



BRIDGE ELEMENTARY

Administrative Procedures – Updated February 2025

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Attendance Procedures – Check In and Check Out

Tardy and Check In

The warning bell rings at 8:25 am and school begins promptly at 8:30 am. At 8:30 am the interior doors from the front foyer to the hallway are locked and all students must enter through the front office. If a student arrives at school after 8:30 am he or she will require a tardy slip from the office in order to go to class. If a student arrives at school after 8:45 am, parents **MUST** escort the child into the office and check the child in by completing the information in the school's CHECK IN / OUT book. Students will receive a check in slip to take with them to class. Students who are not escorted by a parent will receive a non-excused tardy.

Check Out

Please make every attempt to schedule appointments outside the school day. In the event a child needs to leave school early, a parent or trusted guardian, as identified in the student information system, **MUST** present identification to the front office to check a child out of school. Please be patient as the child may be in the classroom, at recess, or in a specialty class, and the office will need to locate the child. This could take up to 15 minutes to find the child, and then have the child gather up their backpack and belongings from their locker.

Attendance Procedures in Compliance with Attendance Policy

These procedures are established in accordance with the Attendance Policy established by the School's Board of Directors.

Student progress is impacted by attendance. Bridge Elementary expects parents to make a good faith effort to get students to school on time each day. Our Attendance Policy requires that all absences be excused within 24 hours of the absence. Parents can excuse absences by calling our school's attendance line or by completing the online Absence Excusal found on our website under Student Data.

When a student will be absent for an extended length of time, the parent must make a good faith effort, by contacting the child's teachers, to ensure the student has access to lessons, curriculum, and computer-assisted instruction during the child's absence.

Definitions

"Absence" or "absent" means the failure of a school-age child assigned to a class or class period to attend a class or class period. "Absence" or "absent" does not mean multiple tardies used to calculate an absence for the sake of a truancy.

"Chronic absenteeism" or "chronically absent" means a student misses 10% or more of days enrolled, for any reason, and makes a school aware that a beginning of tiered supports may be needed.

"Valid excuse" or "excused absence" means an absence resulting from:

- a) an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;
- b) a death of a family member or close friend;
- c) a scheduled family event or a scheduled proactive visit to a health care provider in accordance with Section 53G-6-803(5);
- d) a family emergency;
- e) an approved School activity;
- f) a preapproved extended absence for a family activity or travel, consistent with School policy;
- g) an absence permitted by an individualized education program or Section 504 accommodation plan; or
- h) mental or behavioral health of the school-age child.

The Principal has the discretion to consider other absences as "valid excuses."

"Valid excuse" or "excused absence" does not mean a parent acknowledgement of an absence for a reason other than those described above.

"School-age child" means a minor who is at least six years old but younger than 18 years old and who is not emancipated.

"School day" means the portion of a day that school is in session in which a school-age child is required to be in school for purposes of receiving instruction.

"Truant" means a condition by which a school-age child, without a valid excuse, is absent for at least half of the school day. A school-age child may not be considered truant under this policy more than one time during one day.

Attendance Requirements: Students are expected to have no more than five (5) unexcused absences per year.

Excused Absences: An oral or written communication documenting a valid excuse must be received from the student's parents/guardian within one (1) business day of the absence in order for the absence to be excused. In the event of multiple consecutive absences, written communication must be received within one (1) business day of the student's return to school.

In the event of an unforeseeable illness or emergency, the School should be notified as soon as reasonably possible.

Preapproved Extended Absence: A parent/guardian may request approval from the Principal prior to a student's extended absence of up to ten (10) days per school year. The Principal will approve the absence if the Principal determines that the extended absence will not adversely impact the student's education.

Medical Documentation: The School may not require documentation from a medical professional to substantiate a valid excuse that is a mental or physical illness.

Make-up Work: Make-up work is permitted for students who have excused absences. The teacher will provide the student or the parent/guardian with any make-up work upon request. Make-up work must be completed within a reasonable timeframe as determined by the teacher.

Tardiness: A student is tardy if he or she is not in the assigned classroom when the late bell rings. In general, tardiness will be handled on an individual basis with the teacher. If a student is chronically tardy, then the student may be referred to the administration. Students are considered "chronically tardy" when they have exceeded 5 tardies in one quarter.

Notification of Absences and Tardies: In the event a student is absent, parents/guardians will be notified by phone on the day of the absence. Parents and students are responsible for tracking the total number of absences and tardies. Parents will be notified when their student reaches the 4th unexcused absence of the year. Parents of students may be notified when their child is tardy for the 4th time during a given quarter. If the maximum limit for unexcused absences or tardiness is reached, the Principal will attempt to schedule a meeting with the parents to review the situation and will outline the appropriate corrective action.

Notice of Compulsory Education Violation

The School may issue a "notice of compulsory education violation" to a parent/guardian of a school-age child who is in grades 1 through 6 if the student is truant at least five (5) times during the school year.

This notice shall:

1. Direct the parent/guardian to meet with School authorities to discuss the student's attendance problem and cooperate with the Principal and Board to secure regular attendance by the student;
2. Designate the School authorities with whom the parent is required to meet;
3. State that it is a class B misdemeanor for the student's parent or guardian to intentionally or without good cause fail to meet with the designated School authorities to discuss the student's attendance problems, or fail to prevent the student from being truant an additional five (5) or more times during the remainder of the school year; and

4. Be served on the parent/guardian by personal service or certified mail.

If School personnel have reason to believe that, after a notice of compulsory education violation is issued, the parent or guardian has failed to make a good faith effort to ensure that the school-age child receives an appropriate education, the issuer of the compulsory education violation shall report to the Division of Child and Family Services the information required by Utah Code § 53G-6-202(8) (also in accordance with the School's Child Abuse and Neglect Reporting Policy).

Chronic Absenteeism Prevention and Intervention Program

The School's Chronic Absenteeism Prevention and Intervention Program is established to encourage good attendance, improve academic outcomes, and reduce negative behaviors. Through this program, the School hopes to create a trusting relationship between teachers, students, and parents.

The School's efforts to prevent chronic absenteeism include, but are not limited to:

- Serving students breakfast and lunch at the School each school day.
- Providing classroom and/or schoolwide rewards and/or incentives to students for good attendance.
- Notifying parents/guardians by phone each time a student is absent, and making such notification on the day of the absence.
- Contacting parents/guardians of students who reach four (4) and/or five (5) unexcused absences to try to resolve the students' attendance problems.
- Providing parents/guardians with notices of compulsory education violations, as appropriate and as outlined herein.
- Providing parents/guardians with the School's attendance policies and procedures each year at the time of registration.

The School will seek to help students struggling with absenteeism (including chronically absent students) through implementing research or evidence-based absenteeism and dropout prevention interventions. Those efforts will include documented earnest and persistent efforts to resolve a student's attendance problems through the following interventions:

- When a student's attendance is negatively affecting the student's learning, the classroom teacher will notify the student and/or the student's parent/guardian of the concern. The teacher will set up a conference with the student and/or the student's parent/guardian to identify and resolve any problems that prevent the student from attending school. The student's progress will be monitored.
- If meeting with the student and parent/guardian does not adequately address the problems and the student's learning continues to suffer, then the School counselor or Principal will work with the teacher and parent/guardian in finding a solution to the problems that are preventing the student from attending to his/her learning. Efforts to resolve the problems may include, but are not limited to, the following: making adjustments to the curriculum or the schedule; counseling of the student by School authorities; mentoring the student; providing the student with increased academic support; teaching the student executive function skills such as planning, goal setting, understanding and following multi-step directions, and self-regulation; considering

alternatives proposed by the parent/guardian; or providing the parent/guardian with a list of community resources to help the family.

- The Principal may consult with a parent/guardian to determine if mitigating circumstances such as medical or psychological problems indicate the use of intervention methods for resolving the attendance problems.
- In the event that the preceding interventions fail, the Principal will contact the parent/guardian and request a formal meeting to discuss and resolve the attendance problems. A copy of the communication (letter, email, etc.) will be kept by the School.
- The Principal will notify the student and a parent/guardian of the actions the School may take should the student be truant in the future.

Appeals Process

Parents/guardians who believe that all or part of their student's absences and/or tardies should be considered excused, or if they want to contest a notice of compulsory education, or any disciplinary action taken against their student pursuant to the School's Attendance Policy or these procedures, shall follow the School's Parent Grievance Policy.

Students with Qualified Disabilities

If students with disabilities under the Individuals with Disabilities Education Act, or students protected under either Section 504 of the Rehabilitation Act or the Americans with Disabilities Act, have excessive absences, including but not limited to absences for mental or behavioral health reasons, and fall within the criteria of these procedures, the School will ensure that these procedures are applied in a manner consistent with all applicable state and federal laws and regulations. Excused absences for known mental or behavioral health reasons do not absolve the School of FAPE responsibilities.

Annual Report

The School shall annually report the following data separately to the State Board of Education:

1. absences with a valid excuse; and
2. absences without a valid excuse.

Employees Engaging in Private Activities Related to Public Education

Purpose

Bridge Elementary (the “School”) recognizes that its employees may have opportunities to engage with students in private activities related to public education that are not sponsored by the School. The School supports its employees participating in such activities so long as they are done appropriately.

These procedures are intended to help ensure that any private, but public education-related activity involving School employees is conducted in a manner that complies with state law and rules, including R277-107, and maintains the integrity of the public education system. These procedures outline expectations for School employees who sponsor or participate in private activities related to public education and delineate boundaries between public employment and private enterprise.

Definitions

For purposes of these procedures:

“Employee” means a person who is employed on a full-time, part-time, or contract basis by the School.

“Private, but public education-related activity” means any type of private activity for which:

- a. An employee of the School receives compensation; and
- b. The principal clients are students at the School.

“Private, but public education-related activity” may include:

- a. Tutoring;
- b. Lessons;
- c. Clinics;
- d. Camps; or
- e. Travel opportunities.

General Rules for School Employee Participation in Private, But Public Education-Related Activities

Employees may participate in a private, but public education-related activity in accordance with R277-107 and these procedures.

1. Separation of Private and Public Roles

- a. Employees who participate in a private, but public education-related activity must ensure that such participation is separate and distinguishable

from their employment with the School. For example, such employees may not:

- i. Contact students at the School during School hours to promote such private activities; or
- ii. Use student education records, School resources, or information gained through employment with the School in connection with such private activities, unless that information is readily available to the general public.

2. Prohibited Use of School Time and Resources

- a. Employees who participate in a private activity or a private, but public education-related activity may not use School time or resources to:
 - i. Discuss, promote, or prepare for such private activities; or
 - ii. Organize or advertise such private activities.

3. Permissible Activities by Employees

- a. Employees who participate in a private, but public education-related activity may:
 - i. Offer such private activities to students outside of regular School hours;
 - ii. Discuss such private activities with students or parents outside of the classroom and regular School hours;
 - iii. Use student directories or online resources which are available to the general public; or
 - iv. Advertise or promote such private activities in accordance with the rules in R277-107-3 and -4, including in School publications that allow commercial advertising.

4. Equity and Access

- a. Employees may not condition credit or participation in a School program or activity on a student's participation in such activities as clinics, camps, private programs, or travel activities that are not equally and freely available to all students.
- b. Employees may not state or imply to any person that participation in a regular School activity or program is conditioned on participation in a private activity.

5. Student-Initiated Educational Opportunities

- a. Nothing in these procedures prohibit students from requesting or petitioning the School for academic credit for educational experiences obtained outside of School consistent with School policy and applicable state law.

6. Contracts Governing Private, But Public Education-Related Activities

- a. Contracts between an employee and a sponsor of a private, but public education-related activity shall be signed by the employee and include the acknowledgments set forth in R277-107-6.
- b. An employee shall provide the School with a signed copy of all contracts between the employee and a sponsor of a private, but public education-related activity. The School shall maintain a copy of such contracts in the employee's personnel file.

Family Educational Rights and Privacy

These procedures are established pursuant to the Board's Family Educational Rights and Privacy Policy.

Activities Prohibited Without Prior Written Consent

Prior Written Consent Requirement

Any School employee or agent who plans to administer to a student in any grade any psychological or psychiatric examination, test, or treatment, or any survey, analysis or evaluation that has the purpose or evident intended effect of causing the student to reveal information, whether the information is personally identifiable or not, concerning the student's or any family member's:

- (a) political affiliations or, except as provided under Utah Code § 53G-10-202 or rules of the Utah State Board of Education, political philosophies;
- (b) mental or psychological problems;
- (c) sexual behavior, orientation, gender identity, or attitudes;
- (d) illegal, anti-social, self-incriminating, or demeaning behavior;
- (e) critical appraisals of individuals with whom the student or family member has close family relationships;
- (f) religious affiliations or beliefs;
- (g) legally recognized privileged and analogous relationships, such as those with lawyers, medical personnel, or ministers; or
- (h) income, except as required by law;

shall obtain prior written consent from the student's parent or guardian at least two (2) weeks before the test/treatment/survey/analysis/evaluation is administered or the information listed above is sought, unless the employee or agent must seek this type of private information due to an emergency, or unless a student spontaneously discloses the information.

The prohibitions above also apply within the curriculum and other School activities.

If the School chooses to administer any of the surveys listed below, the School shall, on an annual basis, obtain prior written consent for the survey(s) from students' parents or guardians at the time students register with the School:

- (a) surveys related to an early warning system described in Utah Code § 53F-4-207;
- (b) surveys that include social emotional learning questions; and
- (c) the school climate survey described in Utah Code § 53G-8-802.

Parental Notice and Consent Checklist

For a consent from a student's parent or guardian to be valid, the consent must be in writing and signed. In addition, prior to the written consent being signed by a parent or guardian, a written notice shall be given to the parent or guardian that includes:

- (a) notice that the parent has a reasonable opportunity to obtain written information concerning:
 - (i) relationships and other information that may be examined or requested in the test, treatment, survey, analysis, or evaluation to be administered;
 - (ii) how the test, treatment, survey, analysis, or evaluation will be administered;
 - (iii) why (*i.e.*, the purpose) the test, treatment, survey, analysis, or evaluation is needed; and
 - (iv) who will have access to the information gathered from the test, treatment, survey, analysis, or evaluation to be administered;
- (b) if it is a survey that is to be administered, notice:
 - (i) that a copy of the survey is available at the School and online (a link to the survey shall be included in the notice);
 - (ii) of the intended purpose and use of the data collected through the survey;
 - (iii) of the types of persons or governmental entities that share the data collected from the survey (including a list of recipients who will receive the student-level data), or receive the data collected from the survey from a governmental entity on a regular or contract basis; and
 - (iv) of the record series as defined in Utah Code § 63G-2-103 in which the data is or will be included, if applicable.

