January 25, 2016

The regular meeting of the St. Clair County Board of Education was held on Monday, January 25, 2016. The board meeting began at 6:00 pm at the central office with the following board members in attendance:

Scott Suttle Marie Manning John DeGaris Randy Thompson Allison Gray Terry Green

The following individuals were also in attendance:

Gary Hanner Melinda Splawn Rebecca Beason Jimmy Parker Lisa Love Patty Robinson Beth Evans-Smith Lisa A. Swindall Dezmond Turner Cassandra Taylor Debra Allred Eloise Williams

- **1.** President Scott Suttle called the meeting to order.
- **2.** A quorum of the board was present. Angie Cobb was absent. All other board members were in attendance.
- **3.** Ms. Seals recommended approval of the agenda with the addition of 4,B Approval of a Legal Agreement and 4,C4 1.10 System Philosophy, Purpose and Direction and 4,C5 5.10 Attendance/Enrollment Policy. Mrs. Manning made the motion to accept the agenda as recommended and Mrs. Gray gave the second. All members voted YES.
- **4.** Ms. Seals recommended approval of the Consent Agenda. Mr. Thompson made the motion and Mrs. Manning gave the second. All members voted in favor of the Consent Agenda.
 - A. Minutes-December 14, 2015 and December 21, 2015
 - B. Approval of Legal Agreement
 - C. Approval of New and Revised Policies
 - 1. 5.25 Virtual School Option
 - 2. 8.15 Emergency Drills
 - 3. 8.71 Data Governance Policy
 - 4. 1.10 System Philosophy, Purpose and Direction
 - 5. 5.10 Attendance/Enrollment
 - D. Travel
 - ECTC-selected faculty member(s) to travel on February 16-17, 2016 to Smyrna, GA to attend the Envirobase High Performance Waterborne Certification Training. Envirobase will pay for room and registration and the balance of the expenses will be paid from Perkins Funds.

5. Recognition:

Name	School	Award
Board Members		January-Board Member Appreciation Month

- **6.** There were no audience members who wished to address the board.
- 7. Financial Reports presented by Laura Nance for December 2015:
 - A. Bank Reconciliation
 - B. Other Financial Reports
- **8. A.** Ms. Seals recommended approval of the Personnel Agenda. Mr. Thompson made the motion to accept the recommendation and Mrs. Gray gave the second. All members voted YES.

PERSONNEL AGENDA

EMPLOYMENT

# 1		EMPLOYEE NAME ALEXANDER, MARSHA ANN	SCHOOL STEELE JR HIGH	JOB BOOKKEEPER	EFFECT DATE RANGE 1/27/2016	REMARKS FUND SOURCE - FOUNDATION 202 DAYS
2	1368	BRYAN, ELEANOR KATHERINE	SPRINGVILLE ELEMENTARY	SPECIAL EDUCATION AIDE	1/27/2016	FUND SOURCE - FOUNDATION 182 DAYS
3	1366	GRAYSON, CHRISTY MARIE	ODENVILLE INTERMEDIATE	PART-TIME CUSTODIAL	1/28/2016	FUND SOURCE - FOUNDATION 182 DAYS
4	1365	THOMPSON, SAMANTHA PAIGE	TRANSP/ASHVILLE H/S	BUS DRIVER	1/27/2016	FUND SOURCE - TRANSPORTATION - 182 DAYS
5	1367	UNDERWOOD, DALE DARLENE	TRANSP/SPRINGVILLE ELEM	BUS DRIVER	1/27/2016	FUND SOURCE - TRANSPORTATION - 182 DAYS

CHANGE	OF CO	ONTRA	CT

# PAE EMPLOYEE NAME 6 1364 PHILLIPS, SANDRA MICHELLE	FROM SPECIAL EDUCATION AIDE ODENVILLE INTERMEDIATE	TO SPECIAL ED AIDE/BUS AIDE ODENVILLE INTERMEDIATE	EFFECT DATE 1/26/2016	REMARKS
7 1346 RITCHIE, MERRYANN	SPECIAL EDUCATION AIDE SPRINGVILLE ELEMENTAR	SPECIAL ED AIDE/BUS AIDE Y SPRINGVILLE ELEMENTARY	1/26/2016	
LEAVE OF ABSENCE				
# PAF EMPLOYEE NAME 8 1377 RUMBLEY, KRISTIA LEIGH	SCHOOL MOODY JR. HIGH	JOB LEAVE OF ABSENCE	8/1/2016 5/31/2017	REMARKS LEAVE OF ABSENCE FOR 2016-2017 SCHOOL YEAR
RESIGNATION				
# PAF EMPLOYEE NAME 9 1341 ARMSTRONG, JEFFERY W	SCHOOL TRANSP/MARGARET ELEM	JOB BUS DRIVER	EFFECT DATE RANGE 1/7/2016	REMARKS
10 1339 BROWN, AMBER JONES	STEELE JR HIGH	BOOKKEEPER	1/15/2016	
11 1340 CARTER, SHANNON LYNN	ASHVILLE HIGH	CNP WORKER	1/6/2016	
12 1345 JACKSON, MELISSA LYNNE	MARGARET ELEMENTARY	CNP WORKER	1/3/2016	
13 1354 PARKS, RENA	ODENVILLE MIDDLE	SPECIAL EDUCATION AIDE	2/1/2016	
SUBSTITUTES				
# PAF EMPLOYEE NAME 14 1369 ARMSTRONG, JEFFERY W	SCHOOL ST. CLAIR COUNTY BUS SHOP	JOB SUBSTITUTE BUS DRIVER	EFFECT DATE RANGE 1/8/2016	REMARKS FUND SOURCE - TRANSPORTATION
15 1351 LITTLE, BILLY R	ST. CLAIR COUNTY BUS SHOP	SUBSTITUTE SHOP ASST	11/16/2015 2/26/2016	FUND SOURCE - TRANSPORTATION HOURLY RATE ACCORDING TO SHOP ASSISTANT SALARY SCHEDULE
16 1352 MEALER, SANDRA E	ODENVILLE MIDDLE	SUBSTITUTE BUS AIDE	1/26/2016	FUND SOURCE - LOCAL
EXTENDED DAY				
# PAF EMPLOYEE NAME 17 1383 OSTERMEYER, STEPHANIE C	SCHOOL MOODY ELEMENTARY	JOB EXTENDED DAY TEACHER	1/26/2016 8/1/2016	REMARKS FUND SOURCE - STUDENT TUITION \$17/HR
18 1381 SANDERS, KELLI	ODENVILLE ELEMENTARY	EXTENDED DAY ADULT AIDE	1/26/2016 8/1/2016	FUND SOURCE - STUDENT TUITION \$12/HR
SUPPLEMENTS AND ADDITIONAL PRO	GRAMS			
# PAF EMPLOYEE NAME 19 1362 BURKE, SUMMER NICOLE	STEELE JR HIGH	JOB TUTOR		EMARKS UND SOURCE - COMMUNITY ED \$25/HR
20 1378 DELOACH, MARIANNE FRANCES	INSTRUCTIONAL SERVICES	HOMEBOUND TEACHER HOURLY	1/26/2016 FU	UND SOURCE - IDEA/LOCAL \$30/HR
21 1342 LEE, HEATHER WALKER	INSTRUCTIONAL SERVICES	HOMEBOUND TEACHER HOURLY	1/26/2016 FI	UND SOURCE - IDEA/LOCAL \$30/HR
22 1361 NUSS, PAMELA ANN	STEELE JR HIGH	TUTOR	2/1/2016 FI	UND SOURCE - COMMUNITY ED \$25/HR
23 1360 ROBINSON, PATTY BROWN	STEELE JR HIGH	TUTOR	2/1/2016 FI	UND SOURCE - COMMUNITY ED \$25/HR
24 1363 WASHINGTON, LEEANN VANN	STEELE JR HIGH	TUTOR	2/1/2016 Ft	UND SOURCE - COMMUNITY ED \$25/HR
SUPPLEMENT				
# PAF EMPLOYEE NAME 1350 BUNT, BILLIE SUE	SCHOOL RAGLAND HIGH	JOB SUPPLEMENT		EMARKS IND SOURCE - LOCAL BUS SUPPLEMENT \$56.18/Day
26 1348 COUPLAND, ANGELA MCCLELLA	SYSTEM-WIDE	SUPPLEMENT - NURSING	1/26/2016 FI	UND SOURCE - LOCAL \$3,000
27 1371 FLYNN, PAULA	ASHVILLE HIGH	SUPPLEMENT	1/26/2016 FI	UND SOURCE - LOCAL \$400
28 1349 SELF, LASHON	SYSTEM-WIDE	SUPPLEMENT - NURSING	1/26/2016 FG	UND SOURCE - LOCAL \$3,000
29 1372 STONE, MELANIE HYATT	ASHVILLE ELEMENTARY	SUPPLEMENT	1/26/2016 FI	UND SOURCE - LOCAL \$600

