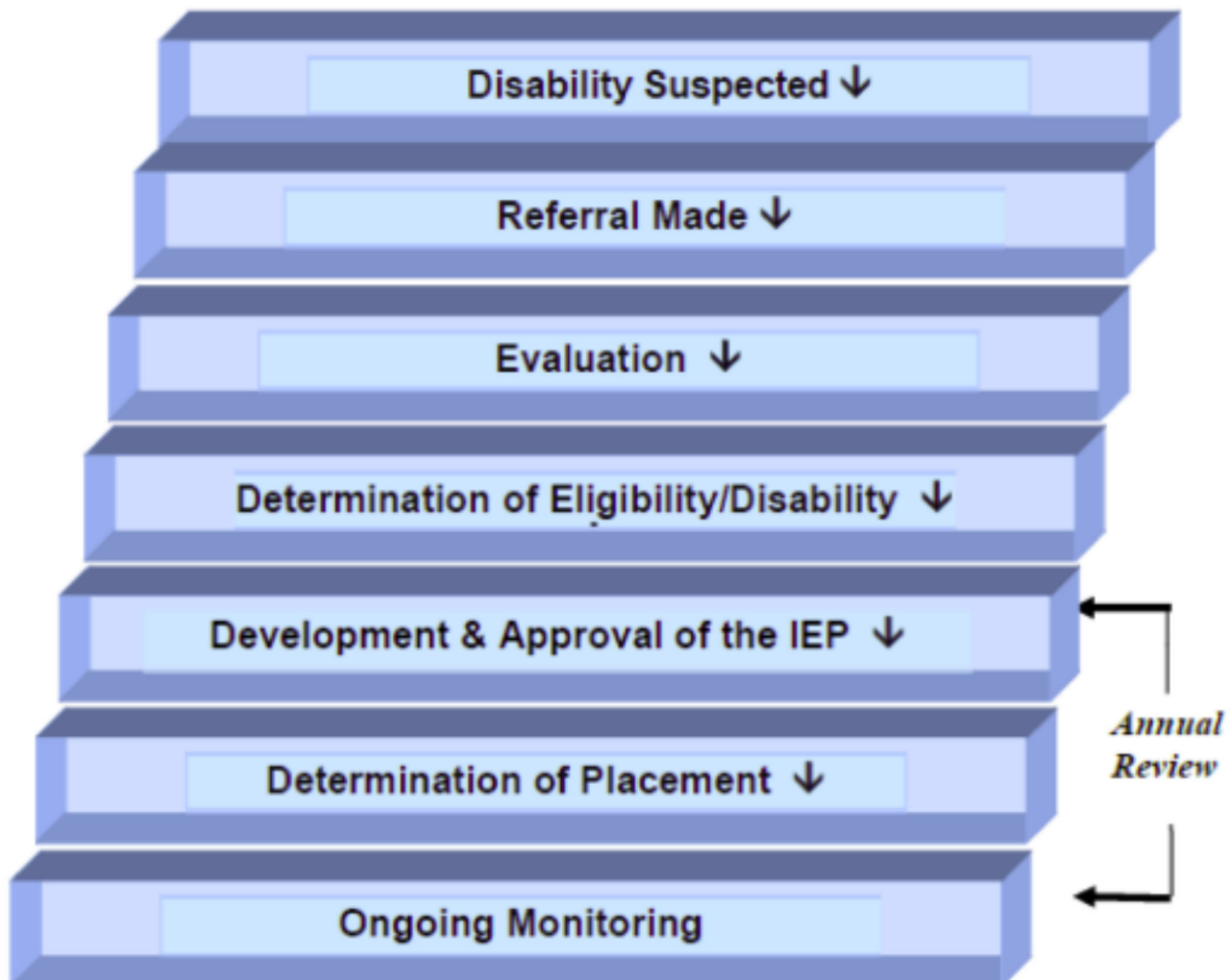
Wilton-Lyndeborough Cooperative School District
School Administrative Unit #63
192 Forest Road Lyndeborough, NH 03082

Peter Weaver
Superintendent of Schools

Ned Pratt
Director of Student Support Services

Kristie LaPlante
Business Administrator

Steps in the NH Special Education Process



Parent Information Center

54 Old Suncook Road, Concord, NH 03301
Telephone: 603-224-7005 / 800-232-0986 (in NH)
E-mail: info@picnh.org

Website: www.picnh.org



A brief overview of the steps in the NH special education process follows:

Disability Suspected and School District Child Find Requirements

Anyone who suspects that a child may have a disability and need special education may refer the child for special education consideration. School districts are required to have formal “Child Find” procedures to locate, evaluate and count children who may have disabilities to ensure that eligible children are provided needed services (see page 7).

When a parent, teacher or other person suspects a child may have a disability and need special education, he/she may make a referral to the school or LEA (local education agency, which is another term for the school district). If a parent makes the referral, a best practice is to make the referral in writing, dating the letter, and explaining why the parent believes the child may have a disability and needs special education. Parents will find it helpful to keep copies of all letters, forms and reports for their records. If the referral comes from someone other than the parent, including from the child’s teacher, the parent must immediately be notified in writing that a referral has been made.

Within 15 business days after receiving the referral, the school must schedule a meeting of the IEP Team (parents are members of the IEP team). This meeting is called the disposition of referral meeting. At this meeting the IEP Team determines whether the child’s needs can be met using existing pupil support services available to all children (general education interventions). Otherwise, the IEP team would determine that there is reason to suspect the child may have a disability and recommend what further testing is needed. The IEP Team must notify the parents, in writing, of their decision. Written parental consent is needed before the school can evaluate the child. More information on referral and disposition of referral may be found on pages 7-8. Parents must be given 10 days written notice of any IEP team meeting (5 days for a manifestation determination meeting), but they may agree to waive the 10-day notice if they wish to meet sooner.

Evaluation

When the IEP Team, including the parents, determines that a child needs to be evaluated for special education, they also decide what testing is needed. To determine what additional testing is needed, the IEP Team first considers any information they already have about the child. After the school district receives written parental consent, the child is given a full and individualized evaluation that will provide information the IEP Team can use to determine if the child is eligible for special education, as well as to identify the child’s educational needs (such as academic, communication, developmental, motor, social/emotional, and vocational needs).

Testing must be done by trained and knowledgeable, certified or licensed evaluators, and completed within 60 calendar days after the school has received written parental consent for the evaluations. During this timeframe, a summary report is developed and a meeting held to determine eligibility. At least 5 days before the meeting, the parents are sent a copy of the results, unless they waive this right. If the parents disagree with the school’s evaluation, they may request an independent educational evaluation (IEE) at public expense or they may obtain an IEE at their own expense. More information on evaluations and independent educational evaluations may be found on pages 9-11.

Determination of Eligibility and Disability Category

Based on the evaluation results, the IEP Team decides whether the child is eligible for special education. To be eligible, the child must have a disability for which the child requires special education or special education and related services to receive a FAPE. The child will then be identified with one or more of 14 disability categories defined in the NH Standards. Once a child has an IEP, he/she is reevaluated at least once every three years to ensure the IEP Team continues to have current information on which to base their decisions. More information on determination of eligibility may be found on page 11.

Development and Approval of the IEP

Within 30 days after the child is found eligible for special education, the IEP Team meets to develop an Individualized Educational Program (IEP) for the child. Once a child has an IEP, it is reviewed and revised at least annually, and it must be in place at the start of each school year. The IEP does not go into effect until it is signed (approved) by the parent

and school district representative. More information on the IEP may be found on pages 12-14.

Determination of Educational Placement

After the IEP has been signed (approved) by the parent and the school district, IEP Team meets to determine the least restrictive environment in which the child can receive the special education and related services listed in his/her IEP. If the parent agrees, meetings may be consolidated to cover more than one step in the process. More information on determination of educational placement may be found on pages 15-16.

Implementation and Ongoing Monitoring

The child begins receiving services as soon as possible after the parents and school district consent in writing to the IEP and educational placement. The child's parents, educators and others involved with the child's special education program then monitor the child's progress on an ongoing basis to ensure his/her educational needs are met. The IEP Team meets at least once each year to review and revise the IEP, or more frequently if any member of the IEP Team has concerns about the child's progress. More information on monitoring may be found on page 16.



New Hampshire Department of Education

FY2026

GENERAL ASSURANCES, REQUIREMENTS AND DEFINITIONS FOR PARTICIPATION IN FEDERAL PROGRAMS

Subrecipients of any Federal grant funds provided through the New Hampshire Department of Education (NHED) must submit a signed copy of this document to the NHED Bureau of Federal Compliance prior to any formula grant application being deemed to be “substantially approvable” or any discretionary grant receiving “final approval.” Once a formula grant is deemed to be in substantially approvable form, the subrecipient may begin to obligate funds which will be reimbursed upon final approval of the application by the NHED (34 CFR 708).

Any funds obligated by the subrecipient prior to the applicant submitting its application to the NHED in substantially approvable form will not be reimbursable even upon final approval of the application by the NHED.

All individuals executing this document should review the document to ensure that you understand the requirements and deadlines to which you are agreeing.

Following your review and acceptance of these General Assurances, Requirements and Definitions for Participation in Federal Programs please sign the certification statement on the appropriate page and then initial each of the remaining pages where indicated (initials on the signature pages are not required).

Please note that the practice of the School Board authorizing the Senior Educational Official to sign on behalf of the School Board Chair is not acceptable to the NHED in this case and will be considered non-responsive.

Once the document is fully executed, please upload a signed copy of these General assurances to the LEA homepage within GMS for review and approval. General assurances must be uploaded for each district applying for federal funds.

Should you have any questions please contact Lindsey Labonville at 603-731-4621 or Lindsey.L.Labonville@doe.nh.gov.

General Assurances, Requirements and Definitions for Participation in Federal Programs

A. General Assurances

Assurance is hereby given by the subrecipient that, to the extent applicable:

- 1) The subrecipient has the legal authority to apply for the federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay non-federal share of project costs, as applicable) to ensure proper planning, management, and completion of the project described in all applications submitted.
- 2) The subrecipient will give the awarding agency, the NHED, the Comptroller General of the United States and, if appropriate, other State Agencies, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3) The subrecipient will comply with the requirements regarding construction and real property within 34 CFR Part 75.600-75.684. The non-Federal entity is required to comply with any reporting requirements on the status of real property in which the Federal Government retains an interest pursuant to 2 CFR 200.330.
- 4) The subrecipient will establish safeguards to prohibit employees from using their positions for purposes that constitute or appear to present a personal or organizational conflict of interest, or for personal gain.
- 5) The subrecipient will initiate and complete the work within the applicable time frame after receiving approval from the awarding agency.
- 6) The subrecipient will comply with all Federal statutes, administrative rules and executive orders including provisions protecting free speech, religious liberty, public welfare, the environment, and those prohibiting discrimination. These include, but are not limited to:
 - (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; ~~including any guidance issued consistent with Executive Order 14151 Ending Radical And Wasteful Government DEI Programs And Preferencing – The White House (January 20, 2025) and the communication titled “Reminder of Legal Obligations Undertaken in Exchange for Receiving Federal Financial Assistance and Request for Certification under Title VI and SFFA v. Harvard issued by the United States Department of Education on April 3, 2025, as applicable;~~¹
 - (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex. ~~including any guidance issued consistent with Executive Order 14168 Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government (January 20, 2025), as applicable;~~
 - (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps;
 - (d) The Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age;
 - (e) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;

¹ Federal statutes shall be interpreted consistent with the judicial and administrative constructions in effect.

