

BOARD OF SCHOOL DIRECTORS

WORK SESSION TUESDAY, SEPTEMBER 12, 2023 7:00 PM

MINUTES

Call to Order	President Theresa Lydon called the meeting to order at 7:00 p.m.		
Pledge	The meeting opened with the pledge to the flag.		
Attendance	<p>Those present included: Mrs. Donahue, Ms. Evans, Mr. Hill, Ms. Lindsey, Mrs. Lydon, Mrs. Shaw and Ms. Snyder. Also present were Dr. William P. Stropkaj, Superintendent; Mr. Joseph A. Kubiak, Assistant to the Superintendent for Operations/Board Secretary; Mr. Michael Brungo, Solicitor; Dr. Shannon Varley, Assistant to the Superintendent for Student Achievement and Mrs. Maureen S. Myers, Assistant Board Secretary/Recording Secretary were present.</p> <p>Mr. LaPorte and Mr. Raso were absent.</p>		
Board President's Report	<p>BOARD PRESIDENT'S REPORT – Mrs. Theresa Lydon</p> <p>The following action items will be considered at the September 19, 2023 Business/Legislative Meeting:</p> <p><u>BOARD ACTION REQUESTED</u></p>		
Board Minutes	<p>BOARD MINUTES</p> <p>It is recommended that the Board approve the Work Session Minutes of August 8, 2023 and the Business/Legislative Minutes of August 15, 2023.</p>		
Review –H&S Plan	<p>REVIEW OF HEALTH AND SAFETY PLAN</p> <p>It is recommended that the Board approve the review of the Health and Safety Plan.</p> <ul style="list-style-type: none">• A discussion was had regarding the Health and Safety Plan.		
Voting – PSBA	<p>VOTING OF PSBA OFFICERS</p> <p>It is recommended that the Board approve the following candidates for the respective positions:</p> <table><tr><td>2024 President-Elect (one-year term)</td><td>Allison Mathis – North Hills School District</td></tr></table>	2024 President-Elect (one-year term)	Allison Mathis – North Hills School District
2024 President-Elect (one-year term)	Allison Mathis – North Hills School District		

- 2024 Vice President (one-year term)** Sabrina Backer – Franklin Area School District
- 2024-2026 PSBA Treasurer (three-year term)** Karen Beck Pooley – Bethlehem Area School District
- 2024-2026 Western Zone Representative (three-year term)** Marsha Pleta – Washington School District
- 2024-2025 Section W3 Advisor (two-year term)** Erik Meredith – East Allegheny School District
- Trustee (term end Dec. 31, 2026) (two candidates)** Marianna Neel & Michael Faccinetto (three-year term)

FOR INFORMATION ONLY

- Parkway West Career and Technology Center Report *Mrs. Annie Shaw*
- SHASDA Report *Mr. Santo Raso*
- PSBA/Legislative Report *Mrs. Theresa Lydon*
 - A discussion was had regarding the recent change to students with an IEP being able to continue their education until they reach the age of 22.
 - News from the Boroughs
 - Board Members talked about different events going on within their boroughs in the coming weeks.

Executive Session

Executive Session – There was no Executive Session prior to this evening’s Work Session.

Superintendent’s Report

SUPERINTENDENT REPORT – Dr. William P. Stropkaj

The following action items will be considered at the September 19, 2023 Business/Legislative Meeting:

BOARD ACTION REQUESTED

Policy 800

FIRST READING POLICY 800: RECORDS MANAGEMENT PLAN

It is recommended that the Board approve the FIRST READING of Policy 800: *Records Management Plan*.

- Given the amount of changes to Policy 800: *Records Management Plan*, the completely revised copy is on display. It was best to put the entire policy on display rather than track the changes in the old version since there were so many changes.

Policy 800.1	<p>FIRST READING POLICY 800.1: ELECTRONIC SIGNATURES/RECORDS</p> <p>It is recommended that the Board approve the FIRST READING of Policy 800.1: <i>Electronic Signatures/Records</i>.</p>
Policy 830	<p>FIRST READING POLICY 830: SECURITY OF COMPUTERIZED PERSONAL INFORMATION/BREACH NOTIFICATION</p> <p>It is recommended that the Board approve the FIRST READING of Policy 830: <i>Security of Computerized Personal Information: Breach Notification</i>.</p>
Policy 830.1	<p>FIRST READING POLICY 830.1: DATA GOVERNANCE-STORAGE/SECURITY</p> <p>It is recommended that the Board approve the FIRST READING of Policy 830.1: <i>Data Governance-Storage/Security</i>.</p>
Comprehensive Plan	<p>COMPREHENSIVE PLAN</p> <p>The Administration recommends that the Board approve the display of the Comprehensive Plan for 28 days.</p> <p><u>For Information Only</u></p> <p>This is a Pennsylvania Department of Education requirement of School Districts.</p>
PD MOU – CS	<p>POLICE MEMORANDUM OF UNDERSTANDING – CASTLE SHANNON</p> <p>In compliance with the School Code, the Administration recommends the renewal of the Police Memorandum of Understanding between the Keystone Oaks School District and Castle Shannon.</p> <p><u>For Information Only</u></p> <p>The MOU is the same verbiage as in the previous years, with no changes.</p> <ul style="list-style-type: none"> • Dr. Stropkaj recognized Mrs. Lydon for her 8 years of service as serving as a member of the Keystone Oaks School Board.
Pupil Personnel Report	<p>PUPIL PERSONNEL REPORT – Dr. William P. Stropkaj</p> <p>The following action items will be considered at the September 19, 2023 Business/Legislative Meeting:</p> <p><u>BOARD ACTION REQUESTED</u></p>
School Dentist Services	<p>SCHOOL DENTIST SERVICES</p>

It is recommended that the Board approve **Dr. Evan Hall** as the School Dentist as per the Agreement between Dr. Evan Hall and the Keystone Oaks School District for the 2023/2024 and 2024/2025 school years at a cost of \$30.00 per dental exam.

