

IV. General Administration

4.1 *Security / Access to Schools*

- 4.1.1 Security Measures Authorized – The Superintendent, principals, and facility administrators are authorized to take reasonable and lawful measures to protect against personal injury, trespass, vandalism, theft, and like threats to personal safety, property damage, and financial loss to or on Board property or at school functions and activities. The Superintendent should be made aware of any extraordinary or special measures that may be proposed in anticipation of or in response to any unusual security threat or risk (e.g., unusual surveillance, assignment of additional security personnel).
- 4.1.2 Access Restrictions Authorized – The Superintendent, principals, and facility administrators are authorized to regulate and restrict access to Board schools, buildings, and facilities in order to maintain appropriate security, minimize disruption and distraction within the learning environment, or to avoid a potential risk of harm to a student or employee. To that end, the Superintendent, principals, and facility administrators are authorized to implement building-level requirements and procedures governing access to Board owned or controlled buildings, grounds, property, events, and activities by school and non-school personnel, including family members and relatives, vendors, attorneys, and other visitors, and to adopt “check-in” and “check-out” requirements and procedures for students and employees.
- 4.1.3 Access for Sex Offenders - No adult sex offender, after having been convicted of a sex offense involving a minor, shall enter onto the property of a Midfield City school while school is in session or attend any Midfield City school activity unless the adult sex offender does all of the following:
- a) Notifies the principal or the school, or his/her designee, before entering onto the property or attending the school activity;
 - b) Immediately report to the principal of the school, or his/her designee, upon entering the property or arriving at the school activity; and
 - c) Complies with any procedures established by the school to monitor the whereabouts of the sex offender during his or her presence on school property or at a school activity.

4.2 *Safe Schools Policy (Drugs, Alcohol, Tobacco, and Weapons)*

- 4.2.1 Prohibition on the Possession of Firearms – The possession of a firearm in a school building, on school grounds, on Board property, on school buses, or at school-sponsored functions is prohibited except for authorized law enforcement

Midfield City Board of Education

personnel and as provided by law. For purposes of this policy, the term “firearm” has the same definition as is found in 18 U.S.C §921.

- a. *Penalties for violations* – In addition to any criminal penalties that may be imposed, the following penalties will be imposed for unauthorized possession of firearms:
 1. *Students* – Students will be expelled for a period of one year. The expulsion requirement may be modified in writing by the Board upon recommendation of the Superintendent on a case-by-case basis. Students who are expelled for firearm possession may not attend regular school classes, but may be permitted to attend alternative schools or education programs established by the Board. Discipline of students with disabilities who violate the firearm possession policy will be determined on a case-by-case basis in accordance with federal and state law. Parents of students who violate this policy will also be notified by the principal of violations.
 2. *Employees* – Employees will be subject to adverse personnel action, which may include termination.
 3. *Other Persons* – Other persons may be denied re-entry to school property.
- b. *Notification of Law Enforcement* – The appropriate law enforcement authority, which may include the city police, county sheriff, and the local district attorney, will be notified by the principal of violations of this policy.

[Reference: ALA. CODE §16-1-24.1, 24.3 (1975); Ala. Admin. Code 290-3-1-.02; Federal Gun Free Schools Act, 20 U.S.C. 7151; Federal Gun Free School Zone Act of 1995 (18 U.S.C. §922(q))]

- 4.2.2 Prohibition on the Possession of Weapons – The possession of a deadly weapon or dangerous instrument in a school building, on school grounds, on school property, on school buses, or at school-sponsored functions is prohibited except for authorized law enforcement personnel. For purposes of this policy, the terms “deadly weapon” and “dangerous instruments” include but are not limited to explosives, incendiary devices, projectiles, knives with a blade length of more than two (2) inches, archery equipment, devices designed to expel projectiles at a high rate of speed, any device so classified under state or federal law, and any device either used or intended to be used in such manner as to inflict bodily harm, provided that the terms “deadly weapon” and “dangerous instruments” will exclude, to the extent permitted by law, devices and equipment that are used for the purpose of and in connection with school or Board sanctioned educational, team, or competitive activities.

Midfield City Board of Education

- a. *Penalties for Violations* – In addition to any criminal penalties that may be imposed, the following penalties will be imposed for unauthorized possession of deadly weapons or dangerous instruments:
 - 1. *Students* – Students will be disciplined in accordance with the Board’s Code of Student Conduct.
 - 2. *Employees* – Employees will be subject to adverse personnel action, which may include termination.
 - 3. *Other Persons* – Other persons may be denied re-entry to school property.
- b. *Notification of Law Enforcement* – The appropriate law enforcement authority, which may include the city police, county sheriff, and the local district attorney, will be notified by the principal of violations of this policy.

[Reference: ALA. CODE §16-1-24.1 (1975); Ala. Admin. Code 290-3-1-.02(1)(b)]

4.2.3 Illegal Drugs and Alcohol – The use, possession, distribution, and sale of alcohol and the illegal use, possession, distribution, and sale of drugs in a school building, on school grounds, on Board property, on school buses, or at school-sponsored functions is prohibited.

- a. *Penalties for Violations* – In addition to any criminal penalties that may be imposed, the following penalties will be imposed for unauthorized possession of illegal drugs or alcohol:
 - 1. *Students* – Students will be disciplined in accordance with the Board’s Code of Student Conduct.
 - 2. *Employees* – Employees will be subject to adverse personnel action, which may include termination.
 - 3. *Other Persons* – Other persons may be denied re-entry to school property.
- b. *Notification of Law Enforcement* – The appropriate law enforcement authority, which may include the city police, county sheriff, and the local district attorney, will be notified by the principal of violations of this policy.

4.2.4 Tobacco – The use of tobacco products and the illegal possession, distribution, and sale of tobacco products on school property is prohibited.

Midfield City Board of Education

- a. *Penalties for Violations*
1. *Students* – Students who violate the tobacco prohibition will be disciplined in accordance with the Board’s Code of Student Conduct.
 2. *Employees* – Employees who violate the tobacco prohibition will be subject to adverse personnel action, which may include termination.
 3. *Other Persons* – Other persons who violate the tobacco prohibition may be denied re-entry to school property.
- b. *Parental Notification* – Parents and guardians may be notified of actual or suspected violations of the tobacco prohibition whether or not the student is charged with a violation of Board policy, which includes the Code of Student Conduct.

[Reference: ALA. CODE §16-1-24.1 (1975); Ala. Admin. Code 290-3-1-.02(1)(b)]

- 4.2.5 Searches – Law enforcement agencies are permitted to make periodic visits to all schools to detect the presence of illegal drugs or weapons and may use any lawful means at their disposal to detect the presence of such substances. The visits will be unannounced to anyone except the Superintendent and principal.

