AGENDA
WINNISQUAM REGIONAL SCHOOL DISTRICT BOARD MEETING

Monday, September 21, 2026

Board Meeting - WRMS Cafeteria - 6:00pm

---

1. **OPENING:**
   - 1.1 Call to Order
   - 1.2 Pledge of Allegiance
   - 1.3 Announcements

2. **SPECIAL PRESENTATIONS / EDUCATIONAL FOCUS**
   NEASC Presentation - Eric Perry, Andrea Wujcik

3. **PUBLIC COMMENT**

4. **MINUTES - August 17, 2026**

5. **SAU ADMINISTRATOR REPORTS**
   - 5.1 Superintendent - Dr. Shannon Bartlett
   - 5.2 Business Administrator - Becky Weldon
   - 5.3 Director of Student Services - Tim Koumrian
   - 5.4 Director of Curriculum - Kathy Riley

6. **DISTRICT ADMINISTRATOR / STUDENT BOARD REP REPORTS**
   - 6.1 Sanbornton Central School Principal - Jason Javalgi
   - 6.2 Southwick School Principal - Stephanie Parzick
   - 6.3 Winnisquam Regional Middle School Principal - Chris Ennis
   - 6.4 Winnisquam Regional High School Principal - Eric Perry
   - 6.5 Winnisquam Career Center Principal - Andrea Wujcik
   - 6.6 Director of Facilities - Rob Berry
   - 6.7 Director of Technology - Jason Mix
   - 6.8 District Coord. of Wellness & Engagement - (Bimonthly) - Sarah Skoglund

7. **ACTION AGENDA:**
   - 7.1 Manifest and Vouchers
   - 7.2 Personnel Actions
     - (1) Resignations - None
     - (2) Retiree Request - None
     - (3) New Hires - None
     - (4) Athletics and Co-curricular - None
   - 7.3 Policy Review - *Second Read* - None
   - 7.4 Policy Review - *First Read*
     - **AC** - Nondiscrimination, Equal Opportunity Employment and Anti-Discrimination Plan
     - **ACA** - Discrimination and Harassment Grievance Procedure
     - **DAF** - Administration of Federal Grant Funds
     - **DFA** - Investment
     - **EBCA** - Crisis Prevention and Emergency Response Plan
     - **EHB** - Data/Records Retention

JFABD - Admission of Homeless Children and Unaccompanied Youth
JLCD - Administering Medication to Students
JLCF - Wellness
JICK - Bullying Prevention - Pupil Safety and Violence Prevention

7.5 Policy Rescinded
EEAA - Video and Audio Surveillance on School Property

7.6 NHSBA Resolutions - J. Cormier
(2026 Resolutions emailed to all board members on 9.3.26)

7.7 2027-2028 Budget Calendar

7.8 Budget Directive from School Board
7.8.1 SAU Central Office Action Budget - DRAFT

7.9 HB1300/HB 564: Community Education information and outreach

8. FINANCES

9. INFORMATIONAL

10. BOARD COMMITTEE & DELEGATE REPORTS

9.1 Board Committees -

- Wellness - (Dunn, Tupeck)
- Facilities - (Goodwin, Turgeon, Stock)

9.2 Delegate Committees -

- Region 8 Advisory Board (Turgeon)
- NH School Boards Association (Cormier)
- Legislative - (Stock, Goodwin, Roy, Cormier)

11. PUBLIC COMMENT

12. OTHER BUSINESS

13. NON PUBLIC MEETING -

RSA 91-A:3II(a)—RSA 91-A:3II(e)

14. ADJOURNMENT

NEASC ACCREDITATION

Winnisquam Regional High School
Winnisquam Career Center

Eric W. Perry, M.Ed., NRP | Principal, WRHS
Andrea Wujcik, M.Ed. | Principal, WiCC

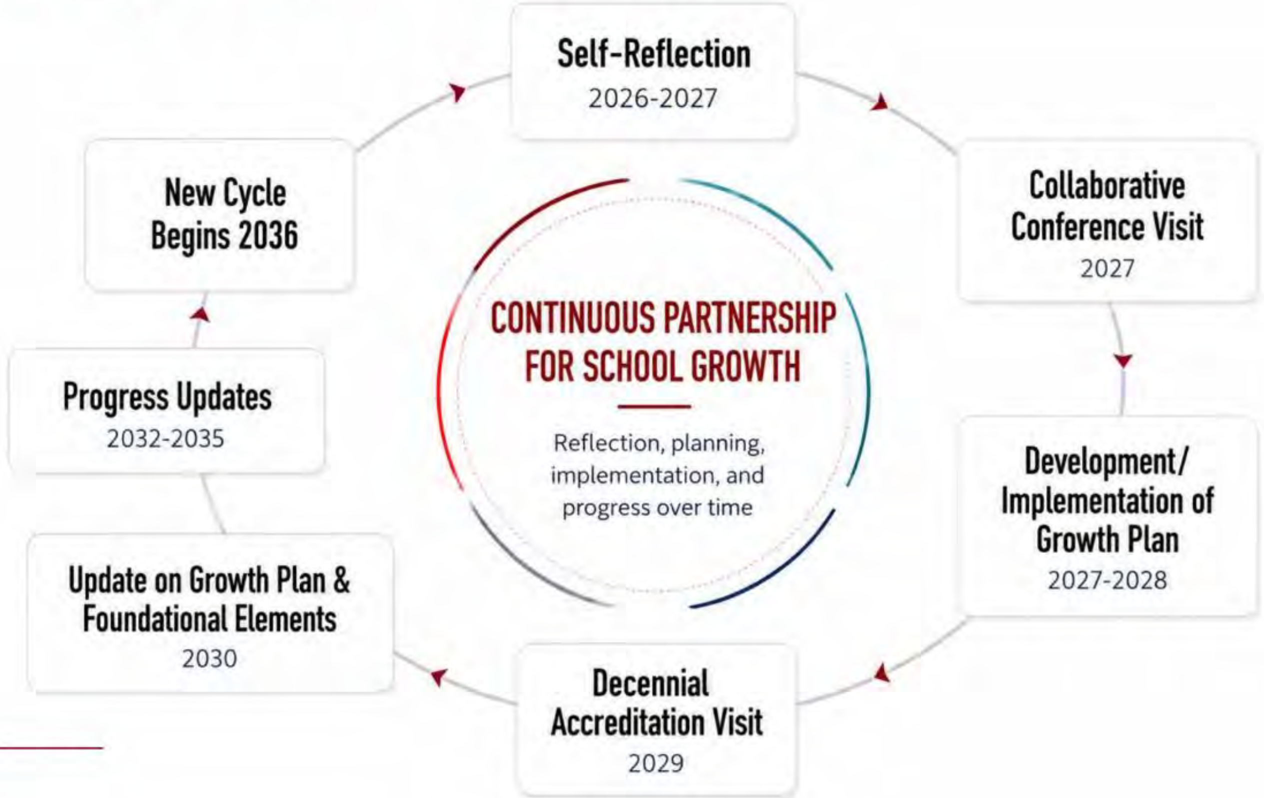
WINNISQUAM REGIONAL HIGH SCHOOL

WINNISQUAM CAREER CENTER

WRHS & WiCC

Stronger Together

Ten-Year Cycle for 2029 Protocol



Five Standards for Self-Reflection

1- LEARNING CULTURE:

- safe environment for learning
- community sets high standards for student learning
- fosters shared values through vision of the learner

2 - STUDENT LEARNING:

- defined curricular experience
- students can demonstrate skills and knowledge in a variety of ways

3 - PROFESSIONAL PRACTICES:

- school growth/improvement plan
- organizational practices and professional learning
- community relationships to support student learning

4 - LEARNING SUPPORT:

- coordinated interventions for all students
- robust support services to assist each student in meeting the vision of the graduate

5 - LEARNING RESOURCES:

- time, funding, and facilities to support the vision of the graduate
- infrastructure supports the delivery of high-quality curriculum, programs, and services

Surveys

Student

Family

Faculty

Teacher Leaders | Coordinators

Science Teacher
Department Team Lead
WRHS

Social Studies Teacher
Department Team Leader
WRHS

Business Agriculture,
Outdoor Resources &
Recreation Teacher
WiCC

Other Committees

Steering

Provide guidance to process, assist with data collection and analysis.

Self-Reflection

Review the self-reflection process and navigate data collection and analysis.

Writing

Succinctly author the data collected in the NEASC requested format.

Vision of a Graduate

Coordinate the process of establishing a District Vision of a Learner.

Portrait of a Learner
Vision of a Graduate

Concurrent Process

Alongside NEASC process. Identify attributes that we desire all students to possess upon graduation.

District Wide

Age-appropriate application to all aspects of the district.

Questions?

MINUTES
WINNISQUAM REGIONAL SCHOOL BOARD MEETING
August 17, 2026

SCHOOL BOARD	ADMINISTRATION
Sean Goodwin, Chairman	Dr. Shannon Bartlett, Superintendent
John Cormier	Rebecca Weldon, Business Administrator
Lance Turgeon	Dr. Kathy Riley, Director of Curriculum and Instruction
Dr. Christina Flanders	Tim Koumrian, Director of Student Services
Jennifer Dunn	Eric Perry, WRHS Principal
David Honeman	Andrea Wujcik, WiCC Principal
Dr. Ernest Roy	Chris Ennis, WRMS Principal
Jennifer Tupeck	Stephanie Parzick, Southwick School Principal
Jasen Stock	Jason Javalgi, Sanbornton Central School Principal
	Rob Berry, Director of Facilities
SECRETARY	Sarah Skoglund, Coordinator of OSW and Behavior
Kathleen Thomas	Patricia Rella, WRHS Assistant Principal

STUDENT SCHOOL BOARD REPRESENTATIVE
Carter Lloyd - absent

1.0 OPENING

1.1 The August 17, 2026 meeting of the Winnisquam Regional School Board was called to order at 6:02 pm by Chairman Sean Goodwin.
1.2 The Pledge of Allegiance was recited.
1.3 Announcements - None

2.0 SPECIAL PRESENTATIONS / EDUCATIONAL FOCUS

3.0 PUBLIC COMMENTS

Maria Hibbert, Northfield resident, expressed concern regarding the removal of the Hockey Co-op program from the Winnisquam budget, advocating to keep the opportunity open for interested students. She noted that the Laconia Athletic Director and Head Hockey Coach expressed support via email for a parent-led fundraising initiative to cover Winnisquam's financial share of the program. Chairman Goodwin stated they would review this further later in the meeting, as this is new information since they met back in November during the budget process.

4.0 MINUTES

School Board Meeting Minutes - June 15, 2026
Motion: A motion was made by John Cormier, seconded by Lance Turgeon, to approve the minutes of the June 15, 2026 School Board meeting as presented.
Vote: Affirmative 9-0 Motion Passes

5.0 SAU ADMINISTRATOR REPORTS

SAU Administrator reports are included in the board packet.

Dr. Bartlett introduced new staff members that were in attendance at this meeting: Eric Perry, HS principal, Patricia Rella, HS Assistant Principal, Kevin Anderson Network Administrator, and Jason Mix, Technology Director.

Dr. Bartlett presented a memorandum of agreement requiring the board chairman's signature regarding Paraprofessional II credentialing. Because federal regulations dictate that all paraprofessionals in Title 1 designated schools must hold Paraprofessional II certification, paras are actively working toward this requirement, which includes passing a certification exam. Currently, three district schools carry the Title 1 designation, while Sanbornton Central School does not. Prior meetings were held with the paraprofessional union to align on moving forward with the agreement, securing their support to reimburse candidates the cost of a successful test result and their initial credentialing. The final step requires Chairman Goodwin's signed approval on the updated agreement.

Dr. Bartlett invited school board members to join in scooping ice cream and welcoming new staff members on August 26th at 3:00 pm at the High School.

There is a Strategic Plan workshop scheduled for October 7th, to be held in the Cosmetology space of the WiCC.

In financial updates, Becky Weldon is currently finalizing the school year reconciliation for the DOE 25 report, with an extension available if needed. The audit for SY 25/26 is officially slated for the week of September 21st. Additionally, the state's approval is pending for the recently submitted food service application. Looking ahead to legislative changes, Superintendent Dr. Bartlett and Becky Weldon will attend a workshop this Tuesday to review the operational impacts of HB1300 on the tax cap and SAU budgets.

Tim Koumrian reported that due to the continuous movement of district-placed students, our special education student count remains fluid. We are currently applying for state special education aid, submitting requests totaling approximately $192,000. While the Department of Education reviews all submissions, funding is subject to allocation. Therefore, we do not expect to receive the full amount.

We have had some new families move into the district recently with students who have intensive needs. Because of this, we are looking at an unbudgeted increase in expenses. Right now, we estimate needing about $360,000 more than what is actually budgeted for this year.

Kathy Riley shared that the Spark '26 event was held last week which also included orientation for 17 new teachers. The event was a huge success. Kathy will share more details in next month's report.

The deadline to validate data and the accountability report was August 14th. Data results are anticipated for October or November, released though current demographics are confirmed accurate, and the necessary verification process is underway. In addition to this month's report, Kathy updated that all schools are planning to include an overview of competency based learning and grading during their open houses. The hope is to better engage parents in conversations about student progress. Meanwhile, the middle school is partnering with the New Hampshire Learning Initiative (NHLI) to focus on competencies, reporting, and family education, which will also support staff turnover as new teachers learn the district's specific competitors and indicators. Regarding the summer curriculum work, it was confirmed that all materials will be placed in a shared Google Drive for all teachers to access and review.

6.0 DISTRICT ADMINISTRATOR REPORTS

NO REPORTS for August Meeting due to summer break

7.0 ACTION AGENDA

7.1 Manifest and Vouchers

Motion: A motion was made by Ernie Roy, seconded by Lance Turgeon, to accept the expenditure manifest for June 1, 2026 through June 30, 2026; voucher numbers 1276, 1280, 1281, 1298, 1299, 1300, 1309, 1310, and 1311; and four payroll expenditures for a grand total of $2,123,590.26.
Vote: Affirmative 9-0 Motion Passes

7.2 Personnel Actions

1. Resignations - None
2. Retiree Request - 2027/2028

Motion: A motion was made by Jennifer Dunn, seconded by Lance Turgeon, to approve the retirement request from Edward Meyer, effective June, 2028.
Vote: Affirmative 9-0 Motion Passes

3. New Hires (4)

Motion: A motion was made by Ernie Roy, seconded by Lance Turgeon, to approve the hiring of Patricia Rella, Assistant Principal High School; Kristen Anderson, Grade 7 Science Teacher Middle School; Kaitlyn Corsi, Math Interventionist Southwick School; and Aaron Hayward, Math Teacher High School.
Vote: Affirmative 9-0 Motion Passes

7.3 Policy Review - Second Read -None

7.4 Policy Review - First Read - None

7.5 Fall Coaches Nominations

Motion: A motion was made by John Cormier, seconded by Lance Turgeon, to approve the coaching nominations for Fall sports dated August 5, 2026.
Vote: Affirmative 9-0 Motion Passes

7.6 Sunday/Holiday Practices

Motion: A motion was made by Lance Turgeon, seconded by Jennifer Dunn, to approve the Sunday/Holiday Practices for High School and Middle School sports as recommended.
Vote: Affirmative 9-0 Motion Passes

7.7 School Budget Calendar

Dr. Bartlett brought to the board’s attention that the December board meeting falls on the week of vacation, and the June meeting is scheduled to happen after school ends. She proposed we move the December date to December 14, 2026 and the June date to June 14, 2027.
Proposal accepted by the Board with an affirmative vote 9-0.

Under the new mandates of House Bill 564, the School Board is required to review and approve a separate School Administrative Unit (SAU) budget rather than sending it to the Budget Committee. The entire process must include a public hearing and reach full completion by the deadline of December 31st. Dr. Bartlett presented the board with a budget timeline to accomplish this process before the deadline.

Chairman Goodwin highlighted the urgency of scheduling the public hearing within this tight legislative window. To stay on track, the board scheduled the public hearing for **Thursday, November 5th at 6:00 pm** in the Middle School Cafeteria. Meanwhile, Lance Turgeon noted that legal challenges and litigation opportunities may arise to block the implementation of this tax cap.

Becky Weldon reminded the Board that a request for the budget directive will be on the agenda for the September Board Meeting.

7.8 Audit Engagement Letter

Becky presented a letter with a proposal for the board to sign regarding the audit. She is expecting to have the audit report by the end of December, possibly the middle of January.

Proposal accepted by the Board with an affirmative vote 9-0.

7.9 Exchange Student

Chairman Goodwin explained that we had previously approved two exchange students, however one moved to another state. The board was presented with documentation for a new student that was recommended by Susan Dyment, the Exchange Student Coordinator.

Motion: A motion was made by Jasen Stock, seconded by Lance Turgeon, to approve the exchange student.

Vote: Affirmative 9-0 Motion Passes

8.0 FINANCES

8.1 Revenue

Despite a current shortfall of $131,000, the district is owed $334,000 in CTE tuition. Becky Weldon is currently seeking guidance from auditors on how to properly report these funds, as the exact breakdown between school and state payments remains unclear. She also noted that a primary driver of the shortfall was a drop in bank account interest earnings, caused by ongoing projects. Furthermore, this outstanding revenue is not factored into the calculation of the unassigned fund balance.