For Information Only

The District will pay an annual fee of \$300.00 for the use of sterilized equipment.

- A discussion was had regard the School Dentist Services Agreement.

PERSONNEL REPORT – Mrs. Theresa Lydon

The following action items will be considered at the September 19, 2023 Business/Legislative Meeting:

BOARD ACTION REQUESTED

APPOINTMENTS

1. Professional Employees

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2020-2026*, the Administration recommends the employment of:

Breanna Baker

Teacher – Biology – High School

Effective – TBD

Salary - \$52,000.00 (pro-rated) (M. Step 4)

Danielle Brandt

Teacher – Special Education – Myrtle Avenue Elementary School

Effective – August 21, 2023

Salary - \$48,000.00 (M, Step 1)

Jennifer Reinard

Nurse – Districtwide

Effective – August 21, 2023

Salary – \$47,000.00 (B, Step 1)

Beth Whitney

Teacher – Special Education - High School

Effective – TBD

Salary – \$60,500.00 (pro-rated) (M+48, Step 9)

2. Classified Employees

In compliance with the *Keystone Oaks Educational Support Personnel Association/PSEA/NEA 2022-2025*, it is recommended that the Board approve the employment of:

Dalia Johnson-Burke

PCA – Myrtle Elementary School

Effective – September 5, 2023

Salary - \$16.87/hour

Sara McGlynn

Paraprofessional – Dormont Elementary School

Effective – September 11, 2023

Salary - \$15.34/hour

3. Food Service Personnel

It is recommended that the Board approve the following individuals as Food Service employees for the 2023/2024 school year:

<u>Name</u>	<u>Hourly Wage</u>
Basimah Anya	\$13.00
Suzanne Kassouf	\$13.00
Kahina Saaoui	\$13.00
Courtney Welch	\$13.00

4. Short Term Substitutes – Change in Daily Salary

It is recommended that the Board approve the change in daily salary from \$130.00/per day to \$135.00/per day for the following individuals retroactive to August 21, 2023:

Aubrey Garvin

Teacher – Aiken – Kindergarten

Effective – August 21, 2023 – November 14, 2023

Salary - \$135.00/per day

Jessica Monaco

Teacher – ESL – Aiken

Effective – August 21, 2023 – November 14, 2023

Salary - \$135.00/per day

5. Homebound Instructors

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2020 – 2026*, it is recommended that the Board approve the following individuals as Homebound Instructors for the 2023/2024 school year:

Georgia Athans
Rebekah Brooks
Candace Bush
Aubrey Garvin
John Murphy
Kimberly Smykal

6. Approval of Activity Stipends – Change in Stipend Amount

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2020-2026*, it is recommended that the Board approve the change in stipend amount for the following individual for the 2023/2024 school year:

<u>Activity</u>	<u>Position</u>	<u>Sponsor</u>	<u>Stipend</u>
Marching Band	Assistant	Kamran Mian	\$2,150.00

7. Approval of Activity Stipends

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2020-2026*, it is recommended that the Board approve the following individuals for the 2023/2024 school year:

<u>Activity</u>	<u>Position</u>	<u>Sponsor</u>	<u>Stipend</u>
Cheerleading (Varsity)	Assistant	Dani Sakulsky	\$2,000.00
Marching Band	Assistant	Alexander Ruskin	\$2,100.00
Soccer (Girls, MS)	Assistant	Michael Muick	\$2,500.00

FMLA

FAMILY AND MEDICAL LEAVE

It is recommended that the Board approve the following individual for Family and Medical Leave:

Employee 4962 - August 14, 2023 to November 7, 2023

Finance Report

FINANCE REPORT – Mr. Nafis Hill

The following action items will be considered at the September 19, 2023 Business/Legislative Meeting:

BOARD ACTION REQUESTED

Accounts Payable

ACCOUNTS PAYABLE APPROVAL LISTS THROUGH AUGUST 31, 2023

The Administration recommends approval of the following Accounts Payable lists as presented in the *Finance Package*:

A. General Fund as of August 31, 2023 (Check No. 69968-70396)	\$1,870,632.54
B. Food Service Fund as of August 31, 2023 (Check No. 9762-9764)	\$3,002.37
C. Athletics as of August 31, 2023 (Check No. 3465-3468)	\$572.50

D. Capital Reserve as of August 31, 2023 (None)	\$0.00
TOTAL	\$1,874,207.41
<ul style="list-style-type: none"> • A discussion was had regarding Accounts Payable. 	

FOR INFORMATION ONLY**I. EXPENDITURE/REVENUE 2023 – 2024 BUDGET to ACTUAL / PROJECTION**

ACCT	DESCRIPTION	2023-2024 BUDGET TOTAL	2023-2024 2 MONTH AUGUST/ACTUAL	OVER (UNDER) BUDGET
Revenue				
6000	Local Revenue Sources	\$ 32,672,317	\$ 12,305,580	\$ (20,366,737)
7000	State Revenue Sources	\$ 13,333,933	\$ 790,534	\$ (12,543,399)
8000	Federal Revenue Sources	\$ 805,962	\$ 567,572	\$ (238,390)
Total Revenue		\$ 46,812,212	\$ 13,663,687	\$ (33,148,525)

				(OVER) UNDER BUDGET
Expenditures				
100	Salaries	\$ 20,607,107	\$ 588,018	\$ 20,019,089
200	Benefits	\$ 13,416,990	\$ 246,494	\$ 13,170,496
300	Professional/Technical Services	\$ 1,929,206	\$ 86,311	\$ 1,842,895
400	Property Services	\$ 1,493,800	\$ 180,538	\$ 1,313,262
500	Other Services	\$ 5,446,273	\$ 532,948	\$ 4,913,325
600	Supplies/Books	\$ 1,715,234	\$ 548,330	\$ 1,166,904
700	Equipment/Property	\$ 1,015,150	\$ 993,475	\$ 21,675
800	Other Objects	\$ 87,100	\$ 39,082	\$ 48,018
900	Other Financial Uses	\$ 1,101,352	\$ 490,661	\$ 610,691
Total Expenditures		\$ 46,812,212	\$ 3,705,857	\$ 43,106,355