[Reference: ALA. CODE §16-1-24.1 (1975); Ala. Admin. Code 290-3-1-.02(1)(b)]

- 4.2.6 Drug and Alcohol Free Environment – All students, employees, volunteers, parents, visitors, and other persons are prohibited from possessing, using, consuming, manufacturing, or distributing illegal controlled substances and alcohol while on Board property or while attending any Board sponsored or sanctioned event, program, activity, or function. Persons who are intoxicated or impaired by the use, consumption, or ingestion of any illegal controlled substance or alcohol are not permitted to be on school property, or to attend or participate in any Board sponsored or sanctioned event, program, activity, or function.

[Reference: ALA. CODE §16-1-24.1, 25-5-330 (1975)]

- 4.2.7 Adoption of Statutory Penalties and Consequences – Persons who violate the Board’s prohibition of firearms, weapons, illegal drugs, or alcohol will be subject to all notification, referral, suspension, placement, re-admission, and other provisions set forth in ALA. CODE §16-1-24.1 and 24.3 (1975).

4.3 Accreditation

Midfield City Board of Education

The Board will implement and adhere to such accreditation policies, principles, standards, and procedures as may be established or required by the Southern Association of Colleges and Schools Council on Accreditation and School Improvement (“SACS CASI”) accreditation division of AdvanceED as a condition to receiving or maintaining accreditation.

4.4 *Use of Board Property*

4.4.1 Equipment, Supplies, Materials, Vehicles – Equipment, supplies, materials, vehicles, and other movable or consumable property owned by or under lease to the Board may not be used by or made available to persons or entities for private or personal use, benefit, or consumption, or for any non-Board related use or purpose. Such property may not be removed from Board premises except as necessary to serve a school or Board-related function or purpose, and with the knowledge and approval of the appropriate supervisor, administrator, or the Superintendent.

4.4.2 Use of Board Facilities – The school grounds and plant may be made available to the community at the discretion of the superintendent on a case by case basis. A written request should be submitted to the Superintendent. The request must contain the following: (1) Purpose of activity (2) Date and time of proposed activity, (3) Number of participants, and (4) Proposed budget. School property may be used free of charge in the following instances: for all school affairs conducted by students of any school and approved by the principal, for all parent-teacher association meetings, for all affairs and performances where admission is charged and all proceeds are to be used for the benefit of that school. A minimum of 30 days’ notice must be given prior to the usage of the facilities for Board approval.

School facilities may be used on an expense basis by community groups for purposes related to or directly connected with school business.

The Board believes the functions of school buildings and grounds should be to accommodate approved school programs for students and to assist in meeting the educational needs of students.

Use of school buildings by the community shall be considered a secondary function and shall be scheduled at times which do not interfere with regular school activities.

The use of school facilities by individuals or groups shall be governed by a signed use agreement between the individual or group and the Board. The use agreement shall contain, but is not limited to, the following:

Midfield City Board of Education

1. A “hold harmless” statement having the effect of holding the Board free from any liability arising from the negligence of the party using the facilities.
2. A statement requiring, with limited exception, any person or group leasing the school facilities to purchase liability insurance identifying the Board and its members as additional insured parties. A certificate verifying the purchase of such insurance should be presented to the Board at least one week prior to use of the facilities, and the school facility shall not be used in a manner not covered by such liability insurance.
3. A statement that the individual or group lessee shall assume all responsibility for damages and/or maintenance expenses invested in the building, directly or indirectly resulting from lessee's use.

Duties of organizations that use board facilities include the following:

1. All decorations must be done by the persons using the building and should meet the approval of the principal.
2. All equipment used must be replaced to its proper storage area or prepared ready for the next school day.
3. All waste, garbage, and such must be disposed of in a way prescribed by the principal.
4. Floors must be left clean.
5. Buildings must be locked and left in a secure manner.
6. Custodial staff must be paid for cleaning
7. Appropriate security staff must be provided.
8. All tobacco/alcoholic beverages are prohibited.
9. An approved staff member must be on-site at all times during the activity and must be paid by the organization.

4.4.3 Advertising – Board property will not be used for commercial advertising except upon such terms and conditions as may be expressly approved by the Board.

4.5 Naming Board Facilities

Midfield City Board of Education

No facility, property, building, or part thereof, under the control of the Board will be named after or for any living person or for any person who has been deceased for fewer than two years.

4.6 *Complaints and Grievances*

4.6.1 General Complaints (Grievances) – Subject to the limitations set forth below and elsewhere in this policy manual, any employee or member of the public may present to the Board a concern, complaint, grievance, or request for corrective action regarding any aspect of school system operations. Before requesting corrective action or relief from the Superintendent or the Board, persons with such complaints, grievances, or requests should present them for resolution to the employee, supervisor, or administrator at the lowest administrative level who has the authority and ability to address the problem or to implement the requested action. The Superintendent is authorized to develop specific procedures (Refer to 4.6.3 for procedures) that will provide for fair consideration and orderly review of complaints and grievances. Such procedures may not unreasonably burden or delay the presentation or processing of such matters, and will be subject to Board review, modification, and approval.

4.6.2 Limitations Regarding Availability and Application of General Complaint/Grievance Policy – The general complaint/grievance policy and any procedures adopted thereunder do not apply to specific complaint or grievance policies and procedures that are established by Board policy or law for application to special factual or legal circumstances (e.g., sexual harassment grievance procedures; review of personnel matters under the Students First Act; “due process” hearings provided under the Individuals with Disabilities Education Act). In such instances, the specific statutory, regulatory, or policy-based process is the applicable procedure. The general complaint/grievance procedures that are authorized under the terms of this policy may not be invoked for the purpose of challenging or seeking review or reconsideration of adverse personnel decisions that have received final Board approval. A grievance may be based on an alleged misapplication of Board policies, regulations, or procedures, but may not be used to challenge the Board’s exercise of its discretion to adopt, approve, modify, or repeal a policy, regulation, or procedure or on its failure to exercise such discretion (e.g., adoption of a school calendar, compensation policies, etc.).

4.6.3 *General Complaints/Grievances Procedure*

LEVEL ONE

Midfield City Board of Education

Grievance Filing Requirements. The grievance process shall be initiated by filing an approved grievance report form (See Appendix for a copy of the form) with the Superintendent within fifteen (15) days of the act or decision that is the basis of the grievance. The Superintendent may, but is not required to, accept late-filed grievances in order to avoid hardship or injustice, or for other good cause. The grievant may also agree at any time to extend any otherwise applicable timeline.

The approved form must be signed by the grievant and include the following information:

1. A complete description of the grievance, including the policy, procedure, or work rule violated or misapplied, and all facts supporting the complaint.
2. The date(s) of the act, omission, or decision on which the grievance is based;
3. The names of the supervisor(s), administrators(s), or other decisionmaker(s) who are responsible for the act, omission, or decision on which the grievance is based;
4. The specific corrective action sought by the grievant;
5. A statement describing the grievant's efforts to resolve the complaint informally or a statement explaining the reason(s) such efforts were not initiated or pursued; and
6. Copy of any relevant documentary or evidentiary material in the possession of the grievant.