- (f) The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
 - (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records;
 - (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing;
 - (i) Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made;
 - (j) The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98); and
 - (k) The requirements of any other statute(s), administrative rule, executive order, dear colleague letter, or non-regulatory guidance which may apply to the application.
- 7) The subrecipient will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchases.
 - 8) The subrecipient will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with federal funds. The subrecipient further assures that no federally appropriated funds have been paid or will be paid by or on behalf of the subrecipient to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.
 - 9) The subrecipient will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported in whole or in part with federal funds.
 - 10) The subrecipient will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported in whole or in part with federal funds.
 - 11) The subrecipient will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
 - 12) The subrecipient will comply with all applicable requirements of all other federal laws, executive orders, regulations, dear colleague letter, non-regulatory guidance and policies governing all program(s).
 - 13) The subrecipient will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and 2 CFR 200.501, Subpart F, "Audit Requirements," as applicable.
 - 14) The recipient will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

- 15) The control of funds provided to a subrecipient that is a Local Education Agency under each program, and title to property acquired with those funds, will be in a public agency, and a public agency will administer those funds and property.
- 16) Personnel funded from federal grants and their subcontractors will adhere to the prohibition from text messaging while driving an organization-owned vehicle, or while driving their own privately owned vehicle during official Grant business, or from using organization-supplied electronic equipment to text message or email while driving. Recipients must comply with these conditions under Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," October 1, 2009 (pursuant to provisions attached to federal grants funded by the US Department of Education).
- 17) The subrecipient assures that it will adhere to the Pro-Children Act of 2001, which states that no person shall permit smoking within any indoor facility owned or leased or contracted and utilized for the provision of routine or regular kindergarten, elementary, or secondary education or library services to children (P.L. 107-110, section 4303(a)). In addition, no person shall permit smoking within any indoor facility (or portion of such a facility) owned or leased or contracted and utilized for the provision of regular or routine health care or day care or early childhood development (Head Start) services (P.L. 107-110, Section 4303(b)(1)). Any failure to comply with a prohibition in this Act shall be considered to be a violation of this Act and any person subject to such prohibition who commits such violation may be liable to the United States for a civil penalty, as determined by the Secretary of Education (P.L. 107-110, section 4303(e)(1)).
- 18) The subrecipient will comply with the Stevens Amendment.
- 19) The subrecipient will comply with the Buy America Preference for Infrastructure Projects as required by 2 CFR Part 184.
- 20) The subrecipient will submit such reports to the NHED and to U.S. governmental agencies as may reasonably be required to enable the NHED and U.S. governmental agencies to perform their duties. The subrecipient will maintain such fiscal and programmatic records, including those required under 20 U.S.C. 1234(f), and will provide access to those records, as necessary, for those Departments/agencies to perform their duties.
- 21) The Subrecipient will ensure compliance with 2 CFR 200.415(a) and (b).
- 22) If an LEA, the subrecipient will provide reasonable opportunities for systematic consultation with and participation of teachers, parents, and other interested agencies, organizations, and individuals, including education-related community groups and non-profit organizations, in the planning for and operation of each program.
- 23) If an LEA, the subrecipient shall assure that any application, evaluation, periodic program plan, or report relating to each program will be made readily available to parents and other members of the general public upon request.
- 24) If an LEA, the subrecipient has adopted effective procedures for acquiring and disseminating to teachers and administrators participating in each program, significant information from educational research, demonstrations, and similar projects, and for adopting, where appropriate, promising educational practices developed through such projects. Such procedures shall ensure compliance with applicable federal laws and requirements.
- 25) The subrecipient will comply with the requirements of the Gun-Free Schools Act of 1994.

- 26) The subrecipient will submit a fully executed and accurate FY25 Single-Audit Certification (required) and the Federal Expenditures Worksheet (if applicable) to the NHED no later than December 31, 2025. The worksheet will be provided to each subrecipient by the NHED via email and is posted on the NHED website.
- 27) The subrecipient shall comply with the restrictions of New Hampshire RSA 15:5.
- 28) The subrecipient will comply with the requirements in 2 CFR Part 180, Government-wide Debarment and Suspension (Non-procurement).
- 29) The subrecipient certifies that it will maintain a drug-free workplace and will comply with the requirements of the Drug-Free Workplace Act of 1988 and 34 CFR 84.200.
- 30) The subrecipient will adhere to the requirements of Title 20 USC 7197 relative to the Transfer of Disciplinary Records.
- 31) The subrecipient will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 32) The subrecipient will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally assisted construction sub-agreements.
- 33) The subrecipient will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 34) The subrecipient will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 35) The subrecipient will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 36) The subrecipient will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 37) As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent

practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award (2 CFR 200.322).

38) The subrecipient will comply with the Prohibition on Certain Telecommunications and Video Surveillance Equipment requirement per 2 CFR 200.216.

39) The subrecipient will comply with the Protection for Whistleblowers (41 U.S.C. §4712).

B. Explanation of Grants Management Requirements

The following section elaborate on certain requirements included in legislation or regulations referred to in the "General Assurances" section. This section also explains the broad requirements that apply to federal program funds.

1. Financial Management Systems

Financial management systems, including records documenting compliance with federal statutes, regulations, and the terms and conditions of the federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions, and to trace funds to establish that such funds have been used in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award.

Specifically, the financial management system must be able to:

- a) Identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and federal award identification must include, as applicable, the CFDA title and number, federal award identification number and year, name of the federal agency, and name of the pass-through entity, if any.
- b) Provide accurate, current, and complete disclosure of the financial results of each federal award or program.
- c) Produce records that identify adequately the source and application of funds for federally funded activities.
- d) Maintain effective control over, and accountability for, all funds, property, and other assets. The subrecipient must adequately safeguard all assets and assure that they are used solely for authorized purposes.
- e) Generate comparisons of expenditures with budget amounts for each federal award.

2. Written Policies and Procedures

The subrecipient must have written policies and procedures for (this list is not all inclusive):

Policy/Procedure Name	In Accordance With	Policy	Procedure
Drug-Free Workplace Policy	34 CFR 84.200 and the Drug-Free Workplace Act of 1988		N/A
Procurement Policy & Procedure	2 CFR 200.317-327		
Conflict of Interest/Standard of Conduct Policy	2 CFR 318(c)(1)		N/A
Inventory Management Policy & Procedure	2 CFR 200.313(d)		
District Travel Policy	2 CFR 200.475(b)		N/A

Subrecipient Monitoring Policy & Procedure (if applicable)	2 CFR 200.332(d)		
Time and Effort Policy & Procedure	2 CFR 200.430		
Records Retention Policy & Procedure	2 CFR 200.334		
Prohibiting the Aiding and Abetting of Sexual Abuse Policy	ESEA Section 8546		N/A
Allowable Cost Determination Policy	2 CFR 200.302(b)(7)		N/A
Gun Free School Act	Gun Free School Act of 1994		N/A
Cash Management	2 CFR 200.302(b)(6) and 200.305		
Nonsmoking Policy for Children's Services	ESEA Section 8573		N/A

3. Internal Controls

The subrecipient must:

- Establish, maintain, and document effective internal controls over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. These internal controls should comply with the guidance outlined in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework" issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- Comply with the U.S. Constitution, federal statutes, regulations, applicable executive order, and non-regulatory guidance, as applicable, and the terms and conditions of the federal awards.
- Take prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.
- Take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the recipient or subrecipient considers sensitive and is consistent with applicable Federal, State, local and tribal laws regarding privacy and responsibility over confidentiality.
- Retain all Federal award records and other supporting documentation in accordance with 2 CFR 200.334.

4. Allowable Costs

In accounting for and expending project/grant funds, the subrecipient may only charge expenditures to the project award if they are:

- in payment of obligations incurred during the approved project period;
- in conformance with the approved project;
- in compliance with all applicable statutes and regulatory provisions;
- costs that are allocable to a particular cost objective;
- spent only for reasonable and necessary costs of the program; and
- not used for general expenses required to carry out other responsibilities of the subrecipient.

5. Audits

This part is applicable for all non-federal entities as defined in 2 CFR 200, Subpart F.

- a) In the event that the subrecipient expends \$1,000,000 or more in federal awards in its fiscal year, the subrecipient must have a single or program-specific audit conducted in accordance with the provisions of 2 CFR 200, Subpart F. In determining the federal awards expended in its fiscal year, the subrecipient shall consider all sources of federal awards, including federal resources received from the NHED. The determination of amounts of federal awards expended should be in accordance with the guidelines established by 2 CFR 200, Subpart F.
- b) In connection with the audit requirements, the subrecipient shall also fulfill the requirements relative to auditee responsibilities as provided in 2 CFR 200.508.
- c) If the subrecipient expends less than \$1,000,000 in federal awards in its fiscal year, an audit conducted in accordance with the provisions of 2 CFR 200, Subpart F, is not required. In the event that the subrecipient expends less than \$1,000,000 in federal awards in its fiscal year and elects to have an audit conducted in accordance with the provisions of 2 CFR 200, Subpart F, the cost of the audit must be paid from non-federal resources (i.e., the cost of such an audit must be paid from subrecipient resources obtained from non-federal entities).

The subrecipient assures it will implement the following audit responsibilities:

- a) Procure or otherwise arrange for the audit required by this part in accordance with auditor selection regulations (2 CFR 200.509) and ensure it is properly performed and submitted no later than nine months after the close of the fiscal year in accordance with report submission regulations (2 CFR 200.512).
- b) Provide the auditor access to personnel, accounts, books, records, supporting documentation, and other information as needed so that the auditor may perform the audit required by this part.
- c) Prepare appropriate financial statements, including the schedule of expenditures of federal awards, in accordance with financial statements regulations (2 CFR 200.510).
- d) Promptly follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan, in accordance with audit findings follow-up regulations (2 CFR 200.511(b-c)).
- e) If an audit reveals the basis for a finding related to a federally funded program, upon request of the NHED Bureau of Federal Compliance (BFC), promptly submit a corrective action plan using the NHED template provided by the BFC for audit findings related to the federally funded programs.
- f) For repeat findings not resolved or only partially resolved, the subrecipient must provide an explanation for findings not resolved or only partially resolved to the BFC for findings related to all federally funded programs. The BFC will review the subrecipient's submission and issue an appropriate management decision adhering to the same framework as set forth in 2 CFR 200.521.

6. Reports to be Submitted

Audits/Management Decisions

Copies of reporting packages for audits conducted in accordance with 2 CFR 200, Subpart F shall be submitted, by or on behalf of the recipient directly to the following:

- a) The Federal Audit Clearinghouse (FAC) in 2 CFR 200, Subpart F requires the auditee to electronically submit the data collection form described in 200.512(b) and the reporting package described in 200.512(c) to FAC at: The Federal Audit Clearinghouse

Copies of other reports or management decision letter(s) shall be submitted by or on behalf of the subrecipient directly to:

- a) **New Hampshire Department of Education
Bureau of Federal Compliance
25 Hall Street
Concord, NH 03301 Or via email to: federalcompliance@doe.nh.gov**
- b) In response to requests by a federal agency, auditees must submit a copy of any management letters issued by the auditor, 2 CFR 200.512(e).

Any other reports, management decision letters, or other information required to be submitted to the NHED pursuant to this agreement shall be submitted in a timely manner.

Single Audit Certifications and Federal Expenditures Worksheet

A fully executed and accurate FY25 Single-Audit Certification (required) and Federal Expenditures Worksheet (if applicable) shall be submitted to the NHED no later than **December 31, 2025**. A copy of the forms will be provided to each subrecipient by the NHED via email.

7. Debarment, Suspension, and Other Responsibility Matters

As required by Executive Orders (E.O.) 12549 and 12689, Debarment and Suspension, and implemented at 2 CFR Part 180, for prospective participants in primary covered transactions, as defined in 2 CFR 180.120, 180.125 and 180.200, no contract shall be made to parties identified on the General Services Administration's *Excluded Parties List System* as excluded from Federal Procurement or Non-procurement Programs in accordance with E.O.s 12549 and 12689, "Debarment and Suspension." This list contains the names of parties debarred, suspended, or otherwise excluded by agencies, and contractors declared ineligible under statutory or regulatory authority other than E.O. 12549. Contractors with awards that exceed the small purchase threshold shall provide the required certification regarding their exclusion status and that of their principal employees.

The federal government imposes this requirement in order to protect the public interest, and to ensure that only responsible organizations and individuals do business with the government and receive and spend government grant funds. Failure to adhere to these requirements may have serious consequences – for example, disallowance of cost, termination of project, or debarment.

To assure that this requirement is met, there are four options for obtaining satisfaction that subrecipients and contractors are not suspended, debarred, or disqualified.

The subrecipient certifies that it and its principals:

- a) Are not presently debarred, suspended, proposed for debarment, and declared ineligible or voluntarily excluded from covered transactions by any federal Department or agency.
- b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes; commission of embezzlement; theft, forgery, bribery, falsification, or destruction of records; making false statements; or receiving stolen property.
- c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in this certification.
- d) Have not within a three-year period preceding this application had one or more public transactions (federal, state, or local) terminated for cause or default.

Where the subrecipient is unable to certify to any of the statements in this certification, they shall attach an explanation to this document.

8. Drug-Free Workplace (Grantees Other Than Individual)

As required by the Drug-Free Workplace Act of 1988 and implemented in 34 CFR 84.200 the subrecipient certifies that it will continue to provide a drug-free workplace by:

- a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance (34 CFR 84.610) is prohibited in the subrecipient's workplace and specifying the actions that will be taken against employees for violation of such prohibition.
 - b) Establishing, as required by 34 CFR 84.215, an ongoing drug-free awareness program to inform employees about:
 - The dangers of drug abuse in the workplace;
 - The recipient's policy of maintaining a drug-free workplace;
 - Any available drug counseling, rehabilitation, and employee assistance programs; and
 - The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
 - c) Requiring that each employee engaged in the performance of the project is given a copy of this statement.
 - d) Notifying the employee in the statement that, as a condition of employment under the project, the employee will:
 - Abide by the terms of the statement; and
 - Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
 - e) Notifying the agency in writing within 5 calendar days after receiving notice of an employee's conviction of a violation of a criminal drug statute in the workplace, as required by 34 CFR 84.205(c)(2), from an employee or otherwise receiving actual notice of employee's conviction. Employers of convicted employees must provide notice, including position title to:

Director, Grants and Contracts Service
U.S. Department of Education
400 Maryland Avenue, S.W. [Room 3124, GSA – Regional Office Building No. 3]
Washington, D.C. 20202-4571
- (Notice shall include the identification number[s] of each affected grant).
- f) Taking one of the following actions, as stated in 34 CFR 84.225(b), within 30 calendar days of receiving the required notice with respect to any employee who is convicted of a violation of a criminal drug statute in the workplace.
 - Taking appropriate personnel action against such an employee, up to and including termination consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - Requiring such employee to participate satisfactorily in drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate

agency.