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#	PAF	EMPLOYEE NAME	<u>SCHOOL</u>	JOB	EFFECT DATE	RANGE	REMARKS
30	1359	HATHORN, MICHAEL SHANNON	RAGLAND HIGH	VARSITY SOFTBALL ASST COACH	1/26/2016	5/31/2016	FUND SOURCE - LOCAL \$1,750/YEAR
31	1358	LUMPKIN, JESSICA MAYHALL	RAGLAND HIGH	VARSITY HEAD SOFTBALL COACH	1/26/2016	5/31/2016	FUND SOURCE - LOCAL \$3,250/YEAR
32	1385	WHITFIELD, HEATHER NICOLE	ASHVILLE HIGH	JV CHEER SPONSER - 2 SPORTS	1/26/2016	8/1/2016	FUND SOURCE - LOCAL \$537.50 (.25 OF THE SUPPLEMENT)
33	1386	WHITFIELD, HEATHER NICOLE	ASHVILLE HIGH	VARSITY CHEER COACH - 2 SPOR	1/26/2016	8/1/2016	FUND SOURCE - LOCAL \$812.50 (.25 OF THE SUPPLEMENT)
TE	RMIN	ATION OF COACHING SUPPLE	MENT				
#	PAF	EMPLOYEE NAME	SCHOOL	JOB	EFFECT DATE	RANGE	REMARKS
34	1357	HATHORN, MICHAEL SHANNON	RAGLAND HIGH	VARSITY HEAD SOFTBALL COACH	8/4/2015	1/25/2016	RETAINS TEACHING POSITION
35	1355	LUMPKIN, JESSICA MAYHALL	RAGLAND HIGH	JV GIRLS HEAD BASKETBALL	8/4/2015	1/25/2016	TEAM DID NOT MAKE - RETAINS TEACHING POSITION
36	1356	LUMPKIN, JESSICA MAYHALL	RAGLAND HIGH	VARSITY SOFTBALL ASST COACH	8/4/2015	1/25/2016	RETAINS TEACHING POSITION
ОТ	HER						
#	PAF	EMPLOYEE NAME	SCHOOL	JOB	EFFECT DATE	RANGE	REMARKS
37	1343	LUNSFORD, KATHRYN JOHNSON	MOODY HIGH	GATEWORKERS	11/1/2015	5/31/2016	FUND SOURCE - LOCAL SCHOOL \$20/GAME
38	1344	SUBLETT, SHERRY LAKE	MOODY HIGH	GATEWORKERS	11/1/2015	5/31/2016	FUND SOURCE - LOCAL SCHOOL \$20/GAME

OTHER NOTIFICATIONS NOT NEEDING BOARD APPROVAL

This section is posted for informational purposes only and did not require board approval

FAMILY MEDICAL LEAVE

-	#	<u>PAF</u>	EMPLOYEE NAME	<u>SCHOOL</u>	<u>JOB</u>	EFFECT DATE	RANGE	REMARKS
	1	1373	JOINER, CINDY RENA	MOODY ELEMENTARY	FAMILY MEDICAL LEAVE	11/30/2015	4/1/2016	INTERMITTENT AND CATASTROPHIC AS NEEDED
	2	1375	KITTS, MELINDA	MOODY MIDDLE	FAMILY MEDICAL LEAVE	12/4/2015	1/4/2016	
	3	1384	OWEN, SHARON M	STEELE JR HIGH	FAMILY MEDICAL LEAVE	12/1/2015	2/4/2016	
	4	1353	PARKS, RENA	ODENVILLE MIDDLE	FAMILY MEDICAL LEAVE	12/2/2015	1/31/2016	
	5	1374	ROBERTS, KASEY BROWN	ASHVILLE HIGH	FAMILY MEDICAL LEAVE	2/19/2016	5/19/2016	CATASTROPHIC AS NEEDED
	6	1376	RUMBLEY, KRISTIA LEIGH	MOODY JR. HIGH	FAMILY MEDICAL LEAVE	4/8/2016	5/27/2016	
	7	1379	SANDERS, NATALIE JOLLEY	RAGLAND HIGH	FAMILY MEDICAL LEAVE	1/6/2016	1/21/2016	CATASTROPHIC AS NEEDED
	8	1380	SCOTT, AMBERLYN NICOLE	SPRINGVILLE ELEMENTARY	FAMILY MEDICAL LEAVE	12/17/2015	1/28/2016	

9. Ms. Seals recommended the approval of Change Order No. 1 for the Renovation of Locker Rooms at Ashville High School for an increase of \$20,151.00, Architect's Job No. 14-79. Mr. Thompson made the motion and Mrs. Manning gave the second. All members voted YES.

10. Board Member Comments:

- A. Mr. Suttle said that he had the opportunity to speak at UAB last week at their Teach Program. He said that Dr. Meadows had a message to the board, "The cavalry is not here yet but we're on our way. Hold down the fort until we get there." He said not only do the students in the program graduate but with a teaching certificate. He said that 1.5-2 students in this program decide to teach. He said that approximately three of those students will go in to the workforce and after about five years they will turn to teaching. He said that if Dr. Bice approves the program, and there is every indication that he will, it will bring an interesting new approach to student teaching. He closed by thanking everyone for the all of the goodies.
- B. Mr. Green said that he wanted to echo what was said. He said that it is great to be recognized and that St. Clair County is a great school system. He thanked everyone for the gifts and said that they are the ones who need to be recognized. He said that the principals are the real hero's and that they make their job easy.
 - C. Mr. Thompson said amen to the above comments.
 - D. Mr. DeGaris said that he was grateful and underserving.