Administrative Investigation and Determination. The Superintendent may assume direct responsibility for reviewing and responding to the grievance or may assign that responsibility to a designated administrator. In either case, the Superintendent's response to the grievance may include informal complaint resolution, formal investigation, or both.

Informal Complaint Resolution. Prior to filing a formal grievance, the employee is expected to have made reasonable efforts to resolve the complaint or problem underlying the grievance informally through discussions or other communication with the employee's immediate supervisor or other persons whose actions or decisions led to the filing of the grievance. Informal complaint resolution will not be required if such efforts would not be practical or reasonable under the circumstances. If the Superintendent or Superintendent's designee determines that further efforts at informal resolution

Midfield City Board of Education

should be attempted, the formal grievance process may be temporarily suspended for that purpose for up to thirty (30) days.

1. Formal Investigation. Should the Superintendent or Superintendent's designee conclude that reasonable efforts at informal complaint resolution have not succeeded or would not be appropriate under the circumstances, the Superintendent or Superintendent's designee shall initiate a formal investigation of the grievance. The Superintendent's investigation may include interviews of witnesses, written statements, depositions, administrative conferences or hearings, or any lawful action that is deemed necessary to reach a just disposition of the grievance. Upon completion of the investigation, the Superintendent or Superintendent's designee shall prepare a written decision on the grievance. If a recommended decision is made by the Superintendent's designee, the Superintendent may adopt, reject, or modify the decision based on his or her review of the evidence.
2. Notification of Superintendent's Decision. The written decision of the Superintendent shall be made and mailed or transmitted to the grievant within sixty (60) calendar days of the date on which the grievance is filed.

LEVEL TWO

Appeal of Superintendent's Decision.

Initiating the Appeal. A grievant who is dissatisfied with the decision of the Superintendent may appeal the decision to the Board of Education by filing a written notice of appeal with the Superintendent within fifteen (15) calendar days of receipt of the Superintendent's written decision.

Transmittal of Grievance Record. Upon receipt of the notice of appeal, the Superintendent shall transmit to the Board Members for their review a copy of the written grievance, the Superintendent's decision letter, the notice of appeal, and all statements, recommendations, documents, recordings, transcripts, or other written tangible evidence filed, submitted, or considered at any stage of the grievance process.

Midfield City Board of Education

Board Consideration of Appeal. Not later than thirty (30) days following receipt of the notice of appeal by the Superintendent, the grievance appeal shall be placed on the Board meeting agenda for consideration. Upon consideration of the grievance appeal and record, the Board may, by majority vote:

1. Affirm the decision of the Superintendent
2. Modify the decision of the Superintendent
3. Defer final action until an evidentiary hearing is held on the grievance.

The decision of the Superintendent shall be final unless an action reversing or modifying the Superintendent's decision is approved by majority vote of the Board.

Hearing Process. If a hearing is approved by the Board, the hearing shall be set within thirty (30) calendar days. Written notice of the hearing shall be provided to the grievant. A final Board decision on the grievance shall be due within five (5) calendar days after the hearing is closed. The Board shall give the grievant written notice of its final decision.

4.6.4 Student Complaints and Grievances – Complaints, grievances, and requests for corrective action may be brought to the attention of the Board by or on behalf of students with respect to academic, athletic, extracurricular, or other non-disciplinary matters, issues, and concerns only after reasonable efforts to resolve the matter at the school and administrative levels have been exhausted. The Superintendent is authorized to develop specific procedures (Refer to 4.6.5 for procedures) that will provide for fair consideration and orderly review of such complaints and grievances. Such procedures will not unreasonably burden or delay the presentation or processing of the complaint or grievance and will be subject to review and approval by the Board. Administrative judgments concerning academic or curricular matters or participation in extracurricular activities may be set aside by the Board only upon a showing that the action or decision in question is arbitrary and capricious, fundamentally unfair, or that it violates Board policy or the student's legal rights.

4.6.5 Student Complaints/Grievances Procedure –

Informal Discussion – If a student believes there is a basis for complaint, he/she shall discuss the complaint with his/her principal or the designee of the principal (except in cases of discrimination or harassment involving the principal or the designee), in which case the complainant shall report to the Student Services Coordinator or other person designated by the Superintendent within five (5) days of the occurrence of the alleged violation except in cases involving harassment or discrimination in which thirty (30) days will be allowed.

Midfield City Board of Education

Level One

If the complainant is not satisfied with the informal resolution he/she may, within five (5) days, file a formal complaint in writing and deliver it to his/her principal or designee. The principal or designee shall communicate his/her answer in writing to the complainant within five (5) days of receiving the written complaint. Class complaints involving more than one (1) principal or designee and complaints involving an administrator above the building level may be filed by the complainant at level two.

Level Two

If the complainant is not satisfied with the resolution at level one, he/she may, within five (5) days of the answer, file a copy of the complaint with the Superintendent. The Superintendent shall indicate his/her disposition in writing to the complainant within five (5) days.

Board Appeal – If the complainant is not satisfied with the resolution by the Superintendent, he/she shall have the right to appeal the Superintendent’s decision to the Midfield City Board of Education, provided request for placement on Board agenda is filed within five (5) days.

Confidentiality will be provided to the extent possible to any student or affected party who alleges discrimination or harassment.

4.6.6 Student Disciplinary Matters – The Board may consider appeals of student disciplinary decisions or actions in accordance with standards and procedures specified in the Code of Student Conduct.

4.6.7 Americans with Disabilities Act Complaint Procedure

- a. *Complaint Criteria* – Persons who believe that they have been discriminated against on the basis of disability in the provision of services, activities, programs, or benefits covered by Title II of the Americans with Disabilities Act may file a written complaint with the ADA Coordinator.
- b. *Complaint Form* – The complaint should be in writing and contain information about the alleged discrimination including the name, address, phone number of complaining party and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

Midfield City Board of Education

- c. *Complaint Process* – The complaint should be submitted to the ADA Coordinator as soon as possible, but no later than thirty (30) days after the alleged violation. The ADA Coordinator will meet with the complaining party to discuss the complaint and possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the complaining party, such as large print, Braille, or audio tape. The response will explain the position of the Board and offer options for substantive resolution of the complaint.
- d. *Appeal Procedure* – If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complaining party may appeal the decision within fifteen (15) calendar days after receipt of the response to the Superintendent. Within fifteen (15) calendar days, the Superintendent will respond in writing, and where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.
- e. *Records Retention* – All written complaints received by the ADA Coordinator, appeals to the Superintendent, and records relating thereto will be retained by the Board for at least three (3) years.
- f. *Additional Procedures Authorized* – The Superintendent is authorized to develop such procedures as are necessary to implement this policy.