Revenues exceeding Expenditures	\$ -	\$ 9,957,830	\$ 9,957,830
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**Other Financing
Sources/(Uses)**

Interfund Transfers In (Out)	\$ -	\$ -	\$ -
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II. SUMMARY OF STUDENT ACTIVITIES ACCOUNTS AS OF AUGUST 31, 2023

Bank Account - Status	Middle / High School	Athletics
Cash Balance - 08/01/2023	\$ 214,011.86	\$ 4,920.33
Deposits	\$ 792.16	\$ 6,681.56
Subtotal	\$ 214,804.02	\$ 11,601.89
Expenditures	\$ 264.36	\$ 4,891.32
Cash Balance - 08/31/2023	\$ 214,539.66	\$ 6,710.57

III. BANK BALANCES

BANK BALANCES PER STATEMENT AS OF AUGUST 31, 2023

	BALANCE
GENERAL FUND	
FNB BANK	\$ 7,996,116
PAYROLL (pass-thru account)	\$ 6,316
FNB SWEEP ACCOUNT	\$ -
ATHLETIC ACCOUNT	\$ 6,711
PLGIT	\$ 10,048,334
FNB MONEY MARKET	\$ 1,639,130
PSDLAF	\$ 169,786
INVEST PROGRAM	\$ 189,715
OTHER POST-EMPLOYMENT BENEFITS	\$ 2,065,569
COMPENSATED ABSENCES	\$ 447,663
	\$ 22,569,339
CAFETERIA FUND	
FNB BANK	\$ 967,010
PLGIT	\$ 1,051,587
	\$ 2,018,596
CONSTRUCTION FUND / CAP RESERVE	
FNB BANK	\$ 42,952
PLGIT - G.O. BOND SERIES C OF 2014/ 12-19	\$ 839
	\$ 43,791
GRAND TOTAL	\$ 24,631,726

Activities & Athletics
Report

ACTIVITIES & ATHLETICS REPORT – Mr. Thomas LaPorte

The following action items will be considered at the September 19, 2023
Business/Legislative Meeting:

BOARD ACTION REQUESTED

Approval of Activities

APPROVAL OF ACTIVITIES FOR THE 2023/2024 SCHOOL YEAR

It is recommended that the Board approve the following activities for the 2023/2024 school
year:

Chess Club (MS)

Extra Worker Positions

EXTRA ACTIVITY WORKER POSITIONS FOR THE 2023/2024 SCHOOL YEAR

It is recommended that the Board approve the following extra athletic worker positions
and stipends for the 2023/2024 school year:

<u>Activity</u>	<u>Title</u>	<u>Amount per Game</u>
V – Varsity; JV- Junior Varsity; MS - Middle School		
Baseball/Softball	Game Manager (V)	\$65
	Book/Pitch Counter (V)	\$50
Boys/Girls Soccer	Game Manager (V, JV)	\$65
	Game Manager (MS)	\$50
	Clock (V, JV)	\$60
	Ticket Takers (V, JV)	\$40
Boys/Girls Volleyball	Game Manager (V, JV)	\$65
	Game Manager (MS)	\$50
	Clock (V, JV)	\$60
Boys/Girls Basketball	Book (V, JV)	\$50
	Scoreboard (V, JV)	\$60
	Scoreboard (MS)	\$50
	Clock (V, JV)	\$60
	Clock (MS)	\$50
	Game Manager (V, JV)	\$65
	Game Manager (MS)	\$50
	Crowd Control (V, JV)	\$50
	Ticket Takers (V, JV)	\$40
Football	Announcer (V, JV)	\$50
	Sticks (V)	\$50
	Clock (V, JV)	\$60
	Announcer (V)	\$50

	Scoreboard (V, JV, MS)	\$60
	Stats (V)	\$50
	Video (V)	\$30
	Parking/Security (V)	\$50
	Ticket Takers (V)	\$40
	25 Second Clock (V)	\$65
	Game Manager (V, JV)	\$65
	Game Manager (MS)	\$50
Swimming	Game Manager (V)	\$65
	Game Manager (MS)	\$50
	Ticket Taker (V)	\$40
Wrestling	Scoreboard (V)	\$60
	Ticket Taker (V, JV)	\$40
	Game Manager (V, JV)	\$65
	Crowd Control (V, MS)	\$50
Track	Timer (FAT System)	\$65

- A discussion was had regarding the Extra Activity Worker Positions for the 2023/2024 school year.

Extra Activity Workers

EXTRA ACTIVITY WORKERS – 2023/2024 SCHOOL YEAR

It is recommended that the Board approve the following individuals as extra activity workers for the 2023/2024 school year:

Roiann Backstrom	Felix Yerace
Josh Kirchner	Kim Smykal
Hope Harris	Bill Ketrow
Gary Goga	Nancy Kraemer
Keith Buckley	Lauryn Greggs
Jordan Zange	Beth Padden
Patty Costatini	Michael Hustava
John McCarthy	Pat Reilly
Kelly Connolly	Steve McCormick
Mike Orosz	TJ O'Farrel
Diane Ferguson	Bruce Hrivnak
Selena Canello	Bill Simon
Pat Reilly	Nicole Davis
Sue Grand	Amy Torcaso
Erin Feeney	Ken Hustava
Bill Irvine	Jerry Tuite
Nick Kamberis	Jeff Sieg
Kelly Diven	Meghan O'Brien
Ryan Warner	Allyson Culp
Judy Wareham	Jim Feeney

Nathan Brestensky

- A discussion was had regarding Extra Activity Workers for the 2023/2024 school year.
- A discussion was regarding District enrollment.