8.2 Expenditures

Becky provided a summary that outlined the district's financial standing, detailing a total income of $27 million in the Fund Balance alongside utilized offset funds. From the remaining balance, $450,000 is allocated for trust fund projects, $175,000 is being returned to taxpayers, though this exact figure may fluctuate during final reconciliation, and any leftover funds will target remaining project needs.

8.3 Food Service

N/A

8.4 Project Summaries

Active trust fund projects include the High School window replacements scheduled for April vacation, bathroom renovations on track to wrap up by Christmas break, and wood fascia work that is nearly finished while awaiting final roof completion.

Dr. Bartlett made mention of the landscaping work being done and flowers planted around the WiCC.

9.0 INFORMATIONAL

Returning to the earlier discussion regarding funding for the Three School Hockey Co-op, the proposal asks the board to support Laconia allowing private funding driven by parents and booster club, to support the district's three hockey players for this year.

Motion: A motion was made by David Honeman, seconded by Jennifer Dunn, to support the request that would allow Laconia to have the Winnisquam players continue with the three school cooperative program using outside funding this year, and then take up next year's funding through the budget process.

Vote: Affirmative 8-0-1 Motion Passes

10.0 BOARD COMMITTEE & DELEGATE UPDATES

10.1 Board Committees

- Wellness (Dunn, Tupeck) - The next meeting of the Wellness Committee will be held on September 17, 2026 at Southwick School at 3:15 pm.

- Facilities (Goodwin, Turgeon, Stock) - A meeting will be planned for September. Lance suggests if we are thinking about going for a bond on the roof, we may want to consult with the Turner Group regarding other needs that we may not be aware of.

- Teacher of the Year (Honeman, Roy, Dunn) - N/A

10.2 Delegate Committees

- Region 8 Advisory Board (Turgeon) -The next meeting is scheduled for October 1, 2026. Lance Turgeon reported that there was considerable conversation at the last state committee meeting regarding students that are receiving EFA funds. We do have one student attending WiCC that is receiving EFA funding. Lance will email the District's attorney for clarification of how these funds work.

- NH School Board Association (Cormier) - Legal Updates
  John Cormier reported that there will be a new set of resolutions coming out. He asked Kathy Thomas to send them to board members before the September Board Meeting.

  Jason Stock reported on a study commission which focuses on tuition allocations for Spaulding. The committee is chaired by Representative Hill and is operating on an aggressive schedule, with a final report due by November 1st to meet the post-election filing period in November.

11.0 PUBLIC COMMENT

12.0 OTHER BUSINESS

13.0 NON-PUBLIC MEETING *(RSA 91-A:3II(a) Personnel Issues - RSA 91-A;3II(e) Negotiations/Legal Mattes)*

14.0 ADJOURNMENT

Motion: At 7:28 pm, a motion was made by Jasen Stock, seconded by David Honeman, to adjourn the meeting.
Vote: Affirmative 9-0 Motion Passes

WINNISQUAM REGIONAL SCHOOL DISTRICT

Enrollment Report By Classroom

September 1, 2026

	P	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
Sanbornton Central		16	12	15	16	18									
		17	11	17	16	18									
		33	23	32	32	36									156
Southwick School		16	14	16	14	18									
		16	15	16	14	18									
		16	13	16	13	18									
		48	42	48	41	54									233
Total Elementary		81	65	80	73	90									**389**
Middle School							81	93	84	103					**361**
Preschool	19														**19**
High School											101	90	80	94	**365**
Total District	19	81	65	80	73	90	81	93	84	103	101	90	80	94	**1134**
Comparison (to above)	**P**	**K**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**Total**
Prev month (June)	37	70	83	77	88	86	88	78	97	86	95	90	82	77	**1,134**
Prev year (September 2025)	28	72	86	78	87	90	91	83	97	87	125	74	89	93	**1,180**
May 2026 dropouts		0		Total	0										
May 2025 dropouts		0		Total	0										
Preschool Program - 8 children in process (referral, evaluation, eligibility, IEP, etc.)															
WiCC Enrollment												22	94	55	**171**
Winnisquam Students Enrolled at WiCC															62

WINNISQUAM REGIONAL SCHOOL DISTRICT
433 West Main Street, Tilton, NH 03276 ★ 603-286-4116 ★ 603-286-7402 Fax

Dr. Shannon Bartlett
Superintendent of Schools

Dr. Kathleen Riley
Director of Curriculum

Timothy Koumrian
Director of Student Services

Rebecca Weldon
Business Administrator

Student Services School Board Report
September 2026

New Life Skills/Secondary Transition Program at WRHS

In the ongoing assessment we do to determine if our spectrum of settings for our students with disabilities meets the needs of our students, WRHS and I determined that our post-graduate population, specifically the students who are 18-22 and on a certificate/alternate diploma track (non-regular high school diploma), were in need of a more formalized, comprehensive approach to life skills instruction as well as application of those skills in the community. As a result, Jackie Daugherty and I are beginning the process of applying to the New Hampshire Education Department for new program approval. We had our initial consultation meeting with the Bureau of Special Education Support on September 3 and will now put together the plan they will look for to review, including a formal description as well as addressing items such as staffing, budget, and access to the general education curriculum. The goal is for that submission to happen this fall. Once that happens, we can formally transition from the current approach of some life skills classes to a program that integrates life skills instruction with work outside of the classroom.

Special Education Program Approval and General Supervision (PAGS) Monitoring Update

Back in May of 2026, I shared with the Board that WRSD will be entering a formal NHED special education monitoring process during the fall of 2027 (a result of a 6-year cyclical monitoring system by the Bureau of Special Education Support). This will look at how we implement federal and state special education regulations in a multitude of ways, including compliance, programming, and even fiscally. Within the last couple of weeks, we received a better spelled out timeline of what that looks like month by month. What I noted was that for districts that are in the fall cohort of districts, the beginning actually starts the spring before. Therefore, this April (April 2027), we will be formulating a District Leadership Team that will oversee the process from the systems level. Between now and then, I will be working with the Admin Team to determine what involvement in that looks like, taking the suggestions of both other districts that have experienced it as well as the NHED of course. I will keep everyone apprised of any further updates that are relevant to the Board.

Respectfully Submitted,

Tim Koumrian
Director of Student Services

WINNISQUAM REGIONAL SCHOOL DISTRICT
433 West Main Street, Tilton, NH 03276 ★ 603-286-4116 ★ 603-286-7402 Fax

Dr. Shannon Bartlett
Superintendent of Schools

Dr. Kathleen Riley
Director of Curriculum

Timothy Koumrian
Director of Student Services

Rebecca Weldon
Business Administrator

Director of Curriculum, Instruction and Innovation Report

September 2026

Professional Development Updates

Over the past several weeks we have had the opportunity to connect with our staffs through New Teacher Orientation, Spark 2026, our district opening days, and our first professional development day of the year on September 8th. The overall feeling throughout all of the buildings is one of excitement and positivity which is awesome to observe and feel a part of.

SPARK 26 (aka Sparkus) launched our preparation for this year by providing all attendees with an immersive, hands-on experience designed to have them experience project-based learning (PBL) as participants**.** Our theme came from the movie *The Greatest Showman*, messaging the idea of *Dare to be Extraordinary*. Over the course of just under 48 hours, teachers learned new skills, collaborated with professional coaches, made creative choices, and worked together to produce a full circus performance. Our Spark planning committee partnered with the Maine Youth Circus and Team Adventure to facilitate this very unique professional development experience. The experience modeled the key elements of PBL, and by engaging in a PBL experience themselves our hope is this will transfer into our WRSD classrooms. We will continue to support the connections between what the teachers experienced themselves into how they can create learning environments and opportunities that foster even greater ownership, creativity, collaboration, and ultimately deeper student engagement.

In the words of Andrew Silver (Maine Youth Circus):

> "I think our biggest takeaway was the scale of the project the teachers were able to accomplish. Talking from experience, putting on a full circus show is a BIG task. Looking back at what we were all able to accomplish in just under 48 hours is monumental."

Opening days and September 8th continued the momentum of Sparkus, and we built upon the messaging of "Dare to be Extraordinary" in our other professional focuses for 26-27.

Respectfully,
Dr. Kathleen Riley

Sanbornton Central Elementary School

Mr. Jason Javalgi
M.Ed.
Principal
Phone Number: (603) 286-8223
Fax Number: (603) 286-2151
16 Hunkins Pond Road, Sanbornton, NH 03269
jjavalgi@wrsdsau59.org

Sanbornton Central Elementary School Principal Report: September 21st, 2026

"*The windows are open, acknowledging the September breeze. A month that smells like notepaper, pencil shavings and autumn leaves. A month that smells like progress, like moving on.*" - Lauren Oliver

Opening Staff Days & Professional Preparation: Our educators and staff kicked off the school year with workshop days focused on aligning curriculum goals and getting classrooms ready for Open House. The entire district gathered on opening morning for a nice welcome back and another preview of the Spark-us '26 performance. Teachers spent the rest of their time in grade-level teams mapping out unit plans for the first semester, organizing materials, and making sure classrooms were set up to welcome students on day one. You could feel the positive energy in the building as everyone worked together to set a strong foundation for the coming months.

Open House & Community Connections: Nearly 90% of our families came out for Open House. Families toured classrooms, met teachers, and caught up with neighbors in the hallways. A big thank you to the PTO for providing pizza dinner for everyone and for our Reading team running the Scholastic Book Fair, where students picked out books for their home libraries. The strong turnout showed how much our community supports our school and our students. It was wonderful seeing the halls filled with so many smiling faces and eager students showing off their new learning spaces.

First Days of School & Orientation: Students jumped right into classroom routines, schedules, and expectations during our first week back. Kindergarten families joined us for an orientation session where students met their teachers, tried out reading activities, and got used to the daily schedule. Across all grade levels, classrooms are focused on setting clear expectations and daily routines. Teachers are already noticing students taking pride in their work and settling into their new classrooms. Everyone adapted quickly to the daily flow, making for a smooth transition back into academic learning.

School-Wide Assembly & Looking Ahead: We wrapped up our first full week with an energetic school-wide assembly to welcome back students, introduce our new staff members, and review our core school-wide expectations: Be Safe, Be Respectful, and Be Responsible. It was a great start to the year, and our staff and students are ready for a strong, successful year ahead. We are excited to build on this early momentum and keep our focus on student growth and success.

SOUTHWICK SCHOOL

Stephanie Parzick
Principal
PH: (603) 286-3611
sparzick@wrsdsau59.org

50 Zion Hill Road
Northfield, NH 03276
FAX:(603) 286-3526
www.wrsdsau59.org

______________BEE RESPONSIBLE ~ BEE RESPECTFUL ~ BEE SAFE______________
...even when no one is looking!

September 2026 School Board Report

We are off to a strong start! Staff returned for our district opening days well rested and ready for a productive school year.

It was wonderful to see so many new and returning families attend our Open House. Family engagement is always an important part of creating strong school-to-home partnerships, and the evening provided a warm and positive start to the year.

As I write this, we have just completed our first three days of school, and the energy has been very positive. Teachers and students are focused on building strong classroom communities and establishing routines that will set the foundation for academic and social-emotional growth throughout the year.

Looking forward,

Stephanie Parzick

Winnisquam Regional Middle School

Administration:
Christopher Ennis, Principal
Fax: 603-286-7410
Scott Dixson, Asst. Principal

76 Winter Street, Tilton, NH 03276
Phone: 603-286-7143 ~
http://www.wrsdsau59.org/winnisquamregionalmiddleschool_home.aspx

---

Board report for September 21, 2026

The year at WRMS is off to a great start! We are super excited about all our new hires. Nearly all of them attended SPARK this year. The opening days with teachers were positive and everyone was eager to have the students back. The first four days of school were set to build relationships with students and set expectations for the school and individual classes. This was done in small groups. These same small groups will spend the few days of the second week getting introduced, or reintroduced, to RULER. This is our 7th year with this SEL curriculum at the middle school. The first few weeks of the school year we will be doing our Aimesweb+ testing. This will be our starting point for each individual student for the year as we strive to create another robust year of learning.

On September 2nd we had our open house. 424 parents and students joined us for the evening where they had the opportunity to talk to the teachers. I gave a Title I presentation followed by a welcome presentation while PTO offered dinners for families as a fundraiser. We were thrilled with the turnout and the opportunity to connect with families.

We anticipate a wonderful year this year with our four grades and incredible staff!

Go Wolves!

Sincerely,

Chris Ennis

WINNISQUAM REGIONAL HIGH SCHOOL
435 WEST MAIN STREET TILTON, NH. 03276 603-286-4531

September School Board Report

WRHS is off to a great start of the school year. With a new schedule which provides unbroken instructional blocks, the new state-mandated Movement Block, and a Bear Block for support and enrichment, our students, faculty, and staff have adjusted well. We appreciate our school community's flexibility and patience as we all adjust to the new schedule.

WRHS opened the school year with a whole school assembly to introduce faculty and staff and kick off the new school year. Enhanced by each department's walk-up song choice, department leaders introduced their team. Each class was introduced as well as we welcomed back the classes of 2027, 2028 and 2029 while welcoming the class of 2030 to WRHS. During the first week of school each class attended an orientation with school administrators to review expectations and review the student handbook guidelines.

This year we are celebrating school pride each week by wearing royal blue, white, black on Winnisquam Wednesdays. This is a fun way to boldly display school spirit. Our school counselors will be capturing the school spirit each week and we will share some of the pictures on the WRHS social media pages. It has been fun to see the students, faculty, and staff participate in this weekly celebration as we embark on the first few weeks of school.

On September 8th WRHS and WiCC met with the New England Association of Schools and Colleges (NEASC). Our Liaison from NEASC, Gretchen McNulty, presented to the principals, leadership, coordinators, and steering committee, and then presented to the whole faculty. During the whole faculty presentation NEASC modeled the self-reflection process for one of the thirty-two elements within the five standards. It was a productive presentation and we are in a solid position to move forward with the process. Our Collaborative Conference Visit is scheduled for March 3rd and 4th. Leading the process for WRHS and WiCC will be three teacher leaders; Catherine Rand (WRHS), Stephanie Shepard (WRHS), and Emelia Webb (WiCC), but the process will require involvement from all members of the WRHS and WiCC community as well as District personnel. We are looking forward to using the NEASC process to identify areas of strength and areas of growth potential.

One of the standards and expectations of the NEASC accreditation is a formalized District vision of a graduate. Sometimes referred to as a portrait of a graduate, portrait of a learner, or vision of a learner, this is a holistic view of the core characteristics we expect our students throughout the district to work to achieve, and possess by the time they graduate. Some initial work in the WRHS Bear Roar process had been started and is a strong foundation to work from. This work will start and continue alongside the NEASC self-reflection process and engage stakeholders from all aspects of the community.

We would like to thank the PTO for their support of the Movement Block activities. Their equipment purchasing campaign has provided fun activities to help our students increase their physical activity. Additionally, thank you to Camden National Bank for their generous donation of $250 to support the purchase of equipment for our Movement Block.

Respectfully submitted,

Eric W. Perry, M.Ed., NRP
Principal

WINNISQUAM CAREER CENTER
437 West Main Street, Tilton, NH 03276, Phone: 603-286-7408
Principal, Andrea Wujcik

September Board Report

The Winnisquam Career Center is off to a great start. I am pleased to say that we are almost full and I feel confident that our numbers will remain consistent. We currently have 172 total students (107 year 1 and 65 year 2 students). With a maximum capacity of 178 that only leaves us 6 open spots, mostly in Business Agriculture. This is an increase of about 52 students.

On the first day the teachers and students gathered at the end of the hallway where the "stadium seating" is for a welcome talk and introductions. My main message this year focused on support, opportunity and wanting them to feel like they belong here. The students were great and couldn't wait to get to their classrooms. I continue to feel the positive energy from them as they walk through the door. I look forward to seeing all the great things they will do this year.

The teachers did a lot of Professional Development work this summer. Three out of four of them attended the 2 day Summer Learning Series put on by NH Career and Technical Association as well as Spark. They continue to be enthusiastic about this new teaching journey they are on and it showed on the first days when they created some great activities for their students. At the WiCC we start the year by prioritizing building relationships and fostering a positive culture. This builds a foundation for a safe learning environment.

On September 24th the WiCC will join forces with the HUOT to hold a regional guidance meeting. These meetings are a place to iron out kinks and help to ensure that everyone is on the same page. This is the first year we will be holding the meetings together with the HUOT with the hope to minimize the number of meetings the counselors need to attend.

As you all know this year we are up for our NEASC accreditation. Eric Perry and I worked collaboratively this summer to build teams for our committees. On September 8th our NEASC reps visited us, toured the WiCC and met with our teams and faculty. It was a great day and provided some much needed clarity on the new process. We look forward to working with Eric and the high school faculty and staff on this process.

It's going to be a great year!