[Reference: 42 U.S.C.A. §12131, *et seq.*]

4.7 Risk Management

The Board may obtain such liability and other forms of insurance or enter into such risk management agreements, pools, cooperatives, and like arrangements, agreements, or undertakings as it deems necessary and appropriate to meet legal requirements or to protect the Board, its employees, or its property from risk of loss.

4.8 Emergency Closing of Schools

- 4.8.1 Authority of Superintendent to Close Schools – The Superintendent is authorized to close schools if such action is warranted by weather conditions or other circumstances that pose a risk to the safety and welfare of students and employees, or that render meaningful instruction impossible (e.g., loss of power or other utility services).
- 4.8.2 Make-Up Dates – To the extent not provided for in the school calendar, any days lost by reasons of an emergency closing will be made up and a revised school calendar approved, if necessary, to reflect any extension or adjustment of

Midfield City Board of Education

the school year required by such action, unless approval to waive the days is obtained in accordance with state law.

4.9 *Internet Safety and Use of Technology*

- 4.9.1 Access to Technology Resources – The Board permits restricted and conditional access to and use of its technology resources, including but not limited to computers, the “Internet,” network storage areas, and electronic mail. Such access and use is restricted to employees, students, and other persons who are engaged in *bona fide* educational and administrative activities that serve and are consistent with identified educational objectives or authorized support functions, and who, by signing an “Acceptable Use Agreement,” agree to abide by all Board policies, rules, and regulations regarding technology use. The Acceptable Use Agreement will be given annually to all Midfield City Schools' employees and students.
- 4.9.2 Restriction or Loss of Technology Privileges – Persons who violate any Board policy, rule, or regulation regarding technology use may be denied use of the Board’s technology resources and may be subject to additional disciplinary action.
- 4.9.3 Ownership of Technology Resources and Data – All technology resources, including network and Internet resources, e-mail systems, and computers or other access devices owned, leased, or maintained by the Board are the sole property of the Board. Board personnel may, at any time and without prior notice, access, search, examine, inspect, collect, or retrieve information of any kind from the Board’s technology resources, including computer or related equipment, files, and data, to determine if a user is in violation of any of the Board’s policies, rules, and regulations regarding access to and use of technology resources, for or in connection with any other matter or reason related to the safe and efficient operation or administration of the school system, or for any other reason not prohibited by law. Users of school system technology resources have no personal right of privacy or confidentiality with respect to the use or content of such resources.
- 4.9.4 Adoption of Rules and Regulations – The Superintendent is authorized to develop for Board approval additional or more specific rules and regulations regarding access to and use of its technology resources and to require adherence to such rules and regulations through such means as the “Acceptable Use Agreement” and application of appropriate disciplinary policies and procedures. This “Acceptable Use Agreement” will be given annually to all Midfield City School Board employees and students. Such rules and regulations will address or provide:

- a. Measures to block or filter Internet access to pictures that are obscene, that constitute child pornography, or that are harmful to minors;
- b. Restriction of access by minors to inappropriate material on the Internet;
- c. The safety and security of minors when they are using electronic mail, chat rooms, and other forms of direct electronic communications;
- d. Prevention of “hacking” and other forms of unauthorized use of or access to computer or Internet files, sites, databases or equipment; and
- e. Unauthorized disclosure, use, and dissemination of personal information regarding minors;
- f. Restriction of minors’ access to harmful material; and
- g. Educating minors about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms and cyberbullying awareness and response.

4.9.5 Limitation on Liability – The Board makes no warranties of any kind; either expresses or implied, that the functions or the services provided by or through the Board’s technology resources will be error-free or without defect. The Board will not be responsible for any damage users may suffer, including but not limited to loss of data or interruption of service.

[Reference: 47 U.S.C. §254(h) and (l)]

4.10 Political Activity

Board employees may participate in political activities to the full extent permitted by the United States Constitution and federal and state laws securing the right to engage in such activities, subject to the following restrictions:

- a. Employees may not appropriate Board property or resources for use in political campaigns, and may not engage in partisan political activities (including but not limited to the distribution of campaign material or literature) during regular school or duty hours or at Board sponsored or sanctioned events, functions, or at activities at which the employee is on duty or assigned official responsibilities;
- b. Employees may not represent their political beliefs or positions on political matters to be those of the Board or other Board officials, or to falsely assert or imply that their political activities or positions are endorsed by or undertaken in the name of the Board or other Board officials;

Midfield City Board of Education

- c. Candidates and representatives of candidates for political office may not invite or allow announced candidates for political office to address student groups except when such candidates are participating in a forum or like format that is designed to provide all candidates the opportunity to participate. Such forums may be conducted only for appropriate age groups, and with the advance approval of the school principal and the Superintendent; and
- d. Political signs may not be placed on schools or school board property. Campaign literature and other material may not be distributed on Board property during the regular school or work day, and may not be distributed at school or Board sponsored events or activities in a manner that impedes the normal and safe movement of pedestrian or vehicular traffic, that creates any other safety hazard or risk, or that disturbs or disrupts the function, activity, or event.

4.11 *Automatic External Defibrillator (AED)*

Sudden Cardiac Arrest (SCA) is a condition that occurs when the electrical impulses of the heart malfunction, causing a disturbance in the heart’s electrical rhythm called ventricular fibrillation (VF). The erratic and ineffective heart rhythm causes complete cessation of the heart’s normal function, resulting in sudden death. The most effective treatment for this condition is the administration of an electrical current to the heart by a defibrillator. An AED is used to treat victims who experience SCA and who are unconscious and without pulse, signs of circulation, and normal breathing. The AED analyzes the heart rhythm and advises operator if shock is needed. In the event of a detectable shock rhythm, the AED will advise the operator to deliver a shock.

4.11.1 Program Coordinator- The Program Coordinator is the district –wide Lead Nurse. The responsibilities of the coordinator are:

- a. Selection of employees for AED training
- b. Coordination of training for emergency responders
- c. Coordination of maintenance of equipment
- d. Maintenance of appropriate records
- e. Monitoring of effectiveness of the system

4.11.2 Authorized Users- The program coordinator will designate employees to receive AED training. All designated employees must have successfully completed CPR/AED training within the past two years and obtain and

Midfield City Board of Education

current certification of course completion card. All designated AED-trained employees are responsible for:

- a. Activating internal emergency response system and providing prompt basic life support including AES and first aid according to training and experience.
- b. Understanding and complying with ALL procedures and guidelines for the AED program.