E. Mrs. Manning agreed with the above comments and said that the County Tournament was Wednesday and Saturday. She said that it is good to see the students excel in sports where they might not excel in other areas. She said that she was proud of everyone and that they are the ones who deserve the recognition. She then mentioned the Spelling Bee the next day at Springville.

11. Superintendent comments:

- A. Ms. Seals thanked the board members for all that they do for the school system. She said that she and the schools appreciates them. She said that they do have a District 6 meeting on February 2nd. She said that right now there are four that are going. She said there is a board meeting on February 22. She would like to have a Work Session prior to the board meeting to go over District Accreditation and present the program. She said to come if there is any way possible. She closed by thanking everyone for all of the goodies.
- 12. Announce next board meeting-Monday, February 22, 2016 at the central office at 6:00 p.m.
- **13.** President Scott Suttle recommended approval to adjourn. Mr. Thompson moved to approve the recommendation.

Approved the 22 nd day of February, 2016	
	Board President
	Board Secretary

VIRTUAL SCHOOL OPTION

5.25

Effective with the ninth grade class of 2016-2017, St. Clair County students in grades 9-12 may elect to participate in the virtual school option according to the following policies and rules.

- I. Scope and Delivery of Services The school system provides a virtual school option to full-time students in grades 9-12 who are enrolled in St. Clair County Schools. Such courses will be delivered through the Alabama State Department of Education's ACCESS program and will include, at a minimum, all courses that are required to obtain a high school diploma. Students enrolled in the virtual school are subject to St. Clair County Schools' graduation requirements.
- II. Student Eligibility Criteria –Students must meet any eligibility requirements of the Alabama State Department of Education's ACCESS program. In addition, students must meet school system enrollment requirements for the course in question including, but not limited to, those contained in the school's curriculum program. The school system reserves the right to develop specific eligibility criteria for virtual courses. Students may be transitioned back to a traditional day program if 1) the student's participation in the virtual program is impeding the student's academic progress; 2) the student fails to meet virtual course attendance requirements; or 3) the student repeatedly violates school system policies, procedures, rules or regulations, including, but not limited to, the school system's rules governing the use of its technology resources.
- III. Monitoring Performance and Testing Requirements Individual student performance will be monitored pursuant to the school system's traditional academic credit requirements and grade scale. Students utilizing the virtual school option will be subject to all state testing and accountability requirements and will be subject to the same rules and regulations regarding the administration of such tests that are applicable to students enrolled in the traditional day program. The Superintendent is hereby authorized to take whatever action may be necessary to facilitate the state testing and accountability requirements applicable to virtual school students. The school system reserves the right to require students utilizing the virtual school option to participate in state testing and accountability requirements on campus at a date and time selected by the school system.
- IV. Attendance –Students participating in the virtual school option are required to be active and submitting assignments in order to remain enrolled in the program. The school system reserves the right to set specific attendance requirements for each virtual course. The Superintendent or his designee is authorized to develop alternate attendance policies for virtual courses, provided that students in such programs are given notice of the attendance requirements. A student's failure to comply with such requirements may result in administrative action including, but not limited to, probation or removal from the class or a charge of truancy, if appropriate.
- V. Extracurricular Activities Students must meet the same extracurricular activity eligibility requirements as students enrolled in the traditional day program, including, but not limited to, any applicable Alabama High School Athletic Association ("AHSAA") requirements. Student

residency for purposes of participating in extracurricular activities will be determined in accordance with applicable state law and AHSAA guidelines.

VI. Additional Procedures Authorized –The Superintendent or his designee is authorized to develop such procedures as he deems necessary to implement this policy including, but not limited to, eligibility criteria for courses, methods for informing students and parents of the virtual program.

REFERENCE(S):	CODE OF ALABAMA 16-46A-1; LEGISLATIVE ACT 2015-89
HISTORY:	ADOPTED:
	REVISED:
	EODMEDI V: NEW

EMERGENCY DRILLS

8.15

The St. Clair County Board of Education requires at least one (1) emergency drill be held at each school during each month school is in session, including summer school session(s). Emergency drills include fire drills, severe weather drills, and lock down/"code red" drills as described in the school and system safety plans.

Fire Drills shall require evacuation of the building. **Seasonal Severe Weather Drills** must be held seasonally, with one (1) during the period of September through November and one (1) during the period of January through March. **Lockdown/Code Red Drills** for safety and security emergencies are to be conducted during the first six weeks of each semester of the school year. Additional lockdown drills, fire drills, and weather drills may be scheduled at any time to complete the requirement of one drill per month.

Training for faculty and staff on procedures for all emergency drills as well as information in the school safety plan shall be conducted at least annually.

The principal shall report the dates of annual safety training as well as dates of all safety drills in the manner prescribed by the State Department of Education and the Superintendent. Failure of a principal to conduct and report safety drills and training according to prescribed rules shall result in appropriate disciplinary action.

REFERENCE(S): CODE OF ALABAMA

<u>36-19-10</u>, <u>36-19-11</u>

HISTORY: ADOPTED: APRIL 19, 1999

REVISED: DECEMBER 15, 2003; FEBRUARY 22, 2010, SEPTEMBER 16, 2013

FORMERLY: EBBC

11 JAN 25 16 BD MTG-AP FEB 22 16

DATA GOVERNANCE POLICY

8.71

Introduction

Protecting our students' and staffs' privacy is an important priority, and St. Clair County Schools is committed to maintaining strong and meaningful privacy and security protections. The privacy and security of this information is a significant responsibility, and we value the trust of our students, parents, and staff.

The St. Clair County Schools Data Governance document includes information regarding the Data Governance Committee, the actual St. Clair County Schools Data and Information Governance and Acceptable Use Policy, applicable Appendices, and Supplemental Resources.

The policy formally outlines how operational and instructional activity shall be carried out to ensure St. Clair County 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.

The St. Clair County Schools Data Governance Policy will be a living document. Procedures to ensure document flexibility are outlined throughout this document. With the Board's permission, the Data Governance Committee may quickly modify information in the Appendices in response to changing needs. All modifications will be posted on the St. Clair County Schools' website.

I. PURPOSE

- A. It is the policy of St. Clair County Schools that data or information in all its forms-written, electronic, or printed--are 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. All of this policy was written with "Need to Know" in mind.
- B. The data governance policies and procedures are documented and reviewed annually by the data governance committee.
- C. St. Clair County Schools conducts and documents annual training on their data governance policy.
- D. The terms data and information are used separately, together, and interchangeably throughout the policy. The intent is the same.

II. SCOPE

The Superintendent and their designee 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 or data systems.

This policy applies to all forms of St. Clair County Schools' data and information, including but not limited to:

A. Speech, spoken face to face, or oral 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, PCs, laptops, tablets, mobile devices, etc.
- E. Data stored on any type of internal, external, or removable media or cloud based services.
- F. Software, hardware and any peripherals used to access or store data.

III. Common Definitions and Responsibilities *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, 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.
- G. **Involved Persons**: Every user of Involved Systems (see below) at St. Clair County 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 St. Clair County 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:
 - 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
 - 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.

