

Section: E
Category: SUPPORT SERVICES
File: EBBA

CODE: PREVENTION OF DISEASE/INFECTION TRANSMISSION

All schools shall provide a sanitary environment and shall establish routines for handling body fluids that are recommended by appropriate health professionals. All school district personnel shall be advised of routine procedures to follow in handling body fluids. These procedures shall provide simple and effective precautions against transmission of diseases to persons potentially exposed to the blood or body fluids of another. These procedures shall be standard health and safety practices. No distinction shall be made between body fluids from individuals with a known disease and individuals without symptoms or with an undiagnosed disease.

The administration shall develop in consultation with medical personnel regulations to be distributed to all staff on a regular basis. Training and appropriate supplies shall be available to all personnel including those involved in transportation and custodial services.

In addition to ensuring that these health and safety practices are carried out on a district-wide basis, special emphasis shall be placed in those areas of school district operation that potentially present a greater need for these precautions.

CROSS REFS.: JLCE, First Aid and Emergency Medical Care
GBGA, Staff Health
JLCC/JLCCA, Communicable Infectious Diseases/Students with
HIV/AIDS

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References:

Section: E
Category: SUPPORT SERVICES
File: EBBA-R

CODE: PREVENTION OF DISEASE/INFECTION TRANSMISSION
UNIVERSAL PRECAUTIONS FOR PREVENTING TRANSMISSION OF HIV, HBV,
AND OTHER BLOOD-BOURNE INFECTIONS

"Universal precautions," as defined by the Centers for Disease Control, are a set of precautions designed to prevent transmission of human immunodeficiency virus (HIV), Hepatitis B virus (HBV), and other blood-borne pathogens when providing first aid or health care. Under universal precautions, blood and certain body fluids of all persons are considered potentially infectious for HIV, HBV and other blood-borne pathogens.

Universal precautions apply to blood, other body fluids containing visible blood, semen, and vaginal secretions. Universal precautions also apply to tissues and to the following fluids: cerebrospinal, synovial, pleural, peritoneal, pericardial, and amniotic fluids.

Universal precautions involve the use of protective barriers such as gloves, gowns, aprons, masks, or protective eyewear, which can reduce the risk of exposure of the health care worker's skin or mucous membranes to potentially infective materials.

In public schools, universal precautions refer to the usual and ordinary steps all school staff need to take in order to reduce their risk of infection with HIV, the virus that causes AIDS, as well as all other blood-borne organisms (such as the Hepatitis B virus).

They are universal because they refer to steps that need to be taken in all cases, not only when a staff member or student is known to be HIV infected. They are precautions because they require foresight and planning and should be integrated into existing safety guidelines.

Appropriate equipment (mops, buckets, bleach, hot water, hand soap, disposable towels, latex or vinyl gloves, and plastic trash bags) must be readily available in the janitor's closet for staff members (custodial staff) who are responsible for the clean-up of body fluid spills.

The following procedures shall be followed by anyone providing personal care to a student such as diapering, catheterization, treatment of injuries, or when cleaning up blood, urine or feces, vomit or other bodily fluids*:

1. Treat human spills with caution.
2. Clean up blood spills promptly.
3. Inspect the intactness of your own skin on all exposed body parts, especially the hands. Cover any and all open cuts or broken skin, or ask another staff member to do the clean up.

4. Wear latex or vinyl gloves (surgical type) whenever cleaning any body fluids. After assisting a child or cleaning up bodily fluids, change to new gloves before assisting another child.
5. Clean up spills with a solution of one part household bleach to ten parts water (1:10) pouring the solution around the periphery of the spill. Disinfect mops, buckets and other cleaning equipment with fresh bleach solution. Spills may be cleaned with Chlorasorb** as noted on the instructions.
6. Discard all disposable materials; including gloves, bandages, diapers, toilet tissue, disposable towels, and baby wipes in a sealed plastic bag, and take immediately to a dumpster.
7. Always wash hands thoroughly after any contact with body fluids. This should be done immediately in order to avoid contaminating other surfaces or parts of the body (be especially careful not to touch your eyes before washing up.) Soap and water will kill HIV.

If an exposure occurs; that is, if body fluids, particularly blood, get into an opening in the skin, wash the area with soap and running water. Applying bleach to the skin is **not** recommended. If body fluids, particularly blood, get into the eyes, flush with water or a saline solution. Steps to take if exposed:

- Report the incident to the appropriate personnel (e.g., the nurse, principal, department head).
- Seek medical attention immediately.

Follow-up medical attention is needed if you have an unprotected exposure, such as:

- Blood splashing into an open cut or into the eyes.
- An accidental needle-stick.
- A bite that breaks the skin.