- g) Making a good-faith effort to maintain a drug-free workplace through implementation of the requirements stated above.

9. Gun Possession

As required by Title XIV, Part F, and Section 14601 (Gun-Free Schools Act of 1994) of the Improving America's Schools Act:

The LEA assures that it shall comply with the provisions of RSA 193:13, IV.

Any pupil who brings or possesses a firearm as defined in section 921 of Title 18 of the United States Code in a safe school zone as defined in RSA 193-D:1 without written authorization from the superintendent or designee shall be expelled from school by the local school board for a period of not less than 12 months. Nothing in this section shall be construed to prevent the local school district or chartered public school that expelled the student from providing educational services to such student in an alternative setting.

The LEA assures that it shall timely file the report required by Ed 317.07.

The LEA assures that it has establish policies on school discipline as required by RSA 193:13, XI and XII and Ed 317.03.

10. Lobbying

As required by Section 1352, Title 31, of the U.S. Code, and implemented in 34 CFR Part 82, for persons entering into a grant or cooperative agreement over \$100,000, as defined in 34 CFR 82.105 and 82.110, the applicant certifies that:

- a) No federally appropriated funds have been paid or will be paid by or on behalf of the subrecipient to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.
- b) If any funds other than federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with federal grants or cooperative agreements, the subrecipient shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- c) The subrecipient shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, contracts under federal awards, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

New Hampshire RSA 15:5 - **Prohibited Activities.**

- I. Except as provided in paragraph II, no recipient of a grant or appropriation of state funds may use the state funds to lobby or attempt to influence legislation, participate in political activity, or

contribute funds to any entity engaged in these activities.

- II. Any recipient of a grant or appropriation of state funds that wishes to engage in any of the activities prohibited in paragraph I, or contribute funds to any entity engaged in these activities, shall segregate the state funds in such a manner that such funds are physically and financially separate from any non-state funds that may be used for any of these purposes. Mere bookkeeping separation of the state funds from other moneys shall not be sufficient.

11. Subrecipient Monitoring

In addition to reviews of audits conducted in accordance with 2 CFR 200, Subpart F, subrecipient monitoring procedures may include, but not be limited to, on-site or remote visits by NHED staff, limited scope audits, and/or other procedures. By signing this document, the subrecipient agrees to comply and cooperate with any monitoring procedures/processes deemed appropriate by the NHED. In the event the NHED determines that a limited scope audit of the project recipient is appropriate, the subrecipient agrees to comply with any additional instructions provided by NHED staff to the subrecipient regarding such audit.

12. More Restrictive Conditions

Subrecipients found to be in noncompliance with program and/or fund source requirements or determined to be “high risk” shall be subject to the imposition of more restrictive conditions as determined by the NHED.

13. Obligations by Subrecipients

Obligations will be considered to have been incurred by subrecipients on the basis of documentary evidence of binding commitments for the acquisition of goods or property or for the performance of work, except that funds for personal services, services performed by public utilities, travel, or the rental of facilities shall be considered to have been obligated at the time such services were rendered, such travel occurred, and/or when facilities were used (see 34 CFR 76.707).

14. Personnel Costs – Time Distribution

Charges to federal projects for personnel costs, whether treated as direct or indirect costs, are allowable to the extent that they satisfy the specific requirements of 2 CFR 200.430 and will be based on payrolls documented in accordance with generally accepted practices of the subrecipient and approved by a responsible official(s) of the subrecipient.

When employees work solely on a single federal award or cost objective, charges for their salaries and wages must be supported by personnel activity reports (PARs), which are periodic certifications (at least semi-annually) that the employees worked solely on that program for the period covered by the certification. These certifications must be signed by the employee or a supervisory official having firsthand knowledge of the work performed by the employee.

When employees work on multiple activities or cost objectives (e.g., more than one federal project, a federal project and a non-federal project, an indirect cost activity and a direct cost activity, two or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity), the distribution of their salaries or wages will be supported by personnel activity reports or equivalent documents that meet the following standards:

- a) Reflect an after-the-fact distribution of the actual activity of each employee;

- b) Account for the total activity for which each employee is compensated;
- c) Prepared at least monthly and must coincide with one or more pay period; and
- d) Signed and dated by the employee.

15. Protected Prayer in Public Elementary and Secondary Schools

The subrecipient certifies that the LEA has no policy that prevents or otherwise denies participation in constitutionally protected prayer in public elementary and secondary schools. (Section 8524(a) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act and codified at 20 U.S.C. § 7904).

16. Purchasing/Procurement

The non-Federal entity must have and use documented procurement procedures, consistent with the standards of this section and 2 CFR 200.317 - 2 CFR 200.327 for any of the following methods of procurement used for the acquisition of property or services required under a Federal award or sub-award.

1. Informal procurement methods
 - a. Micro-purchases
 - b. Simplified Acquisition
2. Formal procurement methods
 - a. Sealed bids
 - b. Proposals
3. Noncompetitive procurement

17. Retention and Access to Records

The subrecipient certifies that it will comply with all federal regulations, including but not limited to, 2 CFR 200.334 – 2 CFR 200.338.

18. The Stevens Amendment

All federally funded projects must comply with the Stevens Amendment of the Department of Defense Appropriation Act, found in Section 8136, which provides:

When issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with federal money, all grantees receiving federal funds, including but not limited to state and local governments, shall clearly state (1) the percentage of the total cost of the program or project which will be financed with federal money, (2) the dollar amount of federal funds for the project or program, and (3) the percentage and dollar amount of the total costs of the project or program that will be funded by non-governmental sources.

19. Transfer of Disciplinary Records

Title 20 USC 7197 requires that the State have a procedure to assure that a student's disciplinary records, with respect to suspensions and expulsions, are transferred by the project recipient to any public or private elementary or secondary school where the student is required or chooses to enroll. In New Hampshire, that assurance is statutory and found at RSA 193-D:8.

The relevant portions of the federal and state law appear below.

- a) **Disciplinary Records** - In accordance with the Family Educational Rights and Privacy Act of 1974 (20 U.S.C. 1232g), not later than 2 years after the date of enactment of this part, each State receiving Federal funds under this Act shall provide an assurance to the Secretary that the State has a procedure in place to facilitate the transfer of disciplinary records, with respect to a suspension or expulsion, by local educational agencies to any private or public elementary school or secondary school for any student who is enrolled or seeks, intends, or is instructed to enroll, on a full- or part-time basis, in the school.
- b) **193-D:8 Transfer Records; Notice** – All elementary and secondary educational institutions, including academies, private schools, and public schools, shall upon request of the parent, pupil, or former pupil, furnish a complete school record for the pupil transferring into a new school system. Such record shall include, but not be limited to, records relating to any incidents involving suspension or expulsion, or delinquent or criminal acts, or any incident reports in which the pupil was charged with any act of theft, destruction, or violence in a safe school zone.

20. Compliance with FERPA and PPRA

The subrecipient certifies that it complies with Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98) by ensuring the following:

- a) The subrecipient has established and implemented effective internal processes to ensure that student's complete education records are maintained;
- b) The subrecipient has established and implemented effective internal processes to ensure that parents are provided with the opportunity to review their student's education records;
- c) The subrecipient has established policies and procedures that permit disclosure of personally identifiable information from a student's education records in order to address safety issues in a manner that complies with FERPA;
- d) The subrecipient provides parents and eligible students annual notification of their rights under FERPA consistent with 34 CFR § 99.7; and
- e) The subrecipient, if applicable, has established procedures to provide military recruiters the same access to secondary students as provided to postsecondary institutions or to prospective employers and require that schools provide student information to military recruiters, when requested, unless the parent has opted out of providing such information (schools are required to provide to military recruiters include student names, addresses, electronic mailing addresses, and telephone listings. *See* Section 8528 of the ESEA, as amended, 20 U.S.C. § 7908 and 10 U.S.C. § 503(c)).

C. Definitions (2 CFR 200.1)

- 1) **Audit finding** - *Audit finding* means deficiencies which the auditor is required by 2 CFR 200.516 (a) to report in the schedule of findings and questioned costs.
- 2) **Management decision** - *Management decision* means the Federal awarding agency's or pass-through entity's written determination, provided to the auditee, of the adequacy of the auditee's proposed corrective actions to address the findings, based on its evaluation of the audit findings and proposed corrective actions.
- 3) **Pass-through entity** - *Pass-through entity (PTE)* means a recipient or subrecipient that provides a subaward to a subrecipient (including lower tier subrecipients) to carry out of a Federal program. The

authority of the pass-through entity under this part flows through the subaward agreement between the pass-through entity and subrecipient.

- 4) **Period of performance** - *Period of performance* means the total estimate time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the Period of Performance in the Federal award per 2 CFR 200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.
- 5) **Subaward** - *Subaward* means an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in with 2 CFR 200.331, including an agreement the pass-through entity considers a contract.
- 6) **Subrecipient** – *Subrecipient* means an entity that receives a subaward from a pass-through entity to carry out part of a federal award.
- 7) **Senior Educational Official** – *Senior Educational Official* means the top executive in an educational organization who makes the key decisions on spending, staffing, and other education policies.

CERTIFICATION

Instructions: The Senior Education Official **must** consult with the School Board for the School District/SAU by informing said School Board about the District's/SAU's participation in Federal Programs and the terms and conditions of the General Assurances, Requirements and Definitions for Participation in Federal Programs. The Senior Educational Official and the Chair of the School Board **must** sign this certification page (and initial the remaining pages) as described below and return it to the NHED. **No payment for project/grant awards will be made by the NHED without a fully executed copy of this General Assurances, Requirements and Definitions for Participation in Federal Programs on file.** For further information, contact the NHED Bureau of Federal Compliance at federalcompliance@doe.nh.gov

Senior Educational Official or other Qualifying Administrator Certification:

We the undersigned acknowledge that [a] person is guilty of a violation of R.S.A. § 641:3 if [h]e or she makes a written or electronic false statement which he or she does not believe to be true, on or pursuant to a form bearing a notification authorized by law to the effect that false statements made therein are punishable; or (b) With a purpose to deceive a public servant in the performance of his or her official function, he or she: (1) Makes any written or electronic false statement which he or she does not believe to be true; or (2) Knowingly creates a false impression in a written application for any pecuniary or other benefit by omitting information necessary to prevent statements therein from being misleading; or (3) Submits or invites reliance on any writing which he or she knows to be lacking in authenticity; or (4) Submits or invites reliance on any sample, specimen, map, boundary mark, or other object which he or she knows to be false.

Accordingly, I, the undersigned official legally authorized to bind the named School District/SAU hereby apply for participation in federally funded education programs on behalf of the School District/SAU named below. I certify, to the best of my knowledge, that the below School District/SAU will adhere to and comply with these General Assurances, Requirements and Definitions for Participation in Federal Programs (pages 1 through 14 inclusive). I further certify, as is evidenced by the Minutes of the School Board Meeting held on _____, _____, that I have informed the members of the School Board of the federal funds the District/SAU will be receiving and of these General Assurances, Requirements and Definitions for the Participation in Federal Programs for the District's/SAU's participation in said programs.

SAU/Charter Number: _____ District or Charter School Name: _____

Typed Name of Senior Educational Official

Signature

Date

School Board Certification:

I, the undersigned official representing the School Board, acknowledge that the Senior Educational Official, as identified above, has consulted with all members of the School Board, in furtherance of the School Board's obligations, including those enumerated in RSA 189:1-a, and pursuant to the School Board's oversight of federal funds the District will be receiving and of the General Assurances, Requirements and Definitions for Participation in Federal Programs in said programs.

Typed Name of School Board
Chair (on behalf of the School Board)

Signature

Date

Once the document is fully executed, please upload a signed copy of these General assurances to the LEA homepage within GMS for review and approval. General assurances must be uploaded for each district applying for federal funds.

GBCD-R - BACKGROUND INVESTIGATION AND CRIMINAL HISTORY RECORDS CHECK – INTERNAL CONTROLS

Category: Priority/Required by Law

A. **Purpose.** This procedural document outlines the responsibilities and protocols required relative to receipt, access, retention and destruction of criminal history record information obtained through the criminal history records check required under RSA 189:13-A and Board policy GBCD.

B. **Definitions.** Except as noted relative to New Hampshire law or Board policy, the definitions are based on those provided in the ***Criminal Justice Information Services Security Policy***, (Version 5.9.2 as of August 2023) of the Federal Bureau of Investigation, Criminal Justice Information Services Division (the “CJIS Security Policy”).

1. **Criminal Justice Information (“CJI”)** – refers to all of the data provided through the Federal Bureau of Investigation’s (“FBI”) criminal justice information system (“CJIS”) including, but not limited to biometric, identity history, biographic, property, and case/incident history data.