A general consent used to approve admission to School or involvement in special education, remedial education, or a School activity does not constitute written consent for these purposes.

Duration of Parental Authorization

Unless otherwise agreed to by a student's parent or guardian and the person requesting written consent, the authorization is valid only for the activity for which it was granted. However, a written withdrawal of authorization submitted to the School Director by the authorizing parent or guardian terminates the authorization.

Waiver of Parental Notice Period

A parent or guardian may waive the 2-week notice period by signing and returning a written waiver to the School.

Well-Being of a Student

If a School employee or agent believes that a situation exists that presents a serious threat to the well-being of a student, that employee or agent shall notify the student's parent or guardian without delay. If, however, the matter has been reported to the Division of Child and Family Services (DCFS), it is the responsibility of DCFS to notify the student's parent or guardian of any possible investigation, prior to the student's return home from School.

Risk of Suicide

If a School employee, agent, or School resource officer (if any) believes a student is at risk of attempting suicide, physical self-harm, or harming others, the School employee, agent, or School resource officer may intervene and ask a student questions regarding the student's suicidal thoughts, physically self-harming behavior, or thoughts of harming others for the purposes of:

- (a) referring the student to appropriate prevention services; and
- (b) informing the student's parent or guardian.

Student Education Records Management

Inspecting and Reviewing Education Records

Parents or guardians have the right to inspect and review their student's education records, subject to certain exceptions. If the education records of a student contain information on more than one student, the parent or guardian may inspect and review or be informed of only the specific information about their student.

- The School will grant a request by a parent or guardian for access to the education records of their child within a reasonable period of time, but in no case more than forty-five (45) days after the request has been received by the School.

Amending Education Records

Parents or guardians have the right to challenge and request the School to amend any portion of their student's education record that they believe is inaccurate, misleading, or in violation of the privacy rights of the student.

- The School shall consider the request and decide whether to amend the records within a reasonable amount of time. If the Director decides not to amend the record as requested, the Director shall inform the parent or guardian of the decision and of their right to a hearing.
- Upon request of a parent or guardian, the School shall provide an opportunity for a hearing to challenge the content of the student's education records on the grounds that the information contained in the education records is inaccurate, misleading, or in violation of the privacy rights of the student.
- Such hearing shall be informal and shall be conducted by an individual who does not have a direct interest in the outcome of the hearing.
- If, as result of the hearing, the School decides that the challenged information is inaccurate, misleading, or in violation of the privacy rights of the student, the record should be amended accordingly and the parent or guardian informed in writing.
- If, as result of the hearing, the School decides that the challenged information is not inaccurate, misleading, or in violation of the privacy rights of the student, it shall inform the parent or guardian of their right to place a statement in the record, commenting on the challenged information in the record or stating why they disagree with the decision. Any such document must remain with the contested part of the record for as long as the record is maintained, and shall be disclosed whenever the portion of the record to which the statement relates is disclosed.

Disclosing Education Records

The School shall not disclose personally identifiable information from a student's education records without first obtaining parental consent, except as provided by law. Such exceptions under FERPA include, but are not limited to, disclosures:

- To School officials within the School who have legitimate educational interests;
- To a contractor, consultant, volunteer or other party to whom the School has outsourced a service or function provided that the outside party::
 - Performs an institutional service or function for which the School would otherwise use employees;
 - Is under the direct control of the School with respect to the use and maintenance of education records; and
 - Is subject to the requirements of 34 CFR § 99.33(a) governing the use and redisclosure of personal identifiable information from education records.
- To an authorized caseworker or other representative of the Department of Health and Human Services, but only as described in Utah Code § 53E-9-308(3);

- To other schools that have requested the records and in which the student seeks or intends to enroll, or where the student is already enrolled, so long as the disclosure is for purposes related to the student's enrollment or transfer;
- In response to valid court orders or subpoenas;
- To appropriate parties in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals;
- To officials in the juvenile justice system as permitted by law;
- To the Comptroller General of the United States, the Attorney General of the United States, the Secretary, or State and local educational authorities in connection with an audit and evaluation of federally or state supported education programs, or for the enforcement of, or compliance with, federal legal requirements relating to those programs;
- To the applicable entities/agencies within the Department of Homeland Security for foreign students attending the School under a visa; or
- To the Attorney General of the United States in response to an *ex parte* order in connection with the investigation or prosecution of terrorism crimes.

The School may disclose a student's directory information without parental consent for appropriate reasons if it has given the parent or guardian proper annual notice of their right to request that their student's directory information not be released by the School and the parent or guardian has not notified the School that they do not want the student's directory information to be released.

- The following information relating to students may be declared directory information from time to time:
 - (a) name, address, e-mail address, and telephone number;
 - (b) date and place of birth;
 - (c) major field of study;
 - (d) participation in officially recognized activities and sports;
 - (e) weight and height of members of athletic teams;
 - (f) dates of attendance;
 - (g) degrees, honors, and awards received;
 - (h) most recent previous education agency or institution attended;
 - (i) photograph;
 - (j) grade level; and
 - (k) parent names and contact information.
- The School shall not release directory information to any individual or organization for commercial use.

Parent or Guardian Right to Access Education Records

The School shall give full rights to student education records to either parent or guardian, unless the School has been provided with evidence that there is a court order

or other legally binding instrument relating to matters such as divorce, separation, or custody that specifically revokes or limits these rights.

Confidentiality of Student Information

The School and all employees, volunteers, third party contractors, or other agents of the School shall protect the privacy of the student and the student's family through compliance with the protections established under state and federal law, including FERPA and the student privacy and data protection statutes in Title 53E, Chapter 9 of the Utah Code.

Access to confidential student information will be limited to individuals with a legitimate educational interest in the data. The Director will determine which individuals have a legitimate educational interest in having access to particular data. In general, this will include the Director, other administrative personnel such as an assistant administrator or counselor, members of the School's front office staff, members of the School's special education staff (in accordance with special education regulations regarding school records), teachers (typically for students in their classes, but sometimes other students as well), and third parties with which the School has contracted to perform special tasks for the School. The School will ensure that all individuals who have access to student information will understand how, where, and when they can access this data and will commit to fulfill their obligations to protect the confidentiality of the information.

Data Collection and Storage Procedures

The School will ensure that its school enrollment verification data, student performance data, and personally identifiable student information are collected, maintained, and transmitted in a secure manner and consistent with sound data collection and storage procedures.

Physical Protection

Any physical documents containing confidential student information will be stored in a secured, locked location. Access to the storage location will be determined by the Director.

Technological Protection

The School will ensure that appropriate technological protections are in place, as described below, whenever the School gathers, transmits, or stores confidential information electronically.

The School currently uses Aspire as its Student Information System. This is the primary location in which the School will store electronic data. This program provides a secure location for the maintenance and transmission of confidential student information. The School also uses the Aspire online registration system for the registration and enrollment of all new and returning students entering the School. In the event the

School decides to use a Student Information System other than Aspire, the School will ensure that the system is approved by USBE and is adequately secure.

All confidential student information that is stored electronically will be in a location that is password protected. Such data will not be stored on local device drives or on removable data storage media.

The School will ensure that its network, including servers and wireless access components, employs industry standard security measures.

School personnel will not share log in information for any system in which confidential student information is stored unless authorized by the Director.

Confidential student information will only be transmitted through secure means such as Movelt and, where practical, will not be transmitted via e-mail in an unencrypted format.

Personnel Responsibilities

School personnel are responsible for entering student data into the School's Student Information System. This includes information obtained through the Aspire online registration system and other data gathered throughout the course of the school year. School personnel also manage the maintenance and reporting of records and data required by governmental entities.

Third Party Access to Confidential Information

The School's Educational Services Provider, Academica West, will have access to the personally identifiable student data and school enrollment verification data collected and maintained by the School in connection with legitimate educational purposes of the School.

Data Breach

The School will notify the parent or guardian of a student if there is a release of the student's personally identifiable student data due to a security breach. The School will also notify the State Superintendent of significant data breaches of student data as required in R277-487.

Training

On an annual basis, the School shall provide appropriate student data privacy training to its employees, aides, and volunteers who are authorized by the School to have access to education records as defined in FERPA. The training shall cover federal and state student data privacy laws and rules. The School shall ensure that its authorized employees sign a statement certifying that they have completed the training and understand student privacy requirements. The School shall create and maintain a list of

the authorized employees and provide it to the Board of Directors as required in Utah Code § 53E-9-204.

The School shall also provide its employees with appropriate training on IT security matters.

Where required by R277-487, educators at the School shall also complete the student data security and privacy training for educators developed by the State Superintendent as a condition of re-licensure.

Concussion and Head Injury Procedures

These procedures are established pursuant to the Concussion and Head Injury Policy established by the School's Board of Directors.

A concussion is a type of traumatic brain injury that interferes with normal function of the brain. It occurs when the brain is rocked back and forth or twisted inside the skull as a result of a blow to the head or body. What may appear to be only a mild jolt or blow to the head or body can result in a concussion. A concussion can occur even if a player or student in an activity is not knocked out or loses consciousness.

The School will ensure that each agent of the School is familiar with, and has a copy of, the Concussion and Head Injury Policy and these Procedures. Before permitting a child to participate in a sporting event of the School, the School will:

- (a) provide a written copy of the Concussion and Head Injury Policy and these Procedures to a parent or legal guardian of a child; and
- (b) obtain the signature of a parent or legal guardian of the child, acknowledging that the parent or legal guardian has read, understands, and agrees to abide by, the Concussion and Head Injury Policy and these Procedures.

The following definitions apply to these Procedures:

- (1) "Agent" means a coach, teacher, employee, representative, or volunteer.
- (2) "Qualified health care provider" means a health care provider who:
 - (a) is licensed under Title 58, Occupations and Professions; and
 - (b) may evaluate and manage a concussion within the health care provider's scope of practice.
- (3) "Sporting event" means any of the following athletic activities that is organized, operated, managed, or sponsored by the School:
 - (a) a game;
 - (b) a practice;
 - (c) a sports camp;
 - (d) a physical education class;
 - (e) a competition; or
 - (f) a tryout.
- (4) "Traumatic head injury" means an injury to the head arising from blunt trauma, an acceleration force, or a deceleration force, with one of the following observed or self-reported conditions attributable to the injury:
 - (a) transient confusion, disorientation, or impaired consciousness;
 - (b) dysfunction of memory;
 - (c) loss of consciousness; or
 - (d) signs of other neurological or neuropsychological dysfunction, including:
 - (i) seizures;
 - (ii) irritability;
 - (iii) lethargy;
 - (iv) vomiting;
 - (v) headache;

- (vi) dizziness; or
- (vii) fatigue.

The following signs and symptoms following a witnessed or suspected blow to the head or body are indicative of probable concussion:

Signs (observed by others):

- Student appears dazed or stunned
- Confusion
- Forgets plays
- Unsure about game, score, opponent
- Moves clumsily (altered coordination)
- Balance problems
- Personality change
- Responds slowly to questions
- Forgets events prior to hit
- Forgets events after the hit
- Loss of consciousness (any duration)

Symptoms (reported by student):

- Headache
- Fatigue
- Nausea or vomiting
- Double vision, blurry vision
- Sensitive to light or noise
- Feels sluggish
- Feels “foggy”
- Problems concentrating
- Problems remembering

The School will (a) immediately remove a child from participating in a sporting event of the School if the child exhibits signs, symptoms, or behaviors consistent with a concussion or is otherwise suspected of sustaining a concussion or a traumatic head injury; and (b) prohibit the child from participating in a sporting event of the School until the child:

(i) is evaluated by a qualified health care provider who is trained in the evaluation and management of a concussion; and

(ii) provides the School with a written statement from the qualified health care provider described in Subsection (1)(b)(i) stating that:

(A) the qualified health care provider has, within three years before the day on which the written statement is made, successfully completed a continuing education course in the evaluation and management of a concussion; and

(B) the child is cleared to resume participation in the sporting event of the School.

The school will follow any return-to-play guidelines established by the student's qualified health care provider.

Emergency Procedures

The following situations constitute a medical emergency and require notification of emergency medical personnel:

- (1) Any student with a witnessed loss of consciousness (LOC) of any duration should be spine boarded and transported immediately to nearest emergency department via emergency vehicle.
- (2) Any student who has symptoms of a concussion, and who is not stable (i.e., condition is worsening), should be transported immediately to the nearest emergency department via emergency vehicle.
- (3) A student who exhibits any of the following symptoms should be transported immediately to the nearest emergency department, via emergency vehicle:
 - a. Deterioration of neurological function
 - b. Decreasing level of consciousness
 - c. Decrease or irregularity in respirations
 - d. Any signs or symptoms of associated injuries, spine or skull fracture, or bleeding
 - e. Mental status changes: lethargy, difficulty maintaining arousal, confusion or agitation
 - f. Seizure activity

A student who is symptomatic but stable may be transported by his or her parents. The parents should be advised to contact the student's primary care provider or seek care at the nearest emergency department on the day of the injury.

Guidelines and Procedures for Coaches and Teachers Supervising Contests and Games

Recognize concussion

1. All agents of the school should become familiar with the signs and symptoms of concussion that are described above.
2. Agents of the school shall have appropriate training about recognizing and responding to traumatic head injuries, consistent with the employees' responsibilities for supervising students and athletes.

Remove from activity

Any student who exhibits signs, symptoms, or behaviors consistent with a concussion (such as loss of consciousness, headache, dizziness, confusion, or balance problems)

shall be immediately removed from the sporting event and shall not return to play until cleared by an appropriate health care professional.