Responsibilities

- A. **Data Governance Committee**: The Data Governance Committee for St. Clair County 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:
 - Reviewing the Data Governance Policy and Acceptable Use Policy annually and communicating changes in policy to all involved parties.
 - Educating data custodians and manage owners and users with comprehensive information about security controls affecting system users and application systems.
- B. **Information Security Officer**: The Information Security Officer (ISO) for St. Clair County Schools is responsible for working with the superintendent, Technology Director, Technology Team, Data Governance Committee, User Management, Owners, and Users to develop and implement prudent security policies, procedures, and controls. Specific responsibilities include:
 - Providing basic security support for all systems and users.
 - Advising owners in the identification and classification of technology and data related resources.
 - 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.
 - Performing or overseeing security audits.
 - Reporting regularly to the Superintendent, Technology Director and St. Clair County Schools Data Governance Committee on St. Clair County Schools' status with regard to information security.
- C. **User Management**: St. Clair County Schools' Administrators are responsible for overseeing their staff's use of information and systems.
 - Reviewing and approving all requests for their employees' access authorizations.
 - Initiating security change requests to keep employees' secure access current with their positions and job functions.

- Promptly informing appropriate parties of employee terminations and transfers, in accordance with local entity termination procedures.
- Revoking physical access to terminated employees, i.e., confiscating keys, changing combination locks, etc.
- Providing employees with the opportunity for training needed to properly use the computer systems.
- Reporting promptly to the Superintendent, Technology Director, ISO and the Data Governance Committee the loss or misuse of St. Clair County' information.
- Initiating corrective actions when problems are identified.
- 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.
- Following all privacy and security policies and procedures.
- D. **Student User management**: Administrators and Faculty are responsible for overseeing all student use of data and data systems, including:
 - Monitoring websites students use
 - Student use of personal devices while on school property
 - Student's use of electronic and paper data
 - Students use of School provided systems
 - Never allow a student to view systems while an employee is logged in
 - Monitor student system logins and assure students are using their own credentials to login to systems and software
 - Assure students are aware of privacy policies
 - Reporting promptly to the Superintendent, Technology Director, ISO and the Data Governance Committee the loss or misuse of St. Clair County' information.
 - Initiating corrective actions when problems are identified.
 - Ensure all students are following all privacy and security policies and procedures as well as the St Clair County Board of Education Acceptable Use Policy.
- E. **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 of information has the responsibility for:

- Knowing the information for which she/he is responsible.
- Determining a data retention period for the information, relying on Local, State and Federal laws, ALSDE guidelines, industry standards, Data Governance Committee guidelines or advice from the school system attorney.

- Ensuring appropriate procedures are in effect to protect the integrity, confidentiality, and availability of the information used or created.
- Authorizing access and assigning data custodianship if applicable.
- Specifying controls and communicating the control requirements to the data custodian and users of the information.
- Reporting promptly to the Technology Director, Data Governance Committee and ISO the loss or misuse of St. Clair County's data.
- Initiating corrective actions when problems are identified.
- Promoting employee education and awareness by utilizing programs approved by the ISO and Data Governance Committee, where appropriate.
- 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.
- 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:

- Access information only in support of their authorized job responsibilities.
- Comply with all data security procedures and guidelines in the St. Clair County Schools Data Governance Policy.
- Keep personal authentication devices (e.g. passwords, secure cards, PINs, access codes, etc.) confidential.
- Report promptly to the ISO and or Data Governance Committee the loss or misuse of St. Clair County Schools' information.
- Follow corrective actions when problems are identified.
- Adhere to the St Clair County Board of Education Acceptable Use Policy

IV. REGULATORY COMPLIANCE

The district will abide by any law, statutory, regulatory, or contractual obligations affecting its data systems. St. Clair County 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)

Referenced Laws, 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.

For more information see: 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.

See www.coppa.org for more details.

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 student's specific rights with respect to their data.

For more information see:

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.

For more information see: http://www.hhs.gov/ocr/privacy/hipaa/understanding/

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.

For more information see: www.pcisecuritystandards.org

- F. **PPRA**: The **Protection of Pupil Rights Amendment** applies to programs that receive funding from the U.S. Department of Education (ED). PPRA is intended to protect the rights of parents and students in two ways:
 - 1. It seeks to ensure that schools and contractors make instructional materials available for inspection by parents if those materials will be used in connection with an ED-funded survey, analysis, or evaluation in which their children participate; and
 - 2. It seeks to ensure that schools and contractors obtain written parental consent before minor students are required to participate in any ED-

funded survey, analysis, or evaluation that reveals information concerning:

- Political affiliations;
- Mental and psychological problems potentially embarrassing to the student and his/her family;
- Sex behavior and attitudes;
- Illegal, anti-social, self-incriminating and demeaning behavior;
- Critical appraisals of other individuals with whom respondents have close family relationships;
- Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers; or
- Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

Parents or students who believe their rights under PPRA may have been violated may file a complaint with ED by writing the Family Policy Compliance Office. Complaints must contain specific allegations of fact giving reasonable cause to believe that a violation of PPRA occurred.

For additional information or technical assistance, you may call (202) 260-3887. Individuals who use TDD may call the Federal Information Relay Service at 1 (800) 877-8339. Or you may contact us at the following address:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202-5920

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

V. RISK MANAGEMENT

- A. A thorough risk analysis of all St. Clair County 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.
- B. 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.

VI. DATA CLASSIFICATION

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.

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 St. Clair County Schools.

B. Confidential Information

 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 must 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 St. Clair County Schools, its staff, parents, students including contract employees, or its business partners. Decisions about the provision of access to this information must always be cleared through the information owner and/or Data Governance Committee.

C. Internal Information

 Internal Information is intended for unrestricted use within St. Clair County Schools, and in some cases within affiliated organizations such as St. Clair County Schools' business or community partners. This type of information is already widely-distributed within St. Clair County 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
- Internal electronic messages
- 2. Any information not explicitly classified as PII, Confidential or Public shall, by default, be classified as Confidential Information until properly reclassified by the Superintendent, ISO or Data Governance Committee.

 Unauthorized disclosure of this information to outsiders may not be appropriate due to legal or contractual provisions and could result in disciplinary or legal actions.

D. Public Information

 Public Information will only be approved and released to the public by a specifically designated authority within each entity of St. Clair County Schools. Individuals are not authorized to release information to the public in any format without prior approval. No information about emergency or legal situations can be released to the public without explicit approval from Administration.

Examples of Public Information may include:

- Marketing brochures and material posted to St. Clair County Schools' web pages
- Tweets, Facebook, phone calls, emails and or information to the public regarding lockdowns etc...
- 2. This information may be disclosed outside of St. Clair County Schools.

E. Directory Information

St. Clair County Schools defines Directory information as follows:

- First and last name
- Gender
- Home address
- Home telephone number
- Email address
- Photograph
- Place and date of birth
- Dates of attendance (years)
- Student grade level
- Diplomas, honors, awards received
- Student participation in school activities or school sports
- Student weight and height for members of school athletic teams
- Student most recent institution/school attended
- Student ID number

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

1. Data Inventory

The St. Clair County School System collects individual student data directly from students and/or families through our state funded student data management

system, Chalkable formerly STI (iNOW). Local student data is securely transmitted daily to the state's data management system from which state and federal reporting is completed. Each student is assigned a unique student identifier upon enrollment into the student management system to ensure compliance with the privacy rights of the student and his or her parents/guardians Maintaining a complete up-to-date inventory of all records and data systems, including those used to store and process data, enables the St. Clair County Schools to target its data security and privacy management efforts to appropriately protect sensitive data. The data records inventory specifies what data elements are collected, provides a justification for their collection, and explains the intended purpose(s) for their use.