2. **Criminal History Records Information (“CHRI”)** – is a subset of CJI, including: information, notations or other written or electronic evidence of an arrest, detention, complaint, indictment, information or other formal criminal charge relating to an identifiable person that includes identifying information regarding the individual as well as the disposition of any charges. For purposes of this document GBCD-RG(1), CHRI will also include all of the information received through the New Hampshire State Police pursuant to RSA 189:13-a regarding the criminal history of a “covered person” (as defined in GBCD) whether or not such information is received by or through the CJIS.

Due to its sensitive nature, and pursuant to regulations of the FBI, additional controls beyond those stated in RSA 189:13-a are required for the access, use and dissemination of CHRI.

3. **“Authorized Person” & “Authorized Personnel”** - an individual (“Authorized Person”), or group of individuals (“Authorized Personnel”), who have been appropriately vetted through a national fingerprint-based record check and have been granted access to CHRI data. However, pursuant to RSA 189:13-a, only the Superintendent or her/his “Designee” as defined under Board policy GBCD qualify as “Authorized Personnel”. See Section D, below for requirements for training of Authorized Personnel.

4. **Electronic Media** - includes memory devices in laptops and computers (hard drives) and any removable, transportable digital memory media, such as magnetic tape or disk, backup medium, optical disk, flash drives, external hard drives, or digital memory card.

5. **Physical Media** - includes printed documents and imagery.

C. **Designated Points of Contact.**

Each Authorized Person may serve as a point of contact (“POC”) for communications with the

FBI, or with the New Hampshire State Police, Justice Information Bureau, as the state CJIS agency (“CSA”), regarding such matters as (i) CHRI audits, (ii) changes to Authorized Personnel within the District, (iii) CHRI training, or (iv) CHRI security as required under state or federal law.

In the event the District has only one Authorized Person, the Superintendent shall also designate a person other than the Authorized Person to serve as an “Alternate POC”. Such Alternate POC will not have access to CHRI (i.e., the Alternate POC is not an “Authorized Person”), but may engage in communications as described in this paragraph, especially in the absence of an Authorized Person. (Hereafter, the/a “POC” will mean and include any Authorized Person/nel as well as the Alternate POC.) In addition to communications with the CSA and FBI as described above, the POC will support policy compliance, including such matters as:

1. Using the New Hampshire State Police Criminal Records Portal (the “NH Criminal Records Portal”), documentation of approved hardware, software, and firmware;
2. Using the NH Criminal Records Portal, communications regarding how the District’s devices/network are connected to the Criminal Records Portal; and
3. Implementation and compliance with security procedures.

D. Training of Authorized Personnel.

The District will ensure that each Authorized Person will complete the training relative to the reading and interpretation of criminal records as required under RSA 189:13-a. Additionally, the District will ensure all persons authorized to have CHRI access will complete Security Awareness Training via CJIS Online immediately upon hire or appointment to access CHRI.

The District will ensure all Authorized Personnel complete recertification of Security Awareness Training every twelve (12) months.

The Alternate POC will keep on file the Security Awareness Training certificate on all authorized personnel.

E. Termination or other Changes to Authorized Personnel.

Upon an Authorized Person’s separation/termination from employment with the District, a POC shall, as soon as practicable, terminate the separated employee’s access to systems or physical areas that would allow access to CHRI.

In the event that there are any other additions or reductions to district employees assigned or to be assigned as Authorized Personnel, the POC will notify the CSA of the personnel changes within seven business days.

Each POC will keep an updated list of the Authorized Personnel and POC that will be available to the CSA or FBI.

F. Access to, and Security, Storage, Retention and Destruction of CHRI.

1. Access to and Storage of CHRI. Authorized Personnel as defined in section B.3, above, are the only persons allowed to access, view, possess, or otherwise handle CHRI whether in

physical or electronic media. Any other dissemination of CHRI in any format or medium is strictly forbidden.

The Superintendent shall designate an area, a room, or a storage container as a controlled area for the purpose of day-to-day access to or storage of CHRI on physical media. CHRI on physical media will be stored at all times in a locked drawer/container at the Central Office that is only accessible to the Authorized Personnel. CHRI in physical media shall not be removed from the designated area except for destruction as provided below.

Any room, area or storage container in which CHRI is contained on physical media shall be locked whenever unattended by Authorized Personnel.

Documents or other physical media containing CHRI, and any devices through which CHRI on electronic media may be viewed, will be positioned at all times in such a way as to prevent persons who are not Authorized Personnel from accessing or viewing CHRI.

In no event shall any physical media containing CHRI be copied or transferred to any electronic media. Similarly, CHRI received and/or accessed through the New Hampshire State Police Criminal Records Portal (the "Criminal Records Portal"), shall not be transferred to physical media (e.g., printed), and shall not be saved or transferred onto any other electronic media or device.

Additionally, if CHRI is received or accessed through the Criminal Records Portal, the District will at all times use electronic media and network infrastructure security methods consistent with the CJIS Security Policy and/or as otherwise required by the CSA or FBI.

The District shall take steps necessary to prevent and protect the District from physical, logical, and electronic breaches consistent with the District's Data Governance and Security Plan and Board policy EHAB.

In no event shall a "personal device" or "personally owned information system" be used to access, view, process, store or transmit CHRI. For the purposes of this policy, "personal device" or "personally owned information system" shall include any portable technology, including, but not limited to, mobile wireless devices (e.g., Blackberries, cellphones, smart phones, tablets, etc.), personal laptops, personal desktop computers, or portable storage device (e.g., flash drive, SD card, DVD, CD, air card, etc.).

2. CHRI Exempt from Public Disclosure. CHRI is exempt from disclosure to the public under RSA 91-A:5, IV. See also, Section 4.2.1 of the CJIS Security Policy, stating that CHRI obtained from the Interstate Information Index is only accessible for an authorized purpose; and FOIA(b)(7)(c), stating that matters which are an unwarranted invasion of personal privacy are exempt from disclosure.

3. Destruction of CHRI. The District will properly sanitize or destroy physical media or electronic media with CHRI within 60 days of receipt by the District. All CHRI will be destroyed as set out below.

a. Physical media with CHRI shall be destroyed by one of the following:

- i.shredding by Authorized Personnel using District-issued cross-cut shredders;
- ii.placed in locked shredding bins for a private contractor approved by the Superintendent to come on-site and shred, witnessed by District personnel throughout the entire process; or
- iii.incineration using District incinerators or, if conducted by non-Authorized Personnel offsite, witnessed by the Superintendent or Superintendent's designee.

b. CHRI on electronic media shall be removed or destroyed by one of the below methods, and computers and other digital or electronic devices or systems that have been used to process, store, or transmit sensitive information shall not be released from the District's direct control until all CHRI has been destroyed using one of the prescribed methods:

- i.Overwriting (at least three times);
- ii.Degaussing (magnetic or electric removal of magnetic data); or
- iii.Physical destruction (i.e., dismantling by methods of crushing, disassembling, etc., ensuring that the platter or other storage device has been physically destroyed so that no data can be extracted).

B. Reporting Information Security Events.

The District will report information security events/cybersecurity incidents involving CHRI consistent with Board policy EHAB. Additionally, the District shall promptly report incident information to appropriate authorities, including the New Hampshire State Police CSA Information Security Officer (ISO).

C. Violations - Misuse of CHRI.

In the event of misuse of CHRI, or violations of any provision of (a) these Internal Controls and Procedures, or (b) the CJIS Security Policy, the District will subject the employee to disciplinary action per Board policy and procedures, up to and including the termination of their employment, and the employee may face criminal prosecution.

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

NH Statutes

RSA 189:13-a

RSA 189:13-b

RSA 189:13-c

RSA 632-A:10

NH Dept of Ed Regulation

Description

[School Employee and Designated School Volunteer Criminal History Records Check](#)

[School Bus Driver & Transportation Monitor Criminal History Records Check](#)

[Credentialing Applicant and Candidate Criminal History Records Check](#)

[Prohibition from Child Care Service of Persons Convicted of Certain Offenses](#)

Description

Code of Conduct for New Hampshire
Educators

Federal Regulations

28 CFR Part 20

Cross References

Code

EEAE

EEAE-R(1)

EEAEA

EEAEA-R(1)

EHB

EHB-R(1)

GADA

GBCE

GDF

IJOC

IJOC-R(1)

JLIF

JLIF-R(1)

Legal Reference:

First Reading:

Second Reading:

Final Adoption:

Revision:

[Code of Conduct for New Hampshire Educators](#)

Description

[Criminal Justice Information Systems](#)

Description

[School Bus Safety Program](#)

[School Bus Safety Program - Safety Guidelines for
Parents/Guardians of Students Using School Buses](#)

[Mandatory Drug and Alcohol Testing – School Bus Drivers
and Contracted Carriers](#)

[Mandatory Drug and Alcohol Testing – School Bus Drivers
and Contracted Carriers - Drug and Alcohol Testing for
School Bus and Commercial Vehicle Drivers](#)

[Data/Records Retention](#)

[Data/Records Retention - Local Records Retention Schedule](#)

[Employment References and Verification](#)

[Training and Information Relative to Child Sexual Abuse
Prevention](#)

[Hiring of Non-Certified Personnel](#)

[Volunteers](#)

[Volunteers - Confidentiality Agreement](#)

[Receipt and Use of Sex Offender Registry Information](#)

[Receipt and Use of Sex Offender Registry Information](#)

IHBA-R – PROGRAMS FOR PUPILS WITH DISABILITIES –SECTION 504-NOTICE OF PARENT & STUDENT RIGHTS

Category: Priority/Required by Law

Notice of Parent and Student Rights under Section 504 Rehabilitation Act of 1973

The Rehabilitation Act of 1973, commonly referred to as “Section 504,” is a nondiscrimination statute enacted by the United States Congress. The purpose of the act is to prohibit discrimination and to ensure that disabled students have educational opportunities and benefits comparable to those provided to non-disabled students.

An eligible student under Section 504 is a student who (a) has, (b) has a record of having, or (c) is regarded as having a physical or mental impairment that substantially limits a major life activity such as, but not limited to learning, self-care, walking, seeing, hearing, speaking, breathing, working, and performing manual tasks.

Dual Eligibility: Many students will be eligible for education services under both Section 504 and the Individuals With Disabilities Education Act (IDEA). Students who are eligible under IDEA have many specific rights that are not available to students who are eligible solely under Section 504. An explanation of procedural safeguards for New Hampshire students eligible for services under the IDEA may be found in the "New Hampshire Special Education Procedural Safeguards Handbook available through the school district's Student Support Services Department and sets out the rights assured by IDEA.

It is the purpose of this notice to set out the rights assured by Section 504 to those disabled students who do not qualify under IDEA. The enabling regulations for Section 504 as set out in 34 CFR Part 104 provides parents and/or students with the following rights:

1. You have a right to be informed by the school district of your rights under Section 504. (34 CFR §104.32)
2. Your child has the right to an appropriate education designed to meet his/her individual educational needs as adequately as the needs of non-disabled students are met. (34 CFR §104.33)
3. Your child has the right to free educational services except for those fees that are also imposed on non-disabled students or their parents. Insurers and similar third parties are not relieved from an otherwise valid obligation to provide or to pay for services provided to a disabled student. (34 CFR §104.34)
4. Your child has a right to placement in the least-restrictive environment. (34 CFR §104.34)
5. Your child has a right to facilities, services, and activities that are comparable to those provided for non-disabled students. (34 CFR §104.34)

6. Your child has a right to an evaluation prior to an initial Section 504 placement and prior to any subsequent significant change in placement. (34 CFR §104.34)
7. Testing and other evaluation procedures must conform to the requirements of 34 CFR §104.35 as to validation, administration, areas of evaluation, etc. The district shall consider information from a variety of sources, such as assessment, aptitude and achievement tests, teacher recommendations, physical condition or medical reports, student grades, progress reports, parent observations, and anecdotal reports. (34 CFR §104.35)
8. Placement decisions must be made by a group of persons (i.e., the Section 504 Committee) including persons knowledgeable about your child, the meaning of the least-restrictive environment, and comparable facilities. (34 CFR §104.36)
9. If eligible under Section 504, your child has a right to periodic reevaluations, generally every three years. (34 CFR §104.35) You have the right to notice prior to any action by the district in regard to the identification, evaluation, or placement of your child. (34 CFR §104.36)
10. You have the right to examine relevant records. (34 CFR §104.36)
11. You have the right to an impartial hearing with respect to the district's actions regarding your child's identification, evaluation, or educational placement, with the opportunity for parental participation in the hearing and representation by an attorney. (34 CFR §104.36)
12. If you wish to challenge the actions of the district's Section 504 Committee in regard to your child's identification, evaluation, or educational placement, you should file a written Notice of Appeal with the district's Section 504 Coordinator within 30 calendar days from the time you receive written notice of the Section 504 Committee's action(s).