Refer the athlete/student for medical evaluation

1. The school's agent is responsible for notifying the student's parent(s) of the injury.
 - a. Contact the parent(s) to inform a parent of the injury. Depending on the injury, either an emergency vehicle will transport or parent(s) will pick the student up at the event for transport.
 - b. A medical evaluation is required before returning to play.
2. In the event that a student's parent(s) cannot be reached, and the student is able to be sent home (rather than directly to a doctor):
 - a. The school's agent should ensure that the student will be with a responsible individual who is capable of monitoring the student and understanding the home care instructions before allowing the student to go home.
 - b. The school's agent should continue efforts to reach a parent.
 - c. If there is any question about the status of the student, or if the student cannot be monitored appropriately, the student should be referred to an Emergency Department for evaluation. An school's agent should accompany the student and remain with the student until a parent arrives.
 - c. The school's agent shall provide for supervision of other students for whom he or she is responsible when accompanying the injured student.

Adjust classroom activities during recovery

The school will adjust classroom activities during the period the student is recovering from a concussion based on the recommendations of the student's health care professional.

Concussion and Head Injury Policy Acknowledgement

I acknowledge that I have read, understand, and agree to abide by, the Concussion and Head Injury Policy and Procedures.

Name of Student: _____

Name of Parent/Guardian: _____

Signature of Parent/Guardian: _____

Date: _____

Data Governance Plan

1. PURPOSE

Bridge Elementary (the “School”) takes seriously its moral and legal responsibility to protect student data privacy and ensure student data security. The School is required by Utah Law and the School’s Student Data Privacy and Security Policy to establish a Data Governance Plan. This administrative Data Governance Plan (the “Plan”) encompasses the full life cycle of the School’s student data, from acquisition, to use, to disposal.

2. SCOPE AND APPLICABILITY

This Plan is applicable to all employees, volunteers, and third-party contractors of the School. The School will use this Plan, along with all policies and procedures of the School concerning student data privacy and security, to manage and address student data issues, assess agreements that permit disclosure of student data to third parties, assess the risk of conducting business with such third parties, and help ensure that the School makes only authorized disclosures of personally identifiable student data to third parties.

This Plan contains the School’s data governance procedures and processes related to:

1. Personnel Roles and Responsibilities;
2. Data Collection;
3. Data Use;
4. Data Storage;
5. Data Sharing;
6. Record Retention and Expungement;
7. Data Breach;
8. Data Transparency;
9. Data Privacy and Security Auditing; and
10. Data Privacy and Security Training.

This Plan refers to and works in conjunction with the School’s Student Data Privacy and Security Policy, Family Educational Rights and Privacy Policy and Administrative Procedures (“FERPA Policy” and “FERPA Administrative Procedures”), Metadata Dictionary, and Student Data Collection Notice.

In addition, this Plan works in conjunction with the School’s Information Technology Security Policy and accompanying Information Technology Systems Security Plan. The Information Technology Systems Security Plan contains procedures and processes related to the following:

1. System Administration;
2. Network Security;

3. Application Security;
4. Endpoint, Server, and Device Security;
5. Identity, Authentication, and Access Management;
6. Data Protection and Cryptography;
7. Monitoring, Vulnerability, and Patch Management;
8. High Availability, Disaster Recovery, and Physical Protection;
9. Incident Responses;
10. Acquisition and Asset Management; and
11. Policy, Audit, and E-Discovery Training.

3. ROLES AND RESPONSIBILITIES

All student data utilized by the School is protected pursuant to the federal Family Educational Rights and Privacy Act (“FERPA”), Utah Code § 53E-9-201 *et seq.* (sometimes called “Utah FERPA”), Utah Code § 53E-9-301 *et seq.* The School designates managers to fulfill certain responsibilities regarding student data privacy and security. The School also imposes responsibilities on School employees and volunteers. The roles and responsibilities listed below outline some of the ways School managers, employees, volunteers, and third-party contractors are to utilize and protect personally identifiable student data.

3.1 Student Data Manager

The School’s Director serves as the School’s Student Data Manager and is responsible for student data privacy and security at the School, including doing the following:

1. Acting as the primary local point of contact for the state student data officer described in Utah Code § 53E-9-302.
2. Authorizing and managing the sharing, outside of the School, of personally identifiable student data for the School, including:
 - a. Ensuring that no personally identifiable student data is shared outside of the School without written consent unless such sharing is:
 - i. To the student or student’s parent or guardian;
 - ii. In the absence of a parent or guardian, to an individual acting as a parent or guardian to the student;
 - iii. To other outside parties only as authorized by FERPA, Utah FERPA, and Utah Code § 53E-9-301 *et seq.*;
 - iv. Required by federal law;
 - v. To a caseworker or representative of the Department of Human Services so long as:
 - a. The Department of Human Services is (1) legally responsible for the care and protection of the student, including the responsibility to investigate a report of educational neglect, as provided in Utah Code § 62A-4a-409(5); or (2) providing services to the student;
 - b. The student's personally identifiable student data is not shared with a person who is not authorized (1) to address the student's education needs; or (2) by the

- Department of Human Services to receive the student's personally identifiable student data; and
 - c. The Department of Human Services maintains and protects the student's personally identifiable student data.
 - vi. Pursuant to a valid subpoena;
 - vii. For the purpose of external research or evaluation so long as the Student Data Manager:
 - a. Verifies that the request meets the requirements of 34 C.F.R. § 99.31(a)(6);
 - b. Submits the request to the School's research review process; and
 - c. Fulfills the instructions that result from the review process.
- 3. Ensuring that all aggregate data shared outside of the School without written consent is shared in accordance with the School's review process set forth in Section 7 of this Plan.
- 4. Ensuring that educator evaluation data is protected in accordance with R277-487-6.
- 5. Creating and maintaining a list of all School employees (name and position) who are authorized to have access to education records and provide the list to the School's Board of Directors, in accordance with Utah Code § 53E-9-204.
- 6. Ensuring all School employees and volunteers who are authorized by the School to have access to education records (1) receive annual training on student privacy laws and (2) sign a statement certifying that they have completed the training and understand student privacy requirements (volunteers are not required to sign such a statement). Document names of all those who are trained, as well as the training dates, times, locations, and agendas.
- 7. Ensuring that the School's Student Data Collection Notice is created as a prominent, stand-alone document; is annually updated and published on the School's website; states the student data the School collects; states that the School will not collect the student data described in Utah Code § 53E-9-305(1); states the student data described in Utah Code § 53E-9-308 that the School may not share without written consent; includes the statement in Utah Code § 53E-9-305(2)(f); describes in general terms how the School stores and protects student data; states a student's rights under Utah Code § 53E-9-301 *et seq*; and is distributed to parents and students as required by law.
- 8. Ensuring that this Plan and the School's Metadata Dictionary is maintained, published, and provided to the Utah State Board of Education ("USBE") as required by law.
- 9. Ensuring that by October 1 each year, all the information and data privacy and security related documents set forth in R277-487-3 are provided to the State Superintendent as required by law.

3.2 IT Security Manager

The School's contracted IT provider will function as the School's IT Security Manager. The IT Security Manager's responsibilities include the following:

1. Overseeing IT security at the School;
2. Helping the School to comply with IT security laws applicable to the School;
3. Providing training and support to School employees on IT security matters;
4. Investigating complaints of alleged violations of the School's IT security policies, procedures, or plans;
5. Investigating alleged security breaches of the School's IT systems; and
6. Reporting periodically to the School's Board of Directors on the security of the School's IT systems.

3.3 Employees and Volunteers with Access to Education Records

Employees and volunteers of the School who have access to education records have responsibilities with respect to student data privacy and security, including:

1. Maintaining appropriate confidentiality with regard to personally identifiable student data and student performance data.
2. Participating in student data privacy training each year as required by the School.
3. Signing a statement each year certifying completion of student data privacy training and understanding of student data privacy requirements as required by the School (not required of volunteers).
4. NOT sharing personally identifiable student data outside of the School unless authorized to do so by law and the Student Data Manager.
5. Using password-protected, School-authorized computers when accessing the School's data systems or viewing or downloading any student-level records.
6. NOT sharing or exchanging individual passwords for School-authorized computers or School data systems with anyone, including passwords for the electronic maintenance of student performance data or personally identifiable student data.
7. Logging out of any School data system or portal and closing the browser after each use or extended absence.
8. Storing personally identifiable student data on appropriate, secured locations. Unsecured access and flash drives, DVD, CD-ROM or other removable media, or personally owned computers or devices, are not deemed appropriate for storage of personally identifiable student data unless authorized by the Student Data Manager.
9. Keeping printed documents with personally identifiable student data in a locked, secured location and using School-approved document destruction methods when disposing of such records.
10. NOT sharing personally identifiable student data during public presentations.

11. Using secure methods when sharing or transmitting personally identifiable student data (including enrollment verification data and student performance data) with authorized individuals. Secure electronic methods include, but are not limited to, telephone calls, ownCloud, Movelt (when sending data to the State), and encrypted email. Also, sharing within secured server folders is appropriate for School internal file transfer.
12. Taking steps to avoid disclosure of personally identifiable student data in authorized reports or materials available to the public, such as aggregating, data suppression, rounding, blurring, etc.
13. Only accessing and using student data as authorized by the School to fulfil job or volunteer duties or obligations, and not for any other purpose.
14. Immediately reporting to the Student Data Manager any data breaches, suspected data breaches, or any other suspicious activity related to data access.
15. Consulting with the Student Data Manager regarding any questions about personally identifiable student data and related privacy laws, requirements, or concerns.
16. Abiding by the requirements, processes, and procedures of this Plan.

3.4 Educators

In addition to abiding by the employee responsibilities listed above, educators at the School are also responsible for the following:

1. NOT sharing personally identifiable student data through educational apps (or any other apps or software used for classroom instruction) unless and until the app or software has been approved as required by the Student Data Manager; and
2. Completing the student data security and privacy training for educators developed by the State Superintendent when required for the educator's relicensure pursuant to R277-487.

3.5 Third-Party Contractors

Third-party contractors who have access or receive personally identifiable student data pursuant to a contract with the School shall, absent written consent from a parent or adult student, only use the data for the purpose of providing the contracted product or service within the negotiated contract terms. Third-party contractors shall protect personally identifiable student data against unauthorized access and redisclosure, both physical and digital, and shall follow and comply with the other requirements in R277-487-7. Each third-party contractor is responsible for complying with the contract and entering into and complying with the Data Confidentiality Addendum approved by the School's Board of Directors or some other approved data privacy agreement. The School will follow Utah Code § 53E-9-309 with respect to third-party contractors and personally identifiable student data.

3.6 Consequences for Non-Compliance

The responsibilities listed above are intended to minimize the risk of human error and the misuse of School students' personally identifiable student data. A person or entity's non-compliance with the roles and responsibilities listed above shall result in consequences for the person or entity up to and including removal of access to the School's network. If this access is required for employment or contracted services, employees and third-party contractors may be subject to dismissal.

4. DATA COLLECTION

The School collects student data for two main purposes: to comply with state or federal law and to improve students' educational experience. Student data enables the School to participate in state and federal education programs and to qualify for state and federal education funds. Student data also helps the School to better plan and personalize classroom instruction, increase student and teacher performance, and make informed decisions. The School collects student data primarily through parents or guardians completing a secure online registration packet, but it may also collect additional student data during the school year.

4.1 Data Elements Collected by the School

4.1.1 Necessary Student Data

The School collects student data defined as "necessary student data" in Utah Code § 53E-9-301(12), including:

1. Name (first, middle, and last);
2. Date of birth;
3. Gender;
4. Parent contact information (including full name, relationship to student, home address, phone number(s), and email address);
5. Custodial parent information (including contact information, whether living with student, and existence of any legal documents regarding custody of student);
6. Contact information (including phone number and home/mailling address);
7. A student identification number;
8. Local, state, and national assessment results or an exception from taking a local, state, or national assessment;
9. Courses taken and completed, credits earned, and other transcript information;
10. Course grades and grade point average;
11. Grade level and expected graduation date or graduation cohort;
12. Degree, diploma, credential attainment, and other school exit information;
13. Attendance and mobility;
14. Drop-out data;
15. Immunization record or an exception from an immunization record;
16. Race;
17. Ethnicity;
18. Tribal affiliation;

19. Remediation efforts;
20. An exception from a vision screening required under Utah Code § 53G-9-404 or information collected from a vision screening required under Utah Code § 53G-9-404;
21. Information related to the Utah Registry of Autism and Developmental Disabilities, described in Utah Code § 26-7-4 ;
22. Student injury information;
23. A disciplinary record created and maintained as described in Utah Code § 53E-9-306;
24. Juvenile delinquency records;
25. English language learner status (including whether child speaks a language other than English); and
26. Child find and special education evaluation data related to initiation of an IEP.

4.1.2 Optional Student Data

The School collects the following student data defined as “optional student data” in Utah Code § 53E-9-301(13):

1. Information that is not “necessary student data” described above but is related to a student’s IEP or required for a student to participate in a federal or other program;
2. A student’s preferred first, middle, and last name (but only if different than student’s legal names);
3. A student’s homelessness status;
4. Whether a student was born outside of the United States;
5. A student’s disciplinary history, including whether a student has ever been suspended or expelled from school and if the student has any disciplinary action pending from the student’s previous school of enrollment;
6. A student’s emergency contact information (including name, relationship to student, and phone number(s));
7. Information needed for School to facilitate transfer of a student’s student records from previous school, including:
 - a. Whether student currently resides in Utah;
 - b. District boundaries in which student lives;
 - c. School boundaries in which student lives;
 - d. Whether student has pre-registered with a school other than the school located in the school boundaries in which student lives; and
 - e. Name and contact information (address and phone number) of the school in which the student has pre-registered.
8. Information requested in Household Application for Free and Reduced Price School Meals, including data related to household members, whether any household members participate in assistance programs (such as SNAP, TANF, or FDPIR), and household income.
9. Information related to School’s Fee Waiver Application, including household income verification, whether student receives SSI benefits, whether family

receives TANF, and whether student is in foster care or in state custody.