STUDENT DATA FILES

Data elements collected	Justification for collection	Intended purpose(s) for use
Basic Demographic Information: Student name, State ID #, address, phone, parent info/contact, race, gender, home language, etc.	State reporting requirements	Student Identification Star Assessment Enrollment (Athletics) Drug Testing
Student info: Social security number and/or Identifying Number	State reporting requirements	Student Identification C2C (Athletics) Drug Testing
Grades	State reporting requirements	Track student's achievement levels throughout their school career C2C (Athletics)
Attendance	State reporting requirements	Track student's attendance throughout their school career
Discipline	State reporting requirements	Track student's discipline throughout their school career

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Free/Reduced Lunch information	State reporting requirements	To determine if the student qualifies for free/reduced meals
Special Ed/504/ELL data	Data is collected to ensure proper placement of students in the educational environment	To ensure provision of a free and appropriate education for students with special needs

Assessment data from the	State reporting requirements	Track student's
following assessments:	come repermigned an emeric	achievement levels
J		throughout their school
• Dibels		career to determine
Aspire		areas of strengths and
• ASA		weaknesses and college
ACCESS (LEP students)		and career readiness
AAA (Alabama Alternate		
Assessment)		
Quality Core End of		
Course Assessments		
• Explore (grade 8)		
Renaissance- Star		
Reading and Math		
(grades K-8)		
Plan (grade 10)		
ACT (grade 11)		
Work Keys (grade 12)		
PSAT (grade 11)		
Global Scholars-		
Performance and		
Achievement Series		
STI Achievement &		
Assessment		
Classworks		
AP exams		
Star Assessment (Athletics)		

This information could be provided to the judicial system for Attendance Referrals, Discipline, and various legal needs.

2. **Memorandum of Agreement**: A Memorandum of Agreement (MOA) will be completed between St Clair County Board of Education and any third party vendor or outside entity that may need access to St Clair County Board of

Education, Computers, Network, files, or data (paper or electronic) and kept on file for a minimum period of 3 years. The MOA will be reviewed and updated annually.

The MOA is available at http://www.sccboe.org/moa

3. Data Back-up and Retention Procedures: St Clair County Board of Education will maintain a backup of data that has been stored on the servers in the St Clair County Board of Education network environment. Backups of data created on the local computers or local computing devices are not collected. Any data requiring to be collected in the backup systems must be stored on the St Clair County Board of Education Network drives. Backups will be retained according to type data, and the Industry Best Practices, SCCBOE Policy, Local, State and Federal Laws.

4. End User access

All end users, including all employees, students, guest, vendors, etc., are required to have and use a unique individual Username and Password (login credential), to access local computing devices, the SCCBOE domain, the SCCBOE network and all SCCBOE network resources. This username and password will be created and maintained on the SCCBOE domain. Properly created accounts will receive the appropriate rights to network drives, email, local computer rights, internet access, 3rd party software etc. This is to ensure the privacy and integrity of the User account and the security of information created and stored on the SCCBOE domain and its network, in addition to protecting and securing PII and being compliant with all rules laws and industry best practices. All accounts will be used in accordance with the SCCBOE Acceptable Use Policy and any violations could be subject to penalties, disciplinary actions and possible legal actions.

5. Password Strength

- 1. Users are responsible for complying with the following password standards for network access or access to secure information:
 - a. Passwords must never be shared with another person, unless the person is a designated security manager.
 - b. Every password shall, where possible, be changed yearly if not more frequently for staff and on an age appropriate schedule for students. Guest passwords are changed on the first of every month.
 - c. Passwords must, where applicable, have a minimum length of six (6) characters.
 - d. When possible, for secure sites and/or software applications, user created passwords should adhere to the same criteria as required for network access. These criteria are defined in the SCC Network Group Policy Criteria for Passwords and is listed below:
 - i. Must not contain the user's account name or parts of the user's full name that exceed two consecutive characters
 - ii. Contain characters from three of the following four categories:
 - At least one English uppercase character (A through Z)
 - English lowercase characters (a through z)
 - At least one base 10 digit (0 through 9)
 - At least one non-alphanumeric characters (for example !, \$, #, %)
- Passwords must never be saved when prompted by any application with the exception of central single sign-on (SSO) systems as approved by the Technology Department. This feature must be disabled in all applicable systems.
- 3. Passwords must not be programmed into a PC or recorded anywhere that someone may find and use them.
- 4. When creating a password for secure information or sites, it is important not to use passwords that are easily guessed due to their association with

the user (i.e. children's names, pets' names, birthdays, etc.) A combination of alpha and numeric characters is more difficult to guess.

- 5. Where possible, system software should enforce the following password standards:
 - a. Passwords routed over a network must be encrypted.
 - b. Passwords must be entered in a non-display field.
 - c. System software must enforce the changing of passwords and the minimum length.
 - d. System software shall disable the user password when more than three consecutive invalid passwords are given. Lockout time shall be set at a minimum of 30 minutes.
 - e. System software should maintain a history of previous passwords and prevent their being easily guessed due to their association with the user. A combination of alpha and numeric characters is more difficult to guess.

VIII. IT Disaster Recovery

Controls shall ensure that St. Clair County 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, 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:

- A. A prioritized list of critical services, data, and contacts.
- B. A process enabling St. Clair County Schools to restore any loss of data in the event of fire, vandalism, natural disaster, or system failure.
- C. A process enabling St. Clair County Schools to continue to operate in the event of fire, vandalism, natural disaster, or system failure.
- D. Procedures for periodic testing of written contingency plans to discover weaknesses and the subsequent process of revising the documentation, if necessary.

IX. Acquisition of Software Procedures Purchasing and Disposal Procedures

This procedure is intended to provide for the proper purchasing and disposal of software, cloud based hosted software, technology devices, any computer, laptop, mobile device, printing and or scanning device, network appliance/equipment, AV equipment, server, internal, external or cloud based storage, communication device or any other current or future electronic or technological device or service, herein referred to as systems in this document.

For further clarification of the term technological systems contact the St. Clair County Schools' district Technology Director. All involved systems and data are assets of St. Clair County Schools and are expected to be maintained for cleanliness as well as protected from misuse, unauthorized manipulation, and destruction.

These protection measures may be physical and or software based.

X. Purchasing Guidelines

A. Hardware

All systems that will be purchased, received as a donation or used in conjunction with St. Clair County Schools' technology resources regardless of funding, must be from an approved list of vendors or approved to be accepted by the district Technology Director.

Failure to have the purchase/donation approved may result in lack of technical support, request for removal from premises, or denied access to other technology resources.

B. Software

The Technology Department and/ or Data Governance Committee must be involved in all software, Apps or Cloud based service purchases and decision making process regardless of funding sources. This is to help ensure all software is compatible with existing systems and software. Additionally, to help ensure that all software is compliant with all privacy laws as well as the St Clair County Board of Education Data Governance Policy and all software is legally licensed.