4.11.3 Equipment- The office staff that receives the internal emergency call will dispatch an AED-trained employee to the emergency site with appropriate emergency equipment (AED, First aide supplies, etc.). According to medical guidelines, an AED with regular (ADULT) electrodes/pads should be used on persons who are at least 8 years of age and display ALL symptoms of cardiac arrest. Pediatric electrodes should be used on children who weigh less than 55 lbs. or are under the age of 8 years old. The AED should be placed on the victims' chest if the following symptoms are confirmed:

- a. Victim is unresponsive
- b. Victim is not breathing
- c. Victim does not have any signs of circulation (pulse, coughing, or movement).

4.11.4 Location of AEDs- During school hours, the AED will be at designated locations. The locations are specific to each school but should allow the device to be easily visible by staff. The location should allow staff members to also retrieve the device outside of normal school hours. School administrators and Program Coordinators will determine the individual locations. All AEDs are mounted on the walls in each of the locations.

After school hours, the AED may be moved from its designated location by an AED-trained staff member if approved by a school administrator to support the athletic department or other extra-curricular activities. In the event that the AED is removed, a visible note must be left in the place of the AED, with the phone number of the staff member taking responsibility for the AED, clearly indicating they have possession of the AED, and their location.

Community activities and contracted activities are not guaranteed access to the AED as part of standard usage agreements.

Midfield City Board of Education

The location of AEDs are as follows:

- a. Midfield Board of Education: in back hallway on the right side of the building.
- b. Midfield Elementary School: in main office workroom
- c. Rutledge Middle School: in main office behind secretary's desk
- d. Midfield High School: in main office outside principal's office
- e. Midfield Alternative School: in front office on main wall

4.11.5 Post – Event Review- Following the deployment of the AED and its subsequent use in a medical event, a review shall be conducted to learn from experience. The program coordinator shall conduct and document the review meeting with key participants in the event. The review should include:

- a. Identification of appropriate actions
- b. Areas needed for improvement
- c. Incident stress debriefing

4.11.6 Annual System Assessment- Each school year, in May, the program coordinator shall conduct and document a system readiness review for the upcoming school year. The review shall include all training records as well as equipment operation and maintenance records.

4.11.7 Good Samaritan Law- A person or entity, who in good faith and without compensation renders emergency care or treatment to a person suffering or appearing to suffer from cardiac arrest, which may include the use of an automated external defibrillator, shall be immune from civil liability for any personal injury as a result of care or treatment or as a result of any act or failure to act in providing or arranging further medical treatment where the person acts as an ordinary prudent person would have acted under the same or similar circumstances, except damages that may result for the gross negligence of the person rendering emergency care.

4.12 **Data Governance Policy**

4.12.1 General Provisions - The data governance committee will meet at a minimum of two times per year. Additional meetings will be called, as needed. This policy

Midfield City Board of Education

formally outlines how operational and instructional activity shall be carried out to ensure that Midfield City Schools' data is accurate, accessible, consistent, and protected. The document establishes who is responsible for information under various circumstances and specifies what procedures shall be used to manage and protect it. This document also includes information regarding the Data Governance Committee, the actual Midfield City Schools Data and Information Governance and Use Policy, applicable appendices and supplemental resources.

4.12.2. Purpose - It is the policy of Midfield City Schools that data or information in all its forms--written, electronic, or printed--is protected from accidental or intentional unauthorized modification, destruction or disclosure throughout its life cycle. This protection includes an appropriate level of security over the equipment, software, and practices used to process, store, and transmit data or information.

- a. The data governance policies and procedures are documented and reviewed annually by the data governance committee.
- b. Midfield City Schools conducts annual training on their data governance policy and documents that training.
- c. The terms data and information are used separately, together, and interchangeably throughout the policy. The intent is the same.

4.12.3 Scope - The superintendent is authorized to establish, implement, and maintain data and information security measures. The policy, standards, processes, and procedures apply to all students and employees of the district, contractual third parties and agents of the district, and volunteers who have access to district data systems or data.

This policy applies to all forms of Midfield City Schools' data and information, including but not limited to:

- a. Speech, spoken face to face, or communicated by phone or any current and future technologies,
- b. Hard copy data printed or written,
- c. Communications sent by post/courier, fax, electronic mail, text, chat and or any form of social media, etc.,
- d. Data stored and/or processed by servers, PC's, laptops, tablets, mobile devices, etc., and

Midfield City Board of Education

- e. Data stored on any type of internal, external, or removable media or cloud based services.

4.12.4 Regulatory Compliance - The district will abide by any law, statutory, regulatory, or contractual obligations affecting its data systems. Midfield City Schools complies with all applicable regulatory acts including but not limited to the following:

- a. Children’s Internet Protection Act (CIPA)
- b. Children’s Online Privacy Protection Act (COPPA)
- c. Family Educational Rights and Privacy Act (FERPA)
- d. Health Insurance Portability and Accountability Act (HIPAA)
- e. Payment Card Industry Data Security Standard (PCI DSS)
- f. Protection of Pupil Rights Amendment (PPRA)

4.12.5 Risk Management - A thorough risk analysis of all Midfield City Schools’ data networks, systems, policies, and procedures shall be conducted on an annual basis or as requested by the Superintendent, ISO, or Technology Director. The risk assessment shall be used as a basis for a plan to mitigate identified threats and risk to an acceptable level.

The Superintendent or designee administers periodic risk assessments to identify, quantify, and prioritize risks. Based on the periodic assessment, measures are implemented that mitigate the threats by reducing the amount and scope of the vulnerabilities.

4.12.6 Data Collection - Classification is used to promote proper controls for safeguarding the confidentiality of data. Regardless of classification the integrity and accuracy of all classifications of data are protected. The classification assigned and the related controls applied are dependent on the sensitivity of the data. Data are classified according to the most sensitive detail they include. Data recorded in several formats (e.g., source document, electronic record, report) have the same classification regardless of format.

4.12.7 Systems and Information Control - Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device may be referred to as systems. All

Midfield City Board of Education

involved systems and information are assets of Midfield City Schools shall be protected from misuse, unauthorized manipulation, and destruction. These protection measures may be physical and/or software based.

- a. *Ownership of Software* - All computer software developed by Midfield City Schools employees or contract personnel on behalf of Midfield City Schools, licensed or purchased for Midfield City Schools use is the property of Midfield City Schools and shall not be copied for use at home or any other location, unless otherwise specified by the license agreement.
- b. *Software Installation and Use* - All software packages that reside on technological systems within or used by Midfield City Schools shall comply with applicable licensing agreements and restrictions and shall comply with Midfield City Schools' acquisition of software procedures.
- c. *Virus, Malware, Spyware, Phishing and SPAM Protection* - Virus checking systems approved by the District Technology Department are deployed using a multi-layered approach (computers, servers, gateways, firewalls, filters, etc.) that ensures all electronic files are appropriately scanned for viruses, malware, spyware, phishing and SPAM. Users shall not to turn off or disable Midfield City Schools' protection systems or to install other systems.
- d. *Access Controls* - Physical and electronic access to information systems that contain Personally Identifiable Information (PII), Confidential information, Internal information and computing resources is controlled. To ensure appropriate levels of access by internal workers, a variety of security measures are instituted as recommended by the data governance committee and approved by Midfield City Schools. In particular, the data governance committee shall document roles and rights to the student information system and other like systems. Mechanisms to control access to PII, Confidential information, Internal information and computing resources include, but are not limited to, the following methods:
 1. *Authorization* - Access will be granted on a "need to know" basis and shall be authorized by the superintendent, principal, immediate supervisor, or Data Governance Committee with the assistance of the Technology Director and/or Information Security Officer (ISO.) Specifically, on a case-by-case basis, permissions may be added in to those already held by individual
Midfield City Board of Education

users in the student management system, again on a need-to-know basis and only in order to fulfill specific job responsibilities, with approval of the Data Governance Committee.