4.1.3 Personally Identifiable Student Data

The School collects student data defined as “personally identifiable student data” in Utah Code § 53E-9-301(15), including:

1. A student’s first and last name;
2. The first and last name of a student’s family member (parent or guardian);
3. A student’s or a student’s family’s (parent or guardian’s) home or physical address;
4. A student’s telephone number;
5. A student’s health or disability data (health data collected includes vision and hearing impairment, medical conditions, medications taken during school hours, allergies, special dietary needs, and other); and
6. A student’s education entity student identification number.

4.2 Records Collected by the School

In addition to the records collected by the School as explained above, the School collects the following records as required or allowed by Utah law:

1. A copy of a student’s birth certificate;
2. A copy of a student’s immunization card from the state, other proof of immunizations, or an Immunization Exemption Waiver;
3. If applicable, a copy of a student’s IEP, IHCP, or Section 504 Plan;
4. Proof of a vision exam for students under 8 years of age entering school for the first time in Utah;
5. If applicable, copy of legal documents such as a divorce decree, custody order, restraining order, protective order, power of attorney, or guardianship letters or orders;
6. A copy of a transfer student’s record from the student’s previous school;
7. Fee Waiver Application, as applicable; and
8. Household Application for Free and Reduced Price School Meals, as applicable.

4.3 Data Not Collected by the School

The School does not collect a student’s social security number or, except as required in Utah Code § 78A-6-112, criminal record.

4.4 Data Not Collected by the School Without Prior Written Consent

The School follows Utah Code § 53E-9-203 in Utah FERPA by not collecting certain information from a student by way of a psychological or psychiatric examination, test, treatment, survey, analysis, or evaluation unless the School has received the prior written consent of the student’s parent or legal guardian or an exception to the prior written consent rule applies. Please refer to the School’s FERPA Administrative Procedures (particularly the “Activities Prohibited Without Prior Written Consent” Section) to see the types of information governed by Utah Code § 53E-9-203, the accompanying notice and

consent requirements, and exceptions. These administrative procedures explain how the School complies with the statute.

5. DATA USE

The School uses the student data it collects to conduct the regular activities of the School. School employees and volunteers shall only have access to student data for which they have a legitimate educational interest and shall not use student data for any improper or non-educational purpose. School employees and volunteers shall use student data only as authorized by the School to fulfill their respective job or volunteer duties. Please see the School's FERPA Administrative Procedures (particularly the "Access to Information" Section) for a summary of School personnel who, generally, have a legitimate educational interest in having access to student data and the particular data to which they have access. To help protect the privacy and security of student data, School employees and volunteers who have access to student data will participate in student data privacy training each year as required by the School and employees will sign a statement certifying that they have completed the training and understand student data privacy requirements.

Student data use by outside parties shall be limited to those to whom the School has shared the data in accordance with the law and who have a legitimate need to use the data. For example, outside parties with whom the School has contracted to provide services or functions that the School's employees would typically perform may use student data for the purpose of providing the contracted product or service. Third-party contractors' use of student data shall be in accordance with their contract and/or Data Confidentiality Addendum (or other approved data privacy agreement) with the School, and in compliance with applicable law, including Utah Code § 53E-9-309 and administrative rules adopted by the USBE.

6. DATA STORAGE

Please see the "Physical Protection" and "Technological Protection" Sections of the School's FERPA Administrative Procedures to review the ways in which the School stores student data and protects stored data.

6.1 Electronic Storage

As explained in the School's FERPA Administrative Procedures, most of the student data collected by the School (including the data collected through the School's online registration system) is stored electronically by the School in Aspire, which is the student information system provided to Utah schools by the USBE. Aspire provides a secure location for the storage, maintenance, and transmission of student data. If the School chooses to use any additional student information systems, it will ensure that the system has adequate security protections. School employees and volunteers shall not store personally identifiable student data on their personal computers or devices, flash drives, or any other removable data storage media unless authorized by the Student Data Manager.

6.2 Physical Storage

Any printed documents containing personally identifiable student data is to be stored by the School in a secured, locked location, and access to such locations shall be determined by the Student Data Manager. School employees and volunteers shall not store documents with personally identifiable student data in physical locations away from the School, such as in their homes or vehicles, unless authorized by the Student Data Manager.

6.3 Third-Party Contractors

Third-party contractors shall store personally identifiable student data received from the School in accordance with their contract and/or Data Confidentiality Addendum (or other approved data privacy agreement) with the School and applicable law. Third-party contractors shall follow and comply with the requirements in R277-487-7.

7. DATA SHARING

The School shall not share a student's personally identifiable student data outside of the School unless the data is shared in accordance with FERPA, Utah FERPA, Utah Code § 53E-9-301 *et seq.*, and any other applicable law. The School's Student Data Manager authorizes and manages such data sharing and ensures compliance with applicable law.

7.1 Prior Written Consent

Except as provided by law, the School shall not share a student's personally identifiable data with anyone other than the student or the student's parent or legal guardian unless the School first obtains prior consent from the student's parent or guardian (or the student if the student is 18 years old or older). In order to be valid, the prior consent must:

1. Be in writing;
2. Be signed by the student's parent or guardian, or the student if he or she is 18 or older (electronic signatures are sufficient);
3. Specify the records or data to be disclosed;
4. State the purpose of the disclosure; and
5. Identify the party to whom the disclosure may be made.

As provided in the "Student Education Records Management" Section of the School's FERPA Administrative Procedures, a student's parent or guardian (or the student if the student is 18 years old or older) has the right to inspect and review all of the student's education records maintained by the School and the School must grant such requests within a reasonable period of time, not to exceed 45 days. The School may impose requirements related to such requests, such that the request be in writing, signed, dated, and contain certain information. The School may also require proof of identity and relationship (parent or guardian) to the student before granting access to the student's records.

7.2. Exceptions to the Prior Consent Rule

The School shall not share, outside of the School, a student's personally identifiable

student data without obtaining prior written consent unless such sharing is:

1. To the student or student's parent or guardian;
2. Authorized by federal and Utah law, including FERPA, Utah FERPA, and Utah Code § 53E-9-301 *et seq.* Such authorized sharing includes:
 - a. To a school official who has a legitimate educational interest (a school official could be an employee or agent of the School that the School has authorized to request or receive student data on behalf of the School);
 - b. To a person or entity to whom the School has outsourced a service or function (1) to research the effectiveness of a program's implementation or (2) that the School's employees would typically perform;
 - c. To an authorized caseworker or other representative of the Department of Human Services, but only as described in Utah Code § 53E-9-308(3);
 - d. To other schools that have requested the data and in which the student seeks or intends to enroll, or where the student is already enrolled, so long as the disclosure is for purposes related to the student's enrollment or transfer;
 - e. To individuals who need to know in cases of health and safety emergencies;
 - f. To officials in the juvenile justice system when the disclosure concerns the system's ability to effectively serve, prior to adjudication, the student whose data is to be released;
 - g. In connection with an audit or evaluation of federally or state supported education programs, or for the enforcement of, or compliance with, federal legal requirements relating to those programs;
 - h. To the Immigration and Naturalization Service (INS) for foreign students attending the School under a visa;
 - i. To the Attorney General of the United States in response to an *ex parte* order in connection with the investigation or prosecution of terrorism crimes;
 - j. In response to a valid subpoena; or
 - k. The sharing of personally identifiable student data that is directory information, but only if the School (1) has given the student's parent annual notice of the types of data it has designated as directory information and the parent's right to request that any or all of student's directory information not be released by the School and (2) the parent has not notified the School that he or she does not want the personally identifiable student data to be designated as directory information.

7.3 Directory Information

The School designates the following student data as directory information:

1. Name;
2. Photograph;
3. Grade level;
4. Participation in officially recognized activities and sports;
5. Parent names and contact information; and
6. Honors and awards.

The student data designated as directory information may change from time to time. Parents will be given notice of such changes as required by law.

7.4 Third-Party Contractor Addendum

Unless an exception in Utah Code § 53E-9-309 applies, the School may share personally identifiable student data with third-party contractors only if the contractors have entered into a contract and Data Confidentiality Addendum (or other approved data privacy agreement) with the School. Third-party contractors must comply with the contract, Addendum (or other approved data privacy agreement), Utah Code § 53E-9-301 *et seq.*, and related administrative rules adopted by the USBE.

7.5 Aggregate Data

7.5.1 Definition

“Aggregate data” has the same meaning as set forth in Utah Code § 53E-9-301(2). Aggregate data does not reveal any personally identifiable student data and contains data of at least 10 individuals.

7.5.2 Sharing Aggregate Data

The School may share aggregate data outside of the School without obtaining prior written consent so long as it is shared in accordance with this paragraph. If the School receives a request for aggregate data, including for the purpose of external research or evaluation, the School shall follow the review process set forth below:

1. All requests shall be submitted in writing to the Student Data Manager;
2. The written request to the Student Data Manager shall describe the purpose of the request, the desired student data, how the student data will be used, and details about how the student data will be disclosed or published by the requestor;
3. The Student Data Manager shall review the written request and consult with the School’s management company about any potential data privacy issues relevant to the request;
4. If the Student Data Manager approves of the request, an MOU shall be prepared and presented (along with the requestor’s written request) to the School’s Board of Directors for review and approval; if the Student Data Manager disapproves of the request, the requestor shall be so notified;

5. If the Board approves of the request and MOU, the MOU shall be signed by the Board's president or designee and the requestor; if the Board disapproves of the request, the requestor shall be so notified;
6. After approval by the Board and execution of the MOU, the Student Data Manager or a responsible person designated by the Student Data Manager, shall, as applicable, de-identify the requested student data through disclosure avoidance techniques (such as data suppression, rounding, recoding, blurring, perturbation, etc.) and/or other pertinent techniques;
7. After all requested student data has been de-identified and reviewed by the Student Data Manager, the requested student data shall be saved, physically or electronically, in a secure location managed by the Student Data Manager and then sent to the requestor through a secure method approved by the Student Data Manager.

8. RECORD RETENTION AND EXPUNGEMENT

Record retention and expungement procedures promote efficient management of records, preservation of records of enduring value, quality access to public information, and data privacy.

8.1 Retention

The School shall retain and dispose of student records in accordance with Utah Code § 63G-2-604, Utah Code § 53E-9-306, and rules adopted by the USBE, including R277-487-4. Unless the School adopts its own approved retention schedule, the School shall comply with the Utah Education Records Retention Schedule (also known as the Utah RAMP Retention Schedule) published by the USBE and Utah Division of Archives and Records Service.

8.2 Expungement

The School shall comply with Utah Code § 53E-9-306 and R277-487-4 in terms of what student data it may and may not expunge. Accordingly, the School may not expunge a student's grades, transcripts, record of enrollment, or assessment information. The School may, on its own volition or at the request of a student's parent or an adult student, expunge other student data, including a student's medical records and behavioral assessments, so long as the administrative need for the student data has passed. A request to expunge such student data shall be made in writing to the School's Director and describe in detail the data requested to be expunged.

In addition, a student's parent or an adult student may also request that the School expunge any student data or record not subject to a retention schedule under Utah Code § 63G-2-604, and believed to be

1. Inaccurate;
2. Misleading; or
3. In violation of the privacy rights of the student.

Such a request to expunge a student's student data or records shall be made in writing to the School's Director and describe in detail the data or records requested to be expunged. The School will process such requests following the same procedures

outlined for a request to amend a student record in 34 CFR Part 99, Subpart C. These procedures are outlined below:

1. If a parent or adult student believes that a record is misleading, inaccurate, or in violation of the student's privacy, they may request that the record be expunged.
2. The School shall decide whether to expunge the data within a reasonable time after the request.
3. If the School decides not to expunge the record, the School will inform the parent or adult student of its decision as well as the right to an appeal hearing.
4. The School shall hold a hearing within a reasonable time after receiving the request for a hearing.
5. The School shall provide the parent or adult student notice of the date, time, and place in advance of the hearing.
6. The hearing shall be conducted by any individual that does not have a direct interest in the outcome of the hearing.
7. The School shall give the parent or adult student a full and fair opportunity to present relevant evidence. At the parents' expense and choice, they may be represented by an individual of their choice, including an attorney.
8. The School shall make its decision in writing within a reasonable time following the hearing.
9. The decision must be based exclusively on evidence presented at the hearing and include a summary of the evidence and reasons for the decision.
10. If the decision is to expunge the record, the School will seal it or make it otherwise unavailable to other School staff and educators.

The School may consult with the Utah Division of Archives and Records Service and/or USBE when issues or questions arise with respect to record retention and expungement.

8.3 Disciplinary Record

The School may create and maintain a disciplinary record for a student in accordance with rules adopted by the USBE.

9. DATA BREACH

9.1 Definition of Data Breach

A data breach for purposes of this Plan is any instance in which there is an unauthorized release or access of personally identifiable student data. This definition applies regardless of whether the School stores and manages the data directly or through a third-party contractor.

9.2 Types of Data Breaches

Data breaches can take many forms, including:

1. Hackers gaining access to personally identifiable student data through a malicious attack (such as phishing, virus, bait and switch, keylogger, denial of service, etc.);
2. A School employee losing School equipment on which personally identifiable student data is stored (such as a laptop, thumb drive, cell phone, etc.) or having such equipment stolen;
3. An unauthorized third party retrieving personally identifiable student data from a School's physical files;
4. A School employee accidentally emailing personally identifiable student data to an unauthorized third party; or
5. A School employee or third-party contractor saving files containing personally identifiable student data in a web folder that is publicly accessible online.

9.3 Industry Best Practices

The School takes a variety of measures to protect personally identifiable student data, including imposing disclosure prevention responsibilities on School employees, educators, volunteers, and third-party contractors. The School also follows industry best practices to maintain and protect personally identifiable student data and to prevent data breaches, some of which are outlined in the School's Information Technology Systems Security Plan.

9.4 Responding to a Data Breach.

9.4.1 Reporting a data breach

School employees, volunteers, and third-party contractors shall immediately report a data breach or a suspected data breach to the Student Data Manager. Students and parents of students who become aware of a data breach or that suspect a data breach shall also immediately notify the Student Data Manager.