- 1. Software Installation and Use: All software packages that reside on technological systems within or used by St. Clair County Schools must comply with applicable licensing agreements and restrictions and must comply with St. Clair County Schools' acquisition of software procedures.
- Ownership of Software: All computer software developed by St. Clair County Schools' employees or contract personnel on behalf of St. Clair County Schools, licensed or purchased for St. Clair County Schools' use is the property of St. Clair County Schools and may not be copied for use at home or any other location, unless otherwise specified by the license agreement.

C. Unapproved Software

Any unapproved software, Apps or Cloud based services will not be allowed to be installed on the SCCBOE Domain or its network, any servers or local computing devices until the Technology Department and/ or the Data Governance Committee can examine all software requirements, any compatibility issues, any license issue and compliance with all privacy laws as well as the St Clair County Board of Education Data Governance Policy.

D. Cloud Storage and Software

Purchased software accessed from and storing data in a cloud environment will be required to have a Memorandum of Agreement (MOA) on file with the Technology Director that states or confirms at a minimum that:

- 1. SCCBOE student and/or staff data will not be shared, sold, or mined with or by a third party,
- SCCBOE student and/or staff data will not be stored on servers outside the US unless otherwise approved by the SCCBOE Data Governance Committee.

- 3. The company must comply with SCCBOE guidelines for data transfer or destruction when contractual agreement is terminated.
- 4. No API will be implemented without full consent of SCCBOE and the ALSDE

E. Alabama Competitive Laws

1. All electronic equipment is subject to Alabama competitive bid laws. There are several purchasing co-ops that have been approved for use by the Alabama State Examiners office:

http://www.examiners.state.al.us/purchcoop.aspx. Generally for technological devices and services, St. Clair County Schools purchase from the Alabama Joint Purchasing Agreement (ALJP):

https://connect.alsde.edu/sites/eia/aljp/SitePages/ALJP%20(Alabama%20 K-12%20(IT)%20Joint%20Purchasing)Home.aspx

- In the event that a desired product is not included in one of these agreements, St. Clair County Schools bids the item or items using the districts competitive bid process. All technological systems, services, etc. over \$15,000.00 purchased with public funds are subject to Alabama's competitive bid laws.
- 3. The \$15,000.00 rule is a cumulative number and includes all purchases of any one type product that has been purchased system wide.

F. Inventory

- All technological devices or systems over \$500.00 are inventoried by the Technology Department in accordance with the St. Clair County Schools' Finance Department using the inventory system.
- 2. There are some exceptions under \$500.00, as determined by the Technology Director, such as but not limited to peripherals that are inventoried.
- 3. It is the responsibility of the local school Technology Contact to inventory technological systems used in the local school and manage said inventory. The district technology staff is responsible for ensuring that any network equipment, fileservers, or district systems, etc. are inventoried.

XI. Disposal Guidelines

- A. Equipment shall be considered for disposal for the following reasons:
 - 1. End of useful life
 - 2. Lack of continued need
 - 3. Obsolescence
 - 4. Wear, damage, or deterioration
 - 5. Excessive cost of maintenance or repair
- B. The local school principal, Technology Director, and or the Director of Finance shall approve school disposals list to be presented to the Board of Education for approval of disposal by discard or donation.

- C. Written documentation in the form of a spreadsheet including but not limited to the following shall be provided to the District Technology Office no later than Wednesday at 9:00 a.m. prior to the next Board of Education meeting on the following Monday:
 - 1. Fixed asset tag (FAT) number
 - 2. Location
 - 3. Description
 - 4. Serial number
 - 5. Original cost and account code if available

D. Methods of Disposal

Once equipment has been designated and approved for disposal, it must be handled according to one of the below listed methods.

It is the responsibility of the local school Technology Contact to modify the inventory entry to reflect any in-school transfers, in-district transfers, donations or discards for technological systems. The department from which a computing device was purchased is responsible for modifying the inventory records to reflect any transfers within the central offices, any transfers of central office electronic equipment to local schools, central office donations or central office discards.

E. Transfer/Redistribution

If the equipment has not reached the end of its estimated life, an effort shall be made to redistribute the equipment to locations where it can be of use, first within an individual school or office, and then within the district. Service requests may be entered to have the equipment moved, reinstalled and, in the case of computers, laptops, or peripheral devices, have it wiped and reimaged or configured.

F. Discard

All electronic equipment in the St. Clair County Schools district must be discarded in a manner consistent with applicable environmental regulations. Electronic equipment may contain hazardous materials such as mercury, lead, and hexavalent chromium. In addition, systems may contain Personally Identifiable Information (PII), Confidential, or Internal Information.

Systems must be wiped clean of this information prior to leaving the school district. A district-approved vendor will be contracted for the disposal of all technological systems/equipment. The vendor must provide written documentation verifying the method used for disposal and a certificate stating that no data of any kind can be retrieved from the hard drive or any other component capable of storing data. Under no circumstances should any technological systems/equipment be placed in the trash. Doing so may make St. Clair County Schools and/or the employee who disposed of the equipment liable for violating environmental regulations or laws.

XII. Virus, Malware, and Spyware 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, and spyware.

Users shall not turn off or disable St. Clair County Schools' protection systems or install other systems.

St. Clair County Schools' desktops, laptops, and fileservers run licensed industry standard antivirus/antimalware software. Virus definitions are updated regularly; all Microsoft PC based systems are set to scan all network files as they are accessed. Quick scans are set to run daily at 10:00 AM and a full scheduled scan runs every Friday at 2:00 PM or if missed or interrupted at the next time the computer/laptop is turned on.

XIII. Internet Filtering

Online content and social collaboration continues to increase as educational resources. St. Clair County Schools employs 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 resources and app use with student safety and network security, the Internet traffic from all devices that authenticate to the network is routed through a web filter using the user's network credentials.

For peripheral devices and guest devices, users see a login screen that requires them to login to the web filter with their 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, advertising or have inappropriate graphics or language etc. will be blocked.

XIV. Phishing and SPAM Protection

In addition to the built in spam filtering of Microsoft Exchange, email is filtered for viruses, phishing, spam, and spoofing using a combination of filtering appliances and software. The Spam filter will provide access for the end user to view and recover emails that were caught and held. While the end user can release and recover held emails this should only be done with the strictest care and if it is an email the end user was expecting.

XV. Security Patches

Windows security patches and other Windows patches are researched, tested and approved before being scheduled to "auto-download" and "schedule install." The schedule installs occur during anticipated low usage time frames, in the event they are interrupted for whatever reason they will continue update attempts at the next opportunity when the system is next turned on.

For security reasons all devices are to be permitted the opportunity to update with these patches.