Facilities School Board Update - Sept 2026

CAPITAL IMPROVEMENT PROJECTS

Facilities/Maintenance Update

Project	***Update Mar 25***	***Update Sept 25***	***Update Dec 25***	***Update March 26***	***Update Sept26***
WICC Building		99.5% Complete	99.7% complete.	99.8% complete. West end canopy/ facade, equipment ventilation remain.	Complete
Exterior Door Replacement: SCS + Southwick + WRMS	Summer install	Will run through the fall.	New vendor hired. Spring 26	Work slated to begin April vacation week.	Complete
Track & Pickleball Courts				EOY Funds to improve drainage	Waiting on State Site Inspection (Oct.?)
Track School Records Exterior Signage	Ian to evaluate				
WELC mini-split install				EOY Funds	Complete
HVAC Replacement units (SCS & Southwick & WRMS Media Center)					Summer 27
MS & HS Bathroom Countertops & Partitions					Work ongoing; to be done by Jan 1, 2027
Softball Field	Pending Spring eval of new dugout area runoff				Proposal received; work targeted for October
Sanbornton Central flat roof replacement		Spring/Summer 26	Bid documents released. Contractor meeting was held. Bids due Jan 26.	Contractor selected and under contract. Work to begin April vacation week, weather permitting.	Complete (must return to seal 1 ductwork that leaked)
Wood Fascia Repair (WA 5/SY2425)	Summer 25			Spring 26	Summer 27
Skylight Replacement				EOY Funds	Been delivered; waiting for install availability
SCS & Southwick Room Reconfiguration				EOY Funds	Complete

Southwick Media Center Refurbishment				EOY Funds	In progress; done by Jan 1, 2027
WRHS B-Wing Window Replacement				Summer 26	April vacation 27
WRHS Carpet Replacement					Complete
POTENTIAL NEW PROJECTS					
Southwick K/Grade 1 Fence Gate (EOP)				To fund through operating budget	Complete
Southwick Gym Ventilation Issue					Need staging to access vents to investigate
COMPLETED AS OF SEPT 2026					
New Scoreboards (3)	Steel install started on MS softball field. Conditions too wet. Will resume in summer.	Complete	Complete	-	
HS Science Lab Cabinetry	Summer install	Cabinetry complete, waiting on specialty countertops	Complete	-	
Weight Room Updates		90% complete. Waiting on a few pieces of equipment	95%	Complete	
Baseball Dug Outs (MS)	Fencing complete. Roof install Summer.	Roof Install Fall	Complete		
Fence for Maintenance Storage (WA 6/SY2425)	Summer 25	Complete	-		
High School 2nd Floor bathroom conversions		Complete	-		
Southwick Underground oil tank removal		Complete	-		

OFFICE OF THE DIRECTOR OF TECHNOLOGY-SAU 59
MONTHLY REPORT

To: Dr. Shannon Bartlett

From: Jason Mix

Date: 9/9/26

1. Executive Summary

The district's technology environment has become an essential component of teaching, learning, communication, and daily operations. With increasing reliance on cloud applications, 1:1 student devices, online instructional resources, and digitally managed administrative systems, the reliability and security of the technology infrastructure is directly connected to the district's ability to deliver its educational mission.
This report provides an assessment of the district's current technology environment, with particular focus on:

- Network infrastructure and connectivity. Currently creating heat maps of each school to assess proper Wi-Fi signals, checking current wiring for compliance, and assessing needs for Erate submissions.

- Student and staff devices. Currently meeting with and testing RMM/EDR and AV tools from various manufactures to become compliant with RSA 189:66.

- Identity and access management. Evoked 2 factor authentication for all staff email accounts. Completed 8/31/26.

- Data protection and backup. Evaluating several providers for an immutable backup solution to protect saved data.

- Technology management and support. Testing a device management platform that works with a robust ticketing system that will provide advanced features to support staff.

- Key risks and areas requiring investment Aligning our IT security with our cyber insurance provider and NH standards while not incurring additional cost to our department.

Office of Student Wellness: Board Report
September, 2026

Sarah Skoglund: District Coordinator of Wellness & Engagement
Kara Breault: Family & Student Support Liaison

WRSD Wellness Committee:
Meeting dates for 2026-2027 School Year

- **9/17/26** Southwick School Library/Media Center from 3:15-4:15pm
- **1/7/27** WRMS Library/Media Center from 3:15-4:15pm
- **3/25/27** Sanbornton Central School Library/Media Center from 3:15-4:15pm
- **5/20/27** WRHS Library/Media Center from 3:15-4:15pm

Mandt Training: Mandt is designed to teach staff how to recognize, prevent and safely de-escalate disruptive or potentially unsafe behaviors in the classroom. Teachers/professional staff at Southwick, Sanbornton and Winnisquam Regional Middle School participated in the Relational Skills training on September 8th. A smaller group of selected individuals will be trained in the technical skills training later this year.

School and District Committees are setting their meeting dates for the year, identifying team target areas and beginning this year's work on wellness and behavior related priorities!

Welcome to Kara Breault!
I was hired as the Family Student Support Liaison as of July 1, 2026. Prior to coming to WRSD, I worked with students and families facing barriers for nearly 30 years. I began my career in direct human services, working with adolescents experiencing homelessness and then with youth diagnosed with autism.

From there, I spent more than 20 years with Jobs for Maine's Graduates, a Maine based education nonprofit. In that time I supported foster care youth, parenting students, and middle schoolers navigating poverty and other challenges in accessing education and building toward their futures. I worked closely with community agencies, school staff, and state partners to connect people to the resources they needed.

I live in Moultonborough with my husband and am glad to be putting down roots in New Hampshire. I am excited to bring my experience to Winnisquam and to support the students and families in our community.

McKinney-Vento*:* 29 referrals have been made with 17 students (14 families) having met the criteria for the McKinney-Vento Act. 15 of these students are returning students to the Winnisquam Regional School District with two new students identified prior to the start of the school year.

McKinney-Vento "in Action": WRHS was contacted by a resident of Tilton who was taking in their niece from out-of-state. Due to the situation, the student was identified as an Unaccompanied Youth under the McKinney-Vento act. As an "Unaccompanied Youth", this student was allowed to register and begin school with no interruption. This student began school at the start of the year, with a course schedule that met her academic needs.

We look forward to our continued work in the district with staff, students, families and the community!

Respectfully submitted,
Sarah & Kara

WINNISQUAM REGIONAL SCHOOL DISTRICT
EXPENDITURE MANIFEST - FY 2027
FOR SCHOOL BOARD MEETING OF SEPTEMBER 21, 2026
JULY 1-31, 2026

DATE	DESCRIPTION	VOUCHER #		AMOUNT
7/16/2026	Accounts Payable	1004	$	14,520.00
7/16/2026	Accounts Payable	1005	$	79,292.59
7/16/2026	Accounts Payable	1006	$	416,901.14
7/16/2026	Accounts Payable	1017	$	1,200.00
		TOTAL:	$	511,913.73

DATE	DESCRIPTION	PAYPERIOD #		AMOUNT
7/10/2026	Payroll	1.0	$	236,177.84
7/10/2026	Payroll	1.1	$	6,020.00
7/22/2026	Payroll	1.2	$	2,473.23
7/24/2026	Payroll	2.0	$	272,234.13
		TOTAL:	$	516,905.20
		GRAND TOTAL:	$	1,028,818.93

Sean Goodwin, Board Chair

Ernie Roy, Vice Chair

David Honeman, Board Member

Jennifer Dunn, Board Member

Christina Flanders, Board Member

Lance Turgeon, Board Member

John Cormier, Board Member

Jennifer Tupeck, Board Member

Jasen Stock, Board Member

WINNISQUAM REGIONAL SCHOOL DISTRICT
EXPENDITURE MANIFEST - FY 2027
FOR SCHOOL BOARD MEETING OF SEPTEMBER 21, 2026
AUGUST 1-31, 2026

DATE	DESCRIPTION	VOUCHER #	AMOUNT
8/3/2026	Accounts Payable	1012	$ 33,079.14
8/3/2026	Accounts Payable	1013	$ 698,548.60
8/11/2026	Accounts Payable	1018	$ 4,132.08
8/11/2026	Accounts Payable	1019	$ 5,596.20
8/11/2026	Accounts Payable	1020	$ 192,413.73
8/27/2026	Accounts Payable	1032	$ 20,000.00
8/27/2026	Accounts Payable	1033	$ 58,558.13
8/27/2026	Accounts Payable	1034	$ 155,756.16
		TOTAL:	$ 1,168,084.04

DATE	DESCRIPTION	PAYPERIOD #	AMOUNT
8/7/2026	Payroll	3.0	$ 264,236.41
8/21/2026	Payroll	4.0	$ 778,881.33
8/25/2026	Payroll	5.1	$ 2,210.10
		TOTAL:	$ 1,045,327.84
		GRAND TOTAL:	$ 2,213,411.88

Sean Goodwin, Board Chair

Ernie Roy, Vice Chair

David Honeman, Board Member

Jennifer Dunn, Board Member

Christina Flanders, Board Member

Lance Turgeon, Board Member

John Cormier, Board Member

Jennifer Tupeck, Board Member

Jasen Stock, Board Member

WRSD Policy AC (DRAFT): Nondiscrimination, Equal Opportunity Employment, and Anti-Discrimination Plan

Category: Priority/Required by Law

~ ~
~ ~
ADOPTION/REVISION NOTES –
Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **Special -** Many districts have adopted policies other than NHSBA's policies relative to discrimination, harassment, etc., and used different policy codes than NHSBA. Districts should take extra care to cross-reference according to their own policies and policy codes.

b. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

c. **General –** Highlighted language or blank, underscored spaces _________, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

d. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

e. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: **Revised** - May 2026, Feb. 2025, Feb. 2025;July 2024; May 2024; Nov. 2019; Sept. 2018; Sept. 2008; Feb. 2005; Feb. 2004, July 1998

NHSBA revision notes: May 2026, revised to include required provision relating to consequences, and additional minor corrections and clarifications. **February 2025,** revised section I.3 to reflect changes in USDA required notice of non-discrimination (see also corresponding change to sample policy ACF**. February 10, 2025,** revised in response to nullification of 2024 Title IX regulations (described more fully in the introduction to the NHSBA 2025 Special Title IX Policy Update Summary), with additional revisions to clarify some responsibilities of districts. Revisions include: (a) removal of the specific Title IX notice formerly in Section I.4 that had been required under the now nullified 2024 Title IX regulations; and (b) added language in paragraph D(4) to reflect the Boy Scouts of America Equal Access Act, and added the Act as a reference. **July 2024,** Repealed and replaced to: (1) reflect changes to Title IX, (2) reflect passage HB1169 amending RSA 193:38 and adoption of RSA 275:37-e to include certain hairstyles as attributes of race and therefore protected from discrimination; and (3) aligning with new ACA, policy for a uniform grievance procedure. **May 2024,** (1) re-inserted section heading for Section A, the nondiscrimination statement, as heading and section reference had been inadvertently omitted when the policy was uploaded to the new sample policy site; (2) removed "of students" formerly in that same heading, as the nondiscrimination requirements apply more broadly, except as noted; (3) added USDA nondiscrimination statement; and (4) added cross-reference to new policy ACF relating to USDA civil rights requirements. **November 2019,** Sample policy AC was revised to reflect the 2019 passage of SB263, 2019 N.H. Laws Ch. 282, which among other things: (1) identifies education as a civil right protected under RSA 354-A;(2) expanded (or clarified) the list of classes protected against discrimination under state law; (3) created specific right of claimants or the state attorney General's office to bring discrimination complaints to the NH Human Rights Commission and Superior Court, and (3) requires each district to adopt a policy that sets the framework for developing a coordinated plan to prevent and address incidents of discrimination. The November 2019 revision is intended to meet the minimum requirements of SB263, while more extensive revisions to related NHSBA sample discrimination policies and procedures undergo review and revision. Additionally, incorporates the substantive provisions of former NHSBA sample policy GBA. **September 2018,** Addition of provision prohibiting discrimination in employment practices on the basis of gender identity is required by the passage of HB1319 (2018), which, among other things, amended RSA 354-A:6, and 354-A:7. **September 2014,** Addition of provision prohibiting discrimination on the basis of economic status, per RSA 186:11, XXXIII (effective July 2014). Addition of new paragraph prohibiting discrimination in employment matters against victims of domestic violence, harassment, sexual assault, or stalking, per RSA 275:71 (effective July 2014).

~ ~

A. INTRODUCTION AND GENERAL POLICY AGAINST DISCRIMINATION AND HARASSMENT

The District recognizes the right of all students and staff members to learn and work in an environment free from discrimination or harassment, and likewise, that persons participating or attempting to participate in District programs, employment or activities have the right to do so free from discrimination or harassment.

Accordingly, the District prohibits any type of unlawful harassment or discrimination based on age, race, color, religion, creed, sex, national or ethnic origin, gender identity, sexual orientation, marital status, familial status, physical or mental disability, pregnancy, genetic information, or veteran status by employees, students, members of the school community, or by vendors or visitors on school property or at school-sponsored events. No person shall be excluded from or denied the benefits of educational programs or activities on the basis of any of the above classes or economic status.

As described above, the blanket prohibition afforded under this policy, as well as other Board policies, reflects, but goes further than, some of the same protections afforded under multiple State and Federal statutes or regulations, such as, but not limited to, NH RSA 354-A, and NH RSA 193:38-39, Titles IV, VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1972, the Americans with Disabilities Act of 1990, the Age Discrimination in Employment Act of 1967, and the Pregnant Worker Fairness Act, Additionally, bullying or general harassment of students unrelated to any of the characteristics ("protected classes") identified above, is further prohibited under Board policy JICK and RSA 193-F. Statutory and regulatory statements and notices of nondiscrimination are included in Section _I_ of this policy.

The District has determined that the most effective way to limit harassing or discriminating statements or conduct that is illegal or unlawful under those statutes is to treat it as misconduct under Board policies even when such conduct or statements might not rise to the level of discrimination or harassment prohibited under federal or state law.

B. DEFINITIONS

The definitions found here apply to each Board policy unless and to the extent that such definition is contrary to specific language or context of that policy or other legal authority.

"Days" means calendar days, but excludes non-weekend days on which the SAU office is closed (e.g., holidays, office-wide vacations), or any weekday during the school year on which school is closed (e.g., snow days).

"*Discrimination*" is conferring benefits upon, refusing or denying benefits to, or providing differential treatment to a person or class of persons in violation of law based on race, color, religion, sex, national origin, ancestry, disability, age, genetic information, or any other characteristic protected by law, or based on a belief that such a characteristic exists.

A *"Grievance" or "Complaint"* is a verbal or written report or complaint of discrimination, harassment, or retaliation that objectively can be understood as a request for the District to investigate and make a determination about alleged discrimination. The required form and the specific process for making a report may vary depending on the nature of the conduct or issue. See Section D, below, for further information.

"*Harassment"* generally refers to the use of words or engaging in behaviors that annoy, threaten, intimidate, or demean a person ~~without a legitimate purpose~~. Harassment will often constitute bullying prohibited under Board policy JICK . Additionally, harassment may constitute illegal discrimination if the harassing statements or behaviors include explicit or implicit reference to age, sex, gender identity, sexual orientation, race, color, marital status, familial status, disability, religion or national origin.

"*Retaliation*" means intimidation, threats, coercion, or discrimination against any person by the District, a student, or an employee or other person authorized by the District to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by state or federal law, or District policies, procedures, regulations or rules, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, hearing, or appeal under such policies, procedures, etc.

C. **POLICY APPLICATION**

This policy is applicable to all persons employed or served by the District. It applies to all sites and activities the District supervises, controls, or where it has jurisdiction under the law, including where it (a) occurs on, or is delivered to, school property or a school-sponsored activity or event on or off school property; or (b) occurs off of school property or outside of a school-sponsored activity or event, if the conduct interferes with a student's educational opportunities or substantially disrupts the orderly operations of the school or school-sponsored activity or event, as set forth in Board policy JICK, Pupil Safety and Violence Prevention. Examples of sites and activities include all District buildings and grounds, school buses and other vehicles, field trips, and athletic competitions.

D. **REPORT, COMPLAINT, GRIEVANCE PROCEDURES AND CONSEQUENCES**

1. **Reports and complaints**

   a. Reports or complaints of sex discrimination, including sex-based harassment, or sexual violence should be made under Board policy ACAC;

   b. Reports or complaints by students of discrimination on the basis of educational disability under the IDEA should be made under Board policy ACE;

   c. Reports or complaints of bullying or other harassment of pupils should be made under Board policy JICK;

   d. Reports or complaints of discrimination, harassment, or retaliation not specified above, including, without limitation, claims relating to race, ethnicity, disability (e.g., ADA or 504), religion, access to the Boy Scouts of America or other Title 36 youth group listed in Title 36, Subtitle II, Part B of the United States Code (as a patriotic society) that is intended to serve young people under the age of 21, and not involving or relating to the District's food services (see D.1.e, below) should be made under the grievance procedure in Board policy ACA; and

   e. Reports or complaints of discrimination based upon protected classes relative to any of the District's food and nutrition services (FNS) programs (school lunches, etc.) should be made under Board policy ACF, unless the alleged discriminatory conduct relates to a class identified in Sections D.1.a or D. 1.b above.

   f. Complaints or reports regarding matters not covered in policies listed in D.1.a-e should be made to the District Human Rights Officer. ~~Any person who believes that he or she has been discriminated against, harassed, or bullied in violation of this policy by any student, employee, or other person under the supervision and control of the school system, or any third person who knows or suspects conduct that may constitute discrimination, harassment, or 2 bullying, should contact the District Human Rights Officer, or otherwise as provided in the policies referenced above under this same heading.~~

   Any employee who has witnessed, or who has reliable information that another person may have been subjected to discrimination, harassment, or bullying in violation of this policy has a duty to report such conduct to his/her immediate supervisor, the District [Human Rights Officer], or as provided in one of the policies or administrative procedures referenced above under this same heading. Additionally, employees who observe an incident of harassment, discrimination or bullying are expected to intervene to stop the conduct in situations in which they have supervisory control over the perpetrator and it is safe to do so.