Student Support Services Office
192 Forest Road
Lyndeborough, NH 03082
TEL: 603-732-9175

A hearing will be scheduled before an impartial hearing officer, and you will be notified in writing of the date, time, and place for the hearing.

13. If you disagree with the decision of the impartial hearing officer, you have a right to a review of that decision by a court of competent jurisdiction. (34 CFR §104.36)
14. On Section 504 matters other than your child's identification, evaluation, and placement, you have a right to file a complaint with the district's Section 504 Coordinator (or designee), who will investigate the allegations to the extent warranted by the nature of the complaint in an effort to reach a prompt and

equitable resolution.

15. You also have the right to file a complaint with the Office of Civil Rights. The address of the Regional Office with jurisdiction in New Hampshire is:

Office for Civil Rights
U.S. Department of Education,
5 Post Office Square
Boston, Massachusetts 02109-3921
Tel: (617) 289-0111
TTY: (877) 521-2172
FAX: (617) 289-0150
OCR.Boston@ed.gov
Web Contact: www.ed.gov

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

NH Statutes

RSA 186-C
RSA 186-C:10-a

NH Dept of Ed Regulation

N.H. Code Admin. Rules Ed 1100

Federal Regulations

34 CFR 104
34 CFR 300 et seq.

Federal Statutes

20 U.S.C. § 1400-1417
20 U.S.C. §§1400 et seq.
29 U.S.C. 794
42 U.S.C. 12101, et seq.

Cross References

Code

AC

AC-R(2)

Description

[Special Education](#)

[Retention of Individualized Education Programs](#)

Description

[Standards for the Education of Students With Disabilities](#)

Description

[Nondiscrimination on the Basis of Handicap](#)

[Assistance to the States for the Education of Children with Disabilities](#)

Description

[Individuals with Disabilities Education Act \(IDEA\)](#)

[Individuals with Disabilities Education Law](#)

[Rehabilitation Act of 1973 \(Section 504\)](#)

[Title II of The Americans with Disabilities Act of 1990](#)

Description

[Nondiscrimination, Equal Opportunity Employment, and Anti-Discrimination Plan](#)

[Nondiscrimination, Equal Opportunity Employment, and Anti-Discrimination Plan - Annual Notice of Contact Information](#)

ACE	<u>Procedural Safeguards: Nondiscrimination on the Basis of Disability</u>
IHBAA	<u>Evaluation Requirements for Children With Specific Learning Disabilities</u>
IHBAB	<u>Special Education Evaluations</u>
IHBAC	<u>Developmental Delay as Qualifying Disability</u>
IHBAM	<u>District Special Education Policy and Procedures Manual</u>
IKFC	<u>Alternative Diploma for Students with Cognitive Disabilities</u>
JICD	<u>Student Discipline and Due Process</u>
JICD-R(1)	<u>Student Discipline and Due Process - Memorandum of Understanding</u>
JICK	<u>Pupil Safety and Violence Prevention</u>
JICK-R(1)	<u>Pupil Safety and Violence Prevention - Report Form</u>
JICK-R(2)	<u>Pupil Safety and Violence Prevention - Bullying Report Form</u>
JICK-R(3)	<u>Pupil Safety and Violence Prevention - School Board Notification of Bullying Report</u>

Start the policy language here.

Legal Reference:

First Reading:

Second Reading:

Final Adoption:

Revision:

JRA - STUDENT RECORDS and ACCESS (FERPA)

Category: Recommended

Mentioned Policies: ILD

- A. **General Statement**. It is the policy of the School Board that all school district personnel will follow the procedures outlined herein as they pertain to the maintenance of student records. Furthermore, it is the policy of the School Board that all school district personnel will follow the provisions of the Family Educational Rights Privacy Act (FERPA) and its corresponding regulations.
- B. **"Education Record"**. For the purposes of this policy and in accordance with FERPA, the term "educational record" is defined as all records, files, documents and other material containing information directly related to a student; and maintained by the school district; or by such other agents as may be acting for the school district. Such records include, but are not limited to, completed forms, printed documents, handwriting, videotape, audiotape, electronic or computer files, film, print, microfilm and/or microfiche. Educational records do not include records of instructional, supervisory, and administrative personnel and educational personnel ancillary thereto which are in the sole possession of the maker thereof and which are not accessible or revealed to any other person except a substitute.
- C. **"Directory Information"**. For the purposes of this policy, and in accordance with the provisions of FERPA and New Hampshire RSA 189:1-e, the term "directory information" means:
1. Student name(s), address(es), telephone number(s), and date(s) of enrollment;
 2. Parent/guardian name(s) and address(es);
 3. Student grade level, enrollment status and dates of attendance;
 4. Student photograph(s);
 5. Student participation in recognized school activities and sports;
 6. Athletic team member weight and height;
 7. Post-high school plans; and
 8. Student diploma(s), certificate(s), award(s), or honor(s) received.

Except for elements of a student's directory information which the student's parent or an eligible student has notified the District not to disclose, the District may release or disclose student directory information without prior consent of the student's parent/eligible student. Within the first three weeks of each school year, the District will provide notice to parents/eligible students of their rights under FERPA and that the District may publish directory information without their prior consent. Parents/eligible students will be given until September 30th to notify the District in writing of any or all directory information

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items that they refuse to permit the District to release or disclose. Notice from a parent/eligible student that any or all directory information shall not be released will only be valid for that school year and must be re-issued each school year.

- D. **"Personally Identifiable Information"**. "Personally identifiable information" is defined as data or information which makes the individual who is the subject of a record known, including information such as: a student's name; the student's or student's family's address; the name of the student's parent or other family members; a personal identifier such as a student's Social Security number; the student's date of birth, place of birth, or mother's birth name. "Personally identifiable information" also includes other information that, alone or in combination, is linked or linkable to a specific student; that would: allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with a reasonable certainty; or other information requested by a person whom the District reasonably believes knows the identity of the student to whom the education record relates.
- E. **FERPA Definition of "Parent"**. For the purposes of this policy, the term parent shall mean and include a natural. parent, a guardian, or an individual acting as a parent in the absence of a parent or guardian, and all of their plural or singular forms.
- F. **Annual Notification/Rights of Parents and Eligible Students**. Within the first four weeks of each school year the District will publish notice to parents and eligible students of their rights under State law, Federal law, and this policy. The District will send a notice listing these rights home with each student. The notice will include:
1. The rights of parents or eligible students to inspect and review the student's education records;
 2. The intent of the District to limit the disclosure of information in a student's record, except: (a) by the prior written consent of the parent or eligible student; (b) as directory information; or (c) under certain, limited circumstances, as permitted by law;
 3. The right of a student's parents or an eligible student to seek to correct parts of the student's educational records which he/she believes to be inaccurate, misleading, or in violation of student rights; this includes a hearing to present evidence that the records should be changed if the District decides not to alter them according to the parent's or eligible student's request;
 4. The right of any person to file a complaint with the United States Department of Education if the District violates FERPA; and
 5. The procedure that a student's parents or an eligible student should follow to obtain copies of this policy.

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- G. **Procedure To Inspect Education Records.** Parents or eligible students may inspect and review that student's education records. In some circumstances, it may be more convenient for the record custodian to provide copies of records.

Since a student's records may be maintained in several locations, the school Principal may offer to collect copies of records or the records themselves from locations other than a student's school, so that they may be inspected at one site. If parents and eligible students wish to inspect records where they are maintained, school Principals will determine if a review at that site is reasonable.

Although not specifically required, in order that a request is handled in a timely manner, parents/eligible students should consider submitting their request in writing to the school Principal, identifying as precisely as possible the record or records that he/she wishes to inspect. The Principal will contact the parents or the eligible student to discuss how access is best arranged for their inspection or review of the records (copies, records brought to a single site, etc.).

The Principal will make the needed arrangements as soon as possible and notify the parent or eligible student of the time and place where the records may be inspected. **This procedure must be completed within fourteen (14) days of when the request for access is first made.** *Note: the fourteen (14) day limit is required under New Hampshire RSA 189:66, IV, in contrast to the forty-five (45) day period otherwise allowed under FERPA.*

If for any valid reason such as the parent's working hours, distance between record location sites or the parent or student's health, a parent or eligible student cannot personally inspect and review a student's education records, the Principal may arrange for the parent or eligible student to obtain copies of the records.

When records contain information about students other than a parent's child or the eligible student, the parent or eligible student may not inspect and review the records of the other students. If such records do contain the names of other students, the Principal will seek consultation with the Superintendent and/or the District's attorney to determine how best to proceed. ***Where practicable, it may be necessary to prepare a copy of the record which has all personally identifiable information on other students redacted, with the parent or eligible student being allowed to review or receive only a copy of the redacted record. Both the original and redacted copy should be retained by the District.***

- H. **Procedures To Seek To Correction of Education Records.** Parents of students or eligible students have a right to seek to change any part of the student's records which they believe is inaccurate, misleading, or in violation of student rights. FERPA and its regulations use both "correct/ion" and "amend." For the purposes of this policy, the two words (in all of their respective forms) shall mean the same thing unless the context suggests otherwise. To establish an orderly process to review and correct (amend) the

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education records for a requester, the following processes are established.

1. **First-level decision.** When a parent or eligible student finds an item in the student's education records that he/she believes is inaccurate, misleading or in violation of student rights, he/she should submit a written request asking the building Principal to correct it. If the records are incorrect because of clear error and it is a simple matter to make the change, the Principal should make the correction. If the records are changed to the parent's/eligible student's satisfaction, both parties shall sign a document/form stating the date the records were changed and that the parent/eligible student is satisfied with the correction.

If the Principal believes that the record should not be changed, he/she shall:

- a. Provide the requester with a copy of the questioned records at no cost;
 - b. Ask the parent/eligible student to initiate a written appeal of the denial of the request for the change, which will be forwarded to the Superintendent;
 - c. Forward the written appeal to the Superintendent; and
 - d. Inform the parents/eligible student that the appeal has been forwarded to the Superintendent for a decision.
2. **Second-level decision.** If the parent/eligible student wishes to challenge the Principal's decision to not change the student record, he/she may appeal the matter to the Superintendent. The parent/eligible student shall submit a written request to the Principal asking that the matter be appealed to the Superintendent. The Principal will forward the appeal to the Superintendent.

The Superintendent shall, within ten (10) business days after receiving the appeal:

- a. Review the request;
- b. Discuss the request with other school officials;
- c. Make a decision whether or not to make the requested correction to the educational record;
- d. Schedule a meeting with the parents/eligible student if the Superintendent believes such a meeting would be necessary; and
- e. Notify the parents/eligible student of the Superintendent's decision on their request to correct the student's educational record.

If the Superintendent determines the records should be corrected, he/she will make the change and notify the parents/eligible student in writing that the change has been made. The letter stating the change has been made will include an invitation for the parent/eligible student to inspect and review the records to verify that the records have been corrected and the correction is satisfactory. If the records are changed to the parent's/eligible student's satisfaction, both parties shall sign a document/form stating the date the records were changed and that the parent/eligible student is satisfied with the correction.

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If the Superintendent determines the records will not be corrected, he/she will notify the parents/eligible student in writing of his/her decision. Such a letter will also notify the parents/eligible student of their right to an appeal hearing before the School Board.

3. **Third-level decision.** If the parents or eligible student are not satisfied with the Superintendent's decision, they may submit a written request for a hearing before the School Board. The parents/eligible student shall submit the request for a hearing with the Superintendent within ten (10) business days of the date of the Superintendent's written decision in Section H.2, above. The Superintendent will inform the School Board of the request for a hearing and will work with the School Board to schedule a hearing within forty five (45) days of receipt of the request. Once the meeting is scheduled, the Superintendent will inform the parents/eligible student in writing of the date, time, and place of the hearing.

The hearing will be held in a non-public session consistent with the provisions of RSA 91-A:3, unless the parent/eligible student requests that the hearing be held in public session. The School Board will give the parent/eligible student a full and fair opportunity to present evidence relevant to the issues raised under their request. The parents/eligible students may be assisted or represented by one or more individuals of their own choice, including an attorney.

The School Board will issue its final decision in writing within thirty (30) days of the hearing, and will notify the parents/eligible student thereof via certified mail, return receipt requested. The School Board will base its decision solely on the evidence presented at the hearing. The School Board's written decision will include a summary of the evidence and the reasons for its decision.

If the School Board determines that the student record should be corrected, it will direct the Superintendent to do so as soon as possible. The Superintendent will then contact the parents/eligible student for a meeting so they can review and inspect the records to verify that they have been corrected. At this meeting, both parties shall sign a document/form stating the date the records were corrected and that the parent/eligible student is satisfied with the correction.

The School Board's decision will be final, except as otherwise provided by law.

4. **Parent/Eligible Student Explanation to be Included in Record.** Notwithstanding the resolution of any request to correct a student's record(s), in accordance with section (a)(2) of FERPA, a parent or eligible student may insert into that student's educational record a written explanation regarding the content of the record.
 1. **Disclosure of Student Records and Student Information.** In addition to directory information, the District may disclose student records and student information without consent to the following parties on the condition that the recipient agrees not to permit any other party to have access to the released information without the written consent of

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the parents of the student, and under the conditions specified.