XVI. Physical and Security Controls

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 St. Clair County 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:

- 1. Authorization: Access shall 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 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.
- 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 must NOT be shared.
- 3. **Data Integrity**: St. Clair County 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:
 - a. transaction audit
 - b. disk redundancy (RAID)
 - c. ECC (Error Correcting Memory)
 - d. checksums (file integrity)
 - e. data encryption
 - f. data wipes
- 4. **Transmission Security**: Technical security mechanisms are in place to guard against unauthorized access to data that is transmitted over a communications network, including wireless networks. The following features are implemented:
 - a. integrity controls and
 - b. encryption, where deemed appropriate (all SCCBOE Exchange email is encrypted via SSL certificates)

Note: Only SCCBOE district-supported email accounts will 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. **All School business conducted in email must only be in the SCCBOE email system.**

5. Remote Access: Access into St. Clair County Schools' network from outside is allowed using the SCCBOE 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 must maintain the same level of protections as information stored and accessed within the St. Clair County Schools' network. PII must 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 must be restricted to only appropriately authorized individuals. At a minimum, staff passwords must be changed annually.
 - a. 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 properly secured.
 - 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.
 - c. It is the responsibility of the user to not leave these devices logged in, unattended, and open to unauthorized use.

XVII. Social Networking

While an absolute ban on electronic communications (IM, Facebook, Snapchat, Email, etc.) between a student and faculty member may seem extreme, everyone should be aware that great caution should be taken in this practice. The St Clair County Board of Education does not recommend faculty having this type communication with students. However, the SCCBOE does recognize there may be an occasional need.

- a. Professional and business topics should only be discussed. It is suggested this only be school related communications and such things as a friend request should be avoided.
- b. Never discuss private or personal issues.
- c. Maintain a record of all conversations.
- d. Notify an administrator if a student uses electronic communications to report a crime or abuse.
- e. Social Networking is not an approved forum to communicate PII or Student Progress.
- f. Social Networking is not an approved forum to communicate Emergency, Legal situations or school status unless approved by Administration.

XVIII. The following physical and security controls must be adhered to:

- A. **Network systems must be installed in an access-controlled area.** The area in and around the computer facility shall afford protection against fire, water damage, and other environmental hazards such as power outages and extreme temperature situations outside of industry accepted operational standards.
- B. **Monitor and maintain data centers' temperature and humidity levels.** The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) recommends an inlet temperature range of 68 to 77 degrees and relative humidity of 40% to 55%.
- C. **File servers** and or storage containing PII, Confidential and or Internal Information shall be installed in a secure area to prevent theft, destruction or access by unauthorized individuals.
- D. Computers and other systems must be secured against use by unauthorized individuals. It is the responsibility of the user to not leave these devices logged in, unattended, and open to unauthorized use.

- E. **Ensure network systems and network equipment are properly secured** to prevent unauthorized physical access and data is properly safeguarded to protect from loss. A record must be maintained of all personnel who have authorized access.
- F. **Maintain a log of all visitors** granted entry into secured areas or areas containing sensitive or confidential data (e.g., data storage facilities). Record the visitor's name, organization, and the name of the person granting access. Retain visitor logs for no less than 6 months. Ensure visitors are escorted by a person with authorized access to the secured area.
- G. Monitor and control the delivery and removal of all asset-tagged and or datastoring technological equipment or systems. Maintain a record of all such items entering or exiting their assigned location using the district approved technology inventory program. No technology equipment regardless of how purchased or funded shall be moved without the explicit approval of the technology department.
- H. **Ensure that technological equipment or systems being removed** for transfer to another organization or being designated as surplus property is appropriately sanitized in accordance with applicable policies and procedures.

XIX. Data Transfer/Exchange/Printing/Storage

- 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) must 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.
- B. Other Electronic Data Transfers and Printing: PII, Confidential Information, and Internal Information must 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.
- C. **Oral Communications**: St. Clair County 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. St. Clair County Schools' staff must not discuss PII or Confidential Information in public areas if the information can be overheard. Caution must be used when conducting conversations in semi-private rooms, waiting rooms, corridors, elevators, stairwells, cafeterias, restaurants, or on public transportation etc.

- D. **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. These reviews shall be documented and maintained for six (6) years.
- E. **Evaluation**: St. Clair County 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.

XX. COMPLIANCE

- A. The Data Governance Policy applies to all users of St. Clair County 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 St. Clair County Board of Education EMPLOYEE HANDBOOK 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 St. Clair County Schools' policies. Further, penalties associated with state and federal laws may apply.
- B. Possible disciplinary/corrective action may be instituted for, but is not limited to, the following:
 - 1. Unauthorized disclosure of PII or Confidential Information
 - 2. Unauthorized disclosure of a log-in code (User ID and password)
 - 3. An attempt to obtain a log-in code or password that belongs to another person
 - 4. An attempt to use another person's log-in code or password
 - 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
 - 6. Installation or use of unlicensed or unapproved software on St. Clair County Schools' technological systems, including cloud systems.
 - 7. The intentional unauthorized altering, destruction, or disposal of St. Clair County Schools' information, data and/or systems. This includes the unauthorized removal from SCCBOE any 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.
 - 8. 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

XXI. Summary of Chalkable (INOW) Permissions & Standards

Allowable Permission Settings: The following rights and permission has been set as a guide to be used daily in order to ensure St Clair County Board of Education is in

compliance with all privacy of information laws. These guide are created to follow the rule of "Need to Know".

St Clair County Schools maintain the following permission groups in Chalkable (iNOW):

- 1. Central Office Employees
- 2. Chalkable Teacher Group
- 3. District Personnel Administrator
- 4. District Technician
- 5. Administration Enrollment
- 6. Counselor
- 7. School Administrator
- 8. School Personnel Administrator
- 9. Attendance Clerk
- 10. Basic Office Personnel
- 11. Census Clerk
- 12. Enrollment Clerk
- 13. Scheduling Clerk
- 14. School Bookkeeper
- 15. School Technician
- 16. Transcript Clerk
- 17. Nurse
- 18. Nurse Assistant
- 19. Special Ed Coordinator
- 20. Past Academic Session Rights (Principal Access)
- 21. Future Academic Sessions Rights (Scheduling)
- 22. PE Teachers
- 23. SETS Staff
- 24. Teacher
- 25. Day Program

A. Schedule Lookup

- a. **Staff Affected**: Local school Administrators, designated school personnel and appropriate Central Office Personnel
 - i. School Administrators, Counselors and Office Aides/Bookkeepers will have rights to look up any student and see their schedule to locate the student. Teachers only have rights to look up student that are currently their students.

B. Check In/Out

a. Staff Affected: Local school Administrators, designated school personnel and appropriate Central Office Personnel

- i. This level of permission allows the user to see the Summary, Main, and Contacts tabs.
- ii. It gives them the ability to check students in and out and to view the following information. The rights to look up this information normally is restricted to School Administrators, Counselors, Office Aides/Bookkeepers and the student's current teachers.
 - Name
 - Date of Birth
 - Age
 - Phone (This can be hidden if necessary)
 - Gender
 - Grade (This can be hidden if necessary)
 - Address (This can be hidden if necessary)
 - List of Contacts and their relationship

C. Discipline History

- a. **Staff Affected**: Local School Administrators and appropriate Central Office Personnel.
 - Only school administrators and appropriate Central Office
 Personnel will have access to student discipline history. Only
 Principal or Assistant Principal has the rights to enter discipline for
 students. Staff should consult with their school administrators if
 they need discipline history on a given student.

D. Transcript/Grades

a. **Staff Affected**: Local School Administrators and appropriate Central Office Personnel.

Only school administrators and appropriate Central Office Personnel will have access to student transcripts and/or grades.

i. Only Principal or Counselors have the rights to certify transcripts.