2. **Grievance Procedures and Investigations**

   Grievance procedures and investigations of any complaints shall be according to the policies listed above and related administrative procedures or regulations.

3. **Consequences and Remedies**

Employees who violate this policy, including the failure to report or intervene as described in Section D.1, above, will be disciplined, up to and including employment termination.

Students who violate this policy will be disciplined in accordance with applicable policies, Codes of Conduct, or school/classroom rules and regulations. Patrons, contractors, visitors, or others who violate this policy may be prohibited from District property or otherwise restricted while on District property subject to applicable law. See also Board policy KFA. The Superintendent, Human Rights Officer, Building Principal, or designees will contact law enforcement or seek a court order to enforce this policy when necessary or when actions may constitute criminal behavior.

E. **ALTERNATIVE COMPLAINT PROCEDURES AND LEGAL REMEDIES**

At any time, whether or not an individual files a complaint or report under this policy or policy ACA, an individual may file a complaint with an external agency, such as the Office for Civil Rights ("OCR") of the United States Department of Education, the New Hampshire Commission for Human Rights, or another relevant authority. The contact information for such agencies is located in AC-R(2). Complaints to the OCR, however, must be made within 180 days of the last act of alleged discrimination, harassment or retaliation giving rise to the complaint or from the date the Complainant could reasonably become aware of such occurrence.

Notwithstanding any other remedy, any person may contact the police or pursue criminal prosecution under state or federal criminal law.

F. **RETALIATION PROHIBITED**

No reprisals or retaliation of any kind will be taken by the Board or by any District employee against the complainant or other individual on account of his or her filing a complaint or report or making statements in the course of an investigation or grievance procedure. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of an investigation, a disciplinary proceeding, or grievance proceeding does not constitute retaliation, provided, however, that a finding explicitly or implicitly negating a statement, alone, is not sufficient alone to conclude that the person made a materially false statement in bad faith.

G. **HUMAN RIGHTS OFFICER, TITLE IX AND 504/ADA COORDINATORS**

The Superintendent shall assure that District and or building personnel are assigned to the positions listed below. Each year, and more often when personnel change, the Superintendent shall prepare and disseminate as a supplement to this policy AC-R(2) an updated list of the person or persons acting in those positions, along with their District contact information, including telephone number, email, and postal and physical addresses:

Human Rights [or Nondiscrimination] Officer __________________ [check district policies for title]

Title IX Coordinator [[i][delete endnote]]

504/ADA Coordinator [[ii][delete endnote]]

The Appendix will also include current contact information for relevant state and federal agencies including:

U.S. Department of Education, Office of Civil Rights
U.S. Department of Agriculture, Office of Civil Rights
N.H. Human Rights Commission
N.H. Department of Justice, Civil Rights Unit
N.H. Department of Education, Commissioner of Education

H. **DISTRICT ANTI-DISCRIMINATION PLAN**

No later than October 15, 2020, the Superintendent shall develop and provide to the Board for approval, a coordinated written District Anti-Discrimination Plan (the "Plan") to include guidelines, protocols, and procedures intended to prevent, assess the presence of, intervene in, and respond to incidents of discrimination.

Among other things, the Plan should include provisions and recommendations with respect to resources, policies, complaint procedures, student education programs, Plan dissemination, and training appropriate to carrying out the Plan objectives stated in the preceding paragraph.

In developing the Plan, the Superintendent is encouraged to seek input from appropriate groups of the school and local community and coordinate with the District's Human Rights Officer and Title IX and 504 Coordinators.

No less than once every two years (off years from review of the District's Suicide Prevention Plan per Policy JLDBB), the Superintendent shall update the District Anti-Discrimination Plan, and present the same to the Board for review. Such Plan updates should be submitted to the Board in time for appropriate budget consideration.

I. STATUTORY AND REGULATORY NONDISCRIMINATION STATEMENTS AND NOTICES

1. **Comprehensive Prohibition Against Discrimination in Educational Programs and Activities.**
   Under State or Federal law and Board policy, no person shall be excluded from, denied the benefits of, or subjected to discrimination in the District's public schools because of their age, sex, gender identity, sexual orientation, race, color, marital status, familial status, disability, religion or national origin. As used in this section, "race" means immutable traits associated with race, including hair texture and protective hairstyles~~. and~~ ~~"~~Protective hairstyles" means hairstyles or hair type, including braids, locs, tight coils or curls, cornrows, Bantu knots, Afros, twists, and headwraps. Discrimination, including harassment, against any person in the District's education programs, on the basis of any of the above classes, or a person's creed, is prohibited.

   Finally, there shall be no denial to any person of the benefits of educational programs or activities, on the basis of any of the above classes, or economic status.

   Harassment of students other than on the basis of any of the classes or categories listed above is prohibited under Board policy JICK Pupil Safety and Violence Prevention.

2. **Equal Opportunity of Employment and Prohibition Against Discrimination in Employment.**
   The School District is an Equal Opportunity Employer. The District ensures equal employment opportunities without regard to age, color, creed, disability, gender identity, marital status, national origin, pregnancy, race, religion, sex, or sexual orientation. The District will employ individuals who meet the physical and mental requirements, and who have the education, training, and experience established as necessary for the performance of the job as specified in the pertinent job description(s).

   Discrimination against and harassment of school employees because of age, sex, race, creed, religion, color, marital status, familial status, physical or mental disability, genetic information, national origin, ancestry, sexual orientation, or gender identity is prohibited. Additionally, the District will not discriminate against any employee who is a victim of domestic violence, harassment, sexual assault, or stalking.

3. **USDA Nondiscrimination Statement (copied from Policy ACF).**
   In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

   Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

   To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: USDA Form AD-3027 (linked tested 2024/5/9), from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

a. **Mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights 1400
Independence Avenue, SW
Washington, D.C. 20250-9410;

b. **Fax:**
(833) 256-1665 or (202) 690-7442; or

c. **Email:**
Program.Intake@usda.gov

J. **COLLABORATION WITH OUTSIDE AGENCIES**

Information may be disclosed if necessary to further the investigation, appeal or resolution of a grievance, or if necessary to carry out interim or disciplinary measures. The District will disclose information to the District's attorney, law enforcement, and others when necessary to enforce this policy or when required by law. In implementing this policy, the District will comply with state and federal laws regarding the confidentiality of student and employee records. Information regarding any resulting employee or student disciplinary action will be maintained and released in the same manner as any other disciplinary record. The District will keep any documentation created in investigating the complaint including, but not limited to, documentation considered when making any conclusions, in accordance with Board policy, state and federal laws, and as advised by the District's attorney.

K. **ADDITIONAL REPORTING REQUIREMENTS**

Reports under this Policy are in addition to and do not replace other reporting requirements mandated by law or other policies - see, e.g., Educator Code of Conduct (see Board policy GBEAB), abuse or neglect of children (see RSA 169-C:29 and policy JLF), acts of “theft, destruction, or violence” (see RSA 193-D:4, I (a) and Ed 317.06), incidents of “bullying” (see RSA 193-F and policy JICK), and hazing (see RSA 671:7).

L. **ADMINISTRATIVE PROCEDURES, REGULATIONS AND TRAINING PROGRAMS**

The Superintendent shall develop such other procedures and regulations, and shall ensure that training programs are provided as are necessary and appropriate to implement this policy as well as the other policies referenced above.

M. **NOTICE OF COMPLIANCE**

The Superintendent will provide notice of the nondiscrimination statements and notices, the Anti-Discrimination Plan, to all applicants for employment, employees, students, parents, and other interested persons as required by statute, policy or regulation, or as the Superintendent may otherwise deem appropriate.

---

[i][Delete endnote] The specific title "Title IX Coordinator" is required by federal regulations.

[ii][Delete endnote] The specific titles of "504 Coordinator" and "ADA Coordinator" are required by federal rules/guidelines. One person can serve as Coordinator for both and have the title "504/ADA Coordinator" shown here, or different people can serve in each role.

District Policy History:
Approved by the WRSB: September 15, 2025
Approved by the WRSB: May 19, 2025
Emergency Approval by WRSB: August 9, 2024
Approved by the WRSB: February 17, 2020
Revised: November 2019

Approved by the WRSB: February 18, 2019
Revised September 2018
Revised and Approved by the WRSB: September 18, 2017
Approved by the WRSB: November 17, 2014
Revised: September 2014
Revised: July 1998, February 2004, February 2005, September 2008

WRSD Policy ACA (DRAFT): Discrimination and Harassment Grievance Procedure

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –
Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

a. **General –** Highlighted language or blank, underscored spaces ____, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

b. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

c. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised — May 2026, Feb. 2025. **New policy**, July 2024.

NHSBA notes: May 2026 - revisions include (1) changes to better align Level III procedures with Ed 204.01, (2) clarifying employee/volunteer reporting requirements, (c) corrections to formatting errors that occurred in the earlier uploading process. **February 2025 -** Revised (a) to better align with other discrimination policies/procedures; (b) added language describing the grounds for appeal that a party may assert in a Level III appeal; and (c) added a definition of "complaint" and moved the information about how to file complaints from the Level III appeal section to the definition of "Complaint." **July 26, 2024**, New sample policy to provide a uniform grievance procedure for discrimination and harassment issues for which no other procedures is required; the grievance procedure also includes "appeal" steps that align with sample ACAC and Title IX's allowance for an appeal process that is "comparable" to other discrimination processes.

~ ~

A. **Purpose.**
As described in Board policy AC and other policies referenced there, the District is committed to maintaining a workplace and educational environment that is free from discrimination, harassment, and retaliation* in admission or access to, or treatment or employment in, its programs, services, activities, and facilities.

> ***NOTE:** Definitions for these terms can be found in policy AC.

This policy provides a grievance process for any complaints of illegal discrimination, harassment, or retaliation that are not addressed by other Board policies. For example, while race-based or ethnicity-based harassment or discrimination could be addressed through the grievance process in this policy, sex discrimination or sex-based harassment must be addressed under policy ACAC.

> **See policy AC for policies for those types of discrimination, harassment, or retaliation for which grievance and complaint procedures are set forth in a separate policy.**

The District does not assume responsibility or liability for actions that are unrelated to the District's programs or activities. However, the District may investigate any behavior that occurs on or off District property to the extent that such an investigation is necessary for the District to meet its legal obligations to address discrimination, harassment, and retaliation that negatively impact the education or work environment in the District. The District can address such behavior only when and to the extent that the District has the legal authority to do so.

B. **Reports and Complaints of Discrimination or Harassment.**

Under this policy, a **report** is nothing more than providing information to the District regarding conduct or statements that might constitute discrimination, harassment, or retaliation ("Discriminatory Conduct") as described below. A **grievance** or **complaint** (referred to in this policy as a "**Complaint**") is a verbal or written report or complaint of Discriminatory Conduct that objectively can be understood as a request for the District to investigate and make a determination about alleged Discriminatory Conduct. A Complaint is required to initiate the formal Grievance Process as described below.

C. **Reports – Informal Process.**

Contact information for the District's Human Rights Officer, Title IX Coordinator, and 504/ADA Coordinator can be found in AC-R(2). [See and delete endnote]

Upon receiving a report, the Human Rights Officer may determine that the incident has been appropriately addressed or may recommend additional action.

1. Reports of prohibited or illegal Discriminatory Conduct should be made to the District Human Rights Officer under this policy unless:

    a. The report is about the Human Rights Officer, Title IX Coordinator, or 504/ADA Coordinator, in which case the report may be made directly to the Superintendent or Superintendent's designee, who shall then appoint an alternate to act in place of the disqualified officer.

    b. The report concerns potential **sex discrimination, sex-based harassment, or retaliation**, in which case the report should be made to the **District [or building {if applicable}] Title IX Coordinator** under policy ***ACAC.***

    c. The report concerns potential discrimination, harassment, or retaliation related to a real or perceived **disability**, in which case the report should be made to the **District's 504/ADA Coordinator** under this policy.

    d. The report concerns **harassment that does not involve a protected class** (included in AC), in which case the report shall be made to the **Building Principal** under policy **JICK**.

2. Any person who believes they have been subjected to prohibited or illegal Discriminatory Conduct may report the alleged acts to the District [or building {if applicable}] Human Rights Officer in accordance with this policy.

    If a student is more comfortable reporting to a person other than the Human Rights Officer (e.g., guidance counselor, teacher, Principal), the student may tell any school district employee or volunteer. The employee or volunteer shall then make a report as discussed above and below in this Section C.

3. Any person who witnesses or receives a report of behavior they believe to be Discriminatory Conduct should report the alleged acts immediately to the District [or building {if applicable}]. [Delete endnote]
    If a student is more comfortable reporting to a person other than the Human Rights Officer (e.g., guidance counselor, teacher, Principal), the student may tell any school district employee or volunteer. The employee or volunteer shall then make a report per the following paragraph.

    District employees and volunteers are required to report any bullying, harassment or other discriminatory conduct as soon as possible, but not later than the end of the school day, or, if occurring after the end of the school day, then no later than the end of the next business day. The employee/volunteer reporting requirement does not apply if (i) the employee or volunteer is the subject of the bullying, harassment or other discriminatory conduct, AND (ii) no student witnessed or was otherwise impacted by the conduct.

D. **Definitions.**

For the purposes of this policy and only this policy, terms are defined as follows.

"Complaint" means a document filed by a complainant, alleging discrimination or harassment against a respondent or the District, and requesting that the District investigate the allegation of harassment or discrimination. ("Complaint" is to be distinguished from a "Report" as defined below.)

- Complaints involving sex discrimination, sexual harassment (whether under Title IX or other), or retaliation must be referred to the Title IX Coordinator. See policy ACAC for the Title IX Grievance Procedure.
- Complaints involving discrimination, harassment, or retaliation relative to a real or perceived disability must be referred to the 504/ADA Coordinator. Such complaints will

be addressed in accordance with this policy and "Human Rights Officer" below shall refer to the 504/ADA Coordinator.

- Complaints of harassment that do not involve protected classes as identified in policy AC should be processed under policy JICK, the District's anti-bullying policy and procedures.

- All other Complaints will be managed by the Human Rights Officer.

"Complainant" is the person making a complaint. The Complainant may or may not be the Victim. If the Complainant is under 18 years of age, the Complainant's parent(s) or legal guardian(s) shall also receive any communication regarding the Complaint or Grievance Process to which the Complainant is entitled. **"Discriminatory Conduct"** refers to discrimination, harassment, or retaliation.

"Grievance Process" is the formal investigation and determination of whether prohibited or illegal discrimination, harassment, or retaliation occurred, and may include appeals.

"Human Rights Officer" is the person assigned to that role in the District; contact information for this person can be found in policy AC-R(2). If the Human Rights Officer designates another person to act as the Human Rights Officer, "Human Rights Officer" shall refer to that designee. Similarly, if the Human Rights Officer directs a Complaint to the 504/ADA Coordinator, "Human Rights Officer" as used in this policy refers to the 504/ADA Coordinator. If the report or Complaint of alleged discrimination, harassment, or retaliation involves the Human Rights Officer, "Human Rights Officer" shall refer to a person assigned by the Superintendent or the Superintendent's designee to handle the report or Complaint.

"Report" is information provided to the District regarding conduct or statements that might constitute discrimination, harassment, or retaliation. A report does NOT prompt the Grievance Process; only a Complaint initiates the formal Grievance Process.

"Respondent" is the person who allegedly engaged in the prohibited or illegal discrimination, harassment, or retaliation. If a District policy, procedure, rule, custom, or practice is the subject of a report or Complaint and not a specific person, the District is considered the Respondent. If a Respondent is under 18 years of age, the Respondent's parent(s) or legal guardian(s) shall also receive any communication regarding the Complaint or Grievance Process to which the Respondent is entitled.

"Victim" is the person who was allegedly subjected to the prohibited or illegal discrimination, harassment, or retaliation. The Victim may or may not be the Complainant. If a Victim is under 18 years of age, the Victim's parent(s) or legal guardian(s) shall also receive any communication regarding the Complaint or Grievance Process to which the Victim is entitled.

"Witness" is a person who may have information regarding the alleged discrimination, harassment, or retaliation.

E. **Complaints and Initiation of the Formal Grievance Process.**

A person begins the formal grievance process by making a Complaint with the Human Rights Officer. If the Complaint is against the Human Rights Officer, the Title IX Coordinator, or the 504/ADA Coordinator, or if some other conflict of interest exists, the Complaint may be made to the Superintendent or Superintendent's designee, who shall then appoint an alternate to act in place of the disqualified officer. For Complaints against the Human Rights Officer, the appointed alternate shall be deemed the "Human Rights Officer" for purposes of all the duties and powers of the Human Rights Officer as described below.