ADJOURNMENT

On the motion of Mrs. Donahue, seconded by Mr. Hill, the meeting was adjourned at 7:35 p.m.

Motion passed 7-0

Respectfully submitted,

Joseph A. Kubiak
Board Secretary

Maureen S. Myers
Assistant Board Secretary

Adjournment

Policy Guide



Title **RECORDS MANAGEMENT**
PLAN

Adopted **NOVEMBER 16, 2009**

Last Revised ~~NOVEMBER 21, 2013~~

	<p style="text-align: center;">POLICY NO. 800826 RECORDS MANAGEMENT PLAN</p>	
Section 1	<p><u>Purpose</u></p> <p>The Board recognizes the importance of establishing and maintaining a Records Management Plan that defines district staff responsibilities and complies with federal and state laws and regulations.</p>	
Section 2	<p><u>Authority</u></p> <p>The Board shall retain, as a permanent record of the District, Board minutes, annual auditor's reports and annual financial reports. All other financial records, including financial account books, orders, bills, contracts, invoices, receipts and purchase orders, shall be retained by the District for a period of not less than six (6) years.</p> <p>All other district records shall be retained in accordance with state and federal laws and regulations and the District Records Management Plan approved by the Board.</p> <p>The District shall make a good faith effort to comply with all proper requests for record production. Selective destruction of records in anticipation of litigation is forbidden.</p>	<p>SC 518</p> <p>65 P.S. 67.901 Pol. 623</p>
Section 3	<p><u>Definitions</u></p> <p>Electronic Mail (Email) System - a system that enables users to compose, transmit, receive and manage text and/or graphic electronic messages and images across local area networks and through gateways connecting other networks. This information</p>	

<p>Section 4</p>	<p style="text-align: center;">POLICY NO. 800826 RECORDS MANAGEMENT PLAN</p> <p>consists primarily of messages but may include attachments such as calendars, directories, distribution lists, word processing documents, spreadsheets and other electronic documents.</p> <p>Litigation Hold - a communication ordering that all records and data relating to an issue being addressed by current or potential litigation or investigation be preserved for possible production during the litigation or investigation.</p> <p>Records - information, regardless of physical form or characteristics, that documents a transaction or activity of the district and that is created, received or retained pursuant to law or in connection with a transaction, business or activity of the District. The term includes a document, paper, letter, map, book, tape, photograph, film or sound recording, information stored or maintained electronically and a data-processed or image-processed document.</p> <p>Records Management Plan - the system implemented by the District for the storage, retention, retrieval and disposition of all records generated by district operations.</p> <p>Records Retention Schedule - a comprehensive listing stating retention periods and proper disposition of records.</p> <p><u>Delegation of Responsibility</u></p> <p>Any individual responsible for the collection, maintenance and/or security of records on behalf of the District shall comply with state and federal laws and regulations, Board policies, district procedures and the Records Management Plan.</p> <p><u>Records Coordinator</u></p> <p>In order to maintain a Records Management Plan that complies with federal and state laws and regulations and Board policy, the Board designates the Assistant to the Superintendent for Operations as the District's Records Coordinator who shall serve as the chairperson of the Records Management Committee.</p> <p>The Records Coordinator shall be responsible to:</p>	<p>65 P.S. 67.102</p>
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	<p style="text-align: center;">POLICY NO. 800826 RECORDS MANAGEMENT PLAN</p> <ol style="list-style-type: none"> 1. Ensure that training appropriate to the user's position and level of responsibility is provided. Such training may include: <ol style="list-style-type: none"> a. Operation, care and handling of the equipment and software. b. Requirements of the Records Retention Schedule. c. Protocols for preserving and categorizing district records. d. Procedures and responsibilities of district staff in the event of a litigation hold. e. Identification of what is and what is not a record. f. Disposal of records. 2. Review the Records Management Plan periodically to ensure that record descriptions and retention periods are updated as necessary. 3. Identify, when the retention period expires, the specific records to be disposed of and ensure that all identified records are properly disposed of annually. <p><u>Records Management Committee</u></p> <p>A committee responsible for the development and recommendation of the District's Records Management Plan shall be established by the Board. The Records Management Committee shall give primary consideration to the most efficient and economical means of implementing the recommended Plan. Members of the Committee shall include the:</p> <ol style="list-style-type: none"> 1. Open Records Officer. 2. Superintendent. 3. Board Secretary. 4. District solicitor. 	<p>Pol. 801</p> <p>SC 433</p>
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<p>Section 5</p>	<p style="text-align: center;">POLICY NO. 800826 RECORDS MANAGEMENT PLAN</p> <p>5. Director of Information Technology or designee.</p> <p>6. Assistant to the Superintendent for Operations.</p> <p>The Records Management Committee shall meet annually to evaluate the effectiveness and implementation of the Records Management Plan and recommend changes as needed.</p> <p><u>Guidelines</u></p> <p><u>Records Management Plan</u></p> <p>The District's Records Management Plan shall be the principal means for the storage, retention, retrieval and disposition of manual and electronic records, including emails. The Plan shall not rely primarily on backup systems to manage the retention and disposition of records.</p> <p>The Records Management Plan shall include:</p> <ol style="list-style-type: none"> 1. Comprehensive listing of records and data of the District. 2. Criteria to distinguish records of the school district from the supplemental personal records of individual employees. 3. System(s) of records storage and retrieval to be used, including in what form the records will be stored, maintained, reproduced and disposed. 4. Preservation measures to protect the integrity of records and reduce the risk of a data breach. Such measures shall include encryption or other appropriate security procedures. 5. Data map or flow chart detailing the sources, routes and destinations of electronic records. 6. Procedures and employee(s) designated for determining whether an item is a record. 	<p>65 P.S. 67.708 20 U.S.C. 1232g</p> <p>73 P.S. 2301 et seq Pol. 830, 830.1</p>
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POLICY NO. 800826
RECORDS MANAGEMENT PLAN

7. Procedures for adding, revising or deleting records and data, and any other details necessary to implement the Records Management Plan.
8. Records Retention Schedule.
9. Provisions for the storage and retrieval of records in the event of an emergency or disaster.
10. Staff positions authorized to access district records.
11. Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all records relevant to the current or potential claim. Such procedures shall specify:
 - a. Who can initiate a litigation hold.
 - b. How and to whom a litigation hold is communicated.
 - c. Who will determine which records are subject to the litigation hold.
 - d. Who will be responsible for collecting and preserving such records and data.
 - e. Who will be responsible for monitoring and ensuring the District's compliance with the litigation hold.
 - f. In what format the records will be collected.