If medication is indicated, the sooner it is provided after an exposure, the more effective it will be. Other treatments that may be appropriate include blood test and counseling.

Please Note:

* *Urine, vomit, or feces, unless grossly contaminated with blood, do not pose a significant risk of HIV infection. However, in the interest of proper hygiene, universal precautions should be used routinely when handling these fluids as well.*

** *Chlorasorb is the preferred cleaning/disinfecting agent. As an alternative, a 10% bleach solution may be used. (1 part bleach to 10 parts water)*

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References:

***Lower Pioneer Valley Educational Collaborative
Board of Directors Policy***

Section: E
Category: SUPPORT SERVICES
File: EBC

CODE: EMERGENCY PLANS

Advance planning for emergencies and disasters is essential to provide for the safety of students and staff; it also strengthens the morale of all concerned to know that plans exist and that students and staff have been trained in carrying out the plans.

The Executive Director will develop and maintain plans that meet the requirements of state law for preparedness in case of fire, civil emergencies, and natural disasters.

The Executive Director shall develop, in consultation with school nurses, school physicians, athletic coaches, trainers, and local Emergency Medical Services agencies, an Emergency Medical Response Plan for each LPVEC program. Each Plan shall include:

1. A method establishing a rapid communications system linking all parts of the school campus, including outdoor facilities, to local Emergency Medical Services along with protocols to clarify when EMS and other emergency contacts will be called.
2. A determination of EMS response times to any location on the campus.
3. A list of relevant contacts with telephone numbers and a protocol indicating when each person shall be called, including names of experts to help with post-event support.
4. A method to efficiently direct EMS personnel to any location on campus, including the location of available rescue equipment.
5. Safety precautions to prevent injuries in classrooms and on the school campus.
6. A method of providing access to training in CPR and first aid for teachers, athletic coaches, trainers, and other school staff which may include CPR training for High School students; provided that the Board of Directors may opt out of instruction in CPR pursuant to Section 1 of Chapter 71.
7. In the event the school possesses Automated External Defibrillators (AEDs), the location of all available AEDs, whether the location is fixed or portable, and a list of personnel trained in its use.

Plans shall be submitted at least every three (3) years by September 1. Plans must be updated in the case of new construction or other physical changes to the school campus.

Building Principals will meet all requirements for conducting fire drills and Emergency Response drills to give students practice in moving with orderly dispatch to designated areas under emergency conditions, and the staff practice in carrying out their assigned responsibilities for building evacuation.

CROSS REF.: EBCD, Emergency Closings
JL, Student Welfare
JLC, Student Health Services and Requirements

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References: M.G.L. 69:8A Section 363 of Chapter 159 of the Acts of 2000

Section: E
Category: SUPPORT SERVICES
File: ECAD

**CODE: SCHOOL AND PERSONAL
PROPERTY REPLACEMENT/RESTITUTION**

The LPVEC Board of Directors will authorize payment of the cost of replacing or repairing property of an employee such as eye glasses, hearing aids, dentures, watches, or articles of clothing necessarily worn or carried by the employee, or vehicles when such items are damaged or stolen in the line of duty as a result of malicious acts and without fault of the employee. Other personal property of employees or personal teaching aids belonging to the employee, are not included.

The maximum payment any one can claim is \$1,000 or actual cost, whichever is less in the case of vehicles, and \$500 or actual cost, whichever is less, for other property. An employee is limited to a maximum annual claim of \$1,000. Loss or damage will be reported to the Executive Director or Program Supervisor and, if appropriate, to the police as soon as the employee becomes aware of such loss or damage.

Claim reports are available from the Director of Finance and should be forwarded through the Executive Director or Program Supervisor to the Director of Finance.

Employees must seek reimbursement, as appropriate, from their private insurance policy. Employees will not be compensated for losses or damages for which compensation, wholly or partially, can be paid under the employee's private insurance policy.

This policy does not extend to student property.

Adoption Date: July 1, 2010

Revised:

Source: MASC Policy Reference

Legal References:

Section: E
Category: SUPPORT SERVICES
File: EEA

CODE: STUDENT TRANSPORTATION SERVICES

The major purpose of the school system's transportation services is to aid students in getting to and from school in an efficient, safe, and economical manner.

The LPVEC offers student transportation services to its member districts wishing to participate in the program. The LPVEC will be responsible for the safe operation of school buses, will comply with all applicable state law and regulations including, but not limited to:

1. Specifications for school bus design and equipment
2. Inspection of buses
3. Qualifications and examinations of bus drivers
4. Driving regulations
5. Small vehicle requirement, if applicable
6. Insurance coverage
7. Adherence to local regulations and directives as specified in bid contracts

The Director of Finance, working with the Transportation General Manager and other appropriate administrators, will be responsible for establishing bus schedules, routes, stops, and all other matters relative to the transportation program.