[The District's Complaint form can be ~~found here {insert website link to form} or~~ obtained from the {Human Rights Officer}.] Written Complaints are strongly encouraged, as a written record provides certainty regarding the nature of the Complaint. If an oral Complaint is made, the Human Rights Officer will offer to assist in the preparation of a written Complaint or, if assistance is refused, to create a recording of the oral Complaint. If both assistance and recording are refused by the Complainant, the District will investigate the expressed oral Complaint but, again, notes that an undocumented or unrecorded Complaint may result in uncertainty regarding the nature of the Complaint.

The submission of a Complaint initiates Level 1 of the Grievance Process as described below. Upon receiving the Complaint, the Human Rights Officer will review the Complaint to determine whether it concerns allegations more appropriately addressed under a different procedure in accordance with policy AC.

Complaints should be made as soon as possible. Complainants are advised that complaints to the Office for Civil Rights of the United States Department of Education ("OCR") must be made within 180 days of the last act of alleged discrimination, harassment, or retaliation giving rise to the complaint or from the date the Complainant could reasonably have become aware of such occurrence.

If the person making the Complaint (the "Complainant") or the person alleged to have committed the discriminatory conduct (the "Respondent") is under 18 years of age, the Human Rights Officer shall notify their parent(s)/guardian(s) of the Complaint.

In determining whether the alleged actions constitute prohibited or illegal Discriminatory Conduct, the District will consider the surrounding circumstances, the nature of the behavior, the relationships between the parties involved, past incidents, the context in which the alleged incidents occurred, and all other relevant information. If, after investigation, school officials determine that it is more likely than not (the preponderance of the evidence standard) that Discriminatory Conduct or other prohibited behavior has occurred, the District will take prompt and effective corrective action in accordance with law and Board policy.

Level I – Investigation and Initial Determination:

The Human Rights Officer will initiate an impartial investigation within five days of receiving the Complaint. The Human Rights Officer may appoint another qualified person (e.g. Building Principal, etc.) to undertake the investigation. The Human Rights Officer or the appointed designee shall be known as the Investigator. The Investigator shall coordinate with the Superintendent with respect to assignment of persons or resources to fulfill the District's obligations, both general and case specific, relative to this policy (e.g., supplemental investigators, specialists); this may involve the retention of third-party personnel or additional expenditure of resources.

The Investigator shall conduct a prompt, impartial, adequate, reliable, and thorough investigation, including the opportunity for the Complainant and other parties involved to identify witnesses and provide information and other evidence. The Investigator will evaluate all relevant information and documentation relating to the Complaint.

Within 30 working days of receiving the Complaint, the Investigator will complete a written report that summarizes the investigation and makes determinations as to whether the facts indicate a violation of this policy based on the appropriate legal standard. If someone other than the Human Rights Officer serves as Investigator, the Human Rights Officer will receive the report and either adopt the report as submitted or modify and complete the report upon further investigation and/or review of applicable policy and law. If the determination is that prohibited or illegal Discriminatory Conduct occurred, the Human Rights Officer will recommend corrective action to the Superintendent to address the discrimination, harassment, or retaliation; prevent recurrence; and remedy its effects.

The Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), and the Respondent(s) will be notified of the determination in writing, within five working days of the completion of the investigatory report.

An extension of the investigation and any other deadlines/periods identified in this Section may be warranted if extenuating circumstances exist as determined by the Investigator. The Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), and the Respondent(s) will be notified when deadlines are extended.

Level II – Appeal:

Within five working days after receiving the Level I decision, the Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), or any Respondent may appeal the Investigator's decision to the Superintendent by notifying the Superintendent in writing. The Superintendent shall impartially review the matter or may designate another qualified person to conduct a prompt and impartial review.

Within ten working days, the Superintendent or designee will complete a written decision on the appeal, stating whether a violation of District policy is found and, if so, stating what corrective actions will be implemented, or, the Superintendent/designee may determine to remand the matter to the Investigator for further investigation or consideration. If someone other than the Superintendent conducts the appeal, the Superintendent will review and sign the report before it is given to the person appealing. A copy of the appeal and decision will be given to the Level I Investigator. The Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), and any Respondent will be notified in writing, within five working days of the Superintendent's decision, regarding whether the Superintendent or designee upheld, overturned, or modified the Level I decision.

Level III – Appeal:

Within five working days after receiving the Level II decision, the Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), or any Respondent may appeal the Superintendent's decision by notifying the Superintendent and School Board Chair in writing.

Level III appeals may only be based upon one or more of the following grounds, which must be stated specifically in the party's written appeal:

1. Procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
3. ~~[Additional bases may be added by a district if made available equally to both parties];~~ OR
4. The Investigator, or Superintendent/designee had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Appeals for any other reason not included in the written appeal will not be heard.

Appeals that pertain only to disciplinary sanctions may be made pursuant to the District's ordinary review process for discipline, or, to the extent applicable, any statutory or other processes provided under collective bargaining agreements or individual contracts.

Upon receiving a written appeal, the School Board Chair will promptly confer with the School Board's attorney for guidance as to whether assigning the appeal to an outside hearing officer is in the best interests of the District. This conference may occur with the Board in the context of a consultation with counsel under 91-A:2, II (b).

The Level III appeal, and the written decision will be conducted consistent with the procedures established under Ed 204.01, and such other procedures as may be agreed upon by the parties. Without impairing or limiting those provisions, the Complainant(s), the victim(s) (if someone other than the victim(s) filed the Complaint), and each Respondent will be allowed to address or otherwise submit information to the Board/hearing officer, and the Board/hearing officer may call for the presence of other persons the Board/hearing officer deems necessary. Within 30 calendar days of the conclusion of the hearing, the Board/hearing officer will issue a written decision to the interested parties (subject to such confidentiality as is consisting with applicable law). The decision will include all information required under Ed 204.01 (c)-(e).

An aggrieved party has the right to appeal the final decision of the local School Board to the State Board within thirty (30) calendar days of receipt of the written decision of the local School Board in accordance with RSA 541-A and State of Ed. 204.01(g). Absent such an appeal, the Level III decision is final.

F. **Confidentiality.**

Information contained in reports or Complaints, or the records relating to a formal grievance process, including, e.g., the identities of the Complainant(s), victim(s), Respondent(s), or witness(es), will only be disclosed as reasonably necessary in connection with the investigation or as required by law or policy. The District will make reports to appropriate authorities as necessary or as required by law.

G. **District Actions in Absence of Formal Complaint.**

Even if the person who is the subject of the alleged discriminatory conduct does not file a Complaint under this policy, if the District otherwise learns about possible discrimination, harassment, or retaliation, including violence, the Human Rights Officer will conduct a prompt, impartial, adequate, reliable, and thorough investigation to determine whether conduct in violation of law, District policy, or District [~~expectations~~, Code of Conduct] occurred, and will consult with the Building Principal and/or Superintendent regarding recommended supportive measures, remedies, and/or disciplinary consequences as deemed necessary or appropriate.

H. **Interim and/or Supportive Measures.**

When a report or Complaint is made or the District otherwise learns of potential discrimination, harassment, or retaliation, the District will take immediate action to protect the alleged victim(s), including implementing interim and/or supportive measures. Such measures may be provided on a temporary, long-term, or permanent basis and include, but are not limited to, altering a class seating arrangement, providing additional supervision, or suspending an employee pending an investigation. The District will also take immediate steps to prevent retaliation against the alleged victim(s) and/or Complainant(s), any person associated with the alleged victim(s) and/or Complainant(s), or any witness(es) or participant(s) in the investigation. These steps may include, but are not limited to, notifying students, employees and others that they are protected from retaliation, ensuring that they know how to make reports or Complaints, and initiating follow-up contact with the alleged victim(s) and/or Complainant(s) to determine if any additional acts of discrimination, harassment, or retaliation have occurred.

I. **Consequences and Remedies.**

If the District determines that prohibited or illegal Discriminatory Conduct has occurred, the District will take prompt, effective and appropriate action to address the behavior, prevent its recurrence, and remedy its effects.

Employees who violate this policy will be disciplined, up to and including employment termination. Students who violate this policy will be disciplined in accordance with applicable policies, Codes of Conduct, or school/classroom rules and regulations. Patrons, contractors, visitors, or others who violate this policy may be prohibited from District property or otherwise restricted while on District property. The Superintendent, Human Rights Officer, Building Principal, or designees will contact law enforcement or seek a court order to enforce this policy when necessary or when actions may constitute criminal behavior.

J. **Training.**

The District will provide training to employees on identifying and reporting acts that may constitute discrimination, harassment, or retaliation. The District will instruct employees to make all reports to proper personnel, specifically the Building Principal. The Building Principal will refer reports of illegal discrimination, harassment, or retaliation to the proper personnel, as found in policies AC and AC-R(2). The District will inform employees of the consequences of violating this policy and the remedies the District may use to rectify policy violations. All employees will have access to the District's current policies, required notices, and complaint forms. The District will provide training to any person responsible for investigating potential discrimination, harassment, or retaliation.

The District will provide information to parents/guardians and students regarding this policy and will provide age-appropriate instruction to students.

[Delete endnote] The Human Rights Officer may serve multiple roles in the District and in small districts, may even be the Superintendent or Principal. The specific titles of "504 Coordinator" and "ADA Coordinator" are required by federal rules/guidelines but the title of Human Rights Officer may vary by district. One person can serve as both 504 Coordinator and ADA Coordinator and have the title "504/ADA Coordinator" shown here, or different people can serve in multiple roles.

District Policy History:
Approved by the WRSB: May 19,2025
Emergency Adoption by the WRSB on August 19, 2024

WRSD Policy DAF (DRAFT): Administration of Federal Grant Funds

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –

Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. *{**} indicates reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.*

b. This sample policy DAF, includes several sub-policies (see page 3, below), and is intended to establish the local board's expectations and standards for financial management and other internal controls relative to Federal grant awards as required under the UGG. **This policy is not sufficient, alone, to serve as the written controls required by the UGG**. The policy **must be supplemented with written procedures** that should be developed under the supervision of the Superintendent and business office. The specific procedures will require tailoring according to the administrative structure, technological capacity and other circumstances or preferences of each district. Written procedures which are required under the policy and the UGG are indicated in the policy, and may be identified searching for the phrase "administrative procedures". **NHED, Bureau of Federal Compliance**, has released several "Fact Sheets" relative to the UGG which include, among other things, a description of some of the specific procedures administrators will need to create and implement:

https://www.education.nh.gov/who-we-are/division-educator-and-analytic-resources/bureau-of-financial-compliance/Federal-funds-fact-sheets

An example of the type of procedures (as opposed to policy) required by the UGG may be found in the NHED the sample set of procedures for food service procurement. Note, however, that many of the provisions stated as required in the DOE Fact Sheets, and the food service procedures, are incorporated into sample policy DAF.

d. *General – As will all sample policies, NHSBA recommends that each district carefully review this sample DAF prior to adoption to assure suitability with the district's own specific circumstances, organizational structures, etc.. Highlighted language in this sample indicates areas which Boards must change/complete to reflect local personnel titles, policy references, duty assignments etc.* ***This text box, and all highlights within the policy should be removed prior to adoption.***

e. *A sampling review of the policy manuals of various school districts, reveals that many districts have adopted some UGG policies or components of policies required by the Federal Uniform Grant Guidance (2 CFR 200). In order to avoid redundancy, we recommend that prior to adoption of this sample, Districts review their own policy manuals for related policies, and make such changes as are appropriate.*

f. *Other current existing policies implicated by this sample DAF should be reviewed to help assure continuity of practices within the District. Most significantly:*

- *Modify DJ to identify who has authority to approve purchase orders;*
- *Modify DJB to outline approved process for purchase order procedures. The policy may instruct the Superintendent to approve and implement written procedures which more specifically spell out the process.*

g. *The UGG and this policy apply specifically to Federal grant funds - whether or not received directly, through NHED or through any other pass-through entity, and irrespective of whether the Federal moneys are the sole funds used for the particular purpose, program, purchase, etc. Because many of the elements required under the UGG are significantly more restrictive or burdensome then those which may exist under state law, the component "sub-policies" (see* *page 3 of this packet, page 1 of the policy) are framed to pertain to Federal Fund use only. Boards may choose to extend some of the requirements found in this policy more generally. For instance, the Travel section (DAF-6), or Conflict of Interest (DAF-4), could be extended to district programs which do not rely on Federal grant funds. In those instances, we recommend revising current policies to simply refer to the appropriate section(s) of this policy. E.g., the last two sentences of NHSBA sample policy DKC would be replaced with "Travel reimbursement shall be subject to the same restrictions, procedures and controls as set forth in Board Policy DAF-7 regarding travel relating to Federal grant funds."*

h. *Because this sample implicates subject matter found in several other NHSBA samples (see related policies section in the headers of pages 1 and 3), districts should review their own companion policies and consider whether to include the following notation:*

All purchases of property and services made using Federal funds are conducted in accordance with all applicable Federal and State laws and regulations, the Uniform Grant Guidance, and the District's written policies and procedures. See Board Policy DAF.

Direct any inquiries to either NHSBA's Director of Policy Services or local district counsel.

NHSBA history: Revised – May 2026, Oct. 2024 — minor correction only, Sept. 2024, Sept. 2021, July 2019; **New policy** – April 2019

NHSBA notes: May 2026, revisions included (1) a new section DAF-4.H.8 relative to Davis-Bacon requirements for construction projects over $2,000 funded in whole or in part from Federal grants; (2) expanded provisions in DAF-6.D relative to disposition of equipment and supplies purchases in whole or part with Federal grant funds; (3) added new section DAF-6.E relative to property lost, stolen or damaged; (4) removal and revision of the primary audit section from DAF-9 to DAF-10, with removal of redundant and clarification of audit language in DAF-11; (5) increase in the procurement thresholds for micro-purchases and simplified acquisitions found in DAF-4.C.2 & .3 and DAF-4.E as permitted (but not required) by the semi-decennial adjustments in the Federal Acquisition Regulation; (6) expansion of the Huawei ban prohibited entities in DAF-4.H.7; (7) removal of the separate CFR definition references for "subrecipient" and "contractor" as all are now in one section (2 CFR 200.01); (8) changed internal references to NHED from NHDOE; and (9) other minor corrections or formatting changes. **October 2024 - Minor Correction Only** — In the September 30, 2025 update, the cost threshold for the definition of equipment was increased from $5,000 to $10,000 to reflect amendment to 2 CFR 200.01's definition of equipment. Unfortunately, when adopting the changes for the September 30 version, the 5,000 was not deleted. Accordingly, the only change on 10/18/24 was to remove the 5,000 in DAF-6.A such that the remaining number is $10,000. **September 30, 2024,** revisions included addition of DAF-12 relative to mandatory reporting on real property in which the Federal Government has an interest; addition of DAF-13, relative to Federal Whistleblower protections; DAF-3.D additions relative to veteran owned, and disabled service member owned businesses as "labor surplus firms"; replacing term "non-Federal entity" with "recipient or sub-recipient" throughout (per change in UGG); expansion of D-5 relative to conflicts of interest and revision of language regarding mandatory disclosures in DAF-5; increase of the threshold for equipment from $5,000 to $10,000; addition and revisions to DAF-9.B relative to individual employee timekeeping for Time and Effort reporting; Creation of new DAF-9.C relative to audit requirements; other minor changes; and, finally, removal of the page references in the "table of contents" at the beginning of the policy due to the Simbli platform re-formatting. **September 2021,** NHSBA revised DAF to reflect amendments to the Uniform Grant Guidance (generally 2 CFR 200), primarily regarding pre-award costs (DAF-1.F), micro-purchase limits (DAF-3.C), addition of "domestic preference" and Huawei ban (DAF-3.H), grant closeout provisions (DAF-10), and minor text and grammar corrections; **July 2019**, NHSBA revised DAF to include DAF-11, regarding sub-recipient monitoring, and modified DAF-4 to include reference to "buy American" requirements; **April 2019**, policy created to reflect requirements of Title 2 CFR Part 200, commonly known as the Uniform Grant Guidance.

~ ~

TABLE OF CONTENTS

This Policy includes "sub-policies" relating to specific provisions of the Uniform Administrative Requirements for Federal Awards issued by the U.S. Office of Budget and Management. Those requirements, which are commonly known as Uniform Grant Guidance ("UGG"), are found in Title 2 of the Code of Federal Regulations ("CFR") part 200. The sub-policies include:

NOTICE: Notwithstanding any other policy of the District, all funds awarded directly or indirectly through any Federal grant or subsidy programs shall be administered in accordance with this Policy, and any administrative procedures adopted implementing this Policy.

The Board accepts Federal funds, which are available, provided that there is a specific need for them and that the required matching funds are available. The Board intends to administer Federal grant awards efficiently, effectively and in compliance with all requirements imposed by law, the awarding agency and the New Hampshire Department of Education (NHED) or other applicable pass-through entity.

This policy establishes the minimum standards regarding internal controls and grant management to be used by the District in the administration of any funds received by the District through Federal grant programs as required by applicable NH and Federal laws or regulations, including, without limitation, the UGG.