1. *School officials with a legitimate educational interest.* A school official may only access student records when the school official has a legitimate educational interest.
 - a. *"School officials"* means persons employed or used by the District to perform institutional services and functions, and includes such persons as teachers, instructional aides, administrators, including health or medical staff, school resource officers, and third parties such as contractors, attorneys, consultants, and volunteers. Such third party school officials may access student records provided such persons are:
 1. Under the District's direct control with respect to the use and maintenance of education records; and
 2. Prohibited from disclosing the information to any other party without the prior written consent of the parent/eligible student, or as otherwise authorized by law.
 - b. *"Legitimate educational interest"* includes performing a task or engaging in an activity related to (i) one's regular duties or professional responsibilities, (ii) a student's education, (iii) the discipline of a student, (iv) a service to or benefit for a student, (v) measures to support student success, and (vi) the safety and security of the campus.
2. *Other schools into which a student is transferring or enrolling*, upon condition that the student's parents be notified of the transfer, receive a copy of the record if desired, and have an opportunity for a hearing to challenge the content of the record. This exception continues after the date that a student has transferred
3. *Officials for audit or evaluation purposes.*
4. *Appropriate parties in connection with financial aid.*
5. *Organizations conducting certain studies for, or on behalf of, the School District.* Student records or student information will only be provided pursuant to this paragraph if the study is for the purpose of: developing, validating or administering predictive tests; administering student aid programs; or improving instruction. The recipient organization must agree to limit access to the information and to destroy the information when no longer needed for the purpose for which it is released. Additionally, any such studies must comply with the provisions of Board policy ILD.
6. *Accrediting organizations.*
7. *Judicial orders or lawfully issued subpoenas*, upon condition that parents and the student are notified of all such orders or subpoenas in advance of compliance therewith by the District, except when a parent is a party to a court proceeding involving child abuse or neglect or dependency. The Principal shall consult with the Superintendent and legal counsel as needed to ensure compliance with the judicial order and applicable law.

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8. *Health and safety emergencies.*

- J. **Maintenance of Student Records and Data.** The Principal of each building is responsible for record maintenance, access, and destruction of all student records. All school district personnel having access to records shall place great emphasis upon privacy rights of students and parents.

All entries into student records must be dated and signed by the person accessing such records.

The principal will ensure that all records are maintained in accordance with applicable retention schedules as may be established by law.

- K. **Disclosures Made From Education Records.** The District will maintain an accurate record of all requests for it to disclose information from, or to permit access to, a student's education records and of the information it discloses and persons to whom it permits access, with some exceptions listed below. This record is kept with, but is not a part of, each student's cumulative school records. It is available only to the record custodian, the eligible student, the parent(s) of the student or to federal, state, or local officials for the purpose of auditing or enforcing federally supported educational programs.

The record includes:

1. The name of the person who or agency which made the request;
2. In the event of a health and safety emergency, the articulable and significant threat to the health or safety of a student or other individuals that formed the basis for the disclosure; and the parties to whom the agency or institution disclosed the information;
3. Whether the request was granted and, if it was, the date access was permitted or the disclosure was made;
4. The date on which the person or agency made the request; and
5. The interest which the person or agency has in the information.

The District will maintain this record as long as it maintains the student's education record. The records do not include requests for access or information relative to access which has been granted to parent(s) of the student or to an eligible student; requests for access or access granted to officials of the District who have a legitimate educational interest in the student; requests for, or disclosures of, information contained in the student's education records if the request is accompanied by the prior written consent of a parent/eligible student or if the disclosure is authorized by such prior consent or for requests for, or disclosures of, directory information designated for that student.

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The records of a request for the correction of an educational record, including any appeal of a denial of that request, if the educational record is ultimately corrected shall not be treated as part of the educational record of the student and shall be preserved separately

District Policy History:

First Reading: September 14, 2010

Second Reading: October 12, 2010

Final Adoption: October 12, 2010

Reviewed: January 13, 2015, February 17, 2015

Revised: February 17, 2015

Legal References:

NH Statutes		Description
RSA 189:1-e		<u>Directory Information</u>
RSA 189:66		<u>Data Inventory and Policies Publication</u>
RSA 91-A:5,III		<u>Exemptions, Pupil Records</u>
Federal Regulations		Description
34 CFR. Part 99		<u>Family Educational Rights and Privacy Act Regulations</u>
Federal Statutes		Description
20 U.S.C. §1232g		<u>Family Educational Rights and Privacy Act (FERPA)</u>

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

**WILTON-LYNDEBOROUGH COOPERATIVE
SCHOOL BOARD MEETING
Tuesday, May 13, 2025
Wilton-Lyndeborough Cooperative M/H School
6:30 p.m.**

The videoconferencing link was published several places including on the meeting agenda.

Present: *Dennis Golding, John Zavgren (6:32pm), Michelle Alley, Paul White, Erin Collins, Darlene Anzalone, Diane Foss, and School Board Student Representative Andie White*

Superintendent Peter Weaver, Principals Tom Ronning and Bridgette Fuller, Assistant Principal Katie Gosselin, Director of Student Support Services Ned Pratt, Technology Director Nicholas Buroker, Curriculum Coordinator Samantha Dignan, and Clerk Kristina Fowler

I. CALL TO ORDER

Chairman Golding called the meeting to order at 6:30pm.

II. PLEDGE OF ALLEGIANCE

The Pledge of Allegiance was recited.

III. STUDENT/STAFF ACKNOWLEDGEMENT

Principal Fuller honored several students from FRES as Responsibility CARES Ambassadors. Students include Ethan Gamby, TJ Guay, Hailey Porter, Lillyanna Robinson, Avery Herlihy, Darcy Conway, Lenaya Batchelder, Katie Rawson, Ephraim Morgan, Nadine Vanderhoof, and Sage Trudeau. Principal Fuller reviewed the many reasons these students deserve the title of Responsibility Ambassadors. Students received a round of applause.

IV. ADJUSTMENTS TO THE AGENDA

Superintendent requested to add Mr. Buroker to request use of unspent funds for Chromebooks to the agenda. Chairman Golding suggested it be added as an addendum to the Technology Committee Report.

*A MOTION was made by Mr. White and SECONDED by Ms. Collins to accept the adjustments to the agenda.
Voting: all aye, motion carried.*

V. PUBLIC COMMENTS

The public comment section of the agenda was read. Superintendent called out all the phone numbers and names joined in the meeting asking if they wanted to comment. There were no comments to report.

VI. BOARD CORRESPONDENCE

a. Reports

i. Superintendent's Report

Superintendent spoke regarding the facilities manager interviews. There were 8 applicants, narrowed down to 5 who were interviewed by the committee. The committee consisted of the Superintendent, custodians Ann Bird, Pete Stephenson, Principal Ronning and Ms. LaPlante. Each interview was about 30-35 minutes in length, it was not an easy decision, but the team deliberated with some disagreements and came down to 2 finalists. The 2 finalists will tour the buildings tomorrow and there is another opportunity to ask questions and will see if the conclusion aligns with the committee. If all goes well hopefully a contract will be offered and we can present a candidate to you at the next meeting. He thanked Roger Spurrell for the part-time work he has been doing outside at the schools. He has been cutting the grass, spreading mulch and has been able to step into that position and work independently, which he appreciates.

ii. Student School Board Report

Ms. Andie White, MS Board Representative, wanted to bring to the Board's attention the incident with the Chromebook. She is aware it was dealt with but wanted to know why there was no evacuation as the room had smoke and it is toxic. The next day it still smelled like smoke, and we had kids in there. She doesn't think kids should have been in there because it is very toxic to animals and humans. She spoke of testing happening in the school and going well. Kids are excited with school ending. There is a teacher leaving at the end of the year and they have been making a quilt in FACS and cookies and in Ms. Norton's class they are making notes. Board members thanked her for asking the question about the Chromebook and Ms. Collins offered to help with quilt if they needed it. Principal Ronning will address the Chromebook question during his report.

iii. WLCTA Report

Ms. Morgan Kudlich reported on FRES and LCS.

- 5th grade will be going on a field trip around the towns of Wilton and Lyndeborough later this month.

- 2nd grade will be going on their yearly trip to Odiorne State Park and the Seacoast Science Center.
- Kindergarten students will have their Step-Up Day at the end of May when they get a chance to visit FRES and meet the 1st grade teachers. They will also be going on a June field trip to the Friendly Farm to visit the animals!
- 1st grade is going on a field trip to the Peabody Mill in Amherst.
- 3rd Grade is going on a field trip to the Squam Lakes Natural Science Center in Holderness, NH.
- The entire 1st grade class created a book, and now they are all published authors!
- 5th Grade Graduation is June 4th.
- FRES Field day is June 5th, and LCS Field Day is June 6th. Reach out to the PTO if you would like to volunteer for either event!
- The final musical event of the year is May 29th at 6pm, featuring 4th & 5th grade band students and 3rd-5th grade singers performing a program of songs about America!

Ms. Erin Rosana reported for WLC.

- Students from grades 10-12 went to Washington DC May 5-8. Thanks to Katy Morshed for making this trip possible and to Zac Provost, Katie Gosselin, and Alice Bartoldus for chaperoning!
- Junior/Senior Prom was May 10th at Alpine Grove. Thank you to all community members who have donated at fundraisers to make prom possible!
 - Special thanks to Lynne Crouse who was our photographer, as well as the teachers who served as chaperones! We feel very thankful to have such a supportive community of people to be there for the kids.
- Senior Project presentations are happening Thursday, May 15th. Special thanks to Bill Comerford for leading the Senior Project program and thanks to all teachers who served as mentors.
- May 16th - Early release PD Day
 - A number of teachers across grade levels have volunteered to run PD sessions in their areas of expertise, including but not limited to the use of Canva to enhance learning, foundational reading skills, and using Google suite.
- WLC's Spring Concert will be Thursday, May 15th at 6pm. Our theme this year is musical theatre and will feature both middle school and high school band and chorus. We will also have four seniors presenting solos that they have been working hard on. Come listen to our talented students in the WLC cafeteria at this free event.
- Senior Awards night is May 22; the Junior class will be hosting a potluck dinner for seniors beforehand.
- Teachers are working hard to ensure that both seniors and other grades are prepared for final exams; seniors take their exams May 21, 22, and 27th.

Ms. Anzalone voiced appreciation for everyone involved in the DC trip. She suggests announcing it earlier to give more time to save up for it. It was confirmed senior graduation is May 30 at 7pm, WLC. Ms. Rosana informed the Board that this will be their last report, Ms. Rosana and Ms. Kudlich will be stepping down from their WLCTA co-president roles although will continue to be involved. Ms. Rosana thanked the Board for the good working relationship, and they will be working with the replacements to continue fostering that relationship between the WLCTA and School Board. They appreciate the community and being able to share with the Board each month and know they are listening. Chairman Golding thanked them noting it has been a great experience.

iv. Principal's Report

Principal Fuller thanked Ms. Alley for giving out the Responsibility Ambassador certificates to the students. She thanked Ms. Collins for making the "SOS we need substitute" signs. She informed them we have a new substitute applicant! She spoke of interviews for open positions have started, they have finalists for the counselor position. There has been an increase in behavior events in the month of April, rising to 21. When she analyzed the data there were 17 students responsible for the 21 behaviors and 8 are part of the IEP process or 504, all supportive students, the others were learning opportunities. A question was raised if she had an idea of what triggered those. Principal Fuller spoke of it being a tough time for kids with a week of vacation that month. Ms. Alley asked if she considered an escalation, which Principal Fuller responded definitely. Ms. Alley asked if it was the same children in December and November that made up the 17 students. Principal Fuller confirms that 8 have consistently received supports for their behaviors. She confirms that the number of in and out of school suspensions is higher than last year at this time. She spoke of summer programs such as theatre camp that still in the works with more information to come.