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References: MGL 40:5; 71:7A, B and C; 71:37D; 71:48A; 71:68; 71:71A; 71B:4; 71B:5; 71B:8; 74:8A; 76:1; 76:12Bi; 76:14

Section: E
Category: SUPPORT SERVICES
File: EEAEA-1

**CODE: DRUG AND ALCOHOL TESTING FOR
SCHOOL BUS AND COMMERCIAL VEHICLE DRIVERS**

The LPVEC shall adhere to federal law and Department of Transportation regulations requiring a drug and alcohol-testing program for school bus drivers and commercial vehicle drivers. Such testing will be conducted for five different situations:

1. pre-employment,
2. randomly,
3. following an accident,
4. following an authorization to return to duty, or
5. upon reasonable suspicion that a driver is under the influence of alcohol or using drugs.

The LPVEC will comply with Department of Transportation protocols regarding the collection and testing necessary to establish whether alcohol or drugs are present in the driver's system, and regulations will be established for the steps to be taken in the event that test results are positive.

This program shall comply with the requirements of the Code of Federal Regulations, Title 49, Section 382 et seq. The Executive Director or designees shall adopt and enact procedures consistent with the federal regulations, defining the circumstances and procedures for testing.

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References:

Section: E
Category: SUPPORT SERVICES
File: EEAEC

CODE: STUDENT CONDUCT ON SCHOOL BUSES

The LPVEC and its staff share with students and parents the responsibility for student safety during transportation to and from school. The authority for enforcing LPVEC requirements of student conduct on buses will rest with the Transportation General Manager.

To ensure the safety of all students who ride in buses, it may occasionally be necessary to revoke the privilege of transportation from a student who abuses this privilege. Parents of children whose behavior and misconduct on school buses endangers the health, safety, and welfare of other riders will be notified that their children face the loss of transportation privileges in accordance with regulations approved by the LPVEC.

Adoption Date:

Revised:

Source: MASC Policy Reference

Legal References:

Section: E
Category: SUPPORT SERVICES
File: EEAJ

CODE: MOTOR VEHICLE IDLING ON SCHOOL GROUNDS

No motor vehicle operator shall cause or allow any motor vehicle operated by him or her on school grounds to idle unnecessarily, except for any of the following reasons: traffic conditions; queuing at a school for the purpose of picking up or discharging students; turbo-charged diesel engine cool down or warm up; maintenance of appropriate temperature for school buses when accepting or discharging passengers not to exceed three minutes in any fifteen minute period or one minute in any fifteen minute period for other motor vehicles; for circumstances involving safety or emergencies and for servicing or repairing motor vehicles; and as these exceptions are more completely described in the below referenced regulations. The term "school grounds" shall mean in, on or within 100 feet of the real property of the school whether or not it is in session, and shall include any athletic field or facility and any playground used for school purposes or functions which is owned by the municipality or school district, regardless of proximity to a school building, as well as any parking lot appurtenant to such school athletic field, facility or playground. Reasonable efforts shall be made by the district to identify by signage all known and actual air intake systems, which may be within 100 feet of an idling motor vehicle. A motor vehicle operator shall not idle a motor within 100 feet of such air intake system, unless the LPVEC has determined that alternative locations block traffic, impair student safety or are not cost effective.

The LPVEC shall erect and maintain in a conspicuous location on school grounds "NO IDLING" signage as described below. All such signage shall contain appropriate sized font so as to be visible from a distance of 50 feet.

NO IDLING
PENALTIES OF \$100 FOR FIRST OFFENSE AND \$500
FOR SECOND AND SUBSEQUENT OFFENSES
M.G.L. C. 90, § 16B AND 540 CMR 27.00

It shall be the responsibility of the school administration to ensure that each school bus driver employed by the LPVEC and not by a school bus contractor shall, upon employment and at least once per year thereafter, sign a document acknowledging the receipt of copies of M.G.L. c. 90, § 16B and 540 CMR 27.00. The prohibitions contained in M.G.L. c. 90, § 16B shall be enforced by state or local law enforcement agencies.

Adoption Date: October 27, 2010

Revised:

Source: MASC Policy Reference

Legal References: M.G.L. c. 71:37H, c. 90:16B and 540 CMR 27.00

Section: E
Category: SUPPORT SERVICES
File: EFAB

CODE: PROTOCOL AND GUIDELINES FOR MANAGEMENT OF LIFE-THREATENING FOOD ALLERGIES IN THE LPVEC

BACKGROUND

Allergic food reactions can span a wide range of severity of symptoms. The most severe and potentially life threatening reaction is anaphylaxis. This protocol is to be used for students who are at risk for anaphylaxis and in circumstances where a previously undiagnosed life-threatening allergic response occurs.