9.4.2 Data Breach Protocol

The Student Data Manager shall collaborate with the IT Security Manager and others, as appropriate, to determine whether a data breach has occurred. If it is determined that a data breach has occurred, the School shall, under the direction of the Student Data Manager and IT Security Manager, follow the protocol described below:

1. Lock down systems and data that have been breached or suspected to have been breached, including changing applicable passwords, encryption keys, locks, etc;
2. Assemble a Data Breach Response Team, which could include the Student Data Manager, IT Security Manager, School employees, Board members, members of the School's management company, the School's IT provider, etc;
3. Record as many details about the data breach as possible, including:
 - a. Date and time data breach was discovered;

- b. Data elements involved (for example, students' first and last name, SSIDs, DOBs, passwords, account information, employee social security numbers, etc.);
 - c. Data systems involved (for example, Aspire, online registration system, or other School data system); and
 - d. Type of data breach (physical, such as stolen/lost paperwork or computer equipment; or electronic, such as hacking or unauthorized email transmission).
4. Assign an incident manager that has the appropriate qualifications and skills to be responsible for the investigation of the data breach;
 - a. Investigate scope of data breach to determine types of information compromised and number of affected individuals; and
 - b. Investigate the data breach in a way that will ensure that the investigative evidence is appropriately handled and preserved;
5. Attempt to retrieve lost, stolen, or otherwise compromised data;
6. Determine whether notification of affected individuals is appropriate and, if so, when and how to provide such notification; notification timeframes and requirements should be identified as soon as possible and notices developed and delivered to affected individuals and agencies in accordance with regulatory mandates and timeframes;
7. If the data breach involved the release of a student's personally identifiable student data, notify the student (if the student is an adult student) or the student's parent or legal guardian if the student is not an adult student in a manner reasonable under the circumstances;
8. If the data breach (by the School or one of its third-party contractors) constitutes a "significant data breach" as defined in R277-487-2, report it to the State Superintendent within ten business days of the initial discovery of the significant data breach as required in R277-487-3;
9. Determine whether to notify the authorities/law enforcement (situation dependent); involve legal counsel to analyze legal obligations;
10. If the School has cyber liability and/or data breach insurance coverage, determine whether to notify the insurance provider and make a claim on such coverage; and
11. Consult with appropriate security professionals, as necessary, to identify the possible reason(s) for the data breach and how to prevent similar data breaches in the future.

Following the steps above and clearly defining the roles and responsibilities of all those involved in the steps will promote better response coordination and help the School shorten its incident response time. Prompt response is essential for minimizing the risk of any further data loss and, therefore, plays an important role in mitigating any negative consequences of the breach, including potential harm to affected individuals. All work and activities performed under each of the steps above should be well documented and all documentation should be retained as required.

9.4.3 Coordination with Management Company and/or Legal Counsel

The School shall coordinate with its management company and/or separate legal counsel on the preparation and method of delivery of written materials, including notifications, related to a data breach.

9.5 Cooperation

The School shall cooperate with regulatory and governmental agencies that make inquiries regarding a data breach.

10. DATA TRANSPARENCY

The School's policies concerning data privacy and security are published on the School's website. In addition, each year the School shall publish its current version of the following on its website:

1. Metadata Dictionary;
2. Student Data Collection Notice;
3. Information Technology Systems Security Plan;
4. Notification of Rights under FERPA;
5. Notice of Directory Information; and
6. Data Governance Plan.

11. DATA PRIVACY AND SECURITY AUDITING

The School shall periodically conduct audits to determine compliance with this Plan and to assess the quality and effectiveness of the data privacy and security processes and procedures set forth in this Plan. The School shall use the results of such audits to determine ways in which this Plan and the School's student data governance and management can be improved. The School may use third-party experts to assist with and/or conduct such audits.

The School or its designee may audit its third-party contractors to verify compliance with the terms of the School's Data Confidentiality Addendum (or other approved data privacy agreement) that relate to the confidentiality and protection of personally identifiable student data.

12. DATA PRIVACY AND SECURITY TRAINING

On an annual basis, the School shall provide appropriate student data privacy training to its employees, aides, and volunteers who are authorized by the School to have access to education records as defined in FERPA.

The School shall also provide its employees with appropriate training on IT security matters.

Where required by R277-487, educators at the School shall also complete the student data security and privacy training for educators developed by the State Superintendent as a condition of re-licensure.

Library Materials Procedures

These procedures are established in accordance with the Library Materials Policy adopted by the School's Board of Directors.

I. Selection of Materials for School's Library Collection

- a. The School's librarian will select all library materials, including from materials provided as gifts or donations to the School's library. The selection of library materials will be consistent with the School's Library Materials Policy and will be performed under the direction of the Director.
- b. The following selection criteria will be used:
 - i. Overall purpose and educational significance;
 - ii. Legality;
 - iii. Age and developmental appropriateness;
 - iv. Timeliness and/or permanence;
 - v. Readability and accessibility for intended audience;
 - vi. Artistic quality and literary style;
 - vii. Reputation and significance of author, producer, and/or publisher;
 - viii. Variety of format with efforts to incorporate emerging technologies; and
 - ix. Quality and value commensurate with cost and/or need.
- c. The librarian may seek recommendations and work collaboratively with parents, patrons, and others in the School community during the selection process.
- d. The School's library collection will reflect a diversity of ideas, varying viewpoints, and adhere to applicable law.
- e. Any electronic databases and other web-based searches and content will be filtered through the School's state-required internet filter.

II. Library Collection Maintenance

- a. Library materials will be maintained consistent with the criteria listed above, applicable state and federal laws, including Utah Code § 53G-10-103.
- b. The librarian or another employee designated by the School's Director will inventory the School's library collection and equipment annually or at another time interval determined by the Director. The inventory may be used to:
 - i. Determine losses and remove damaged or worn materials to be considered for replacement;
 - ii. Deselect and remove materials that are inconsistent with the law or that are no longer relevant to the curriculum or of interest to students; or
 - iii. Identify gaps or deficits in the School's library collection.

III. Library Materials Review Process

- a. A library materials review request may only be made by:
 - i. A parent of a student who attends the School;
 - ii. A student who attends the School; or
 - iii. An employee of the School.

- b. A library materials review request must be made in writing by completing the School's Library Materials Review Request Form and submitting the Form to the School's Director or another employee designated by the School's Director. The requestor must provide all information requested on the Form.
- c. All library materials review requests must be based upon the concern that the material is "sensitive material" as defined in Utah Code § 53G-10-103 or upon concerns with the age-appropriateness of content in the material.
- d. To the extent practicable, the identity of a requestor will be protected and kept confidential from all individuals outside of the School's review process outlined in these procedures.
- e. The material that is subject to a review request will have restricted access (for example, by maintaining the material behind the circulation desk and requiring an access code for digital materials) until the processes described in these procedures are completed. Access to such material will be limited to students with prior parent/guardian permission only. A list of restricted materials will be made available to the public upon request.
- f. After receipt of a request for review, the School's Director or another employee designated by the School's Director will acknowledge receipt of the request and convene a Library Materials Review Committee (the "Review Committee") within a reasonable time according to the procedure outlined below:
 - i. The Review Committee will include a reasonable number of individuals.
 - ii. Members of the Review Committee will be selected by the Director and include at least the following:
 - 1. The School's Director or another member of the School's administration;
 - 2. A licensed teacher at the School (if practicable, the teacher will be an English language arts teacher or teacher who teaches a subject that is relevant to the challenged material);
 - 3. The School's librarian; and
 - 4. At least two parents of current students at the School that are reflective of the School community as required in Subsection 53G-10-103(3).
- g. The Review Committee will determine the amount of time needed for an adequate review of the challenged material to make a thorough and thoughtful decision and inform the requestor of the determined timeline. The Review Committee will strive to complete all reviews and make its final decision between thirty to sixty (30-60) days of its receipt of the request for review.
- h. Each member of the Review Committee will receive materials to complete the review process, including the following:
 - i. A copy of the Library Materials Review Request Form that was submitted;
 - ii. Access to the challenged material being;
 - iii. A copy of the School's Library Materials Policy and these procedures; and
 - iv. Any relevant information about the challenged material from the School's librarian, including the reason(s) the material was selected to be in the School's library collection.

- i. The Review Committee will schedule a meeting (or multiple meetings, if the Review Committee determines that is necessary) to complete the review process.
- j. The Review Committee will determine whether the challenged material constitutes sensitive material consistent with Utah Code § 53G-10-103, the School's Library Materials Policy and these procedures, and the guidance letter provided by the Attorney General's Office dated June 1, 2022.
- k. In deciding whether the challenged material constitutes sensitive material, the Committee will:
 - i. Consider *all* elements of the definitions of pornographic or indecent material as defined in Utah Code § 76-10-1235, § 76-10-1201, § 76-10-1203, and § 76-10-1227; and
 - ii. Whether the challenged material is age appropriate due to vulgarity or violence.
- l. In deciding whether the challenged material is age appropriate due to vulgarity, violence, or content, the Review Committee must consider the challenged material taken as a whole and consider whether it has serious literary, artistic, political, or scientific value for minors, which may include the following objective criteria:
 - i. Reliable, expert reviews of the material or other objective sources;
 - ii. Review Committee members' experience and background; and
 - iii. Community standards.
- m. In deciding whether the challenged material taken as a whole has serious literary, artistic political, or scientific value as described above, the Review Committee will consider that:
 - i. Serious value does not mean *any value*; and
 - ii. Greater protections should exist concerning content for a library in an elementary or middle school setting.
- n. The Review Committee will make a final decision on a challenged material as follows:
 - i. **Retained**: the decision to maintain access in the School to the challenged material for all students;
 - ii. **Restricted**: the decision to restrict access in the School to the challenged material for certain students as determined by the Review Committee; or
 - iii. **Removed**: the decision to prohibit access in the School to the challenged material for all students.
- o. The decision of the Review Committee will be determined by majority vote of the Review Committee members. This decision is final unless appealed in accordance with Section IV below.
- p. The final decision of the Review Committee will be communicated in writing to the requestor and appropriate School employees within seven (7) days of the decision being made.
- q. The challenged material may not be reviewed again for three (3) school years following the Review Committee's decision.
- r. The School will maintain a list of all materials that receive a "removed"

- decision from the Review Committee and share the list with all School employees. The list will also be made available to the public upon request.
- s. The School will also maintain a list of all Review Committee final decisions on challenged material and share the list with all School employees, whether the final decision was retained, restricted, or removed.
 - t. If library materials review requests become unduly burdensome, the School may limit the number of review requests an individual may make in the course of a school year.

IV. Appeals Process

- a. The original requestor or another individual listed in Section III(a) who was not on the Review Committee may appeal the decision of the Review Committee in writing to the School's Board of Directors (the "Board") within fourteen (14) days of receipt of the Review Committee's final written decision using the School's Library Materials Appeal Request Form.
- b. After receipt of a completed Library Materials Appeal Request Form, the Board President or another Board member designated by the Board President will acknowledge receipt of the appeal and appoint a Library Materials Appeals Committee (the "Appeals Committee") within a reasonable time according to the procedure outlined below:
 - i. The Appeals Committee will include at least three individuals.
 - ii. Members of the Appeals Committee will be selected by the Board President or another Board member designated by the Board President and include at least the following:
 - 1. Two or more Board members;
 - 2. A School administrator and/or other School employee who did not participate in the initial Review Committee.
 - iii. The Board President or another Board member designated by the Board President may, in his/her discretion, also add to the Appeals Committee a parent or licensed teacher at the School who did not participate in the initial Review Committee.
 - iv. If a quorum of the Board is selected to serve on the Appeals Committee, the Appeals Committee will follow the Open and Public Meetings Act in its deliberations.
- c. The Appeals Committee will determine the amount of time needed for an adequate review of the challenged material to make a thorough and thoughtful decision and inform the requestor of the determined timeline. The Appeals Committee will strive to complete its review and make its final decision between thirty to sixty (30-60) days of its receipt of the appeal.
- d. Each member of the Appeals Committee will receive materials to complete the review process, including the following:
 - i. A copy of the Library Materials Review Request Form;
 - ii. A copy of the Library Materials Appeal Request Form;
 - iii. A copy of the challenged material;
 - iv. The Review Committee's final decision and rationale for the decision; and

- v. A copy of the School's Library Materials Policy and these procedures.
- e. The Appeals Committee will schedule a meeting (or multiple meetings if the Appeals Committee determines that is necessary) to complete the appeals process.
- f. The Appeals Committee may make a final decision of a reviewed material as follows:
 - i. **Retained:** the decision to maintain access in a school setting to the challenged material for all students;
 - ii. **Restricted:** the decision to restrict access in a school setting to the challenged material for certain students;
 - iii. **Removed:** the decision to prohibit access in a school setting to the challenged material for all students; or
 - iv. Another decision as decided by the Appeals Committee.
- g. The decision of the Appeals Committee will be determined by majority vote. This decision is final, subject to Section V below.
- h. A challenged material may not be reviewed again for three (3) school years if the Appeals Committee votes to uphold the Review Committee's decision.
- i. The final decision of the Appeals Committee will be communicated in writing to the requestor and appropriate employees within seven (7) days of the decision.
- j. The School will maintain a list of the final decisions made by the Appeals Committee and share the list with all School employees. The list will also be made available to the public upon request.

V. Final Procedural Review (Applicable if permitted by R277-123)

- a. The requestor in Section IV(a) may, in accordance with R277-123, petition the USBE for a procedural review of the Appeals Committee's final decision.
- b. The USBE's review decision is final.

VI. Postings on Website

- a. The School will post the following on its website:
 - i. The Library Materials Policy and these procedures;
 - ii. The Library Materials Review Request Form; and
 - iii. The Library Materials Appeal Request Form.

Library Materials Review Request Form

Information about Library Material Requested to be Reviewed:

- 1) Title:
- 2) Author:
- 3) School where this library material can be accessed:

Information about Requestor:

- | | | | |
|----|--|-----|----|
| 1) | <u>Name:</u> | | |
| 2) | <u>Telephone:</u> | | |
| 3) | <u>Address:</u> | | |
| 4) | <u>Email:</u> | | |
| 5) | <u>Are you a student of this school?</u> | Yes | No |
| 6) | <u>Are you a parent of a student of this school?</u> | Yes | No |
| 7) | <u>Are you an employee of this school?</u> | Yes | No |

Information about Review Request:

- 1) Was this library material recommended, assigned, or made available through the school? If so, where?
- 2) What complaints, objections, or concerns do you have about this library material? Please provide examples, page numbers, links, or any other information to help in locating or identifying the content of concern. Please attach any images or other corroborating evidence. You may attach other additional pages as needed
- 3) What action(s) are you requesting the Library Materials Review Committee to consider?