E. Past/Future Academic Sessions

 a. Staff Affected: Local School Administrators and appropriate Central Office Personnel.

Only school administrators and appropriate Central Office Personnel will have access to past and/or future school's academic sessions.

i. This level of permission allows the user to view/run reports only for all past history for students, teachers, health and scheduling.

F. Health - Level 1, 2, 3

- a. Level 1. Staff Affected: Lead Nurse. Nurse. Medication Assistance
 - i. This level of permission allows the user to enter/edit, run reports for the purpose of logging medication and treatment logs.
- b. Level 2. Staff Affected: Physical Education Teachers

- i. This level of permission allows the physical education teacher to log fitness results for state reporting.
- c. **Level 3. Staff Affected**: Local School Administrators and appropriate Central Office Personnel.
 - i. This level of permission allows the user to view and run reports.

G. AHSAA Student in Good Standing Forms

a. The AHSAA Student in Good Standing Release Form must be completed and signed by the school Principal. This is only to be completed when the student athletes leaving your school are not in good standing.

H. Co-Op Student View

a. Staff Affected: Career Tech Director and Career Tech Teacher in Charge of Co-Op Student Tracking – CTE staff will be granted rights to post grades and view Transcripts for all students participating in a Co-Op work program.

I. Taylor's Law Report for Driver's License

- a. **Staff Affected**: Local School Administrators, Office Aides/Bookkeepers
 - i. The Taylor's Law report must be printed and given to parents/students who request it in order for them to apply for a driver's license. Thus, this should affect all high schools and some middle school. It should not affect elementary schools. The Chalkable (INOW) Taylor's Law report does not show the student's discipline history. Instead it shows a date that the student is eligible to get a driver's license.

J. Special Groups Rights

 a. Staff Affected: Central Office staff, CNP Administration, Federal Programs, Student Services, Special Ed, Nurse, Grant Writer, Community Ed

After approval from the Superintendent and/or the Data Governance Committee special access can be given on a temporary or permanent basis, annually. These rights should only be given after evidence of "Need To Know" has been met in order to stay in compliance with FERPA and other privacy of information laws.

If you have any questions or comments about these guidelines, please contact your principal or immediate supervisor. If you do not have any questions, the St. Clair County School System presumes that you understand and are aware of the rules and guidelines and must adhere to them.

REFERENCE(S):	
HISTORY:	ADOPTED:
	REVISED:

SYSTEM PHILOSOPHY, PURPOSE AND DIRECTION

1.10

- St. Clair County Board of Education shall maintain and communicate a purpose and direction that commits to high expectations for learning as well as shared values and beliefs about teaching and learning to all stakeholders. The purpose will clearly focus on student success.
- St. Clair County Board of Education will engage in a systematic, inclusive and comprehensive process to review, revise and communicate a system-wide purpose for student success including participation from all stakeholder groups. The process will be implemented on a regular schedule, clearly documented and a record of the use and results of the process will be communicated to all stakeholders.
- St. Clair County Board of Education shall ensure that each school engages in a systematic, inclusive and comprehensive process to review, revise and communicate a system-wide purpose for student success including participation from all stakeholder groups.

District's Slogan: "Preparing Tomorrow's Leaders Today"

REFERENCE(S): CODE OF ALABAMA

16-8-8

HISTORY: ADOPTED: FEBRUARY 22, 2010

REVISED: July 1, 2010,_

FORMERLY: NEW

ADMITTANCE/ENROLLMENT REQUIREMENTS

5.10

- I. Any student who initially enrolls in the St. Clair County School System shall be required to present the following documents:
 - A. An official birth certificate:
 - B. Immunization as required for the prevention of those communicable diseases designated by the State Health Officer;
 - C. Proof of residency (copy of power bill, telephone bill, rent receipt, etc.) of the parent(s), legal custodian(s), and/or legal guardian(s); and,
 - D. Proof of guardianship or custody when warranted.

Exceptions may be granted as provided in Alabama statutes and federal law.

- II. The school principal shall determine grade placement of students from a private or non-public school or from home education based on state regulations and St. Clair County Board of Education rules regarding transfer of credit as well as other factors including test data, age, and previous school records.
- III. Admission may be denied a resident student who is over seventeen (17) years of age and who has repeatedly been dismissed from previous schools for violation of the rules of the school with the exception of students who have current IEPs.
- IV. When a student facing some type of disciplinary action is withdrawn from school prior to receiving the punishment, said student (and his/her parent/legal guardian) should be informed that prior to admission/readmission to any St. Clair County school, the disciplinary action would have to be completed. This includes any suspension, work assignment, or referral to the Superintendent or Board of Education for a hearing.

V. Resident Students

- A. The Board defines resident students as students whose parents or legal guardians live within the jurisdiction of the St. Clair County School System. All resident students of the school district shall be entitled to be admitted, subject to policy limitations and judicial constraints, to the St. Clair County Schools.
- B. Children of employees of the St. Clair County Board of Education shall be allowed admission as resident students as long as their parents remain employed by the St Clair County Board of Education. Children of employees may attend the school in the zone of their residence or in the zone in which their parent is employed.
- VI. All homeless, migratory, immigrant, and limited English proficient children shall have equal access to the same free appropriate public education, including public preschool education, provided to other children and youth. Such children will be provided the

opportunity to participate in the same state educational programs and to meet the same state student performance standards as all other children without being isolated or stigmatized.

Students who live in the attendance areas of St. Clair County School System and who are homeless, migratory, immigrant and/or limited English proficient shall not be prohibited from school attendance due to any of the following:

- A. Residency requirements
- B Lack of social security number
- C. Lack of birth certificate
- D. Lack of school records or transcripts
- E. Lack of immunizations
- F. Legal custody requirements
- G. Transportation
- H. Language barriers
- I. Disabilities

Dispute Resolution - Homeless students will continue in the school of origin for the duration of homelessness. Students may enroll in any public school that non-homeless students, who live in the attendance area in which the students reside, are actually eligible to attend.

If the school enrollment decision is contrary to the wishes of the student's parent/guardian, the school will provide the parent, guardian, or unaccompanied youth with a written explanation of the decision, a statement of the right to appeal, and procedure for appealing the placement decision. The principal of this school will notify the Board's Homeless Liaison of the dispute and take steps to resolve the dispute. When a dispute arises regarding school placement, the system will immediately enroll the homeless student in the school in which enrollment is sought by the parent, guardian, or unaccompanied youth, pending resolution of the dispute. The Board's Homeless Liaison will expeditiously take steps to resolve the dispute. If the dispute cannot be settled by the homeless liaison, the liaison will assist the complainant in seeking technical assistance form an appropriate service agency.

VII. St. Clair County Schools may admit foreign exchange students in grades 9-12 only.

REFERENCE(S): CODE OF ALABAMA

<u>16-28-4</u>, <u>16-30-1 TO -4</u>, 42 U.S.C. §1432(a)(3)(E)

NO CHILD LEFT BEHIND ACT OF 2001, TITLE VII-B OF THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT OF 2001

HISTORY: ADOPTED: JUNE 23, 2003

REVISED: DECEMBER 15, 2003; FEBRUARY 23, 2004; FEBRUARY 22, 2010,

AUGUST 4, 2015,__

FORMERLY: JBC, JBCA. JBCBA