Principal Ronning commented that it is amazing how much can happen in a week! He spoke of being proud of the staff in the 2 years he has been here they have worked hard on curriculum. When NEASC came they didn't have a written curriculum, and we can now say we have an official curriculum. He sent the Association a follow-up letter to the one in the packet saying they have achieved this. Assessments are happening and he continues to send out notes of appreciation to students and parents and parents consistently come to the office with concerns about how to move the school forward. He spoke of receiving a number of calls from parents, and they also call parents with both positives and concerns. The feedback being received is positive and he

appreciates this. He spoke to Ms. White's question about why they did not evacuate during the Chromebook incident. It is amazing when you look at emergency situations and the question is always how will you react to it. He informs the group the number one response he gets is to call the office. On the day of the incident, when Mr. Buroker arrived, the smoke was contained in the room. The windows were open, and it created a vacuum going out the windows and they believed they had it contained. Mr. Buroker took care of the computer; the remainder of the day was not interrupted. They had some parents call with concerns and he called the fire chief and explained the situation and how they handled it, and the fire chief said it was handled appropriately. They are planning further conversations over the summer on how to improve. He notes if it happens again don't call the office, go to the nearest pull station to pull it and evacuate the building. He informs the group that at every exit you will find a pull station. Pull it as you exit and they will deal with it; he would rather have it done that way rather than get a phone call. He confirms Mr. Buroker took the computer, they have the individual responsible and the situation was handled, and they moved forward. Ms. Anzalone spoke of the message received being vague that went out and heard about it when her kids got home. She suggested also sending out something cautionary with more information about potential risks and what to look for. Principal Ronning confirmed it was part of the TikTok challenge and there have been 20 in NH and considerably more in other states. A question was raised with the no cell phone policy, did the videographer suffer consequences as well. Principal Ronning confirms they are not sure which individual actually was responsible for posting it. He confirms they continue to work on the cell phone concerns. Mr. Zavgren suggested next time there is a fire drill that it is a good time to show students/staff where the pull stations are. A question was raised whether the students have any idea that it is a discussion at the Board level? Principal Ronning responded to the most recent incident, the individual was very aware it was coming to the Board. He spoke of bringing students to the Board last year and when they have discussions with students, they do tell them they will move it up the chain of command from Superintendent to the Board regarding unacceptable behavior. Often students hear them, but he did have one student who had to go before the Board say he never thought Principal Ronning would actually do it. When you say something, you have to mean it and provide a school conducive to learning and to be the best version of self and if not hold them accountable and educate them for next time. Did they learn from their mistake, do they understand what they did was wrong? It can be as simple as hanging out in the bathroom or picking on each other, do they understand why it is wrong and that it can have lasting effects on other students. We are making sure when they leave here, they are productive members of society. The Superintendent added when Principal Ronning reached out to him to alert him of the incident his only question was are the kids safe and he said they were and that is our priority. Principal Ronning has more years of experience as a principal than the Superintendent does and the problem that caused it was contained, and we would deal with the consequences after. Last year there were thousands of dollars in damage in the bathrooms, we were fed up. He spoke of the way the media is today, they were afraid kids might go home and do it (Chromebook challenge) and cause damage. In hindsight we should have sent home links about inhalation as a precautionary measure even though we didn't think it happened, and we may meet with the Fire Chief and get some resources for us. If we figure out who did the filming, it will be a real problem for the student as it's a crime and we would have recommended the police take action. Even in the MS sometimes we do silly things and damaging school property is a crime in this state. A question was raised if the students must pay for the equipment and how the video happened. Principal Ronning responded that he doesn't want to get into too much detail, the video shows the computer smoking not the how to. The student received suspension and did get an invoice to replace the computer and received 30 hours of community service with our technology department and he feels the consequences met the incident. It was noted that having to pay for a Chromebook is written in our Technology Plan and the parents should receive a copy. A brief discussion was had of letting parents know when something is circulating on social media, so they know what to look for. Principal Ronning agreed and reminds the group that on the website there is a red triangle where they post alerts at the school, you can get written information there by date. In addition to that, on that day a 2nd message was sent to parents alerting them to be aware that students can do this with their computer and to talk to them about it. The worst case-scenario is if the child did it in their house and it led to a house fire. He agrees with the Superintendent that they could send something out with regard to inhalation/chemicals and what to look for. A question was raised how often fire safety rules are gone over. Principal Ronning responded, at the beginning of the year and it is done another time plus, even if we go outside, we are having conversations. We have gone through ALICE, and we talk through all of those pieces. We had police, EMS, the Fire Chief and all had conversations, and our next meeting is June 23, all making sure we have a safe environment. Discussions continued about communicating with parents. Assistant Principal Gosselin spoke about the discipline data she provided saying that the HS looks really good especially it being a tough time for kids and staff. In MS there was a spike of 21 with some repeat incidents. Typically, it is repeat offenders, class disruptions and theft that made up the 21. A question was raised what is being stolen. Assistant Principal Gosselin confirms theft of a tennis ball (goes to the bottom of the chairs) and a teacher's pen. There was a very limited number of students involved. Principal Ronning spoke to what the Superintendent had said previously about vandalism and theft that was happening a couple years ago with students wanting to meet the TikTok challenges. We don't steal from one another in this school; we support one another and don't take from one another. Typically, we use restorative practice but with repeat offenders the consequences get bigger as we go along. Superintendent spoke about this being a difficult time for students academically the work gets harder as the year is coming to an end and that speaks to Principal Fuller's data too as he would expect the incidents would increase. The other piece is some kids are disappointed that the year is ending and for some kids the school is the only nurturing place they have, and kids can get anxious with that ending. We try to mitigate it with some of our more fragile students who may manifest some of these things and we need to be cognizant of it as staff know there may be other things going on. He knows the numbers look high, but students bring challenges and every school struggles with this and coming out of COVID he is pleased there is a small number of students and this summer they will dig deeper to see if we could have done anything better. The kids will be with us for a long time and sometimes the support we have we could miss something or not try something. We will review the discipline data and

look at the profile of the “highflyers”, so we have some things in place to anticipate the transition back to school in August and September. Assistant Principal Gosselin confirms both at the MS and HS there were all classroom incidents relating to bullying. The HS one was founded and required a safe schools report with the police. The MS one was a potential but because we had some good students coming forward with information it was not. A brief discussion was had regarding summer opportunities for kids. Assistant Principal Gosselin confirms the musical theater camp they are looking at is for K-12. They also have Ms. Bartoldus working on something for mental health but that is not worked out yet. It would be similar to what they did during COVID with Fun Fridays. They also have competency recovery and ESY. She confirms they are not doing the math or science summer camps that was done with ESSER money, and the theatre camp will be through a grant. It was suggested to publish what the libraries have going to inform parents better. Superintendent added they are working with the athletic department and talking about for a long-time having summer camps and maybe we can start one now. We are looking at all angles to keep kids in the buildings as much as we can, but it costs money. Kids love the camps, but it is a matter of whether we can pull it off or not. It was suggested to use kids to volunteer to help. Assistant Principal Gosselin spoke of how amazing the kids were on the DC trip. The bus driver said they were one of the best groups he has ever taken. In the holocaust museum, at the end some of our kids said that other school groups didn’t take their hats off and were talking during the clips. They were actually talking to her about the behaviors of other schools’ children. We have awesome kids! She spoke of the Perry scholarship, which is a big one, it is awarded to students who uphold usually a C plus average or B minus average throughout their four years. We have 5 recipients this year totaling \$65,000 per year. It is being awarded to Jared Clark, Mia Gorman, Noah Jaffy, Lily Gibson and Christian Balusek. It is amazing because we compete with Milford for that scholarship and seeing it go to 5 recipients is really great. Earth Day was a huge success and step up night is June 3. She gave a shout out to Ms. Erin Rosana who runs NHS, has been Union President and doing all these things behind the scenes. She is a class advisor, was in charge of prom and not for the 1st time either. She organizes the upcoming France and England trip. She can’t even tell you how much she is involved in and not seeing her every month here will be rough, but she is glad she is taking somewhat of a break. Thank you to Ms. Rosana! A question was raised if on the DC trip they meet anyone from Congress. Assistant Principal Gosselin responded no but when someone walked by Mr. Provost would quiz them about who they thought it was. Superintendent said that it is a goal they have, there is a program called Close Up. First, they needed to break the ice and get the trip back on. Parents invest in this and kids, the next step is how to make it better with something like meeting Congress members and meeting other groups and other ways to kick it up a notch academically. Ms. Collins spoke of a program called Democracy Summer and if there is interest, she can see if she can get a meet and greet arranged. Ms. Anzalone suggested seeing if there is a way to partner with other schools to decrease the cost by sharing a bus etc.

v. Curriculum Coordinator’s Report

Ms. Dignan reported PD is coming up on Friday. Ms. Rosana is teaching Canva, Ms. Bertoncini is doing CPR training, it will be an exciting day. Over the summer, teachers at FRES are going to Responsive Classroom training and the HS social studies teachers including Ms. Rosana, have signed up to learn about the new minimum standards and what we need to do as a social studies department to makes sure we are hitting all of those new standards. The NHSAS and iReady testing are all underway and some grades are completed with all of them. Ms. Kudlich and Ms. Anderson are going to work together to do the week-log theater program, we are in the process of getting funding for that and everything squared away. Ms. Bartoldus is working on a mental health program for incoming 6th and 12th graders; it is not finalized as of yet. Ms. Anzalone thanked her for the curriculum piece. She asked for several years to see it and now it is posted. Superintendent spoke to that, when he came here 5 years ago he was astonished because he didn’t know what the teachers were teaching, there were a lot of gaps and incompletes. Teachers were working doubly hard but were not making any headway. He is happy to say that with the right staff and curriculum coordinator we can finally check that box. A lot of credit goes to Ms. Dignan for sticking with it and not waiting for the next Superintendent to come because it was not a priority.

VII. COMMITTEE ASSIGNMENTS

Chairman Golding reviewed we have 2 openings for board members; one is for Facilities Committee and the other is on the Strategic Planning Committee. Ms. Alley agreed to be on the Facilities Committee for now and Ms. Anzalone asked to continue on the Strategic Planning Committee.

A MOTION was made by Ms. Foss and SECONDED by Mr. White to approve Ms. Alley to be on the Facilities Committee and Ms. Anzalone to be on the Strategic Planning Committee.
Voting: all aye, motion carried.

Chairman Golding asked Ms. Alley, Mr. Zavgren and Ms. Collins to reach out to Ms. LaPlante and the Superintendent and schedule a meeting for the Facilities Committee. Ms. Anzalone asked if there should be another community member to take over her position as community member on the Strategic Planning Committee. Chairman Golding responded we can ask for a 4th and run an ad for it but we can get the committee going anyway. Superintendent added they can get the Facilities Committee going and Mr. Allen can sit in on the 1st meeting. Mr. Allen in the audience agreed. He is already on the Strategic Planning Committee. Ms. Anzalone asked if we could open the committee up to students. Superintendent responded he has never seen students on the Board committees, he doesn’t want to say no but it is a high-level conversation but is not opposed to it. Chairman Golding asked if it is something the student board representatives can talk to their peers about. Superintendent suggested having that stakeholder group with a couple of students in leadership roles such as class president or NHS, maybe they are not standing members and are invited when certain topics are being discussed. He is not opposed to student’s having a voice. There was a

brief discussion about this including when we talk about sending students out of the district to other schools he wants to hear from the student leaders in the school who can speak for the students or student athletes maybe going to a school that has cuts in athletics, how does that make them feel or their siblings behind them. He thinks that conversation is really important. The Board was asked if there is any objection to having the Superintendent speak with Principal Ronning and Assistant Principal Gosselin about this. No objection heard. Chairman asked the board members of both the Facilities Committee and Strategic Planning Committee to work with Ms. LaPlante and the Superintendent to schedule meetings.

VIII. PRINCIPAL INTERVIEW PROCESS

Superintendent reviewed the proposed process. Currently there are 8 applicants, and he is shooting for the interviews to happen on May 22 or May 28. They feel they can narrow down the 8 to 3 strong candidates to interview, set up a schedule of 2 hours to include 3 rotations with 3 groups of teacher leadership at FRES which Principal Fuller would facilitate, the 2nd group would consist of board members and PTO members facilitated by Ms. Dignan and the 3rd group would be administration leadership facilitated by Principal Ronning. A handler will be assigned to each one to show them where to go and track the time. He spoke of the importance of those running on time as there is a ripple effect if they run over. It needs to be well-organized, and candidates need to rotate at the appropriate times. Everyone will have the opportunity to list their strengths and weaknesses and narrow them down to 2 finalists. A community meet and greet would be held for the community, ask questions and provide written comments. Hopefully we can have a nomination for the June 10 board meeting to present. He asked if the Board wanted to be more involved than that, he has seen the Boards interview and choose the candidate and is open to ideas on how they want to do it. If they are OK with the process he presented, they can get started looking at candidates tomorrow and start making calls. If the Board would like to choose board members to be in one of the groups, he asks that it be done tonight. He then suggested instead sending all the members the date and time for the interviews and as many of them can come should and those who cannot, can meet the finalists at the community night. The interviews time will be 5:30pm-7:30pm or 6pm-8pm. He wants to be cognizant of staff and families who are all out at this time of year. Chairman Golding asked if any board members volunteer, Chairman Golding, Ms. Foss and Ms. Collins volunteered. Superintendent confirms there would be 3 candidates to interview, and the candidates would rotate between the 3 groups and ask questions to them as a team. Let's assume all board members will be available and anyone who can attend will. Chairman Golding asked if there is any objection to the process, no objection heard.

IX. ACTION ITEMS

a. Approve Minutes of Previous Meeting

A MOTION was made by Mr. White and SECONDED by Ms. Foss to approve the minutes of April 22, 2025, as written. Voting: six ayes, one abstention from Ms. Anzalone, motion carried.