Requestor's Signature: _____ **Date:** _____

After you submit this Form, you will receive an acknowledgment of receipt and an estimated timeline for when a decision will be made by the Review Committee. The Review Committee generally completes its review and makes its final decision between thirty to sixty (30-60) days after its receipt of a request for review.

*****Below is for Internal Use Only*****

Name of Administrator Convening the Review Committee:

Anticipated Date by Which Review will be Completed:

Library Materials Appeal Request Form

Instructions:

A requestor must submit this Form along with a copy of the Review Committee's written decision within fourteen (14) days of receiving the Review Committee's written decision.

Information about Requestor:

- 1) **Name:**
- 2) **Telephone:**
- 3) **Address:**
- 4) **Email:**
- 5) **Date you received Review Committee's written decision:**
- 6) **Are you a student of this school?** Yes No
- 7) **Are you a parent of a student of this school?** Yes No
- 8) **Are you an employee of this school?** Yes No

Information about Challenged Library Material:

- 1) Title:
- 2) Author:
- 3) School:
- 4) Please provide a written statement setting forth your rationale to appeal the Review Committee's decision regarding the challenged library material (attach additional pages as needed).

Requestor's Signature: _____ Date: _____

After you submit this Form, you will receive an acknowledgment of receipt and an estimated timeline for when a decision will be made by the Appeals Committee. The Appeals Committee generally completes its review and makes its final decision between thirty to sixty (30-60) days after its receipt of an appeal.

*******Below is for Internal Use Only*******

Name of Board Member Convening the Appeals Committee: _____

Anticipated Date by Which Review will be Completed: _____

Meal Charges Procedure

A. Purpose and Background

- 1) The National School Lunch Program ("NSLP") and National School Breakfast Program ("NSBP") are programs that Bridge Elementary ("BRIDGE ELEMENTARY" or the "School") offers.
- 2) The purpose of this procedure is to explain how BRIDGE ELEMENTARY will notify parents/guardians about: money owed for student meals; the School's procedures for providing meals if students' accounts are delinquent; and to assure and remind parents and School employees that students will never be confronted or embarrassed about money owed for school meals.

B. Information Provided to Parents

- 1) Prior to or at the beginning of each school year, parents shall receive information from BRIDGE ELEMENTARY regarding:
 - a) School meals;
 - b) Prices for the meals;
 - c) How parents may provide payment for meals; and
 - d) The NSLP and NSBP and how students may qualify for reduced-price or free meals under the programs, including an application for free or reduced-price meals.
- 2) BRIDGE ELEMENTARY shall provide the information described above as follows:
 - a) Information will be provided to BRIDGE ELEMENTARY students and families regarding school meals, prices, payments and how to qualify and apply for free and reduced school meals through the following means: School newsletter at the beginning of the school year, printed and available at Back-to-School Night and given to all students on the 1st day of school. It will also be printed and available in the School office beginning at Back-to-School Night and throughout the school year. It will also be posted on the BRIDGE ELEMENTARY Child Nutrition Director's blog found on the School's website.
 - b) During Back-to-School Night BRIDGE ELEMENTARY will provide applications for free/reduced-price meals to parents, both by providing printed copies and by providing access to a computer to fill out an electronic application online. BRIDGE ELEMENTARY will also have a computer set up during parent teacher conferences for the purpose of filling out an electronic application online. The application is accepted year-round and available in a variety of languages at: <http://www.fns.usda.gov/schoolmeals/family-friendly-application-translations>. The School will provide paper applications for parents who do not have access to online forms.
- 3) Prior to or at the beginning of each school year, and upon a student transferring to the School during the school year, BRIDGE ELEMENTARY will provide to the parent of each student a written copy of this procedure by having the newsletter which lists the information above in section 1 available at the front office year-round for parents to access. This procedure will also be posted on the School's website at www.bridgecharter.org, under the lunch tab section. Students, parents, and the School community were involved in developing these communication procedures.
- 4) If a parent or family qualifies for SNAP, FEP, FRRIP, or Medicaid and has not received a qualification for free or reduced-price lunch letter before school starts, the parent should contact the School food service director at chefdave@bridgecharter.org. Parents should also contact the School food service director for questions about the NSLP or NSBP or for assistance with applying for free or reduced-price school meals.

C. Payments and School Verification

- 1) BRIDGE ELEMENTARY must verify at some point in each student's meal service that the meal is reimbursable or non-reimbursable.
- 2) BRIDGE ELEMENTARY will credit meal payments from parents to the student's account within 48 hours, working with banking holidays and schedules. This assures all funds are accurately applied to meal accounts as soon as possible before students are selecting school meals.
- 3) If a student/family qualifies for free meals, no payments are due.
- 4) If a family qualifies for reduced-price meals, the school will charge no more than \$.30 for breakfast and \$.40 for lunch.
- 5) Parent payment options for student meals may include:
 - a) Parents may make online payments, using debit or credit cards, for one or all of their students, allocating the funds to individual student's accounts. There may be additional fees for making payments by credit card through the School website. To make an online payment through the School website, parents must click on the lunch tab and go to the link for instant payments. A third party handles all online payments; and
 - b) Parents may make payments to the School by mail or hand delivery. Payments should clearly indicate the account to which the funds should be credited (student's name and amount, if several students attend the school). BRIDGE ELEMENTARY also accepts payments by check and/or cash at the School.

D. Identification of Delinquent Accounts

- 1) BRIDGE ELEMENTARY will identify accounts weekly and notify parents by email of negative balances. BRIDGE ELEMENTARY may ask students to take notifications addressed to the parent home with them; however, the School will not tell students to "remind" their parents to send money to the School. It is the parents' responsibility to pay the student's account. Asking students to remind parents is inappropriate.
- 2) The School may use any of the following options (or other reasonable options) for student meals if a student's meal account is inadequate:
 - a) Student may bring a sack meal from home; or
 - b) School may continue to provide a regular meal to students and notify parents that the School will use collection efforts to pay for meals. The School shall maintain documentation of parent notice.

E. Delinquent Balances and Other Procedures

- 1) We will notify parents of students with delinquent balances in their school lunch accounts by such methods as:
 - a) Weekly e-mail on accounts from negative \$.01-\$19.99;
 - b) Phone Call from negative \$20.00 to \$50.00; and
 - c) Account turned over to collections negative \$50.01 and above.
 - d) If no payment is received, the account will be turned over to a collection agency when the student's account becomes negative \$50. (No federal funds may be used for the collection of funds). BRIDGE ELEMENTARY will notify parents at least annually concerning their procedures for the collection of past-due accounts.
- 2) BRIDGE ELEMENTARY may complete an application for free/reduced-price meals on behalf of the parents, if School personnel have knowledge of the parents' financial circumstances and parents give permission. The School will notify parents that an application has been completed on their behalf ("Eligibility Manual for School Meals," July, 2015, pg. 45).

- 3) If a student repeatedly has no money in the student's school lunch account and no student meals are provided from home, School officials will consider the circumstances in the home (e.g., potential abuse or neglect, homelessness, etc.) and may contact the School's social worker and/or Child Protective Services.
- 4) BRIDGE ELEMENTARY will use collection agencies to collect on delinquent accounts.

F. Faculty/Staff/Patrons

- 1) As a Child Nutrition Program, our responsibility is to the students of BRIDGE ELEMENTARY. We love when parents, grandparents, older siblings, Aunt, Uncles, Family Members, Teachers, Aides, Administration and any visitors come to have lunch with our students and in our school. Parents and guests may purchase lunch using their student's accounts if there are funds in the account to cover the meals. When any other account besides student accounts hit a zero balance (\$0.00), meals may be denied until funds or a receipt for funds being deposited into the account that day is presented to the point of sale person.
- 2) The School will annually provide a copy of this procedure to all School personnel who are responsible for or involved in:
 - a) Collecting payment for meals at the time of meal service;
 - b) Notifying parents of delinquent accounts;
 - c) Collection efforts for delinquent accounts;
 - d) Distributing this procedure and other information about the NSLP and NSBP; and
 - e) Enforcing any aspect of this procedure.

G. Review of Procedures

- 1) The School will review this procedure annually and revise it as the School deems necessary.

Office Attendance Procedures

Updated June 2023

Daily Attendance

Classroom Attendance

Teachers must take attendance within the first 15 minutes of school. By 8:50 am the office will run the Attendance Collection Report to identify the teachers who have not taken attendance.

- Notify the teacher that attendance has not been taken and must be taken immediately. Depending on the teacher, notification could occur using one of the following methods:
 - Call to classroom
 - Overhead announcement to classroom
 - Text to teacher
- Verify the teacher completes attendance. If, 15 minutes after contact, attendance is still not taken, send a runner to the teacher's classroom to tell the teacher that attendance must be taken immediately.
- Notify the principal of the teachers that require continual reminders to update attendance timely.

Excused Absences via Email or Phone

Check the email notifications and phone notifications for absence excusals. Update ASPIRE with “Excused” for students based on the information the parent provided (see below for valid excuses). Update the attendance note to indicate if it was based on a parent phone call, email, or perhaps a written note or verbal information provided by a sibling. According to Utah Law and Bridge’s Attendance Policy, a valid excuse includes the following:

1. an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;
2. a death of a family member or close friend;
3. a scheduled family event or a scheduled proactive visit to a health care provider in accordance with Section 53G-6-803(5);
4. a family emergency;
5. an approved school activity;
6. an absence permitted by a school-age minor's:
 - a. individualized education program, developed pursuant to the Individuals with Disabilities Education Improvement Act of 2004, as amended;
 - b. or accommodation plan, developed pursuant to Section 504 of the Rehabilitation Act of 1973, as amended;
7. a preapproved extended absence for a family activity or travel, consistent with school policy; or
8. mental or behavioral health of the school-age child

However, please know that any parent approved absence is essentially “excused”. Unexcused absences are those in which the parent does not take action to notify the school.

Tardy Students or Late Check-In

At 8:30 am, students must be provided a tardy slip and marked “tardy” in the attendance system. Students take the tardy slip to their classroom to alert teachers that the student did check in with the front office.

When a parent checks a student in throughout the day, attendance in ASPIRE must be updated to reflect “check-in”.

Phone Calls to Parents

Prior to 9:30 am an absent student report must be run using ASPIRE. Parents of all absent students must be notified, no later than 10:00 am, that their child is not at school. This can be accomplished by phone calls from the office or by using a contact application such as One Call. If using an application to make contact, ENSURE that only parents of absent students are contacted.

10 Days Consecutive Absence

A consecutive absence report must be run daily to identify students who have been absent, without parental excusal, for 10 consecutive days. If a student has been absent for 10 consecutive days, the following steps must occur.

- Contact parents to determine if the student is attending another school or if the parent has decided to home school the student.
 - **Attending another school** – contact the school and verify attendance and ask for a Records Request notice. You may also check UTREX to determine if the student has indeed been picked up by another school.

- Withdraw or unenroll the student through ASPIRE and the lottery using the best practices suggested by the ASPIRE team.
- **Home School** – inform parent they need to complete the homeschool form and file it with their district of residence. Email or mail the parent the homeschool form.
 - Notify the district of residence.
 - Withdraw or unenroll the student through ASPIRE and the lottery using the best practices suggested by the ASPIRE team.

If no contact is made, withdraw or unenroll the student through ASPIRE and the lottery using the best practices suggested by the ASPIRE team. Periodically check UTREX and records requests to determine if the student is picked up by another school.

Excessively Absent Students (Unexcused)

A report of student absences must be run weekly to identify students with excessive, unexcused absences. Use the following chart to determine the action to perform based on the number of absences of a student. The office staff should run the report and provide it to the principal weekly.

Number of <u>Unexcused</u> Absences	Action to Take
4	<ul style="list-style-type: none"> • Principal sends email to parents using the suggested verbiage shown below. • A copy of the email is placed in the student's cum file.
5 – 6 Send a separate letter for 5 and 6 absences.	<ul style="list-style-type: none"> • A compulsory attendance letter is sent to parents (see below). • Parent is required to contact the principal. • A copy of the letter is placed in the student's cum file.
7 – 9 Send a separate letter for 7, 8, and 9 absences.	<ul style="list-style-type: none"> • A compulsory attendance letter is sent to parents via registered mail (see below). • Parent is required to contact the principal. • A copy of the letter and a copy of the registered mail receipt is placed in the student's cum file.
10+ Days NOTE: for habitual absences the letter must be resent at 15 and 20 days.	<ul style="list-style-type: none"> • A compulsory attendance letter is sent to parents via registered mail (see below). • Parent is required to contact the principal. • A copy of the letter and a copy of the registered mail receipt is placed in the student's cum file. • The principal will contact Division of Family Services each time a letter is sent.

4 Unexcused Absences – Suggested Email Verbiage

Dear Parent or Guardian,

As of the date of this email, your student has _____ unexcused absences. It is school policy that a parent or guardian excuse a student's absence daily, unless previous arrangements have been made with the office staff or the principal.

Bridge Elementary makes a special effort to ensure all students fully benefit from their education by attending school regularly. Attending school regularly helps children feel better about school—and themselves. Consistent attendance is essential to a student making adequate progress within the school year. To ensure your student can remain in attendance at Bridge Elementary, future absences must be excused on the day of the absence by either calling the school's attendance line or by using the online excusal form found on our website.

Please schedule an appointment with the principal by calling 801-499-5180 if you would like to discuss your student's absences, either past or future.

5 – 7 Unexcused Absences

Notice of Compulsory Education Violation

Dear Parent/Guardian:

This letter is to inform you that your child, _____, now has _____ unexcused absences this school year.

An oral or written communication documenting a valid excuse must be received from the student's parents/guardian within one (1) business day of the absence in order for an absence to be excused. In the event of multiple consecutive absences, written communication must be received within one (1) business day of the student's return to school.