Anaphylaxis is a potentially life-threatening medical condition occurring in food allergic individuals after exposure to their specific food allergens. Anaphylaxis refers to a collection of symptoms affecting multiple systems in the body, the most dangerous of which are breathing difficulties and a drop in blood pressure or shock, which are potentially fatal. The most common causes of anaphylaxis in children include allergies to:

1. Foods (most commonly; dairy products, eggs, fish/shellfish, milk, peanuts/tree nuts, soy, wheat)
2. Latex, medications, and stinging insects

Anaphylaxis can occur immediately and/or 2-6 hours following allergen exposure, so it is important to:

1. Identify student at risk.
2. Have appropriate preventative policies.
3. Be prepared to handle an emergency.
4. Ensure appropriate medical care and follow-up.

PURPOSE AND GOAL

The LPVEC cannot guarantee an allergen-free environment for all students with life threatening allergies. The goal is to minimize the risk or exposure to food allergens, to educate the community, and to maintain and regularly update a system-wide protocol for responding to the needs of students with life-threatening food allergies.

A system-wide effort requires the cooperation of all groups of people within the system. The sections below highlight the major responsibilities of the various groups. Each child's plan will be individualized and, therefore, not all responsibilities can be detailed in this protocol.

The goal of the LPVEC is to engage in a system-wide effort to:

1. Avoid any occurrence of life-threatening food- based allergic reactions
2. Prepare for any allergic reactions to food
3. Respond appropriately to any allergy emergencies that arise

RESPONSIBILITIES OF PARENTS OF STUDENTS WITH LIFE –THREATENING FOOD ALLERGIES

Each parent of a student with a life-threatening allergy shall have the following responsibilities:

1. Inform the school nurse of your child's allergies prior to the opening of school (or as soon as possible after diagnosis).
2. Arrange to meet with the school nurse to develop an individual Health Care Plan (HCP) for the student and provide medical information from the child's treating physician as needed to write the HCP.
3. Arrange for school health professionals to be able to communicate with your child's physician.
4. Provide the school with a list of foods and ingredients to be avoided, and provide a list of safe or acceptable foods that can be served to your child.
5. Provide the school nurse with enough up-to-date emergency medications (including Epi-pens) so they can be placed in all required locations for the current school year.
6. Complete and submit all required medication forms.
7. Provide a MEDIC ALERT ID for your child.
8. Notify nurse of upcoming field trips as soon as possible and provide Epi-pen to be taken on field trips as stated in the field trip policy.
9. Encourage your child to wash hands before and after handling food.
10. Teach your child to:
 - a. Recognize the first symptoms of a food allergic/anaphylactic reaction.
 - b. Know where the epinephrine auto-injector is kept and who has access to the epinephrine.
 - c. Communicate clearly as soon as he/she feels a reaction is starting.
 - d. Carry his/her own epinephrine auto-injector when appropriate.
 - e. Not share snacks, lunches, or drinks.
 - f. Understand the importance of hand washing before and after eating.
 - g. Report teasing and/or bullying that may relate to the child's allergy.
 - h. Take as much responsibility as possible for his/her own safety.
11. As children get older, teach them to:
 - a. Communicate the seriousness of the allergy.
 - b. Communicate symptoms as they appear.
 - c. Read labels.
 - d. Administer own epinephrine auto-injector and be able to train others in its use.
12. Inform the school of any changes in the child's life-threatening food allergy status.

13. Provide the school with the licensed provider's statement if the student no longer has food allergies.
14. Go on field trips and out-of-school activities with your child, whenever possible.
15. Provide bag of snacks for your child's classroom along with safe foods for special occasions.
16. Sign a release for school personnel to consult with family physical/allergist and all medical providers.

RESPONSIBILITIES OF STUDENTS

Each student with a life threatening food allergy should be proactive in the care and management of his/her food allergies and reactions based upon their age and capabilities.

Students with life threatening food allergies should be educated to take on increasing responsibilities in the care and management of their allergies as follows:

- Do not share or trade food with others.
- Always wash your hands before and after eating.
- Only eat foods when you are sure about the ingredients.
- Learn to recognize symptoms of an allergic reaction.
- Tell an adult immediately if you are experiencing symptoms or accidentally ate food that may have unknown ingredients.
- Develop a relationship with the school nurse/health office staff and/or another trusted adult in the school to assist with answering questions and identifying issues related to the management of your food allergy in school.