The Board directs the *[….Superintendent, Business Administrator____~~other – for instance, a District may designate a "Federal Funds Coordinator"]~~* to develop, monitor, and enforce effective administrative procedures and other internal controls over Federal awards as necessary in order to provide reasonable assurances that the District is managing the awards in compliance with all requirements for Federal grants and awards. Systems and controls must meet all requirements of Federal and/or state law and regulation and shall be based on best practices.

The Superintendent is directed to assure that all individuals responsible for the administration of a Federal grant or award shall be provided sufficient training to carry out their duties in accordance with all applicable requirements for the Federal grant or award and this policy.
To the extent not covered by this Policy, the administrative procedures and internal controls must provide for:

1. identification of all Federal funds received and expended and their program source;
2. accurate, current, and complete disclosure of financial data in accordance with Federal requirements;
3. records sufficient to track the receipt and use of funds;
4. effective control and accountability over assets to assure they are used only for authorized purposes and
5. comparison of expenditures against budget

As the content of this policy reflects and is primarily comprised of content required under state and Federal laws, regulations and guidance, this policy may be amended or revised at the first meeting the change(s) is/are considered by the Board without the normal requirement of two readings as provided in Board policy BGAA.

DAF-1 ALLOWABILITY

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with all applicable Federal, State and local laws, the associated agreements/assurances, program objectives and the specific terms and conditions of the grant award.

A. **Cost Principles:** Except whether otherwise authorized by statute, costs shall meet the following general criteria in order to be allowable under Federal awards:

1. Be "necessary" and "reasonable" for proper and efficient performance and administration of the Federal award and be allocable thereto under these principles.

   a. To determine whether a cost is "reasonable", consideration shall be given to:

      i. whether a cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the Federal award;

      ii. the restraints or requirements imposed by such factors as sound business practices, arm's length bargaining, Federal, State, local, tribal and other laws and regulations;

      iii. market prices for comparable goods or services for the geographic area;

      iv. whether the individuals concerned acted with prudence in the circumstances considering their responsibilities; and

      v. whether the cost represents any significant deviation from the established practices or Board policy which may increase the expense. While Federal regulations do not provide specific descriptions of what satisfied the "necessary" element beyond its inclusion in the reasonableness analysis above, whether a cost is necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the District can demonstrate that the cost addresses an existing need and can prove it.

   b. When determining whether a cost is "necessary", consideration may be given to whether:

      i. the cost is needed for the proper and efficient performance of the grant program;

      ii. the cost is identified in the approved budget or application;

      iii. there is an educational benefit associated with the cost;

      iv. the cost aligns with identified needs based on results and findings from a needs assessment; and/or

      v. the cost addresses program goals and objectives and is based on program data.

   c. A cost is allocable to the Federal award if the goods or services involved are chargeable or assignable to the Federal award in accordance with the relative benefit received.

2. Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the Federal award.

3. Be consistent with policies and procedures that apply uniformly to both Federally-financed

and other activities of the District.

4. Be afforded consistent treatment. A cost cannot be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.

5. Be determined in accordance with generally accepted accounting principles.

6. Be representative of actual cost, net of all applicable credits or offsets.

   The term “applicable credits” refers to those receipts or reductions of expenditures that operate to offset or reduce expense items allocable to the Federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to/or received by the State relate to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate.

7. Be not included as a match or cost-share, unless the specific Federal program authorizes Federal costs to be treated as such.

8. Be adequately documented:
   a. in the case of personal services, the Superintendent shall implement a system for District personnel to account for time and efforts expended on grant funded programs to assure that only permissible personnel expenses are allocated;

   b. in the case of other costs, all receipts and other invoice materials shall be retained, along with any documentation identifying the need and purpose for such expenditure if not otherwise clear.

B. **Selected Items of Cost:** The District shall follow the rules for selected items of cost at 2 CFR Part 200, Subpart E when charging these specific expenditures to a Federal grant. When applicable, District staff shall check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District and program-specific rules, including the terms and conditions of the award, may deem a cost as unallowable and District personnel shall follow those rules as well.

C. **Cost Compliance:** The Superintendent shall require that grant program funds are expended and are accounted for consistent with the requirements of the specific program and as identified in the grant application. Compliance monitoring includes accounting for direct or indirect costs and reporting them as permitted or required by each grant.

D. **Determining Whether A Cost is Direct or Indirect:**
   1. “Direct costs” are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

      These costs may include: salaries and fringe benefits of employees working directly on a grant-funded project; purchased services contracted for performance under the grant; travel of employees working directly on a grant-funded project; materials, supplies, and equipment purchased for use on a specific grant; and infrastructure costs directly attributable to the program (such as long distance telephone calls specific to the program, etc.).

   2. “Indirect costs” are those that have been incurred for a common or joint purpose benefiting more than one (1) cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

      These costs may include: general data processing, human resources, utility costs, maintenance, accounting, etc.

Federal education programs with supplement not supplant provisions must use a restricted indirect cost rate. In a restricted rate, indirect costs are limited to general management costs. General management costs do not include divisional administration that is limited to one (1) component of the District, the governing body of the District, compensation of the Superintendent, compensation of the chief executive officer of any component of the District, and operation of the immediate offices of these officers.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if **all** the following conditions are met:

a. Administrative or clerical services are integral to a project or activity.

b. Individuals involved can be specifically identified with the project or activity.

c. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency.

d. The costs are also not recovered as indirect costs.

Where a Federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap shall include all direct administrative charges as well as any recovered indirect charges.

Effort should be given to identify costs as direct costs whenever practical, but allocation of indirect costs may be used where not prohibited and where indirect cost allocation is approved ahead of time by NHED or the pass-through entity (Federal funds subject to 2 C.F.R Part 200 pertaining to determining indirect cost allocation).

E. **Timely Obligation of Funds:** Obligations are orders placed for property and services, contracts and sub-awards made, and similar transactions during a given period that require payment by the recipient or sub-recipient during the same or a future period.

The following are examples of when funds are determined to be "obligated" under applicable regulation of the U.S. Department of Education:

When the obligation is for:

1. Acquisition of property – on the date which the District makes a binding written commitment to acquire the property.

2. Personal services by an employee of the District – when the services are performed.

3. Personal services by a contractor who is not an employee of the District – on the date which the District makes a binding written commitment to obtain the services.

4. Public utility services – when the District received the services.

5. Travel – when the travel is taken.

6. Rental of property – when the District uses the property.

7. A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR Part 200, Subpart E – Cost Principles – on the first day of the project period.

F. **Period of Performance:** All obligations must occur on or between the beginning and ending dates of the grant project. This period of time is known as the period of performance. The period of performance is dictated by statute and will be indicated in the Grant Award Notification ("GAN"). As a general rule, State-administered Federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many Federal education grants, the period of performance is twenty-seven (27) months. This maximum period includes a fifteen (15) month period of initial availability, plus a twelve (12) month period of carry over. For direct grants, the period of performance is generally identified in the GAN.

Pre-award costs are those incurred prior to the effective date of the Federal award or sub-award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the *initial* Federal awarding agency or of the NHED or other pass-through entity.

For both State-administered and direct grants, regardless of the period of availability, the District shall liquidate all obligations incurred under the award not later than forty-five (45) days after the end of the funding period unless an extension is authorized. Any funds not obligated within the period of performance or liquidated within the appropriate timeframe are said to lapse and shall be returned to the awarding agency. Consistently, the District shall closely monitor grant spending throughout the grant cycle.

DAF-2 CASH MANAGEMENT AND FUND CONTROL

Payment methods must be established in writing that minimize the time elapsed between the drawdown of Federal funds and the disbursement of those funds. Standards for funds control and accountability must be met as required by the Uniform Guidance for advance payments and in accordance with the requirements of NHED or other applicable pass-through-entity.

In order to provide reasonable assurance that all assets, including Federal, State, and local funds, are safeguarded against waste, loss, unauthorized use, or misappropriation, the Superintendent shall implement internal controls in the area of cash management.

The District's payment methods shall minimize the time elapsing between the transfer of funds from the United States Treasury or the NHED (pass-through entity) and disbursement by the District, regardless of whether the payment is made by electronic fund transfer, or issuance or redemption of checks, warrants, or payment by other means.

The District shall use forms and procedures required by the NHED, grantor agency or other pass-through entity to request payment. The District shall request grant fund payments in accordance with the provisions of the grant. Additionally, the District's financial management systems shall meet the standards for fund control and accountability as established by the awarding agency.

The *[___Superintendent /Officer]* is authorized to submit requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as deemed appropriate when electronic transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

When the District uses a cash advance payment method, the following standards shall apply:

A. The timing and amount of the advance payment requested will be as close as is administratively feasible to the actual disbursement for direct program or project costs and the proportionate share of any allowable indirect costs.

B. The District shall make timely payment to contractors in accordance with contract provisions.

C. To the extent available, the District shall disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.

D. The District shall account for the receipt, obligation and expenditure of funds.

E. Advance payments shall be deposited and maintained in insured accounts whenever possible.

F. Advance payments will be maintained in interest-bearing accounts unless the following apply:

1. The District receives less than $120,000 in Federal awards per year.

2. The best reasonably available interest-bearing account would not be expected to earn interest in excess of $500 per year on Federal cash balances.

3. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.

4. A foreign government or banking system prohibits or precludes interest-bearing accounts.

G. Pursuant to Federal law and regulations, the District may retain interest earned in an amount up to $500 per year for administrative costs. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System ("PMS") through an electronic medium using either Automated Clearing House ("ACH") network or a Fedwire Funds Service payment. Remittances shall include pertinent information of the payee and nature of payment in the memo area (often referred to as "addenda records" by Financial Institutions) as that will assist in the timely posting of interest earned on Federal funds.

DAF-3 <u>PROCUREMENT</u>

All purchases for property and services made using Federal funds must be conducted in accordance with all applicable Federal, State and local laws and regulations, the Uniform Guidance, and the District's written policies and procedures.

Procurement of all supplies, materials equipment, and services paid for from Federal funds or District matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, District policies, and procedures.

The Superintendent shall maintain a procurement and contract administration system in accordance with the USDOE requirements (2 CFR 200.317-327) for the administration and management of Federal grants and Federally-funded programs. The District shall maintain a contract administration system that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall also conform to the provisions of the District's ~~documented~~ general purchasing Policy DJ.

The District avoids situations that unnecessarily restrict competition and avoids acquisition of unnecessary or duplicative items. Individuals or organizations that develop or draft specifications, requirements, statements of work, and/or invitations for bids, requests for proposals, or invitations to negotiate, are excluded from competing for such purchases. Additionally, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis shall be made to lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

Contracts are awarded only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration is given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. No contract is awarded to a contractor who is suspended or debarred from eligibility for participation in Federal assistance programs or activities.

Purchasing records are sufficiently maintained to detail the history of all procurements and must include at least the rationale for the method of procurement, selection of contract type, and contractor selection or rejection; the basis for the contract price; and verification that the contractor is not suspended or debarred.

To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

A. **<u>Competition</u>:** All procurement transactions shall be conducted in a manner that encourages full and open competition and that is in accordance with good administrative practice and sound business judgment. In order to promote objective contractor performance and eliminate unfair competitive advantage, the District shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids or requests for proposals from competition for such procurements.

Some of the situations considered to be restrictive of competition include, but are not limited to, the following:

1. unreasonable requirements on firms in order for them to qualify to do business;

2. any arbitrary action in the procurement process.

3. specification of only a "brand name" product instead of allowing for an "or equal" product to be offered and describing the performance or other relevant requirements of the procurement; and/or

4. organizational conflicts of interest;

5. noncompetitive contracts to consultants that are on retainer contracts;

6. unnecessary experience and excessive bonding requirements;

   Further, the District does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless (1) an applicable Federal statute expressly mandates or encourages a geographic preference; (2) the District is contracting for architectural and engineering services, in which case geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

   To the extent that the District uses a pre-qualified list of persons, firms or products to acquire goods and services, the pre-qualified list must include enough qualified sources as to ensure maximum open and free competition. The District allows vendors to apply for consideration to be placed on the list as requested.

B. **Solicitation Language:** The District shall require that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, shall set forth those minimum essential characteristics and standards to which it shall conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

   When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which shall be met by offers shall be clearly stated, and must identify all requirements which the offerors shall fulfill and all other factors to be used in evaluating bids or proposals.

   The Board will not approve any expenditure for an unauthorized purchase or contract.

C. **Procurement Methods:** The District shall utilize the following methods of procurement:

   1. Micro-purchases

      Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed *$15,000.* To the extent practicable, the District shall distribute micro-purchase equitably among qualified suppliers. Micro-purchases may be made without soliciting competitive quotations if the Superintendent considers the price to be reasonable. The District maintains evidence of this reasonableness in the records of all purchases made by this method.

2. Small Purchases (Simplified Acquisition)

   Small purchase procedures provide for relatively simple and informal procurement methods for securing services, supplies, and other property which is acquired above the *aggregate dollar* micro-purchase threshold and not exceeding the competitive bid threshold of $350,000. Small purchase procedures require that price or rate quotations shall be obtained from an adequate number of qualified sources.

3. Sealed Bids

   Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment which amounts to $250,000 and when the Board determines to build, repair, enlarge, improve, or demolish a school building/facility the cost of which will exceed $350,000 ~~250,000~~.
   a. In order for sealed bidding to be feasible, the following conditions shall be present:
      i. a complete, adequate, and realistic specification or purchase description is available;
      ii. two (2) or more responsible bidders are willing and able to compete effectively for the business; and
      iii. the procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.
   b. When sealed bids are used, the following requirements apply:
      i. Bids shall be solicited in accordance with the provisions of State law and policy DJE. Bids shall be solicited from an adequate number of qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised.
      ii. The invitation for bids will include product/contract specifications and pertinent attachments and shall define the items and/or services required in order for the bidder to properly respond.
      iii. All bids will be opened at the time and place prescribed in the invitation for bids; bids will be opened publicly.
      iv. A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts may only be used to determine the low bid when prior experience indicates that such discounts are usually taken.
      v. The Board reserves the right to reject any and all bids for sound documented reason.
      vi. Bid protests shall be handled pursuant to the process set forth in DAF-3.I.

4. Competitive Proposals

   Procurement by competitive proposal, normally conducted with more than one source submitting an offer, is generally used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method.

   If this method is used, the following requirements apply:
   a. Requests for proposals shall be publicized and identify all evaluation factors and their relative importance. Any response to the publicized requests for proposals shall be considered to the maximum extent practical.

b. Proposals shall be solicited from an adequate number of sources.

c. The District shall use its written method for conducting technical evaluations of the proposals received and for selecting recipients.

d. Contracts shall be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors consider

The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

5. Noncompetitive Proposals

Procurement by noncompetitive proposals allows for solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

a. the item is available only for a single source;

b. the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;

c. the Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District; and/or

d. after solicitation of a number of sources, competition is determined to be inadequate.

D. **Contracting with Small and Minority Businesses, Women's Business Enterprises, Labor Surplus Area Firms & Veteran Owned Small Businesses:** The District must take necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms, including, without limitation, Veteran-Owned Small Businesses (VOSBs) or Service-Disabled Veteran-Owned Small Businesses (SDVOSBs) are used when possible ("target businesses"). Affirmative steps must include:

1. Placing qualified target businesses on solicitation lists;

2. Assuring that target businesses are solicited whenever they are potential sources;

3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by target businesses;

4. Establishing delivery schedules, where the requirement permits, which encourage participation by target businesses;

5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

E. **Contract/Price Analysis:** The District shall perform a cost or price analysis in connection with every procurement action in excess of $350,000 ~~250,000~~ (i.e., the Simplified Acquisition/Small Purchase limit), including contract modifications. (See 2 CFR 200.324). A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the District shall come to an independent estimate prior to receiving bids or proposals.

When performing a cost analysis, the District shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

F. **Time and Materials Contracts:** The District shall use a time and materials type contract only (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to the District is the sum of the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiently. Therefore, the District sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls, and otherwise performs in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

G. **Suspension and Debarment:** The District will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. All purchasing decisions shall be made in the best interests of the District and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the District shall consider such factors as (1) contractor integrity; (2) compliance with public policy; (3) record of past performance; and (4) financial and technical resources.

The Superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The District is subject to and shall abide by the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR Part 180.

Suspension is an action taken by the District that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensure. A person so excluded is suspended. (See 2 CFR Part 180 Subpart G).

Debarment is an action taken by the Superintendent to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR chapter 1). A person so excluded is debarred. (See 2 CFR Part 180 Subpart H).

The District shall not subcontract with or award sub-grants to any person or company who is debarred or suspended. For contracts over $25,000 the District shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management ("SAM"), which maintains a list of such debarred or suspended vendors at www.sam.gov (which replaced the former Excluded Parties List System or EPLS); or collecting a certification from the vendor. (See 2 CFR Part 180 Sub part C).

Documentation that debarment/suspension was queried must be retained for each covered transaction as part of the documentation required under DAF-3, paragraph J. This documentation should include the date(s) queried and copy(ies) of the SAM result report/screen shot, or a copy of the or certification from the vendor. It should be attached to the payment backup and retained for future audit review.