2. *Identification/Authentication* - Unique user identification (user ID) and authentication are required for all systems that maintain or access PII, Confidential information, and/or Internal Information. Users will be held accountable for all actions performed on the system with their User ID. User accounts and passwords shall NOT be shared.

3. *Data Integrity* - Midfield City Schools provides safeguards so that PII, Confidential, and Internal Information is not altered or destroyed in an unauthorized manner. Core data are backed up to a private cloud for disaster recovery. In addition, listed below are methods that are used for data integrity in various circumstances:
 - (i.) transaction audit
 - (ii.) disk redundancy (RAID)
 - (iii.) ECC (Error Correcting Memory)
 - (iv.) checksums (file integrity)
 - (v.) data encryption
 - (vi.) data wipes

4. *Transmission Security* - Technical security mechanisms are in place to guard against unauthorized access to data that are transmitted over a communications network, including wireless networks. The following features are implemented:
 - (i.) integrity controls and
 - (ii.) encryption, where deemed appropriate

Note: Only MCS district-supported email accounts shall be used for communications to and from school employees, to and from parents or other community members, to and from other educational agencies, to and from vendors or other associations, and to and from students for school business.

**See also Resource 3: Excerpts from Email Guidelines*

Midfield City Board of Education

5. *Remote Access* - Access into Midfield City Schools' network from outside is allowed using the MCS Portal. All other network access options are strictly prohibited without explicit authorization from the Technology Director, ISO, or Data Governance Committee. Further, PII, Confidential Information and/or Internal Information that is stored or accessed remotely shall maintain the same level of protections as information stored and accessed within the Midfield City Schools' network. PII shall only be stored in cloud storage if said storage has been approved by the Data Governance Committee or its designees.
6. *Physical and Electronic Access and Security* - Access to areas in which information processing is carried out shall be restricted to only appropriately authorized individuals. At a minimum, staff passwords shall be changed annually.
 - (i.) No PII, Confidential and/or Internal Information shall be stored on a device itself such as a hard drive, mobile device of any kind, or external storage device that is not located within a secure area.
 - (ii.) No technological systems that may contain information as defined above shall be disposed of or moved without adhering to the appropriate Purchasing and Disposal of Electronic Equipment procedures.
 - (iii.) It is the responsibility of the user to not leave these devices logged in, unattended, and open to unauthorized use.

4.12.8 Data Transfer/Exchange/Printing

- a. *Electronic Mass Data Transfers* - Downloading, uploading or transferring PII, Confidential Information, and Internal Information between systems shall be strictly controlled. Requests for mass download of, or individual requests for, information for research or any other purposes that include PII shall be in accordance with this policy and be approved by the data governance committee. All other mass downloads of information shall be approved by the committee and/or ISO and include only the minimum amount of information necessary to fulfill the request. A Memorandum of Agreement (MOA) shall be in place when transferring PII to external entities such as software or application vendors, textbook companies, testing companies, or any other web based application, etc. unless the exception is approved by the data governance committee.

Midfield City Board of Education

- b. *Other Electronic Data Transfers and Printing* - PII, Confidential Information, and Internal Information shall be stored in a manner inaccessible to unauthorized individuals. PII and Confidential Information shall not be downloaded, copied or printed indiscriminately or left unattended and open to compromise. PII that is downloaded for educational purposes where possible shall be de-identified before use.
1. *Oral Communications* - Midfield City Schools' staff shall be aware of their surroundings when discussing PII and Confidential Information. This includes but is not limited to the use of cellular telephones in public areas. Midfield City Schools' staff shall not discuss PII or Confidential Information in public areas if the information can be overheard. Caution shall be used when conducting conversations in: semi-private rooms, waiting rooms, corridors, elevators, stairwells, cafeterias, restaurants, or on public transportation.
 2. *Audit Controls* - Hardware, software, services and/or procedural mechanisms that record and examine activity in information systems that contain or use PII are reviewed by the Data Governance Committee annually. Further, the committee also regularly reviews records of information system activity, such as audit logs, access reports, and security incident tracking reports
 3. *Evaluation* - Midfield City Schools requires that periodic technical and non-technical evaluations of access controls, storage, and other systems be performed in response to environmental or operational changes affecting the security of electronic PII to ensure its continued protection.
 4. *IT Disaster Recovery* - Controls shall ensure that Midfield City Schools can recover from any damage to critical systems, data, or information within a reasonable period of time. Each school, department, or individual is required to report any instances immediately to the Superintendent, Risk Management Officer, Technology Director and/or ISO for response to a system emergency or other occurrence (for example, fire, vandalism, system failure and natural disaster) that damages data or systems. The IT Disaster Plan shall include the following:
 - (i.) A prioritized list of critical services, data, and contacts.
 - (ii.) A process enabling Midfield City Schools to restore any loss of data in the event of fire, vandalism, natural disaster, or system failure.

Midfield City Board of Education

- (iii.) A process enabling Midfield City Schools to continue to operate in the event of fire, vandalism, natural disaster, or system failure.
- (iv.) Procedures for periodic testing of written contingency plans to discover weaknesses and the subsequent process of revising the documentation, if necessary.

4.12.9 Compliance - The Data Governance Policy applies to all users of Midfield City Schools' information including: employees, staff, students, volunteers, and outside affiliates. Failure to comply with this policy by employees, staff, volunteers, and outside affiliates may result in disciplinary action up to and including dismissal in accordance with applicable Midfield City Schools' procedures, or, in the case of outside affiliates, termination of the affiliation. Failure to comply with this policy by students may constitute grounds for corrective action in accordance with Midfield City Schools' policies. Further, penalties associated with state and federal laws may apply.