Have ongoing conversations with parents, school nurse and physician concerning how much responsibility you are ready to take on, including carrying an Epi-pen.

RESPONSIBILITIES OF THE LPVEC CTEC, TWAIN PROGRAM, AND TRANSITIONS PROGRAM

The LPVEC will endeavor to:

1. Create a system-wide emergency plan for addressing life -threatening food- based allergic reactions.
2. Provide annual in-service training and education on reducing food allergy risks, recognizing food allergy symptoms, and emergency procedures for staff.
3. Training shall include, but not be limited to:
 - a. A description/definition of severe allergies and a discussion of the most common foods causing allergic reactions
 - b. The signs and symptoms of anaphylaxis
 - c. The correct use of an Epi-pen
 - d. Specific steps to follow in the event of an emergency
4. School health professionals in conjunction with the student's parent(s)/guardian(s) and the primary care provider/allergist will develop a Health Care Plan for any student with a life-

threatening food allergy. The HCPs will be reviewed by the school nurse, the student's parent(s)/guardian(s) and primary care provider and/or the student's allergist, and approved by the child's physician/allergist.

5. Be knowledgeable about and follow applicable federal laws including ADA, IDEA, Section 504, and FERPA as well as any applicable state laws or district policies.
6. Provide education on reducing food allergy risks.
7. After a reaction, identify those who were involved in the medical intervention and those who witnessed the event.
8. Meet with the adults to discuss what was observed and to dispel any rumors.
9. If an allergic reaction is thought to be from a food provided by the school food service, request assistance of the Food Service Director to ascertain what potential food item was served/consumed. Review food label from Food Service Director and Staff.
10. Agree on a plan to disseminate factual information and review knowledge about food allergies to school mates who witnessed or were involved in the allergic reaction, with parental and student consent.
11. Review the HCP and/or Emergency response plan to address any changes that need to be made.
12. Make the Health Care Plan available in the Nurse's Office. Recommend that parents/guardians attach a photograph of their child to their Health Care Plan.
13. Submit to school bus drivers a list of students who have life-threatening food allergies.
14. Make Epi-pens (belonging to the school and those prescribed to the students) available in the nurse's office and in other clearly designated locations as specified in the Health Care Plan. Encourage students to carry their Epi-pens on their person as allowed by the district's Administration of Medication Policy.
15. Familiarize teachers with the Health Care Plans of their students and any other staff member who has contact with the student on a need-to-know basis.

RESPONSIBILITIES OF THE SCHOOL PRINCIPAL

To the extent possible, the principal of each school shall be responsible for the following:

1. To ensure that school nurses familiarize teachers and staff with the Health Care Plans of the students with whom they have contact on a need-to-know basis.
2. In conjunction with nurses, to provide in-service training and education for staff regarding life-threatening allergies, symptoms, risk reduction procedures and emergency procedures including demonstration on how to use the Epi-pen.
3. To post the school's emergency protocol in appropriate locations.
4. To notify staff of the locations of Epi-pens in the school.
5. To develop a contingency plan for staff and students in the event that the nurse is not in the office or in the building. Staff will call 911 in all instances of any allergic reaction.

RESPONSIBILITIES OF SCHOOL HEALTH PROFESSIONALS

The school nurse is the primary coordinator of each student's Health Care Plan.

Each school nurse will have the following responsibilities:

- To develop a HCP for students with a life threatening allergy. This plan may include collaboration with parent/guardian and other school staff. Nurse will encourage use of MEDIC-ALERT bracelets or necklace
- Maintain updated HCPs in the Health Office and/or in student's homeroom.
- To assist the principal in providing information about students with life threatening allergies to appropriate staff on a need to know basis
- To familiarize teacher(s)/staff with the HCPs of their students.
- The school nurse will be responsible for following the Department of Public Health regulations governing the administration of prescription medications. Nurses are also responsible for following the regulations that permit registration of non-licensed personnel to be trained and to administer and Epi-Pen.
- Encourage parents to have 2 Epi-Pens available in school at all times.
- Inform the school principal and parent/guardian if any student experiences an allergic reaction that has not been previously diagnosed.
- Emergency protocol will be in place in the event that no nursing coverage is available during normal school hours.

RESPONSIBILITY OF PEDIATRICIAN

Pediatrician will:

1. Consult with administration on implementation of best practices.
2. Be available to review Individual Health Care Plans if needed.