When possible, records and data shall be stored in their original form, including metadata, such as creation date, author, type of file, etc.

For any record not covered by the Records Retention Schedule, the Records Management Committee shall determine how long the record shall be kept and recommend any necessary revisions to the retention schedule.

Pol. 830.1

POLICY NO. 800826
RECORDS MANAGEMENT PLAN

The District shall store, maintain and dispose of records in a manner that protects any sensitive, proprietary or confidential information or individual privacy rights, and helps conserve natural resources.

Manual Records

Manual records, which include all records not stored electronically, shall be retained and disposed of in accordance with the Records Management Plan.

Manual records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

The district requires that all manual record systems be assessed annually and all vital information be entered into an electronic records system for long-term storage and backup recovery.

The District shall develop and maintain adequate and up-to-date documentation about each manual record system.

Documentation may:

1. List system title and responsible employee(s) or office.
2. Define the contents of the system, including record formats.
3. Identify vital records and information.
4. Determine restrictions on access and use.

Electronic Records

Electronic records shall be retained and disposed of in the same manner as records in other formats and in accordance with the Records Management Plan.

Electronic records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

POLICY NO. 800826
RECORDS MANAGEMENT PLAN

The District shall develop and maintain adequate and up-to-date documentation about each electronic record system.

Documentation may:

1. List system title and responsible employee(s) or office.
2. Specify all technical characteristics necessary for reading or processing the records stored on the system.
3. Identify all defined inputs and outputs of the system.
4. Define the contents of the system, including records formats and database tables.
5. Identify vital records and information.
6. Determine restrictions on access and use.
7. Describe update cycles or conditions.

Email Records

Email messages, in and of themselves, do not constitute records. Retention and disposition of email messages depend on the function and content of the individual message.

Records on an email system, including messages and attachments, shall be retained and disposed of in accordance with the District's Records Management Plan.

Email messages and attachments that do not meet the definition of records shall be deleted as required by the Records Management Plan.

Email records may be maintained as an electronic record or be printed and maintained as a manual record.

For each email considered to be a record, the following information shall be retained:

1. Message content.
2. Name of sender.

POLICY NO. 800~~826~~
RECORDS MANAGEMENT PLAN

3. Name of recipient.

4. Date and time of transmission and/or receipt.

Service Providers

The Board requires service providers contracted by the District to create, maintain, retain and dispose of district records in accordance with the Records Management Plan.

65 P.S. 67.506

Previously Revised: November 21, 2013

References:

School Code – 24 P.S. Sec. 433, 518

PA Right-To-Know Law – 65 P.S. Sec. 67.102, 67.506, 67.708, 67.901

Family Educational Rights and Privacy Act – 20 U.S.C. Sec. 1232g

Breach of Personal Information Notification Act – 73 P.S. Sec. 2301 et seq

Board Policy – 623, 801, 830, 830.1

Policy Guide

Policy No. 800.1Section OPERATIONSTitle ELECTRONIC SIGNATURES/RECORDS

Adopted _____

Last Revised _____

POLICY NO. 800.1 ELECTRONIC SIGNATURES/RECORDS		
Section 1	<p><u>Purpose</u></p> <p>Under certain conditions, electronic records and signatures satisfy the requirements of a manual record and/or signature when transacting business. The Board recognizes that the effectiveness of electronic records and signatures depends upon the authenticity and reliability of the signatures and the context in which the electronic records are created, transferred and stored. Therefore, the Board adopts this policy to allow for the use of and acceptance of electronic records and signatures and to establish the guidelines under which electronic signatures may be utilized by the District.</p>	73 P.S. 2260.101 et seq
Section 2	<p><u>Authority</u></p> <p>The Board authorizes the use of electronic signatures in place of manual signatures to conduct district business unless a manual signature is required by law or regulations. Electronic signatures shall have the full force and effect of a manual signature when used in accordance with this policy and applicable law and regulations. Only positions that are authorized by a Board Resolution may use electronic signatures on behalf of the District.</p> <p>Electronic records filed with or issued by the District shall have the full force and effect of paper records when the requirements of this policy and applicable law and regulations are satisfied.</p>	<p>73 P.S. 2260.101 et seq.</p> <p>15 U.S.C. 7001 et seq 73 P.S. 2260.301 et seq Pol. 800</p>