Possible disciplinary/corrective action may be instituted for, but is not limited to, the following:

- a. Unauthorized disclosure of PII or Confidential Information.
- b. Unauthorized disclosure of a log-in code (User ID and password).
- c. An attempt to obtain a log-in code or password that belongs to another person.
- d. An attempt to use another person's log-in code or password.
- e. Unauthorized use of an authorized password to invade student or employee privacy by examining records or information for which there has been no request for review.
- f. Installation or use of unlicensed software on Midfield City School technological systems.
- g. The intentional unauthorized altering, destruction, or disposal of Midfield City Schools' information, data and/or systems. This includes the unauthorized removal from MCS of technological systems such as but not limited to laptops, internal or external storage, computers, servers, backups or other media, copiers, etc. that contain PII or confidential information.

Midfield City Board of Education

- h. An attempt to gain access to log-in codes for purposes other than for support by authorized technology staff, including the completion of fraudulent documentation to gain access.

4.12.10 Laws, Statutory, Regulatory, and Contractual Security Requirements

- a. *CIPA* - The Children’s Internet Protection Act was enacted by Congress in 2000 to address concerns about children’s access to obscene or harmful content over the Internet. CIPA imposes certain requirements on schools or libraries that receive discounts for Internet access or internal connections through the E-rate program. Schools subject to CIPA have two additional certification requirements: 1) their Internet safety policies shall include monitoring the online activities of minors; and 2) as required by the Protecting Children in the 21st Century Act, they shall provide for educating minors about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, and cyber bullying awareness and response.

Reference: <http://www.fcc.gov/guides/childrens-internet-protection-act>

- b. *COPPA* - The Children’s Online Privacy Protection Act, regulates operators of commercial websites or online services directed to children under 13 that collect or store information about children. Parental permission is required to gather certain information.

Reference: www.coppa.org

- c. *FERPA* - The Family Educational Rights and Privacy Act, applies to all institutions that are recipients of federal aid administered by the Secretary of Education. This regulation protects student information and accords students specific rights with respect to their data.

Reference : <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

- d. *HIPAA* - The Health Insurance Portability and Accountability Act, applies to organizations that transmit or store Protected Health Information (PII). It is a broad standard that was originally intended to combat waste, fraud, and abuse in health care delivery and health insurance, but is now used to measure and improve the security of health information as well. *In general, schools are not bound by HIPAA guidelines.*

Reference: <http://www.hhs.gov/ocr/privacy/hipaa/understanding/>

Midfield City Board of Education

- e. *PCI DSS* - The Payment Card Industry Data Security Standard was created by a consortium of payment brands including American Express, Discover, MasterCard, and Visa. It covers the management of payment card data and is relevant for any organization that accepts credit card payments.

Reference: www.pcisecuritystandards.org

- f. *PPRA* - The Protection of Pupil Rights Amendment affords parents and minor students' rights regarding our conduct of surveys, collection and use of information for marketing purposes, and certain physical exams. These include the right to the following:

Consent before students are required to submit to a survey that concerns one or more of the following protected areas ("protected information survey") if the survey is funded in whole or in part by a program of the U.S. Department of Education (ED)

- (i.) Political affiliations or beliefs of the student or student's parent;
- (ii.) Mental or psychological problems of the student or student's family;
- (iii.) Sex behavior or attitudes;
- (iv.) Illegal, anti-social, self-incriminating, or demeaning behavior;
- (v.) Critical appraisals of others with whom respondents have close family relationships;
- (vi.) Legally recognized privileged relationships, such as with lawyers, doctors, or ministers;
- (vii.) Religious practices, affiliations, or beliefs of the student or parents; or
- (viii.) Income, other than as required by law to determine program eligibility.

Receive notice and an opportunity to opt a student out of the following:

- (i.) Any other protected information survey, regardless of funding;
- (ii.) Any non-emergency, invasive physical exam or screening required as a condition of attendance, administered by the school or its agent, and not necessary to protect the immediate health and safety of a student, except for hearing, vision, or scoliosis screenings, or any physical exam or screening permitted or required under State law; and

Midfield City Board of Education

- (iii.) Activities involving collection, disclosure, or use of personal information obtained from students for marketing or to sell or otherwise distribute the information to others.

Reference : <http://www2.ed.gov/policy/gen/guid/fpco/ppra/index.html>

4.12.11 Information Risk Management Practices

The analysis involved in Midfield City Schools Risk Management Practices examines the types of threats – internal or external, natural or manmade, electronic and non-electronic – that affect the ability to manage and protect the information resource. The analysis also documents any existing vulnerabilities found within each entity, which potentially exposes the information resource to the threats. Finally, the analysis includes an evaluation of the information assets and the technology associated with its collection, storage, dissemination and protection.

From the combination of threats, vulnerabilities, and asset values, an estimate of the risks to the confidentiality, integrity and availability of the information is determined and addressed based on recommendations by the Data Governance Committee. The frequency of the risk analysis is determined at the district level. It is the option of the superintendent or designee to conduct the analysis internally or externally.

4.12.12 Definitions

- a. *Availability* - Data or information is accessible and usable upon demand by an authorized person.
- b. *Confidentiality* - Data or information is not made available or disclosed to unauthorized persons or processes.
- c. *Data* - Facts or information
- d. *Entity* - Organization such as school system, school, and department or in some cases business
- e.. *Information* - Knowledge that you get about something or someone; facts or details.
- f. *Data Integrity* - Data or information has not been altered or destroyed in an unauthorized manner.

Midfield City Board of Education

- g. *Involved Persons* - Every user of Involved Systems (see below) at Midfield City Schools – no matter what their status. This includes nurses, residents, students, employees, contractors, consultants, temporaries, volunteers, substitutes, student teachers, interns, etc.
- h. *Systems* - All data-involved computer equipment/devices and network systems that are operated within or by the Midfield City Schools physically or virtually. This includes all platforms (operating systems), all computer/device sizes (personal digital assistants, desktops, mainframes, telephones, laptops, tablets, game consoles, etc.), and all applications and data (whether developed in-house or licensed from third parties) contained on those systems.
- i. *Personally Identifiable Information (PII)* - PII is any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.
- j. *Risk* - The probability of a loss of confidentiality, integrity, or availability of information resources.