A valid excuse or an excused absence means an absence resulting from:

- (a) an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;
- (b) a death of a family member or close friend;
- (c) a scheduled family event or a scheduled proactive visit to a health care provider in accordance with Section 53G-6-803(5);
- (d) a family emergency;
- (e) an approved school activity;
- (f) a preapproved extended absence for a family activity or travel, consistent with school policy;
- (g) an absence permitted by an individualized education program or accommodation plan, developed pursuant to relevant law; or
- (h) mental or behavioral health of the school-age child.

Pursuant to School policy and state law, you ***must immediately contact the School to schedule a meeting*** with the principal to discuss your child's attendance problems. Your cooperation in this matter is required.

State law also requires that we inform you that it is a Class B Misdemeanor for a student's parent/guardian to intentionally or recklessly fail to meet with school authorities to discuss the student's attendance problems or fail to prevent the student from being truant during the remainder of the school year.

Sincerely,

Principal

7 – 10 Unexcused Absences – Compulsory Education Letter
Notice of Compulsory Education Violation

DELIVERED VIA CERTIFIED MAIL

Dear Parent/Guardian:

This letter is to inform you that your child, _____, now has five (5) or more unexcused absences this school year.

An oral or written communication documenting a valid excuse must be received from the student's parents/guardian within one (1) business day of the absence in order for an absence to be excused. In the event of multiple consecutive absences, written communication must be received within one (1) business day of the student's return to school.

A valid excuse or an excused absence means an absence resulting from:

- (a) an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;
- (b) a death of a family member or close friend;
- (c) a scheduled family event or a scheduled proactive visit to a health care provider in accordance with Section 53G-6-803(5);
- (d) a family emergency;
- (e) an approved school activity;
- (f) a preapproved extended absence for a family activity or travel, consistent with school policy;
- (g) an absence permitted by an individualized education program or accommodation plan, developed pursuant to relevant law; or
- (h) mental or behavioral health of the school-age child.

Pursuant to School policy and state law, you ***must immediately contact the School to schedule a meeting*** with the principal to discuss your child's attendance problems. Your cooperation in this matter is required.

State law also requires that we inform you that it is a Class B Misdemeanor for a student's parent/guardian to intentionally or recklessly fail to meet with school authorities to discuss the student's attendance problems or fail to prevent the student from being truant during the remainder of the school year.

Sincerely,

Principal

10+ Unexcused Absences - Compulsory Education Registered Letter
Notice of Compulsory Education Violation
DELIVERED VIA CERTIFIED MAIL

Dear Parent/Guardian:

This letter is to inform you that your child, _____, now has five (5) or more unexcused absences this school year.

An oral or written communication documenting a valid excuse must be received from the student's parents/guardian within one (1) business day of the absence in order for an absence to be excused. In the event of multiple consecutive absences, written communication must be received within one (1) business day of the student's return to school.

A valid excuse or an excused absence means an absence resulting from:

- (a) an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;
- (b) a death of a family member or close friend;
- (c) a scheduled family event or a scheduled proactive visit to a health care provider in accordance with Section 53G-6-803(5);
- (d) a family emergency;
- (e) an approved school activity;
- (f) a preapproved extended absence for a family activity or travel, consistent with school policy;
- (g) an absence permitted by an individualized education program or accommodation plan, developed pursuant to relevant law; or
- (h) mental or behavioral health of the school-age child.

Pursuant to School policy and state law, you ***must immediately contact the School to schedule a meeting*** with the Principal to discuss your child's attendance problems. Your cooperation in this matter is required.

State law also requires that we inform you that it is a Class B Misdemeanor for a student's parent/guardian to intentionally or recklessly fail to meet with school authorities to discuss the student's attendance problems or fail to prevent the student from being truant during the remainder of the school year.

Because of the previous notifications and your child's continued absenteeism, administration believes the parent has failed to make a good faith effort to ensure that the child receives an appropriate education and pursuant to Utah law, administration has contacted Division of Family Services.

Sincerely,

Principal

Tardy Students

Students who arrive in their classroom after the 8:30 am bell are considered tardy. This is NOT the same as when a parent escorts the student into school and checks the child in late. Tardy students will be marked in the attendance system as such and will be provided a tardy slip to take to class so the teacher knows the student's attendance was acknowledged by the office.

Prior to the absence report being taken, and parents contacted regarding absent students, the front office will ensure the ASPIRE system has been updated to reflect “Tardy” so parents are not wrongfully contacted. All staff must take great care not to berate or embarrass the student for their tardiness as most students require parents provide transportation to get the student to school and the tardiness may not be the fault of the student.

A report of student tardiness must be run weekly to identify students with excessive tardies. Use the following chart to determine the action to perform based on the number of tardies of a student. Use discretion when sending an excessive tardy email or letter for students who have a valid excuse, a 504 or IEP accommodation that provides for late arrival.

Number of Tardies	Action to Take
7 – 10	<ul style="list-style-type: none"> • An excessive tardy email is sent to parents using the suggested verbiage below. • Parent is required to contact principal. • A copy of the letter is placed in the student’s cum file.
Over 10 days NOTE: for habitual tardiness the letter should be resent every 10, 20, and 30 days.	<ul style="list-style-type: none"> • An excessive tardy letter is sent to parents via registered mail. • Parent is required to schedule a meeting with the Director of Operations to determine actions to encourage on-time arrival. • A copy of the letter and a copy of the registered mail receipt is placed in the student’s cum file.
Over 30 days	<ul style="list-style-type: none"> • An excessive tardy letter is sent to parents via registered mail. • Parent is required to schedule a meeting with the principal to determine actions to encourage on-time arrival. • A copy of the letter and a copy of the registered mail receipt is placed in the student’s cum file. • The principal will contact Division of Family Services.

7 – 10 Tardies – Email Verbiage

Dear Parent or Guardian,

As of the date of this email, your student has _____ tardies, defined as arriving to school after the morning bell rings without a parent or guardian checking the child into school.

Bridge Elementary makes a special effort to ensure all students fully benefit from their education by attending school regularly and attending on time. Attending school regularly helps children feel better about school—and themselves. Consistent and timely attendance is essential to a student making adequate progress within the school year. To ensure your student can remain in attendance at Bridge Elementary, future late arrivals must be accompanied by a parent or guardian to check the student into school.

In addition, please schedule an appointment with the Director of Operations by calling _____ if you would like to discuss your student’s late arrivals, either past or future.

10+ Tardies – Registered Letter

DELIVERED VIA CERTIFIED MAIL

Dear Parent/Guardian:

This letter is to inform you that your child, _____, now has _____ tardies this school year. A tardy is defined as arriving to school after the morning bell rings without a parent or guardian checking the child into school.

Bridge Elementary makes a special effort to ensure all students fully benefit from their education by attending school regularly and attending on time. Attending school regularly helps children feel better about school—and themselves. Consistent and timely attendance is essential to a student making adequate progress within the school year. To ensure your student can remain in attendance at Bridge Elementary, future late arrivals must be accompanied by a parent or guardian to check the student into school.

Pursuant to School policy and state law, you ***must immediately contact the School to schedule a meeting*** with the principal to discuss your child's attendance problems. Your cooperation in this matter is required.

State law also requires that we inform you that it is a Class B Misdemeanor for a student's parent/guardian to intentionally or recklessly fail to meet with school authorities to discuss the student's attendance problems or fail to prevent the student from being truant during the remainder of the school year.

Sincerely,

Principal

30 Tardies – Registered Letter

DELIVERED VIA CERTIFIED MAIL

Dear Parent/Guardian:

This letter is to inform you that your child, _____, now has _____ tardies this school year. A tardy is defined as arriving to school after the morning bell rings without a parent or guardian checking the child into school.

Bridge Elementary makes a special effort to ensure all students fully benefit from their education by attending school regularly and attending on time. Attending school regularly helps children feel better about school—and themselves. Consistent and timely attendance is essential to a student making adequate progress within the school year. To ensure your student can remain in attendance at Bridge Elementary, future late arrivals must be accompanied by a parent or guardian to check the student into school.

Pursuant to School policy and state law, you ***must immediately contact the School to schedule a meeting*** with the principal to discuss your child's attendance problems. Your cooperation in this matter is required.

State law also requires that we inform you that it is a Class B Misdemeanor for a student's parent/guardian to intentionally or recklessly fail to meet with school authorities to discuss the student's attendance problems or fail to prevent the student from being truant during the remainder of the school year.

Because of the previous notifications and your child's continued tardiness, administration believes the parent has failed to make a good faith effort to ensure that the child receives an appropriate education and pursuant to Utah law, administration has contacted Division of Family Services.

Sincerely,

Principal

Meetings with Parent and Principal

When meeting with a parent regarding excessive absences or excessive tardies, the principal must keep record of the meeting and work with the parent to help increase student attendance and/or reduce the student's late arrivals. Prior to a referral to Division of Family Services, administration must consider the following:

- counseling of the minor by school authorities;
- issuing a notice of truancy to a school-age minor who is at least 12 years old, in accordance with Section 53G-6-203;
- issuing a notice of compulsory education violation to a parent of a school-age child, in accordance with Section 53G-6-202;
- making any necessary adjustment to the curriculum and schedule to meet special needs of the minor;
- considering alternatives proposed by a parent;
- monitoring school attendance of the minor;
- voluntary participation in truancy mediation, if available; and
- providing a school-age minor's parent, upon request, with a list of resources available to assist the parent in resolving the school-age minor's attendance problems.

Contacting Division of Family Services

When contacting the Division of Family Services for compulsory education, administration must provide:

- a) identifying information of the child and the child's parent who received the notice of compulsory education violation;
 - (b) information regarding the longest number of consecutive school days the school-age minor has been absent from school and the percentage of school days the child has been absent during each relevant school term;
 - (c) whether the child has made adequate educational progress;
 - (d) whether the requirements of Section 53G-6-206 have been met which include as reasonably feasible,
- counseling of the minor by school authorities;
 - issuing a notice of truancy to a school-age minor who is at least 12 years old, in accordance with Section 53G-6-203;
 - issuing a notice of compulsory education violation to a parent of a school-age child, in accordance with Section 53G-6-202;
 - making any necessary adjustment to the curriculum and schedule to meet special needs of the minor;
 - considering alternatives proposed by a parent;
 - monitoring school attendance of the minor;
 - voluntary participation in truancy mediation, if available; and
 - providing a school-age minor's parent, upon request, with a list of resources available to assist the parent in resolving the school-age minor's attendance problems.
- (e) whether the child is two or more years behind the local public school's age group expectations in one or more basic skills; and
 - (f) whether the child is receiving special education services or systematic remediation efforts

Long Term Excusal Based on Illness

Based on state law, school administration can excuse a child's attendance if the school-age minor is in a physical or mental condition, certified by a competent physician, which renders attendance inexpedient and impracticable. In these cases, follow the Home Hospital Instruction Procedures.

Office Procedure for Deposits and Paying Bills

Update June 2023

Deposits

State law, and Bridge's Cash Handling policy, require that deposits are made a minimum of every three days. If the amount of cash at the school exceeds \$500, a deposit must be made even if it is less than three days since the previous deposit. The lead secretary

Completion of Deposit Form and Notification of Deposit to Bookkeeper

A cloud-based spreadsheet must be created to keep track of all deposits made. The link for the spreadsheet must be shared with the AW bookkeeper assigned to the school. Additionally, all checks provided to the school for deposit must be scanned and saved on the server using the following file name: Scanned Checks for Deposit MM.DD.YYYY

Two individuals, identified as cash handlers by the principal must count the checks, cash and coin separately to verify the accuracy of the deposit. The deposit slip must be completed, and the deposit spreadsheet also completed to match the deposit.

Periodically the AW bookkeeper will reconcile the deposits with the school. The principal will identify the person or persons for this task.

Paying Bills in Intacct

The principal may assign an individual to oversee the process of paying bills through the Intacct system.

Using Debit Card

When the school's debit card is used, the individual using the card must enter the information and upload the receipt into Intacct. The Debit card is considered "petty cash" and will rarely have an amount over \$5,000 accessible at any given time. The principal will be the only individual authorized to ask accounting to transfer funds to the petty cash account. The principal and lead secretary will have access to debit cards and will work together to ensure the account is not overdrawn.

Invoices and Bills

Invoices that arrive at the school must be entered within five days of the date the invoice is received. The principal will approve transactions within three days of entry into Intacct.

Technology Systems Security Plan

1. PURPOSE

The primary purpose of this Information Technology Systems Security Plan is to establish security measures that will help Bridge Elementary (the “School”) protect sensitive data that is stored or maintained on its computer equipment, systems, and networks. The School is required to establish this Plan pursuant to Utah Administrative Code Rule R277-487 and the School’s Information Technology Security Policy.

2. SCOPE AND APPLICABILITY

This Plan is applicable to employees, volunteers, and third-party contractors of the School. The School will use this Plan to protect its computer equipment, systems, and networks from, among other things, unauthorized access, inappropriate disclosure, and compromise.

This Plan works in conjunction with the School’s Information Technology Security Policy, Student Data Privacy and Security Policy, Family Educational Rights and Privacy Policy and Administrative Procedures, Data Governance Plan, and policies and procedures pertaining to the School’s electronic resources and devices.

This Plan contains security measures related to the following:

1. System Administration;
2. Network Security;
3. Application Security;
4. Endpoint, Server, and Device Security;
5. Identity, Authentication, and Access Management;
6. Data Protection and Cryptography;
7. Monitoring, Vulnerability, and Patch Management;
8. High Availability, Disaster Recovery, and Physical Protection;
9. Incident Responses;
10. Acquisition and Asset Management; and
11. Policy, Audit, and E-Discovery Training.

3. ROLES AND RESPONSIBILITIES

The School’s contracted IT provider functions as the School’s IT Security Manager and will help the School implement this Plan and comply with it. The responsibilities of the IT Security Manager set forth in this Plan supplement the responsibilities of the IT Security Manager outlined in the School’s Data Governance Plan, which include the following:

1. Overseeing IT security at the School;
2. Helping the School to comply with IT security laws applicable to the School;
3. Providing training and support to School employees on IT security matters;
4. Investigating complaints of alleged violations of the School’s IT security policies, procedures, or plans;
5. Investigating alleged security breaches of the School’s IT systems; and

6. Reporting periodically to the School's Board of Directors on the security of the School's IT systems.

Please refer to the School's Data Governance Plan to review the data privacy and security roles and responsibilities of the School's Student Data Manager, employees, educators, volunteers, and third-party contractors.