X. COMMITTEE REPORTS

i. Technology Committee

Chairman Golding reported the committee met last Thursday, Chairman is Mr. Zavgren, and he is Vice Chair. Mr. Zavgren reported the committee discussed migrating our domain, we can repost or transfer our domain name instead of winging it ourselves, we can join a bigger group, a .GOV domain and can be SAU63.NH.gov vs. SAU63.org which sounds like a great idea because of one of the attack services for a domain is the registration information and you want to make sure that is locked down nice and tight. He spoke of it being a bad idea to expect every SAU in NH to have somebody on staff who could administrate that, it takes specialized skills. He thinks it is better if we move over to that government domain from our own domain and that frees up Mr. Buroker to do other more important things. He spoke of the downside being everyone's email address changes and any embedded links on the website will be broken, there is some pain involved but he thinks it's a good idea. The other thing they talked about is locking down our website and removing a lot of details to make things a little bit clearer. There are basically 2 things you do, you read it, and you write it. There should be a handful of trusted people that write it and thinks we want to make sure that those accounts use multifactor authentication for access. The default which is a bad idea is to use a password to identify yourself, instead use a cell phone or have rotating passcodes with identifier and should have as many as can stand. They didn't talk about this in the meeting, but it occurred to him to ask if we move our domain to the .GOV domain who administrates the mail gateway when our mail comes through the .GOV domain and is that mail gateway effective in bringing spam down to a dull roar? He knows a lot of ransomware attacks are caused by phishing emails and if we have 1 or 2 really smart effective people working on keeping the spam out, that is probably better than a hundred different administrators all over the state trying to do the same thing. He also wonders what our ransomware policy for the school is. In case there is a ransomware attack what do we do? A discussion came up regarding Chromebooks. Chairman Golding explained it was about the cost for Chromebooks increasing between now and July and we will need 70 Chromebooks and may want to look at purchasing them now before that cost rises and use unspent funds. We will be trying to avoid the large increase in the budget next year. Mr. Buroker said that a lot has changed in a week. We were looking at an increase of 145% a week ago. When he made the budget, he didn't expect to pay more than he budgeted and with that in mind he brought the issue to the Technology Committee and the Superintendent suggested using unspent funds to get ahead of the price increase. Since then, the tariffs for computer chips have gone down and now we are only looking at a 30% increase. We need 70 student devices and 10 teacher Chromebooks for next year at a total with licenses of \$23,429.50. He thinks now is the time to purchase and leaves it up to the Board if they want to go for the full amount or just the 30% increase to prevent a budget overrun next year. He asks the Board to allocate unspent funds for the Chromebooks and associated license costs. The 30% cost would be \$7,029 (vs. \$23,429.50).

The Superintendent added this would be for Mr. Buroker to purchase now with the \$7,029 using unspent funds if we have them to offset the increase next year. A question was raised how much the budget is. Mr. Buroker responded, the lines total \$33,800 but that includes other items for replacement equipment. Ms. Anzalone suggested buying them now to save money next year as something else could come up, we don't know. Superintendent wanted it to be clear that they are only asking for the 30% increase of \$7,029 to offset the increase next year so that we buy the rest and stay within budget. If it goes beyond the 30%, we may not be able to purchase all we need. Superintendent spoke about being in an interesting spot this year with the fund balance. Typically, we have challenges in staffing and the majority of the fund balance is from salary and benefits with unfilled positions and being thoughtful with our spending. We are now really tight. He limits the request to only \$7,029 and if Ms. LaPlante comes back and says we have additional savings that would be another discussion. He recommends waiting until June 10 to see where we are with the operating budget and move forward with the \$7,029 now. We are fighting against the surplus in the warehouses now and it is a limited amount sitting in there and Mr. Buroker is trying to get them at this price point before they sell out. It was noted it is only for 90 days and who knows what will happen next. There was a brief discussion. Superintendent reiterated he is only asking for \$7,029, if we find our funds are robust then we will come back with any additional from Mr. Buroker, right now the only thing on the table is \$7,029. If approved Mr. Buroker will start right away making the purchases. Chairman Golding commends Mr. Buroker for looking into that because at the technology meeting, we were talking about \$23,000 and now it is only \$7,029.

A MOTION was made by Mr. White and SECONDED by Ms. Collins to authorize spending \$7,029 using unspent funds for the 30% increase in Chromebooks.
Voting: all aye, motion carried.

XI. RESIGNATIONS / APPOINTMENTS / LEAVES

a. Resignation-Danyel Chapman-IT Technician

Superintendent reviewed the resignation.

A brief discussion was had regarding opportunities for IT internships. Mr. Buroker currently has a student intern who will be graduating. Superintendent has suggested that perhaps he could come back and work in the summers. Chairman Golding noted there is support from the Board to float idea to the intern. Ms. Anzalone asked about opportunities to work with schools to do internships. Mr. Buroker spoke regarding some of the issues with that and the Superintendent added, often it is working with confidential information, and we want to be sure if we have an internship program which he would be in favor of that we need controls around security. Mr. Buroker has a potential student he is looking to replace the one graduating. It was noted if we could continue to have the students help maintain the Chromebooks it makes sense.

XII. PUBLIC COMMENTS

The public comment section of the agenda was read. Superintendent called out all the phone numbers and names joined in the meeting asking if they wanted to comment. There were no comments to report.

XIII. SCHOOL BOARD MEMBER COMMENTS

Ms. Alley congratulated the Responsibility Ambassadors; it is difficult to develop those skills and standing out for it is amazing. She recognized Ms. Andie White for bringing up the concerns of the MS to the Board. She has brought up concerns of the MS twice, it shows she is interested in school and wants to see it succeed. She thanked Principal Fuller, Principal Ronning and Assistant Principal Gosselin for constantly striving to make our schools amazing! It is an amazing community for her kids and gives a shout-out to them for doing it.

Mr. Zavgren thanked Mr. Buroker for doing a great job.

Ms. Collins looks forward to the summer programming and thanked those for working on it. Don't hesitate to reach out to her for help if needed.

Ms. Anzalone echoed the congratulations Ms. Alley voiced and thanked the PTO for the work done on Teacher Appreciation Week especially Mandy and Crystal. Ms. Rosana and Ms. Kudlich, great work in the WLCTA, it was great working with them on negotiations. She gave a shoutout to Ms. Rosana who is amazing and for putting up with her kids, being a class advisor. She does a lot now and is doing NHS and wanted to recognize her.

Chairman Golding congratulated the 5 students receiving the Perry Scholarship. He wanted to reiterate what Mr. Zavgren said about Mr. Buroker finding savings from a week ago to now when it was 5 figures and now it has dropped to 4, it will look good to the community next year and he appreciates that as a taxpayer. He thinks all was covered and he spoke about getting our kids to not do the Chromebook challenge, it is hurtful and could have been a lot worse.

XIV. NON-PUBLIC SESSION RSA 91-A: 3 II (A) (C)

A MOTION was made by Ms. Anzalone and SECONDED by Ms. Collins to enter Non-Public Session to review the non-public minutes RSA 91-A: 3 II (A) (C) at 8:32pm.

Voting: via roll call vote, all aye, motion carried.

RETURN TO PUBLIC SESSION

The Board entered public session at 8:47pm.

Superintendent encouraged members to attend graduation.

A MOTION was made to seal the non-public session minutes RSA 91-A: 3 II (A) (C) by Ms. Foss and SECONDED by Ms. Alley.

Voting: all aye, motion carried.

XV. ADJOURNMENT

A MOTION was made by Mr. White and SECONDED by Ms. Collins to adjourn the Board meeting at 8:53pm.

Voting: all aye, motion carried.

Respectfully submitted,

Kristina Fowler

DRAFT

ADB - DRUG FREE WORKPLACE & DRUG FREE SCHOOLS

Category: Required

Related Policies:

The Wilton-Lyndeborough School District will provide a drug-free workplace in accordance with the Drug-Free Schools and Communities Act of 1988 and Amendments of 1989 (41 USC Section 701 Et. Seq.). In compliance with statutory requirements, the District will:

A. Drug-Free Workplace

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

ADB - DRUG FREE WORKPLACE & DRUG FREE SCHOOLS

- iii. Establish a drug-free awareness program to educate employees about the dangers of drug abuse and drug use in the workplace, the specifics of this policy, including, the consequences for violating the policy, and any information about available drug and alcohol counseling, rehabilitation, reentry, or other employee-assistance programs.

B. District Action Upon Violation of Policy

An employee who violates this policy may be subject to disciplinary action; up to and including termination of employment. Alternatively, the Board may require an employee to successfully complete an appropriate drug- or alcohol-abuse, employee-assistance rehabilitation program.

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

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

C. Drug-Free School Zone

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

ADB - DRUG FREE WORKPLACE & DRUG FREE SCHOOLS

D. Implementation and Review

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

Note: ADB replaces GBEC

District Policy History:

First Reading: September 14, 2010

Second Reading: October 12, 2010

Final Adoption: October 12, 2010

Reviewed: January 4, 2022, January 18, 2022

Revised: February 1, 2022

Legal References:

NH Statutes

RSA 318-B

Controlled Drug Act

RSA Chapter 193-B

Drug Free School Zones

Description

NH Dept of Ed Regulation

N.H. Code Admin. Rules Ed 316

Procedure to mark drug-free school zones

Description

ADB - DRUG FREE WORKPLACE & DRUG FREE SCHOOLS

Federal Statutes	Description
21 USC § 812	<u>Schedules of Controlled Substances</u>
41 U.S.C. §101, et. seq.	<u>Drug-free workplace requirements for Federal contractors, and Federal grant recipients</u>

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



Wilton-Lyndeborough Cooperative School District
School Administrative Unit #63

192 Forest Road Lyndeborough, NH 03082
603-732-9227

Peter Weaver
Superintendent of Schools

Ned Pratt
Director of Student Support Services

Kristie LaPlante
Business Administrator

TO: Amanda Guay
FROM: Peter Weaver
DATE: May 15, 2025
RE: Resignation

In accordance with Policy GCQC:

“A resignation by a licensed employee who is under contract to the school should be submitted to the Superintendent. Said resignation of a licensed employee may take effect on a date approved by the Superintendent acting as agent of the School Board.

I am in receipt of your email dated May 12 that you intend to resign your position as Instructional Aide effective May 16, 2025.

Wilton-Lyndeborough Cooperative School District provides a safe and educational environment that promotes student exploration, critical thinking and responsible citizenship.



Wilton-Lyndeborough Cooperative School District
School Administrative Unit #63

192 Forest Road Lyndeborough, NH 03082
603-732-9227

Peter Weaver
Superintendent of Schools

Ned Pratt
Director of Student Support Services

Kristie LaPlante
Business Administrator

TO: The WLC School Board
FROM: Peter Weaver
DATE: May 27, 2025
RE: Nomination for Facilities Manager

Please accept this as the nomination for Benjamin Hofstetter as the Facilities Manager for our District. Mr. Hofstetter has been a Union Tradesman and certified carpenter for 10 years. He has owned/operated Cowboy Creations, a general construction company ranging from handyman services such as basic plumbing and electrical fixture installation to general contractor for general residential remodel, specializing in custom bathroom and basement improvement projects. He has experience managing projects, procurement, maintenance, negotiating vendor contracts, coordinating repairs, inventory management, streamlining operations and implementing cost-savings initiatives. His references describe him as dependable, reliable, confident, and capable with the ability to adapt rapidly to changing situations.

There were eight applicants for this position. I recommend a motion to appoint Benjamin Hofstetter as the Facilities Manager for our District with a salary of \$65,000.

Wilton-Lyndeborough Cooperative School District provides a safe and educational environment that promotes student exploration, critical thinking and responsible citizenship.



BENJAMIN HOFSTETTER

Lyndeborough NH | 603.325.0957 | Bronco10787@aol.com |

Certified carpenter of 10 years. Rounded experience within commercial building systems with an emphasis on material procurement and inventory management under the carpentry umbrella.

EXPERIENCE

MAY 2011-
FEB 2020

WAREHOUSE MANAGER, ALL INTERIORS

Procured tools and materials for projects and delivered to appropriate points of contact. Coordinated building repairs and maintenance as necessary. Coordinated with field operators for maintenance on equipment. Trained drivers and warehouse workers on processes and procedures of inventory management and warehouse scheduling.

APRIL 2020-NOV
2020

CARPENTER, NEW ENGLAND FINISH SYSTEMS

Framed walls, installed drywall and finish systems

JAN 2021-
SEP 2022

CARPENTER, FAZIO CONSTRUCTION

Framed walls, installed drywall

MAR 2023-
DEC 2023

CARPENTER, CHARLES SERVICES AND EQUIPMENT

Framed walls, installed drywall and finish systems,

MAR 2024-
JAN 2025

CARPENTER, DB CONTRACTORS

Installed finish cabinetry and millwork. Managed procurement, installation and maintenance on safety concerns and general conditions on jobsite.

MAR 2020-

COWBOY CREATIONS

Owner/operator general construction company ranging from handyman services such as basic plumbing and electrical fixture installation to general contractor for general residential remodel, specializing in custom bathroom and basement improvement projects.

EDUCATION

JUNE 20XX

NECTS, MILLBURY MASSACHUSETTES

Journeyman carpenter certificate
Osha 10
Osha 30
CPR/AED certified