H. **Additional Requirements for Procurement Contracts Using Federal Funds:**

1. Clause for Remedies Arising from Breach: For any contract using Federal funds under which the contract amount exceeds the upper limit for Simplified Acquisition/Small Purchases (see DAF-3.C.2), the contract must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and must provide for sanctions and penalties. (See 2 CFR 200, Appendix II(A)).

2. Termination clause: For any contract using Federal funds under which the contract amount exceeds $10,000, it must address the District's authority to terminate the contract for cause and for convenience, including the manner by which termination will be effected and the basis for settlement. (See 2 CFR 200, Appendix II (B)).

3. Anti-pollution clause: For any contract using Federal funds under which the contract amount exceeds $150,000, the contract must include clauses addressing the Clean Air Act and the Federal Water Pollution Control Act. (See 2 CFR 200, Appendix II (G)).

4. Anti-lobbying clause: For any contract using Federal funds under which the contract exceeds $100,000, the contract must include an anti-lobbying clause, and require bidders to submit Anti-Lobbying Certification as required under 2 CFR 200, Appendix II (I).

5. Negotiation of profit: For each contract using Federal funds and for which there is no price competition, and for each Federal fund contract in which a cost analysis is performed, the District shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of the contractor's past performance, and industry profit rates in the surrounding geographical area for similar work. (See 2 CFR 200.324(b)).

6. "Domestic Preference" Requirement**:** The District must provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States, to the greatest extent practicable. This requirement applies whether the District is purchasing the products directly or when the products are purchased by third parties on the District's behalf (e.g. subcontractor, food service management companies, etc.). It also generally applies to all purchases, even those below the micro-purchase threshold, unless otherwise stipulated by the Federal awarding agency. See also additional "Buy American" provisions in DAF-4.C regarding food service procurement.

7. Prohibited Contracts (a/k/a) Huawei Ban: The District may not use Federal funds to procure, obtain, or enter into or renew a contract to:

    a. procure or obtain equipment, services, or systems which substantially use telecommunications equipment or services produced by Huawei Technologies Company or ZTE Corporation, or any of their affiliates or subsidiaries; or

    b. procure or obtain video surveillance and telecom equipment or services from Hytera Communications, Hangzhou Digital Technology, or Dahua Technology.

8. Construction Contracts: Davis-Bacon Act Compliance: All contracts/projects in excess of $2,000 for the construction, alteration , or prepare of public buildings or public works for which the funds are provided in whole or in part by Federal funds are subject to the requirements of the Davis-Bacon Act (40 U.S.C. 3141-3148) Accordingly, such contracts and projects must adhere to the following:

    a. Prevailing Wage Requirements:

        i. Wage Determination. Contractors and subcontractors must pay all laborers and mechanics weekly, and at no less than the prevailing wages and fringe benefits as determined by the
        U.S. Department of Labor (DOL) for the locality in which the project is performed. The "Prevailing Wage determination" must be included in all applicable bid solicitations and contracts.

ii. Certification of Payroll Reporting. Contractors and subcontractors must submit weekly certified payroll records (Form WH-347 or equivalent) to the district official overseeing the project and/or grant (e.g., clerk of the works, project manager, etc.). Such payroll records must include employee names, classifications, hourly rates, actual hours worked, and deductions.

b. Worksite Postings: Contractors/subcontractors must post the Prevailing Wage Determination, as well as the Department of Labor's "Employee Rights Under the Davis-Bacon" at the job site in a visible location.

c. Contractor and Subcontractor Compliance.

i. District contracts subject to the Davis-Bacon Act must include a compliance clause requiring contractor and subcontractor adherence to prevailing wage standards and the additional requirements of the Davis-Bacon Act and this policy section.

ii. Contractors must ensure that their subcontractors also comply with the requirements of the Davis-Bacon Act.

d. Enforcement and Non-compliance.

i. The district official overseeing the project and/or grant (e.g., clerk of the works, project manager, etc.) shall be responsible for monitoring contractor adherence to the Davis-Bacon Act.

ii. Any suspected violations must be reported to the [Superintendent/Business Administrator___________] and may be referred to the U.S. Department of Labor Wage and Hour Division for further investigation.

I. **Bid Protest:** The District maintains the following protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency.

A bidder who wishes to file a bid protest shall file such notice and follow procedures prescribed by the Request For Proposals (RFPs) or the individual bid specifications package, for resolution. Bid protests shall be filed in writing with the Superintendent within seventy-two (72) hours of the opening of the bids in protest.

Within five (5) days of receipt of a protest, the Superintendent shall review the protest as submitted and render a decision regarding the merits of the protest and any impact on the acceptance and rejection of bids submitted. Notice of the filing of a bid protest shall be communicated to the Board and shall be so noted in any subsequent recommendation for the acceptance of bids and awarding of contracts.

Failure to file a notice of intent to protest, or failure to file a formal written protest within the time prescribed, shall constitute a waiver of proceedings.

J. **Maintenance of Procurement Records:** The District shall maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and records regarding debarment/suspension queries or actions. Such records shall be retained consistent with District Policy *EHB* and District Administrative Procedures *EHB-R.*

DAF-4 PROCUREMENT – ADDITIONAL PROVISIONS PERTINENT TO FOOD SERVICE PROGRAM

The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts: (7 CFR Sec. 210.21, 215.14a, 220.16)

A. **Mandatory Contract Clauses:** The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts:

1. Allowable costs will be paid from the nonprofit school food service account to the contractor net of all discounts, rebates and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority;

2. The contractor must separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the nonprofit school food service account) and the amount that is unallowable (cannot be paid from the nonprofit school food service account); or

3. The contractor must exclude all unallowable costs from its billing documents and certify that only allowable costs are submitted for payment and records have been established that maintain the visibility of unallowable costs, including directly associated costs in a manner suitable for contract cost determination and verification;

4. The contractor's determination of its allowable costs must be made in compliance with the applicable departmental and program regulations and Office of Management and Budget cost circulars;

5. The contractor must identify the amount of each discount, rebate and other applicable credit on bills and invoices presented to the school food authority for payment and individually identify the amount as a discount, rebate, or in the case of other applicable credits, the nature of the credit. If approved by the state agency, the school food authority may permit the contractor to report this information on a less frequent basis than monthly, but no less frequently than annually;

6. The contractor must identify the method by which it will report discounts, rebates and other applicable credits allocable to the contract that are not reported prior to conclusion of the contract; and

7. The contractor must maintain documentation of costs and discounts, rebates and other applicable credits, and must furnish such documentation upon request to the school food authority, the state agency, or the department.

B. **Contracts with Food Service Management Companies:** Procedures for selecting and contracting with a food service management company shall comply with guidance provided by the NHED, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts.

C. **"Buy American" Requirement: NOTE -** See DAF-3.H.6 regarding "domestic preference" requirements for procurements other than for food service.

Under the "Buy American" provision of the National School Lunch Act (the "NSLA"), school food authorities (SFAs) are required to purchase, to the maximum extent practicable, *domestic commodity or product*. As an SFA, the District is required to comply with the "Buy American" procurement standards set forth in 7 CFR Part 210.21(d) when purchasing commercial food products served in the school meals programs. This requirement applies whether the District is purchasing the products directly or when the products are purchased by third parties on the District's behalf (e.g., food service management companies, group purchasing cooperatives, shared purchasing, etc.).

Under the NSLA, "*domestic commodity or product*" is defined as an agricultural commodity or product that is produced or processed in the United States using "*substantial"* agricultural commodities that are produced in the United States. For purposes of the act, "*substantial*" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States.

1. Exceptions: The two main exceptions to the Buy American requirements are:

    a. The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or

    b. Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

2. Steps to Comply with Buy American Requirements: In order to help assure that the District remains in compliance with the Buy American requirement, the *[_Superintendent_/Officer/Food Service Director]*, shall

    a. Include a Buy American clause in all procurement documents (product specifications, bid solicitations, requests for proposals, purchase orders, etc.);

    b. Monitor contractor performance;

    c. Require suppliers to certify the origin of the product;

    d. Examine product packaging for identification of the country of origin; and

    e. Require suppliers to provide specific information about the percentage of U.S. content in food products annually ~~*[optional: {from time-to-time} **OR** {state some other standard}]*.~~

DAF-5 CONFLICT OF INTEREST AND MANDATORY DISCLOSURES

The District complies with the requirements of State law and the Uniform Guidance for conflicts of interest and mandatory disclosures for all procurements with Federal funds.

No employee, board member or other District officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict - or apparent conflict - of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, (collectively a "covered individual") has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

Additionally, no employee, board member or other District officer, or agent may solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. This prohibition, however, shall not apply to gratuities of de minimis value, which, for purposes of the policy, are individual gifts, favors, or other items of monetary value, worth $50 or less and which have no bearing on the selection, award or administration of a Federal award.

The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the District or any sub-recipient of the District(see DAF-11).

Each covered individual who is engaged in the selection, award or administration of a contract supported by a Federal grant or award and who has a potential conflict of interest must disclose that conflict in writing to the *[-____Superintendent /Officer]*, who, in turn, shall disclose in writing any such potential conflict of interest to NHED or other applicable pass-through-entity.

Employees who violate this provision are subject to disciplinary consequences up to and including dismissal. Agents or contractors acting on behalf of the District are subject to contract termination. School board members or other District officers are subject to such actions as are within the authority of the School Board or district. Violations will also be reported to law enforcement in appropriate circumstances.

The Superintendent shall timely disclose in writing to NHED or other applicable pass-through-entity, and to the Federal awarding agency whenever the Superintendent has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729-3733). The notice to the Federal awarding agency shall be directed to that agency's Office of Inspector General. The Superintendent shall fully address any such violations promptly and notify the Board with such information as is appropriate under the circumstances (e.g., taking into account applicable disciplinary processes).

DAF-6 INVENTORY MANAGEMENT - EQUIPMENT AND SUPPLIES PURCHASED WITH FEDERAL FUNDS

Equipment and supplies acquired ("property" as used in this policy DAF-6) in whole or in part must be used by the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award. In addition, the subrecipient must not encumber the equipment without prior approval of the Federal awarding agency or pass-through entity. All such property will be used, managed, and disposed of in accordance with applicable state and Federal requirements. Property records and inventory systems shall be sufficiently maintained to account for and track equipment that has been acquired with Federal funds. In furtherance thereof, the following minimum standards and controls shall apply to any equipment or pilferable items acquired in whole or in part under a Federal award until such property is disposed in accordance with applicable laws, regulations and Board policies:

A. **"Equipment" and "Pilferable Items" Defined:** For purposes of this policy, "equipment" means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of $10,000.00, or the capitalization level established by the District for financial statement purposes. "Pilferable items" are those items, *regardless of cost,* which may be easily lost or stolen, such as cell phones, tablets, graphing calculators, software, projectors, cameras and other video equipment, computer equipment and televisions.

B. **Records:** The *[__Superintendent /Officer]* shall maintain records that include a description of the property; a serial number or other identification number; the source of the funding for the property (including the Federal award identification number (FAIN)); who holds title; the acquisition date; the cost of the property; the percentage of the Federal participation in the project costs for the Federal award under which the property was acquired; the location, use, and condition of the property; and any ultimate disposition data, including the date of disposition and sale price of the property.

C. **Inventory:** No less than once every two years, the *[_____Superintendent /Officer]* shall cause a physical inventory of all equipment and pilferable items to be taken, and the results reconciled with the property records. Except as otherwise provided in this policy *DAF-6,* inventories shall be conducted consistent with Board Policy *DID*.

D. **Control, Maintenance and Disposition:**

   1. Control and Maintenance. The Superintendent shall develop administrative procedures relative to property procured in whole or in part with Federal funds to:

      a. prevent loss, damage, or theft of the property; any loss, damage, or theft must be investigated;

      b. to maintain the property and keep it in good condition; and

      c. to ensure the highest possible return through proper sales procedures, in those instances where the District is authorized to sell the property.

2. Disposition. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, or disposed of in the following order of priority:

   a. Re-purpose Before Disposal. Before disposing of any property obtained in whole or in part through the use of Federal awards, such property may and should be used first for other activities supported by the same Federal awarding agency, then any other Federally funded activities, and finally for any non-Federal purposes, provided the use does not interfere with Federal projects.

   b. Fair Market Value (FMV) Assessment

      i. Determine current FMV using reasonable methods (e.g., depreciation schedules, resale comparisons).

      ii. Document the valuation process.

   c. Disposition Options

      i. If FMV is less than $10,000, then the property may be retained, sold, or otherwise disposed of consistent with Board policy DN with no further obligation, but documentation is required.

      ii. If FMV $10,000 or more, then:

         1. Request disposition instructions from NHED, or other pertinent state agency or bureau, or for direct awards, the appropriate Federal awarding agency.

         2. If no response within 120 days:

            a. Return the Federal share of proceeds from sale (proportional to original Federal participation).

            b. Deduct allowable selling and handling costs.

   d. Trade-In Option. Notwithstanding the priority list above, equipment purchased or obtained in whole or in part with Federal awards may be used as a trade-in or sold, with proceeds applied to replacement equipment costs needed for the same Federal program. Such trade-in transactions must be properly documented with records retained in accordance with DAF-10.D.

E. **Notification of any Loss, Damage or Theft.** In the event that the inventory discloses any loss, damage or theft of equipment that will have an impact on the grant program, the *[____ Superintendent /Officer]* shall notify NHED, Bureau of Federal Compliance or other pertinent state department or bureau, or, for direct awards, the appropriate Federal agency's Office of Inspector General.

DAF-7 TRAVEL REIMBURSEMENT – FEDERAL FUNDS

The Board shall reimburse administrative, professional and support employees, and school officials, for travel costs incurred in the course of performing services related to official business as a Federal grant recipient.

For purposes of this policy, “travel costs” shall mean the expenses for transportation, lodging, subsistence, and related items incurred by employees and school officials who are in travel status on official business as a Federal grant recipient.

School officials and district employees shall comply with applicable Board policies and administrative regulations established for reimbursement of travel and other expenses.

The validity of payments for travel costs for all district employees and school officials shall be determined by the *[-__Superintendent_/Officer]*.

Travel costs shall be reimbursed on a mileage basis for travel using an employee's personal vehicle and on an actual cost basis for meals, lodging and other allowable expenses, consistent with those normally allowed in like circumstances in the district's non-Federally funded activities, and in accordance with the district's travel reimbursement policies and administrative regulations.

Mileage reimbursements shall be at the rate approved by the Board or Board policy for other district travel reimbursements. Actual costs for meals, lodging and other allowable expenses shall be reimbursed only to the extent they are reasonable and do not exceed the per diem limits established by Board policy, or, in the absence of such policy, the Federal General Services Administration for Federal employees for locale where incurred.

All travel costs must be presented with an itemized, verified statement prior to reimbursement.

In addition, for any costs that are charged directly to the Federal award, the *[Superintendent /Officer]* shall maintain sufficient records to justify that:

A. Participation of the individual is necessary to the Federal award.

B. The costs are reasonable and consistent with Board policy.

DAF-8 ACCOUNTABILITY AND CERTIFICATIONS

All fiscal transactions must be approved by the *[_______Superintendent /Officer]* who can attest that the expenditure is allowable and approved under the Federal program. The *[____Superintendent /Officer]* submits all required certifications.

DAF-9 TIME-EFFORT REPORTING & OVERSIGHT ~~& AUDIT REQUIREMENTS~~

The Superintendent will establish sufficient oversight of the operations of Federally supported activities to assure compliance with applicable Federal requirements and to ensure that program objectives established by the awarding agency are being achieved. The District will submit all reports as required by Federal or state authorities.

As a recipient of Federal funds, the District shall comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Section 200.430 of the Code of Federal Regulations requires certification of effort to document salary expenses charged directly or indirectly against Federally-sponsored projects. This process is intended to verify the compensation for employment services, including salaries and wages, is allocable and properly expended, and that any variances from the budget are reconciled.

A. **Compensation:** Compensation for employment services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits, which are addressed in 2 CFR 200.431 Compensation – fringe benefits. Costs of compensation are allowable to the extent that they satisfy the specific requirements of these regulations, and that the total compensation for individual employees:

    1. is reasonable for the services rendered, conforms to the District's established written policy, and is consistently applied to both Federal and non-Federal activities; and

    2. follows an appointment made in accordance with the District's written policies and meets the requirements of Federal statute, where applicable.

B. **Time and Effort Reports:**

1. Time and effort reports – general standards. Such reports shall:

    a. be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated;

    b. be incorporated into the official records of the District;

    c. reasonably reflect the total activity for which the employee is compensated by the District, not exceeding 100% of the compensated activities;

    d. encompass both Federally assisted and other activities compensated by the District on an integrated basis;

    e. comply with the District's established accounting policies and practices;

    f. support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one (1) Federal award, a Federal award and non-Federal award, an indirect cost activity and a direct cost activity, two (2) or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity.

2. Individual employee time and effort reporting. Timesheets and required periodic certifications shall include at a minimum:

    a. Employee name;

    b. Grant information;

    c. Time spent on grant;

    d. Period of performance

    e. Signature of employee, and dated after period of performance;

    f. Signature of employee's supervisor who has direct knowledge of the work performed, and dated after period of performance; and

    g. Certifying statement that information is true (can be placed above signatures).