	<p style="text-align: center;">POLICY NO. 800.1 ELECTRONIC SIGNATURES/RECORDS</p> <p>This policy applies to the use of electronic records and signatures when permitted or required in connection with district programs and operations.</p>	
Section 3	<p><u>Definitions</u></p> <p>Electronic record – any record created, generated, sent, communicated, received, or stored by electronic means.</p> <p>Electronic signature – an electronic sound, symbol or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record. More simply, it is a paperless means of committing to a contract or other document in a manner that indicates the signer’s intent to bind themselves and/or the District.</p>	<p>Pol. 800 15 U.S.C. 7006 73 P.S. 2260.103</p> <p>15 U.S.C. 7006 73 P.S. 2260.103</p>
Section 4	<p><u>Delegation of Responsibility</u></p> <p>The Superintendent or designee shall develop administrative regulations to direct staff on the parameters for authorized use of electronic signatures related to district programs and operations.</p>	
Section 5	<p><u>Guidelines</u></p> <p><u>Electronic Recordkeeping</u></p> <p>The maintenance of electronic records and signatures by the district shall comply with the electronic recordkeeping requirements of state and federal laws and regulations and the District’s Records Management Plan.</p> <p>Electronic records created or received by the District shall be appropriately attributed to the individual(s) responsible for their creation, authorization and/or approval.</p> <p>The District may specify the type of electronic signature required on an electronic record, the manner and format in which the electronic signature must be affixed to the electronic record, and the criteria that must be met when an individual uses a third party to file a document if electronic records must be signed by electronic means.</p>	<p>Pol. 800</p> <p>73 P.S. 2260.502</p>

	<p style="text-align: center;">POLICY NO. 800.1 ELECTRONIC SIGNATURES/RECORDS</p> <p>The District shall implement and maintain electronic recordkeeping systems to securely receive, store, and reproduce electronic records and signatures relating to transactions in their original form.</p> <p>Such a system shall allow the District to implement:</p> <ol style="list-style-type: none"> 1. A security procedure for the purposes of verifying that an electronic signature is that of a specific person or for detecting changes or errors in the information in an electronic record. 2. Appropriate control processes and procedures to ensure adequate preservation, disposition, integrity, security, confidentiality and auditability of electronic records. 3. A consistent manner and format in which the electronic records must be created, generated, sent, communicated, received and stored. <p><u>Electronic Signatures</u></p> <p>An electronic signature may be used if the law requires a signature unless there is a specific law, regulation, or order that requires records to be manually signed. The issuance and/or acceptance of an electronic signature by the District shall be permitted in accordance with the provisions of this policy and all applicable state and federal laws and regulations. Such electronic signature shall have the full force and effect of a manual signature only if the electronic signature satisfies all of the following requirements:</p> <ol style="list-style-type: none"> 1. The signing employee is authorized to manually sign the document on behalf of the District. 2. The electronic signature identifies the individual signing the document by their name and position. 3. The individual signing with an electronic signature has signed a statement of exclusive use. 	<p>73 P.S. 2260.103, 2260.305, 2260.306</p> <p>73 P.S. 2260.502</p> <p>73. P.S. 2260.502</p> <p>73 P.S. 2260.101 et seq 15 U.S.C. 7001 et seq 21 P.S. 483.1 et seq Pol. 716</p>
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	<p style="text-align: center;">POLICY NO. 800.1 ELECTRONIC SIGNATURES/RECORDS</p> <ol style="list-style-type: none"> 4. The identity of the individual signing with an electronic signature is capable of being validated through the use of an audit trail. 5. The electronic signature and the document to which it is affixed cannot be altered once the electronic signature has been applied. 6. The electronic signature conforms to all other provisions of this policy. <p>The District shall maintain a secure log of each employee authorized to utilize an electronic signature in connection with district business.</p> <p>This policy does not require a specific method for executing an electronic signature. The employee signing a particular document is responsible for verifying that the method chosen is appropriate for the nature of the transaction. Employees must consider confidentiality, authentication of signatures, and verification that the document signed is, in all respects, identical to the one to which the signer intends to bind the District.</p> <p>Any electronic signature that appears to be forged, altered, or otherwise not authentic, or that is not compliant with law or regulation, this policy or related administrative regulation, is not a valid signature. Should an electronic signature be deemed invalid, the Superintendent or designee may require a manual signature.</p> <p>All other policies that apply to the execution of contracts or other documents on behalf of the District remain in full force and effect.</p>	<p>Pol. 800</p>
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	<p style="text-align: center;">POLICY NO. 800.1 ELECTRONIC SIGNATURES/RECORDS</p> <p>References:</p> <p>Electronic Transactions Act – 73 P.S. Sec. 2260.101 et seq, 2260.103, 2260.301, 2260.305, 2260.306, 2260.502</p> <p>Electronic Records and Signatures in Commerce – 15 U.S.C. Sec. 7001 et seq, 7006</p> <p>Uniform Real Property Electronic Recording Act – 21 P.S. Sec. 483.1 et set</p> <p>Board Policy – 716, 800, 815</p>	
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KEYSTONE OAKS SCHOOL DISTRICT

Policy Guide



Policy No. 830

Section OPERATIONS

Title SECURITY OF COMPUTERIZED
PERSONAL INFORMATION/
BREACH NOTIFICATION

Adopted _____

Last Revised _____

POLICY NO. 830 SECURITY OF COMPUTERIZED PERSONAL INFORMATION/BREACH NOTIFICATION		
Section 1	<p><u>Purpose</u></p> <p>The Board is committed to the security of the District's computerized data and to addressing the risk of a breach of the District's systems involving the possible disclosure of personal information. This policy addresses the manner in which the District will respond to unauthorized access and acquisition of computerized data that compromises the security and confidentiality of personal information.</p>	
Section 2	<p><u>Authority</u></p> <p>The Board requires that records containing personal information be securely maintained, stored and managed in compliance with state and federal laws, regulations, Board policy, administrative regulations and the District's Records Management Plan.</p> <p>The Board directs the District to provide notice as required by law to any resident of the Commonwealth whose unencrypted and unredacted personal information was or is reasonably believed to have been accessed or acquired by unauthorized persons.</p>	<p>73 P.S. 2301 et seq Pol. 113.4, 216, 800, 800.1, 830.1, 874</p> <p>73 P.S. 2301 et seq</p>
Section 3	<p><u>Definitions</u></p> <p>Breach of the security of the system - unauthorized access and acquisition of computerized data that materially compromises the security or confidentiality of personal information</p>	<p>73 P.S. 2302</p>