4.12.13 Responsibilities

- a. *Data Governance Committee* - The Data Governance Committee for Midfield City Schools is responsible for working with the Information Security Officer (ISO) to ensure security policies, procedures, and standards are in place and adhered to by the entity. Other responsibilities include:
 1. Reviewing the Data Governance Policy annually and communicating changes in policy to all involved parties.
 2. Educating users with comprehensive information about security controls affecting system users and application systems.
- b. *Information Security Officer* - The Information Security Officer (ISO) for Midfield City Schools is responsible for working with the superintendent, Data Governance Committee, user management, owners, administrative assistants, and users to develop and implement prudent security policies, procedures, and controls. Specific responsibilities include:

Midfield City Board of Education

1. Providing basic security support for all systems and users.
 2. Advising owners in the identification and classification of technology and data related resources.
 3. Advising systems development and application owners in the implementation of security controls for information on systems, from the point of system design, through testing and production implementation.
 4. Performing or overseeing security audits.
 5. Reporting regularly to the superintendent and Midfield City Schools Data Governance Committee on Midfield City Schools' status with regard to information security.
- c. *User Management* - Midfield City Schools' administrators are responsible for overseeing their staff use of information and systems, including:
1. Reviewing and approving all requests for their employees' access authorizations.
 2. Initiating security change requests to keep employees' secure access current with their positions and job functions.
 3. Promptly informing appropriate parties of employee terminations and transfers, in accordance with local entity termination procedures.
 4. Revoking physical access to terminated employees, i.e., confiscating keys, changing combination locks, etc.
 5. Providing employees with the opportunity for training needed to properly use the computer systems.
 6. Reporting promptly to the ISO and the Data Governance Committee the loss or misuse of Midfield City Schools' information.
 7. Initiating corrective actions when problems are identified.
 8. Following existing approval processes within their respective organization for the selection, budgeting, purchase, and implementation of any technology or data system/software to manage information.

Midfield City Board of Education

9. Following all privacy and security policies and procedures
- d. *Information Owner* - The owner of a collection of information is usually the administrator or supervisor responsible for the creation of that information. In some cases, the owner may be the primary user of that information. In this context, ownership does not signify proprietary interest, and ownership may be shared. The owner may delegate ownership responsibilities to another individual by completing the *Midfield City Schools Information Owner Delegation/Transfer Request Form* and submitting the form to the Data Governance Committee for approval. The owner of information has the responsibility for:
1. Knowing the information for which she/he is responsible.
 2. Determining a data retention period for the information, relying on ALSDE guidelines, industry standards, Data Governance Committee guidelines, or advice from the school system attorney.
 3. Ensuring appropriate procedures are in effect to protect the integrity, confidentiality, and availability of the information used or created.
 4. Authorizing access and assigning responsibilities if applicable.
 5. Specifying controls and communicating the control requirements to the administrative assistants and users of the information.
 6. Reporting promptly to the ISO the loss or misuse of Midfield City Schools' data.
 7. Initiating corrective actions when problems are identified.
 8. Promoting employee education and awareness by utilizing programs approved by the ISO, where appropriate.
 9. Following existing approval processes within the respective organizational unit and district for the selection, budgeting, purchase, and implementation of any computer system/software to manage information.
- e. *Administrative Assistant* - The administrative assistant is assigned by an administrator, data owner, or the ISO based his/her role and is generally responsible for the processing and storage of the information. The administrative assistant is responsible for the administration of controls as specified by the owner. Responsibilities may include:

Midfield City Board of Education

1. Providing and/or recommending physical safeguards.
 2. Providing and/or recommending procedural safeguards.
 3. Administering access to information.
 4. Releasing information as authorized by the Information Owner and/or the ISO and/or Data Governance Committee for use and disclosure using procedures that protect the privacy of the information.
 5. Maintaining information security policies, procedures and standards as appropriate and in consultation with the ISO and/or Data Governance Committee.
 6. Promoting employee education and awareness by utilizing programs approved by the ISO, where appropriate.
 7. Reporting promptly to the ISO and/or Data Governance Committee the loss or misuse of Midfield City Schools data.
 8. Identifying and responding to security incidents and initiating appropriate actions when problems are identified.
- f. *User* - The user is any person who has been authorized to read, enter, print or update information. A user of information is expected to:
1. Access information only in support of their authorized job responsibilities.
 2. Comply with all data security procedures and guidelines in the Midfield City Schools Data Governance Policy and all controls established by the data owner and/or administrative assistant.
 3. Keep personal authentication devices (e.g. passwords, secure cards, PINs, access codes, etc.) confidential.
 4. Report promptly to the ISO and/or Data Governance Committee the loss or misuse of Midfield City Schools' information.
 5. Follow corrective actions when problems are identified.

Midfield City Board of Education

4.12.14 Data Classification Levels

a. *Personally Identifiable Information (PII)*

1. PII is information about an individual maintained by an agency, including:
 - a. Any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records.
 - b. Any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.
2. Unauthorized or improper disclosure, modification, or destruction of this information could violate state and federal laws, result in civil and criminal penalties, and cause serious legal implications for Midfield City Schools.

b. *Confidential Information*

1. Confidential Information is very important and highly sensitive material that is not classified as PII. This information is private or otherwise sensitive in nature and shall be restricted to those with a legitimate business need for access. Examples of Confidential Information may include: personnel information, key financial information, proprietary information of commercial research sponsors, system access passwords and information file encryption keys.
2. Unauthorized disclosure of this information to people without a business need for access may violate laws and regulations, or may cause significant problems for Midfield City Schools, its staff, parents, students including contract employees, or its business partners. Decisions about the provision of access to this information shall always be cleared through the information owner and/or Data Governance Committee.

c. *Internal Information*

1. Internal Information is intended for unrestricted use within Midfield City Schools, and in some cases within affiliated organizations such as Midfield City Schools' business or community partners. This type of information is already widely-distributed within Midfield City

Midfield City Board of Education

Schools, or it could be so distributed within the organization without advance permission from the information owner. Examples of Internal Information may include: personnel directories, internal policies and procedures, most internal electronic mail messages.

2. Any information not explicitly classified as PII, Confidential or Public will, by default, be classified as Internal Information.
3. Unauthorized disclosure of this information to outsiders may not be appropriate due to legal or contractual provisions.

d. *Public Information*

1. Public Information has been specifically approved for public release by a designated authority within each entity of Midfield City Schools. Examples of Public Information may include marketing brochures and material posted to Midfield City Schools' web pages.
2. This information may be disclosed outside of Midfield City Schools.

4.12.15 Virus, Malware, Spyware, Phishing and SPAM Protection

- a. *Internet Filtering* - Student learning using online content and social collaboration continues to increase. Midfield City Schools views Internet filtering as a way to balance safety with learning—letting good content, resources, and connections in while blocking the bad. To balance educational Internet resource and app use with student safety and network security, the Internet traffic from all devices that authenticate to the network is routed through the iBoss filter using the user's network credentials. For companion devices and guest devices, users see a "pop-up screen" that requires them to login to the iBoss Internet filter with his/her network credentials or a guest login and password to gain access to the Internet. This process sets the filtering level appropriately based on the role of the user, such as, student, staff or guest, and more specifically for students, the grade level of the child. All sites that are known for malicious software, phishing, spyware, etc. are blocked.
- b. *Security Patches* - Windows security patches and other Windows patches are scheduled to "auto-download" and "schedule install." The schedule install occurs during the following maintenance window: Monday-Friday 1:00 a.m. to 5:00 a.m. Fileservers are scheduled to "auto-download" and are automatically updated on Saturdays at 2:00 a.m. after which the fileserver is automatically re-booted.

Midfield City Board of Education