4. COMPLIANCE

School employees, volunteers, and third-party contractors must comply with this Plan. Failure to comply shall result in consequences for the person or entity up to and including removal of access to the School's computer equipment, systems, and networks. If such access is required for employment or contracted services, employees and third-party contractors may be subject to dismissal.

5. REPORTING

All persons who are granted access to the School's computer equipment, systems, and networks are expected to be careful and aware of suspicious communications and unauthorized use of the School's IT assets. When School personnel or other users become aware of suspicious activity, they shall immediately contact the Student Data Manager or IT Security Manager with the relevant information.

6. SYSTEM ADMINISTRATION

System administration is a critical function that provides management of the School's information systems that contain sensitive data, including personally identifiable student data. If malicious actors compromise system administration, they have access to the School's sensitive data and information systems.

The School's information systems will be administered by the IT Security Manager. The IT Security Manager will use a combination of preventative, detective, forensic, and audit controls to protect system administration channels from exploitation by attackers.

7. NETWORK SECURITY

It is essential for the School to protect its network from both internal and external malicious actors. The School recognizes that appropriate network security procedures are necessary for identifying, evaluating, controlling, and mitigating network vulnerabilities and for protecting the School's technology assets.

The IT Security Manager will manage the School's network according to industry best practices. In so doing the IT Security Manager will provide a secure and robust computing environment at the School; protect the School's information technology assets and systems; and preserve the privacy of sensitive data belonging to the School's employees, students, and associated entities.

All wireless access networks at the School shall conform to current best practices and shall utilize at minimum WPA encryption for any connections. No wireless access point shall be installed on the School's network that does not conform to current network standards as defined by the IT Security Manager.

The School shall ensure that any remote access with connectivity to the School's internal network is achieved using the School's centralized VPN service that is protected by multiple factor authentication systems.

8. APPLICATION SECURITY

Web application vulnerabilities account for the largest portion of attack vectors outside of malware. To help protect the School from harm, it is essential to perform security assessments of web applications used by the School.

The IT Security Manager shall perform a security assessment of all web applications that are used (or will be used) by the School to house sensitive data. The purpose of the security assessments is to identify potential or realized weaknesses. Any vulnerabilities found in a web application used by the School shall be remediated. If serious vulnerabilities in a web application cannot be remediated, the web application shall be removed.

The IT Security Manager shall determine which web application security assessment tools to use.

9. ENDPOINT, SERVER, AND DEVICE SECURITY

The School understands the importance of preventing, detecting, and remediating attacks and compromises of the School's computers, servers, and other computing devices.

School employees' computers or computing devices shall not be left unattended and unlocked for extended periods of time, especially when logged into sensitive systems or data, including personally identifiable student or employee data. Automatic log off, locks, and password screen savers should be used to enforce this requirement.

The IT Security Manager shall ensure that all servers at the School undergo a security audit and evaluation before they are used by the School. Administrative access to servers shall be password protected. Any and all new servers must be registered and approved by the IT Security Manager. The maintenance and support of all new servers should be managed by the School's IT Security Manager, if possible.

The School shall install, distribute, and maintain spyware, malware, and virus protection software on all School-owned technology assets, including computers, computing devices, and servers.

Server rooms and telecommunication rooms/closets shall be protected by appropriate access control which segregates and restricts access from general office areas at the School. Access control shall be enforced using keys, electronic card readers, or another similar method. Only IT and other School personnel whose job functions require access to such rooms shall be allowed unescorted access.

Before any third-party contractor is allowed access to any computer system, server room, or telecommunication room, the contractor shall be required to present a company issued identification card and his or her access must be confirmed directly by the School employee who issued the service request or by the IT Security Manager.

10. IDENTITY, AUTHENTICATION, AND ACCESS MANAGEMENT

The School shall grant access to its systems and network in accordance with the principles of least privilege and need-to-know. In addition, the School shall require unique identities and authentication in order to access the School's systems and network. This will ensure that users are identifiable and unable to repudiate their activities on the School's systems and network.

Passwords are a critical component of information security and the school shall enforce strong password management. All individual passwords connected to the use of the School's computer equipment, systems, and networks shall:

1. Be created and maintained in accordance with industry best practices;
2. Be maintained in a manner that reduces the threat of unauthorized access to sensitive data;
3. Be treated as confidential information and not be shared with anyone; and
4. Not be inserted into email messages or any other forms of electronic communication.

Any user suspecting that his or her password may have been compromised shall report the incident to the IT Security Manager and change all passwords.

11. DATA PROTECTION AND CRYPTOGRAPHY

One of the most effective ways to achieve data security is through encryption. To read an encrypted file, a person must have access to a secret key or password that enables the person to decrypt it.

Where technologically feasible, the School shall utilize encryption when transmitting sensitive data over the network.

All computers and other computing devices owned by the School, such as desktop computers, laptops, and tablets, that connect to the School's network and that may contain or transmit personally identifiable data must be configured to encrypt such data on any internal hard drive. Users must protect these devices from unauthorized use or access.

Personally identifiable data shall not be stored on external storage media such as external hard drives, flash drives, or DVDs unless such storage is authorized by the Student Data Manager and the personally identifiable data on the external storage media is encrypted. Users must protect these external storage media from unauthorized use or access.

All employees or other users that need assistance or guidance on encrypting sensitive data on any School computer or device described in this section shall contact the IT Security Manager.

12. MONITORING, VULNERABILITY, AND PATCH MANAGEMENT

This area is concerned with minimizing the School's attack surface through the detection and mitigation of vulnerabilities and the early detection of intrusions.

The IT Security Manager shall:

1. Monitor the School's network so that it may detect and investigate security incidents when they occur;
2. Engage in effective vulnerability management and penetration testing in order to detect and remediate vulnerabilities when they occur in the School's computer equipment, systems, and applications; and
3. Perform regular patch management in order to maintain the School's information systems in a secure state.

13. HIGH AVAILABILITY, DISASTER RECOVERY, AND PHYSICAL PROTECTION

Procedures related to high availability, disaster recovery, and physical protection are intended to make it possible for the School to continue to operate successfully in the face of adversity, which may range from mild, routine failures of School computers to severe natural or man-made catastrophes.

The School will ensure the availability and recoverability of the School's data and data systems in accordance with industry best practices.

Physical access to the School's data centers shall be governed by the same access requirements applicable to server rooms and telecommunications rooms at the School.

14. INCIDENT RESPONSES

All incidents of network or system shutdown or failure shall be reported to the IT Security Manager immediately. The IT Security Manager shall utilize industry standards and current best practices in responding to and resolving such incidents.

Incidents involving a data breach shall be reported to the Student Data Manager who, along with the IT Security Manager, shall follow the data breach protocol set forth in the School's Data Governance Plan.

15. ACQUISITION AND ASSET MANAGEMENT

The School shall follow its purchasing and procurement policies when purchasing technology equipment.

The School will track, support, and manage all of its acquired technology assets (hardware and software) in a reasonable and effective manner.

16. POLICY, AUDIT, AND E-DISCOVERY TRAINING

The School shall provide training on its policies as required by law. This includes providing training to its employees, aids, and volunteers regarding information technology security matters on an annual basis. The School shall also provide training on audits and e-discovery as required by law.

17. REVIEWS AND AUDITS

The IT Security Manager shall periodically review the School's security policies, procedures, plans. The IT Security Manager shall ensure that security and privacy audits are performed as required by this Plan or by law.

Time and Effort Documentation – Administrative Procedure

These procedures are established in accordance with the Time and Effort Documentation Policy adopted by the School's Board of Directors.

1. All employees paid in whole or in part with federal funds, employees whose salaries are used to meet a matching/cost sharing requirement, and employees who are paid in whole or in part with state restricted funds are required to provide time and effort documentation that accurately and reasonably represents the work that has been performed during the period being reported on.
 - a. **Semi-Annual Certification** – This certification must be submitted by/for employees who work solely on a single cost objective during the six-month period being reported on.
 - i. Semi-Annual Certifications must:
 1. Be completed at least twice a year. For example, they could be submitted for the periods July 1 through December 31, and January 1 through June 30;
 2. Be submitted after the last day of the period being reported (*i.e.*, after the fact – the certification must reflect an after-the-fact distribution of the actual activity);
 3. Account for the total activity for which the employee is compensated;
 4. Be signed by the employee or a supervisor with direct knowledge of the work performed; and
 5. Be submitted on an approved form.
 - ii. Semi-Annual Certification forms will include the following:
 1. Name and title of the employee;
 2. Name and title of the employee's supervisor;
 3. Name of the cost objective the employee worked on;
 4. Period being reported on;
 5. A certification statement certifying the employee has spent 100% of their time on the stated cost objective;
 6. Whether time, effort, and salary are being used for cost sharing or matching purposes, and if so, for which program(s);
 7. Signature of the employee or the employee's supervisor who has direct knowledge of the work performed; and
 8. Date Signed by the employee or the employee's supervisor (Note: Cannot be dated prior to the end of the period covered by the certification).
 - b. **Personnel Activity Report (PAR)** – This report must be submitted by/for employees who work on multiple cost objectives. PARs must support the distribution of employees' salaries and wages that meet the standards outlined below.
 - i. A PAR must:
 1. Provide a written record of the employee's work activities used to document that employee's time to a cost objective;
 2. Be completed at least monthly and be supported by the employee's work activities (should be submitted after the last day of the month being reported on, that is, after the fact –

the PAR must reflect an after-the-fact distribution of the actual activity, not a budget estimate);

3. Account for the total work activity for which the employee is compensated;
4. Coincide with one or more pay periods;
5. Be signed by the employee; and
6. Be submitted on an approved form.

ii. PAR forms will include the following:

1. Name and title of the employee;
2. Name and title of the employee's supervisor;
3. Name of the cost objectives the employee worked on;
4. Period being reported on (e.g., January 1 through January 31);
5. A certification statement stating that the distribution of the employee's time is an accurate representation of the work performed;
6. Whether time, effort, and salary are being used for cost sharing or matching purposes, and if so, for which cost objective;
7. Distribution of time (by percentage, e.g., 70% Title I, 30% Special Education) by account, function, program, location;
8. Time being reported must represent but cannot exceed 100%;
9. Signature of the employee;
10. Date signed by the employee (Note: Cannot be dated prior to the end of the period covered by the PAR); and
11. Sick time, vacation time, etc. (if applicable) must be coded proportionally to the different programs.

2. Payroll records must reconcile with the time and effort documentation.
3. A reconciliation of payroll records and time and effort documents will be done on a regular basis. Adjustments will be made and discussed, as necessary.
4. If an employee's salary is being used for cost sharing/matching purposes, then this needs to be identified on the employee's time and effort form. Once a salary has been used for matching purposes or a portion of the salary, then the salary, or portion thereof, that has been used may not be used as matching/cost sharing funds for another program.
5. If assignments change, it is the School's responsibility to inform the School's accounting and payroll staff so that payroll records, budgets, etc. can be updated.
6. Upon termination of employment, an employee must submit their final time and effort documentation prior to receiving their final payment.
7. Time and effort procedures will be periodically reviewed by School administration and the accounting and payroll staff. Updates due to changes in rules or regulations will be made in a timely manner, as necessary.
8. Employees will receive appropriate training on time and effort documentation, as necessary.
9. The School will keep a copy of all time and effort documentation (Semi-Annual Certifications, PARs, payroll reports, etc.) in accordance with the School's record retention practices or 3 years from the date of submission, whichever is greater, as required by 2 CFR § 200.334.

10. The signatures required herein may be either handwritten or electronic signatures.

Bridge Wellness Tips and Reminders for Parents

Occasionally children get sick. Out of consideration for others, as well as your own child, it is recommended that when any of the following conditions exist, you keep your child home from school and contact your health care provider for treatment when necessary.

Temperature - 100 degrees or above. A fever is a warning sign that all is not right with the body. Keep your child home until his/her fever has been gone WITHOUT the aid of medication for 24 hours.

Cold or Flu - Both are respiratory illnesses caused by different viruses. Both can cause fever, body aches, cough and fatigue. If your student is ill, please keep them home. They can come back to school when they have not had a fever for 24 hours without the aid of medication and their symptoms are improving.

Strep Throat - The first symptoms are fever, sore throat, and swollen tonsils. This illness is spread by contact with the infected person. **The child should be kept home until they have been on antibiotics for 24 hours.** The antibiotic should be taken for as long as the healthcare provider has ordered. This helps prevent further complications.

Vomiting and Diarrhea - This indicates an illness that can best be taken care of at home. Keep your child home for 24 hours after the LAST time he/she vomited.

Persistent Cough - It is recommended that a healthcare provider evaluate any heavy or hacking cough or a cough that persists for more than 2 weeks. It is also recommended that a persistent runny nose with yellow or green discharge should be evaluated.

Chicken Pox and Rashes - Chicken pox is passed from one person to another by direct contact with an ill person. The child is contagious 1 to 2 days before the rash starts, and until all chicken pox lesions have crusted over. The child should remain at home until all the pox are dry and crusted over. Although children are vaccinated there is still a small chance they could become ill with the virus, but the vaccine is over 90% effective. Also, if your child has any other contagious skin rash, they should stay home until it has been treated and it has been determined that the child is able to attend school.

Lice - Lice are a common problem among school children. The most common sign is persistent itching. Head lice are about the size of a sesame seed. Nits (the egg that the lice lay) are what are most commonly seen. They are located at the base of the hair shaft and are firmly attached. They cannot be easily brushed away like dandruff. Lice are spread through direct contact with someone who is infested by head to head contact. Sleep overs are commonplace for transmission. Treatment with a special lice shampoo should be started immediately and the directions on the shampoo should be followed carefully.

Pink Eye - It is helpful to think of pink eye like the common cold. Both conditions may be passed on to other children, but resolve without treatment. Pink eye generally resolves with less symptoms than the common cold. The best method for preventing spread is good hand washing. Keep your child home if they are producing more than a small amount of discharge from their eye.

SICK CHILDREN BELONG AT HOME - WELL CHILDREN BELONG AT SCHOOL