RESPONSIBILITIES OF TEACHERS

Each teacher shall have the following responsibilities:

1. Receive and review the Individual Health Care Plan, in collaboration with the nurse and parent(s) of any student(s) in your classroom with life-threatening allergies.
2. Leave information in an organized, prominent and accessible format for substitute teacher.
3. Participate in in-service training for students with life-threatening allergies.
4. Participate in the planning of a student's re-entry into school after an anaphylactic reaction.
5. Receive approval from school administration and school nurse prior to using food in classroom lesson plan. Send appropriate letter home to parents if food will be used in classroom lesson plan.
6. Ensure that only approved foods are in classrooms.
7. Collaborate with administration and nurse to send out letters to all parents/guardians of students in a class with an individual with a life-threatening food allergy.

8. Reinforce appropriate hygiene techniques for hand washing before and after eating.
9. If an allergic reaction is suspected, call the nurse's office immediately.

RESPONSIBILITIES OF FOOD SERVICE PERSONNEL

The food service department shall have the following responsibilities:

1. Supply cleaning materials for washing and sanitizing tables as per district protocol.
2. Provide in-service training to food service employees regarding safe food handling practices to avoid cross contamination with potential food allergens.
3. Employees to wear non-latex gloves.

RESPONSIBILITIES OF LPVEC TRANSPORTATION PROGRAM

All school bus drivers shall be informed that he/she is transporting a child with a life-threatening allergy. The school bus drivers will have the following responsibilities.

1. Provide functioning emergency communication devices (e.g., cell phones, two-way radios, etc.) on each bus.
2. Maintain and reinforce policy prohibiting food consumption on buses.

RESPONSIBILITIES OF PERSONS IN CHARGE OF CONDUCTING AFTER-SCHOOL ACTIVITIES

Person in charge of extracurricular programs shall have the following responsibilities:

1. The Health Care Plans will be available for parents to copy to give to others who assume responsibility for their child. Examples of this may include:
 - a. Before or after school activity instructors
 - b. Coaches
 - c. Extracurricular activity advisors
2. Make parents aware that no nurse is available after school hours.

RESPONSIBILITIES DURING RECESS AND PHYSICAL EDUCATION CLASSES

During recess and physical education classes (where a child has a life-threatening allergy), the school shall have the following responsibilities:

1. Children will be under the supervision of at least one adult.
2. An Epi-pen will be taken outside if specified in the child's Health Care Plan.
3. Develop building-based procedure whereby emergency communication device (walkie-talkie, cell phone) is accessible and functional.

The above protocol will be maintained by the LPVEC CTEC, Twain Program, and Transitions Program. LPVEC students in host schools will be covered under the Protocol for Life Threatening Food Allergies according to the protocol in the district in which they are housed.

Adoption Date: April 25, 2012

Revised:

Source: MASC Policy Reference

Legal References:

Section: E
Category: SUPPORT SERVICES
File: EFC

CODE: FREE AND REDUCED PRICE FOOD SERVICES

The LPVEC will take part in the National School Lunch Program and other food programs that may become available to assure that all children receive proper nourishment.

In accordance with guidelines for participation in these programs and in accordance with the wishes of the Board of Directors, no child who is believed improperly nourished will be denied a free lunch or other food simply because proper application has not be received from his/her parent or guardian.

Adoption Date: June 18, 2014

Revised:

Source: MASC Policy Reference

Legal References:

Records Retention Policy for Electronic Correspondence

I. Introduction

All business conducted by government agencies are subject to the Public Records law of the Commonwealth of Massachusetts. This document addresses the unique consideration that must be given to electronic documents. The retention period of electronic documents are determined by their content. If the content is determined to be subject to Public Records law, then the retention period is defined by the laws of the Commonwealth. Furthermore, the Federal Rules of Civil Procedure (FRCP) specifically require that data must be managed such that it can be produced in a timely fashion (90 days) in the event of a court action. E-mail is the most common type of document requested through the e-discovery process so it is incumbent upon School Districts that e-mail be managed with this in mind.

The use of electronic correspondence has proliferated to the point that it is quickly becoming a primary means of communication for school administrators, professional and support staff, volunteers, School Committee members, school councils, and other school groups both during and outside of regular business hours and regularly posted meetings. As such, it is evident that there needs to be a policy both to determine content relevancy and to ensure that content is retained for the correct period of time. All school employees, elected and appointed members of school committees, councils, school groups, and school volunteers, who routinely or otherwise engage in the use of electronic correspondence for school related purposes should receive instruction on Public Records law and data retention.

II. Purpose

Proper management of public records ensures that the government and other authorized personnel have immediate access to information for the full period of time it is needed to conduct daily business, financial transactions, litigation, maintenance of public property, and development and implementation of public policy. Electronic records pose unique problems of recognition, retention, storage and retrieval. The purpose of this policy is to assist School District personnel in recognizing electronic records and understanding the requirements of retaining, storing and retrieving records in accordance with the law and School District needs.