	<p style="text-align: center;">POLICY NO. 830 SECURITY OF COMPUTERIZED PERSONAL INFORMATION/BREACH NOTIFICATION</p> <p>maintained by the District as part of a database of personal information regarding multiple individuals and that causes, or the District reasonably believes has caused, or will cause, loss or injury to any resident of the Commonwealth. Acquisition of personal information by an employee or agent acting in good faith on behalf of the school district is not a breach of the security of the system if the personal information is not used for a purpose other than the lawful purpose of the District and is not subject to further unauthorized disclosure.</p> <p>Determination - a verification or reasonable certainty that a breach of the security of the system has occurred. 73 P.S. 2302</p> <p>Discovery - the knowledge of or reasonable suspicion that a breach of the security of the system has occurred. 73 P.S. 2032</p> <p>Encryption - the use of an algorithmic process to transform data into a form in which there is a low probability of assigning meaning without use of a confidential process or key. 73 P.S. 2302</p> <p>Personal information - includes an individual's first name or first initial and last name in combination with and linked to any one or more of the following, when not encrypted or redacted: 73 P.S. 2302</p> <ol style="list-style-type: none"> 1. Social Security number. 2. Driver's license number or state identification card number issued instead of a driver's license. 3. Financial account number, credit or debit card number, in combination with any required security code, access code or password that would permit access to an individual's financial account. 4. Medical information, meaning any individually identifiable information contained in the individual's current or historical record of medical history or medical treatment or diagnosis created by a health care professional. 73 P.S. 2302 5. Health insurance information, meaning an individual's health insurance policy number or subscriber 73 P.S. 2302 	
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Section 4	<p style="text-align: center;">POLICY NO. 830 SECURITY OF COMPUTERIZED PERSONAL INFORMATION/BREACH NOTIFICATION</p> <p>identification number in combination with access code or other medical information that permits misuse of an individual's health insurance benefits.</p> <p>6. A user name or email address, in combination with a password or security question and answer that would permit access to an online account.</p> <p>Personal information does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media.</p> <p>Records - means any material, regardless of its physical form, on which information is recorded or preserved by any means, including written or spoken words, graphically depicted, printed or electromagnetically transmitted. This term does not include publicly available directories containing information that an individual has voluntarily consented to have publicly disseminated or listed, such as name, address or telephone number.</p> <p>Redact - includes, but is not limited to, alteration or truncation such that no more than the last four (4) digits of a Social Security number, driver's license number, state identification card number or account number is accessible as part of the data.[9]</p> <p><u>Delegation of Responsibility</u></p> <p>The Superintendent or designee shall ensure that the District provides notice, as required by law, of any breach of the security of the District's systems.</p> <p>The Superintendent, in collaboration with appropriate administrators, shall develop administrative regulations to implement this policy, which shall include, but not be limited to:</p> <ol style="list-style-type: none"> 1. Procedures following discovery of a breach. 2. Procedures for the determination of a breach and whether breach notification is required under the law. 	
		73 P.S. 2302 Pol. 801
		73 P.S. 2302
		73 P.S. 2302
		73 P.S. 2301 et seq
		73 P.S. 2301 et seq

	<p style="text-align: center;">POLICY NO. 830 SECURITY OF COMPUTERIZED PERSONAL INFORMATION/BREACH NOTIFICATION</p> <p>3. Breach notification procedures including timeline requirements, who must be notified and methods for such notice.</p> <p>Section 5 <u>Guidelines</u></p> <p>Upon determination of a breach of the security of the system, the Superintendent or designee shall provide notice to the District attorney in the county where the breach occurred and to any resident of the Commonwealth whose unencrypted and unredacted personal information was or is reasonably believed to have been accessed and acquired by an unauthorized person. Such notice shall be made in accordance with the provisions of law regarding timelines and methods of notification.</p> <p>The notice shall be made without an unreasonable delay, except when a law enforcement agency determines and advises the District in writing, citing the applicable section of law, that the notification would impede a criminal or civil investigation, or the District must take necessary measures to determine the scope of the breach and to restore the reasonable integrity of the data system.</p> <p>The District shall also provide notice of the breach if the encrypted information is accessed and acquired in an unencrypted form, if the security breach is linked to a breach of security of the encryption, or if the security breach involves a person with access to the encryption key.</p> <p>References:</p> <p>Breach of Personal Information Notification Act – 73 P.S. Sec. 2301 et seq, 2302, 2303, 2304</p> <p>Board Policy – 113.4, 216, 800, 800.1, 801, 830.1, 874</p>	<p>73 P.S. 2301 et seq</p> <p>73 P.S. 2303, 2304</p> <p>73 P.S. 2301 et seq</p>
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Policy Guide

Policy No. 830.1Section OPERATIONSTitle DATA GOVERNANCE -
STORAGE/SECURITY

Adopted _____

Last Revised _____

POLICY NO. 830.1 DATA GOVERNANCE – STORAGE/SECURITY		
Section 1	<p><u>Purpose</u></p> <p>The District is required to collect, create, store and manage data and information. Accurately maintaining and protecting such data is essential for efficient district operations, legal compliance, confidentiality and upholding trust with the school community.</p> <p>This policy addresses the Board's commitment to sound data governance related to the integrity and security of the data collected, maintained, stored and managed by the District.</p>	
Section 2	<p><u>Authority</u></p> <p>The Board recognizes the importance of establishing and maintaining a system of data governance that addresses district staff responsibilities and complies with federal and state laws and regulations regarding data storage, security and records management. The District's data governance system shall meet or exceed industry and/or government standards for data protection and privacy of personal information.</p> <p>The Board directs that the creation, collection, retention, retrieval and disposition of district records shall be governed by Board policy and the District's Records Management Plan and Records Retention Schedule.</p> <p>The Board directs notifications of a breach of the security of the District's computerized data system involving an individual's</p>	<p>73 P.S. 2305.1, 2305.2</p> <p>Pol. 800</p> <p>73 P.S. 2301 et seq Pol. 830</p>