It is the intent of this policy that all electronic correspondence be retained as per the content of the communication. The Public Records Law of Massachusetts issues a schedule of records maintenance, retention, exemptions, and disposal based on content. Refer to Public Records Law G.L.c.4, §7(26) for the explanation of “public records,” see 950 C.M.R. 32.00; G.L.c.66 §1 for Public Records Access, and §10 for Public inspection and copies of records.

III. Definitions

Public Records are “all books, papers, maps, photographs, recorded tapes, financial statements, statistical tabulations, or other documentary materials or data, regardless of physical form or characteristics, made or received by any officer or employee” of a governmental agency. This includes all government records generated, received or maintained electronically, including computer records, electronic mail, video and audiotapes.

“The statutory definition of “public records” does not distinguish between

traditional paper records and records stored in the computer medium.

Rather, it provides that all information made or received by a public entity,

regardless of the manner in which it exists, constitutes “public records.”

Computer cards, tapes or diskettes are all independent public records that are

subject to the same requirements of the Public Records Law as are paper

records. Therefore, a records custodian is obliged to furnish copies of non-exempt portions of computerized information at the cost of reproduction, unless otherwise provided by law.”

- A Guide to the Massachusetts Public Record Law, p. 27

Executives, in relation to public record documents, include Superintendents, Assistant Superintendents, Business Managers, Directors, Principals, Assistant Principals and School Committee members.

Archive is defined as an archival copy of a document stored in accordance with the retention schedule as defined by Public Records law.

Backup is defined as a temporary duplicate of a file that is stored for a specified period of time not necessarily in accordance with Public Records law for the convenient retrieval of a document that was accidentally erased by the user.

Custodian of Records is defined as “the governmental officer or employee who in the normal course of his or her duties has access to or control of public records.

IV. Record Retention

School District records subject to Public Records law must be retained according to the Commonwealth of Massachusetts Records Retention Policy and the School Department Records Disposal Schedule (20-84) attached hereto. Any employee or officer of the School District who creates or receives an electronic document must review said document for content. Once a determination has been made that the document is subject to Public Records law, the employee or officer must then cause the record to be stored according to this policy by either printing and filing a hard copy or by forwarding the document to the proper custodian of records. Documents not subject to Public Records law may be disposed of after their business value has ceased.

In the Frontier Regional and Union #38 School District, all e-mails are archived automatically without additional action by the user.

All records will be managed in accordance with the Commonwealth of Massachusetts Records Retention Policy for School Departments.

V. Record Storage

Departments of the School District, through their Custodian(s) of Records, should ensure that records are stored in a secure environment that is not subject to the risk of theft or destruction. The retention period

for electronic records subject to retention shall be in accordance with the School Department Records Disposal Schedule (20-84) and the Massachusetts Records Retention Schedule (07/07). It is the responsibility of each Records Custodian to inform those personnel for whose records they are responsible of the manner in which data will be stored.

All electronic records subject to retention must be preserved on paper with all original header information and or metadata, if applicable, if the retention period is greater than ten (10) years. Electronic records whose retention period is less than ten (10) years shall be archived electronically in a manner that provides for easy access and retrieval. These records include e-mails and their attachments, old and new web pages, videos, floppy disks, CDs, audiotapes, and videotapes.

Records Custodians shall, in collaboration with the IT department, determine the specifics of how this policy will be enforced. Suggestions may be found below.

VI. Custodians:

Every department is required to have a Records Custodian. Custodians should provide proper care and management of Public Records. Records Custodians have the authority to direct personnel who control or hold records.

The Records Custodian should know:

- <!--[if !supportLists]-->1. <!--[endif]-->What records the Department makes or receives
- <!--[if !supportLists]-->2. <!--[endif]-->Who makes or receives the records
- <!--[if !supportLists]-->3. <!--[endif]-->When the records can/should be destroyed according to the Records Retention Schedule
- <!--[if !supportLists]-->4. <!--[endif]-->Where the records are stored
- <!--[if !supportLists]-->5. <!--[endif]-->How the records can be accessed during the retention period

In order to catalog this information, it is recommended that an Electronically Stored Information (ESI) Survey Data Map be completed that documents all School District data sources that are subject to Public Records law. Each Records Custodian shall maintain this inventory within their department. This inventory will include what records are within the department, where they are kept, by whom and in what format. It will also include a list of positions likely to contribute records to the department such as those employees or officers who receive electronic records.