<p>Section 3</p>	<p style="text-align: center;">POLICY NO. 830.1 DATA GOVERNANCE – STORAGE/SECURITY</p> <p>personal information to be conducted in accordance with law and Board policy.</p> <p><u>Definitions</u></p> <p>Confidential Data/Information - information regarding which law, Board policy or contract prohibit disclosure or that may be disclosed only in limited circumstances. Confidential data includes, but is not limited to, personally identifiable information and other personal information regarding students, employees and district residents.</p> <p>Critical Data/Information - information that is essential to district operations and that must be accurately and securely maintained to avoid disruption to district operations.</p> <p>Data Governance - the District's comprehensive system to ensure the integrity of data created, collected, stored, secured and managed by the District.</p> <p>Encryption - the use of an algorithmic process to transform data into a form in which there is a low probability of assigning meaning without use of a confidential process or key.</p> <p>Personal Information - includes an individual's first name or first initial and last name in combination with and linked to any one or more of the following when not encrypted or redacted:</p> <ol style="list-style-type: none"> 1. Social Security number. 2. Driver's license number or state identification card number issued instead of a driver's license. 3. Financial account number, credit or debit card number, in combination with any required security code, access code or password that would permit access to an individual's financial account. 4. Medical information, meaning any individually identifiable information contained in the individual's current or historical record of medical history or medical treatment or diagnosis created by a health care professional. 	<p>Pol. 113.4, 216, 874</p> <p>73 P.S. 2302</p> <p>Pol. 830 73 P.S. 2302</p> <p>73 P.S. 2302</p>
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	<p style="text-align: center;">POLICY NO. 830.1 DATA GOVERNANCE – STORAGE/SECURITY</p> <p>5. Health insurance information, meaning an individual's health insurance policy number or subscriber identification number in combination with access code or other medical information that permits misuse of an individual's health insurance benefits.</p> <p>6. A user name or email address, in combination with a password or security question and answer that would permit access to an online account.</p> <p>Personal information does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media.</p> <p>Records Management Plan - the system implemented by the district for the storage, retention, retrieval and disposition of all records generated by district operations.</p> <p>Records Retention Schedule - a comprehensive listing stating retention periods and proper disposition of records.</p>	<p>73. P.S. 2302</p> <p>73 P.S. 2303 Pol. 801</p> <p>Pol. 800</p> <p>Pol. 800</p>
Section 4	<p><u>Delegation of Responsibility</u></p> <p>The Superintendent, in coordination with the Assistant to the Superintendent for Operations shall develop procedures necessary to implement this policy.</p> <p>All individuals who are granted access to confidential and/or critical data/information are required to keep the information secure and are prohibited from disclosing or assisting in the unauthorized disclosure of such data/information.</p> <p>The Assistant to the Superintendent for Operations or designee shall conduct regular vulnerability and risk assessments to monitor the integrity of the district's system of data governance.</p> <p>The Superintendent shall ensure that this policy is reviewed at least annually and updated as necessary.</p>	<p>Pol. 623, 830</p> <p>73 P.S. 2305.1, 2305.2</p>

<p>Section 5</p>	<p style="text-align: center;">POLICY NO. 830.1 DATA GOVERNANCE – STORAGE/SECURITY</p> <p><u>Guidelines</u></p> <p>The District's system of data governance shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1. Data security controls that meet or exceed industry and/or government standards for data protection and privacy, to ensure that only authorized individuals have access to computerized data. 2. A plan for backup and recovery of data to protect against information loss. Redundant backup systems of data storage shall be securely maintained in separate physical locations or in separate data storage systems. 3. Training requirements for individuals who have access to confidential and/or critical data and information. 4. Provisions to minimize the risk of unauthorized access, alteration or erasure of computerized data. 5. An inventory of all software applications, digital tools and platforms, and related instruments comprising the data governance system. 6. Procedures for addressing a breach of data and cybersecurity incidents. 7. Procedures and acceptable use provisions for access to data and protection of privacy and personal information for students, staff and district residents. 8. A requirement that all service providers retained or contracted by the District for data governance and records management purposes meet or exceed industry and/or government standards for data protection and privacy of personal information. <p><u>Use of Personal Electronic Devices and Resources</u></p> <p>The district prohibits storage of confidential and/or critical data/information of the district on a personal electronic device, personal email account or other personal platform. District staff</p>	<p>Pol. 830</p> <p>Pol. 830</p> <p>Pol. 816, 830</p>
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	<p style="text-align: center;">POLICY NO. 830.1 DATA GOVERNANCE – STORAGE/SECURITY</p> <p>and service providers shall use district-controlled accounts and platforms to securely access, store or transmit confidential and/or critical data/information of the District.</p> <p><u>Service Providers</u></p> <p>Service providers retained or contracted by the District shall comply with law, Board policy, administrative regulations and district procedures regarding data security and integrity of data containing confidential and/or critical data/information of the District.</p> <p>The District shall ensure that the agreement or contract for service with a service provider who may have access to confidential and/or critical data/information reflects appropriate data security provisions.</p> <p><u>Consequences</u></p> <p>Failure to comply with law, Board policy, administrative regulations or procedures regarding data governance and security may result in the following disciplinary measures and possible pursuit of civil and criminal sanctions:</p> <ol style="list-style-type: none"> 1. Employees may be disciplined up to and including termination. 2. Volunteers may be excluded from providing services to the District. 3. The termination of a business relationship with a service provider. <p>References:</p> <p>Breach of Personal Information Notification Act – 73 P.S. Sec. 2301 et seq, 2302, 2305.1, 2305.2</p> <p>Board Policy – 113.4, 216, 623, 800, 801, 816, 817, 818, 830, 874, 916</p>	<p>Pol. 800, 830</p> <p>Pol. 817, 818, 916</p>
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