VII. E-mail Policy:

School employees shall be given a District e-mail address and will ***be required to use this address for ALL school business without exception.*** The superintendent and other school employees shall communicate all official business with school personnel using District e-mail addresses. The IT Department will ***not*** forward school e-mail to non-District accounts. If a school employee uses a non-school account for school business, their personal e-mail accounts and computer(s) may be subject to search and seizure in the event of a legal action against the school or School District.

The majority of e-mail files are correspondence files and will therefore come under section F7:2 of the Mass. Public Records Law (M.G.L Ch. 66). E-mail correspondence files consist of information and communications sent or received by individuals using electronic mail systems and include message transmission and receipt data, messages, and attachments.

The School District has the right to monitor, obtain, copy and archive any mail that is sent from or received by School District mail servers. Confidentiality should not be assumed, and therefore confidential and/or

sensitive material should not be communicated via e-mail. For example, it is acceptable to use the e-mail system to schedule an appointment with a parent, but a discussion about a student should be done on the phone, by U.S. mail or in person.

(a) Non-executive E-mail records: shall be stored during the school year and all deleted on June 30 of each year. E-mail messages shall be *automatically* archived when they are received by the School District mail server. *NOTE TO STAFF: Keep in mind that any message that you send or receive is stored, and **can be found**, for this period of time.*

(b) Executives' e-mail records: shall be stored permanently as hard copy, except for mail with little or no business value which may be deleted after use.

(c) All outgoing e-mail from the School District shall have the following disclaimer:

***** NOTICE *****

All electronic messages sent from Frontier Regional and Union #38 School Districts are archived in conformance with Massachusetts and federal Public Records law.

*NOTE TO STAFF: Some system administrators set limits on the amount of e-mail messages that may be stored on servers. In these cases it is recommended that **mail that the user wishes to save be moved out of the e-mail system into your home directory as soon as possible**. Although messages will be automatically archived, they will not be easily accessible.*

Upon the termination of each school year, the Records Custodian shall submit the necessary documentation to the Commonwealth and upon approval, direct the IT department to purge records which are no longer subject to retention. *NOTE TO STAFF: It is recommended that you **DO NOT store any e-mail or other files beyond the retention period**.*

VIII. Litigation Hold

A Litigation Hold occurs upon notification of possible impending litigation, at which point the superintendent or designee shall notify, within one business day, all affected Records Custodians, including the Director of IT, that a litigation hold is in effect. At this time, **ALL** records described on the Litigation Hold Notification form must be saved regardless of their normal retention period. If you are notified that a Litigation Hold has been put in place, do not alter or delete ANY documents, including e-mails that might have a bearing on the judicial action. When in doubt, save the document.

It is the responsibility of the Records Custodian to ensure that no records or e-mails are destroyed, even if the retention period is passed. The Records Custodian must be able to retrieve records subject to Litigation Hold upon request within the time provided for by law.

IX. Retrieval:

Records shall be maintained and stored by the Custodian of Records for each Department within the School District so that production of the record is possible within a reasonable time or as required by law.

X. Backup Policy:

Personal computers shall not be backed up in the regular course of business. Documents that personnel wish to save must be backed up to a file server. A backup protocol shall be put in place by the IT

Department with the goal of facilitating the retrieval of documents that are accidentally erased from a user's computer. A suggested protocol follows:

A new backup shall begin at the beginning of each month. Data will be saved to a portable disk drive or tape that shall be housed off-site. Incremental backups of e-mail and data that has been created or saved on a School District file server shall be backed up nightly. Backups shall be kept for a period of one year before the backup media is recycled.

XI. Archival Policy:

An archiving protocol shall be put in place by the IT Department with the goal of archiving documents that are covered by Public Records law. A suggested protocol follows:

A. *E-mail* – All incoming and outgoing non-executive e-mail, after passing through a SPAM/Virus filter, shall automatically be archived for a period of one school year. Executive e-mail will be archived permanently by printing a hard copy. Upon the termination of a school-year period, the Records Custodian shall submit the necessary documentation to the Commonwealth and upon approval, direct the IT department to purge records which are no longer subject to retention.

B. *Other data* – Each user will be responsible for determining if any given documents are subject to retention under Public Records law. The data retention period should be specified per instructions of the Custodian of the Records. Electronic documents that need to be archived may be attached to an e-mail that may then be sent to an address supplied by the IT department, or printed out and filed depending upon the determination made by the Records Custodian. Documents will then be archived for the specified period. Upon the termination of the retention period, the Records Custodian shall submit the necessary documentation to the Commonwealth and upon approval, direct the IT department to purge electronic records which are no longer subject to retention. Paper records shall be shredded prior to disposal.