    The District will also follow any time and effort requirements imposed by NHED or other pass-through entity as appropriate to the extent that they are more restrictive than the Federal requirements. The *[-______Superintendent /Officer]* is responsible for the collection and retention of employee time and effort reports. Individually reported data will be made available only to authorized auditors or as required by law.

~~C. **Audit Requirements:** The District is required to have a single or program specific audit conducted for any fiscal year in which the district expends $1,000,000 or more. A single audit must be conducted in accordance with 2 CFR 200.514, and must cover the entire operations of the entity, or a series of audits that includes all departments, agencies and other organizational units that expended or otherwise administered Federal awards during the audit period. A program specific audit must be conducted in accordance with 2 CFR 200.501(c). For any year that the District expends less than $1,000,000 during the District's fiscal year in Federal awards, the District is exempt from Federal audit requirements for that year, except as noted in 2 CFR 200.503, but records must be available for review or audit by appropriate officials of the Federal agency, the New Hampshire Department of Education or other pass through entity, and the Government Accountability Office (GAO).~~

DAF-10 <u>GRANT BUDGET RECONCILIATION, GRANT CLOSEOUT, AUDITS & RECORDS</u>

A. **<u>Budget Reconciliation</u>:** Budget estimates are not used as support for charges to Federal awards. However, the District may use budget estimates for interim accounting purposes. The system used by the District to establish budget estimates produces reasonable approximations of the activity actually performed. Any significant changes in the corresponding work activity are identified by the District and entered into the District's records in a timely manner.

The District's internal controls include a process to review after-the-fact interim charges made to a Federal award based on budget estimates and ensure that all necessary adjustments are made so that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

B. **Grant Closeout Requirements:** At the end of the period of performance or when the Federal awarding agency determines the District has completed all applicable administrative actions and all required work under the grant, the agency will close out the Federal award. If the award passed-through the State, the District will have 90 days from the end of the period of performance to submit to the State all financial, performance, and other reports as required by the terms and conditions of the award.

   Failure to submit all required reports within the required timeframe will necessarily result in the Federal awarding agency reporting the District's material failure to comply with the terms of the grant to the Office of Management and Budget (OMB), and may pursue other enforcement actions.

C. **Audit Requirements.** The District is required to have a single or program-specific audit conducted for any fiscal year in which the District expends $1,000,000 or more in Federal awards. A single audit must be conducted in accordance with 2 CFR 200.514, and must cover the entire operations of the District (or subrecipient), or a series of audits that includes all departments, agencies and other organizational units that expended or otherwise administered Federal awards during the audit period. A program-specific audit must be conducted in accordance with 2 CFR 200.501(c).

   For any year that the District expends less than $1,000,000 during the District's fiscal year in Federal awards, the District is exempt from Federal audit requirements for that year, except as noted in 2 CFR 200.503, but records must be available for review or audit by appropriate officials of the Federal agency, the New Hampshire Department of Education or other pass-through entity, and the Government Accountability Office (GAO).

   If a deficiency is identified, the District will:

   1. Issue a management decision on audit findings pertaining to the Federal award.
   2. Develop a corrective action plan (CAP), with an anticipated completion date.
   3. Implement the CAP. ~~Consider whether the results of audits or reviews indicate conditions that necessitate adjustments to pass through entity's own records.~~

D. **Records.** The District must maintain all financial records and other documents pertinent to the grant for a period of three years from the date of submission of the final expenditure report, barring other circumstances detailed in 2 CFR 200.344.

DAF-11 **SUB-RECIPIENT MONITORING AND MANAGEMENT**

When entering agreements involving the expenditure or disbursements of Federal grant funds, the District shall determine whether the recipient of such Federal funds from the District is a "contractor" or "subrecipient", as those terms are defined in 2 CFR §200.01. See also guidance at 2 CFR §200.330 "Subrecipient and contractor determinations". Generally, "subrecipients" are instrumental in implementing the applicable work program whereas a "contractor" provides goods and services for the District's own use. Contractors will be subject to the District's procurement and purchasing policies (e.g., *DAF-3* relative to Federal grant funds, *DJE* relative to bidding requirements for non-Federal money projects, etc.). Subrecipients are subject to this Policy.

Under the UGG, the District is considered a "pass-through entity" in relation to its subrecipients, and as such requires that subrecipients comply with applicable terms and conditions (flow-down provisions). All subrecipients of Federal or State funds received through the District are subject to the same Federal and

State statutes, regulations, and award terms and conditions as the District.

A. **Sub-award Contents and Communication.** In the execution of every sub-award, the District will communicate the following information to the subrecipient and include the same information in the sub-award agreement.

   1. Every sub-award will be clearly identified and include the following Federal award identification:
      a. Subrecipient name
      b. Subrecipient's unique ID number (DUNS)
      c. Federal Award ID Number (FAIN)
      d. Federal award date
      e. Period of performance start and end date
      f. Amount of Federal funds obligated
      g. Amount of Federal funds obligated to the subrecipient
      h. Total amount of the Federal award
      i. Total approved cost sharing or match required where applicable
      j. Project description responsive to FFATA
      k. Name of Federal awarding agency, pass through entity and contact information
      l. CFDA number and name
      m. Identification of the award is R&D
      n. Indirect cost rate for the Federal award

   2. Requirements imposed by the District including statutes, regulations, and the terms and conditions of the Federal award.

   3. Any additional requirements the District deems necessary for financial or performance reporting of subrecipients as necessary.

   4. An approved indirect cost rate negotiated between subrecipient and the Federal government or between the pass-through entity and subrecipient.

   5. Requirements that the District and its auditors have access to the subrecipient records and financial statements.

   6. Terms and conditions for closeout of the sub-award.

B. **Subrecipient Monitoring Procedures.** The Superintendent is responsible for having all the District project managers monitor subrecipients. The District will monitor the activities of the subrecipient to ensure the sub-award is used for authorized purposes. The frequency of monitoring review will be specified in the sub-award and conducted concurrently with all invoice submission. (See also subrecipient audit requirements in Paragraph D below of this Section DAF-11).

   Subrecipient monitoring procedures include:

   1. At the time of proposal, assess the potential of the subrecipient for programmatic, financial, and administrative suitability.

   2. Evaluate each subrecipient's risk of noncompliance prior to executing a sub-award. In doing so, the District will assess the subrecipient's:
      a. Prior experience with the same or similar sub-awards.
      b. The extent and results of Federal awarding agency monitoring.
      c. New personnel or new or substantially changed systems.
      d. Results of previous audits and single audit (if applicable).

   3. Confirm the statement of work and review any non-standard terms and conditions of the sub-award during the negotiation process.

   4. Monitor financial and programmatic progress and ability of the subrecipient to meet

objectives of the sub-award. To facilitate this review, subrecipients are required to submit sufficient invoice detail and a progress report. The District project managers will encourage subrecipients to submit regular invoices.

5. Invoices and progress reports will be date stamped upon receipt if received in hard copy. A record of the date of receipt will be maintained for those invoices sent electronically.

6. In conducting regular oversight and monitoring, the District project managers will:
   a. Verify invoices that include progress reports.
   b. Raise any concerns to the *[__Superintendent_/Officer]*.
   c. Initial the progress report and invoice confirming review and approval prior to payment.
   d. Review subrecipient match tasks for eligibility.
   e. Obtain report, certification and supporting documentation of local (non-Federal)/in-kind match work from the subrecipient.
   f. Review invoice to ensure supporting documentation is included and invoices costs are within the scope of work for the projects being invoiced.
   g. Compare invoice to agreement budget to ensure eligibility of costs and that costs do not exceed budget.
   h. Review progress reports to ensure the project is progressing appropriately and on schedule.

7. The *[___Superintendent_/Officer]*, upon recommendation from the project's manager, will approve the invoice payment and will initial invoices confirming review and approval prior to payment.

8. Payments will be withheld from subrecipients for the following reasons:
   a. Insufficient detail to support the costs billed;
   b. Incomplete work or work not completed in accordance with required specifications.
   c. Ineligible costs; and/or
   d. Unallowable costs;

9. Verify every subrecipient is audited in accordance with 2 CFR §200 Subpart F – Audit Requirements.

C. **Subrecipient Project Files.** Subrecipient project files will contain, at a minimum, the following:
   a. Project proposal;
   b. Project scope;
   c. Progress reports;
   d. Interim and final products; and
   e. Copies of other applicable project documents as required, such as copies of contracts or MOUs.

D. **Subrecipient Audit Requirements**. The *[Superintendent_/Officer]* shall confirm whether the subrecipient meets the Single Audit threshold (see *DAF-10, Section C*, above). If yes, ensure that they have complied with the audit requirement, obtain and review the audit report, and follow-up on any findings. If no, implement alternative monitoring with agreed-upon procedures.

~~If a deficiency is identified, the District will:~~

~~1. Issue a management decision on audit findings pertaining to the Federal award.~~

~~2. Consider whether the results of audits or reviews indicate conditions that necessitate adjustments to pass through the entity's own records.~~

E. **Methodology for Resolving Findings.** The District will work with subrecipients to resolve any findings and deficiencies. To do so, the District may follow up on deficiencies identified through on-site reviews, provision of basic technical assistance, and other means of assistance as appropriate.

The District will only consider taking enforcement action against non-compliant subrecipients in accordance with 2 CFR 200.339 when noncompliance cannot be remedied. Enforcement may include taking any of the following actions as appropriate:

a. Temporarily withhold cash payments pending correction of the deficiency;
b. Disallow all or part of the cost of the activity or action not in compliance;
c. Wholly or partly suspend or terminate the sub-award;
d. Initiate suspension or debarment proceedings;
e. Withhold further Federal awards for the project or program; and/or
f. Take other remedies that may be legally available.

DAF-12 REPORTING ON REAL PROPERTY

The District will annually submit reports on forms provided by the New Hampshire Department of Education (NHED) and in accordance with the Rules or procedures of NHED of any real property in which the Federal Government retains an interest.

DAF-13 WHISTLEBLOWER PROTECTIONS: NOTIFICATION, RIGHTS & REMEDIES

In accordance with the Federal Uniform Grant Guidance, the District is committed to maintaining the highest standards of integrity and transparency in its operations. This policy encourages and protects employees, contractors, and other stakeholders who report, in good faith, any instance of fraud, waste, abuse, or any other misconduct related to Federally funded programs. The District will not retaliate against any individual who, in good faith, reports concerns related to financial irregularities, fraud, or any violation of law or policy involving Federally funded programs. Retaliation against a whistleblower may result in disciplinary action, up to and including termination.

The Superintendent shall ensure that all employees and contractors are notified in writing of their whistleblower rights and remedies under 41 U.S.C. § 4712, including the protection against retaliation for reporting misconduct.

Methods of notification may include:

- Employee handbooks, training materials, and/or other onboarding resources;
- Contracts with employees and or third party contractors;
- Periodically distributed to all employees via email or other communication channels; or
- Displayed prominently in the District's internal communication platforms and in common areas of the workplace.

Individuals may report suspected violations through the following methods:

- Directly to the Superintendent or Business Administrator, via email or in writing.
- Reporting directly to the Office of Inspector General for the Federal awarding agency.

District Policy History:

First reading: ____________________ Second reading/adopted: _

District revision history:

WRSD Policy DFA (DRAFT): Investment

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –
Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

b. **General –** Highlighted language or blank, underscored spaces ___, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

c. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

d. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised - May 2026, Feb. 2008, March 2004, Nov. 1999, July 1998**.**

NHSBA revision notes: Revised - May 2026, revised to reflect that RSA 197:23-a requires annual review of the policy rather than merely periodic. Additionally, some investment vehicles approved and even required for school districts are not fully covered by the FDIC. Feb. 2008. March 2004. Nov. 1999. July 1998.

~ ~

The School Board authorizes the School District Treasurer, working in conjunction with the Superintendent and his/her designee and pursuant to RSA 197:23-a, to invest the funds of the District subject to the following objectives and standards of care.

OBJECTIVES

The three objectives of investment activities shall be safety, liquidity, and yield.

1. Safety of principal is the foremost objective in this policy. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital by mitigating credit and interest rate risk. This will be accomplished by limiting the type of the investments and institutions to those permitted under RSA 197:23-a, I, IV & V ~~and fully covered by FDIC insurance or collateral approved pursuant to applicable law.~~

2. Liquidity of the investment portfolio shall remain sufficient to meet all operating requirements that may be reasonably anticipated.

3. Yield. The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above.

STANDARDS OF CARE

1. Prudence. The standard of prudence to be used by the District Treasurer and Superintendent, or his/her designee involved in the investment process, shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio. They are directed to use the GFOA* Recommended Practices and Policy Statements Related to Cash Management as a guide to the prudent investment of public funds.

2. Ethics and conflicts of interest. The School District Treasurer and Superintendent, or his/her designee involved in the investment process, shall refrain from personal business activity that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. Employees and Investment officials shall disclose any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial institutions with which they conduct business. They shall also disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officials shall subordinate their personal investment transactions to those of the School District, particularly with regard to the timing of purchases and sales.

3. Internal Controls. The District Treasurer and Superintendent or his/her designee shall establish a system of internal controls which shall be documented in writing. The internal controls shall be reviewed periodically by the School Board and an independent auditor.

The investment of funds will be left to the discretion of the Board ~~Finance Committee without prior approval of the Board.~~

The Board will ~~periodically~~ review the investment policy and DFA-R(1) annually.

District Policy History:

Reviewed by the WRSB: September 15, 2025
Reviewed by the WRSB: June 19, 2023
Reviewed by the WRSB: September 23, 2020
Reviewed by the WRSB: August 19, 2019, August 20, 2018, August 21, 2017
Reviewed by the WRSB: January 19, 2016
Approved by the WRSB: November 15, 2010
Approved by the WRSB: March 16, 2009
Revised: February 2008
Revised: July 1998, November 1999, March 2004

WRSD Policy EBCA (DRAFT): Crisis Prevention and Emergency Response Plans

Category: Priority/Required ~~Recommended~~

~ ~

ADOPTION/REVISION NOTES –

Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. General – As with all sample policies, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures.

b. Highlighted language or blank, underscored spaces indicate areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc.

c. {**} indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

d. Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised - May 2026, Sept. 2024, Aug. 2022, Sept. 2021, Nov. 2019, July 2019, Oct. 2018, Sept.
2017, Sept. 2014, Aug. 2007, July 1998

NHSBA revision notes: May **2026,** revised to include definition of school property as required by revised Ed 306.04(b)(2), with additional minor grammatical and formatting changes. Additionally, the category was changed from "Recommended" to "Priority/Required." Although not specifically required itself, the EOP discussed in Section A is statutorily required, as are multiple other "plans" referenced throughout. **September 2024,** Revised to include reference to new chemical safety and chemical hygiene sample policy EBCH. **August 2022**, revised policy to reflect the 2022 passage of HB 1125, which amended RSA 189:64 to change (a) change the name of the site specific plans from "Emergency Response Plans" to "Emergency Operations Plans" (as used by Federal Dept. of Homeland Security), (b) the state submission date for the EOP from 9/1 to 10/15 of each year, and (c) the recipient of the submission from N.H. DOE to the N.H. Department of Safety. The policy was further revised to remove some redundancies, and to clarify the distinction and relationship among the site-specific EOPs the District-wide plan, and other related plans/policies. **September 2021,** revised paragraph 4 to include reference to Sports Injury Emergency Plan as required by RSA 200:40-c and related policy JLCJA. **November 2019,** revised to reflect increase in changes to RSA 189:64 regarding all-hazard drills (increasing from 2 to 4 per year), and requirement that at least one drill concern an armed assailant. **July 2019**, minor change to disclaimers. **October 2018,** retitled and revised substantially to incorporate provisions of now withdrawn (10/2018) sample policy EBC, reflect provisions of the 2018 passage of HB 1370 requiring plans to be submitted to the N.H. Dir. of Homeland Security. **September 2017**, revised to reflect 2017 N.H. Laws Ch. 14 (HB 233), which required annual plans to be submitted to the N.H/ Dept. of Education.
September 2014, re-written in its entirety to reflect changes to RSA 189:64.

~ ~

The Board recognizes that schools are subject to a number of potentially dangerous events, such as natural disasters, industrial accidents, acts of terrorism, and other violent events. No school is immune from these events no matter the size or location. The Board is committed to the prevention of these events, to the extent possible, in the schools and at school-sponsored activities.

A. **Site-specific Emergency Operations Plan (RSA 189:64).**

Each school shall develop a site-specific school emergency operations plan ("EOP") based on and conforming with the Incident Command System and the National Incident Management System and pursuant to RSA 189:64.

Each EOP will address hazards ~~as~~ including, but not limited to: acts of violence, threats, natural disasters, fire, hazardous materials, medical emergencies, and other hazards deemed necessary by the School Board or local emergency authorities. Each EOP for a site will encompass all school property.

As used in this policy, "s*chool property*" means all real property and all physical plant and equipment used for school purposes, including school buses or other vehicles used to transport students on behalf of the District. School property shall also include non-district-owned property when that property is used for school-sponsored educational or co/extracurricular programs or activities. *See also* Ed 306.04(b)(2), RSA 193-D:1, V and RSA 193-F:3, V.

School building principals, or their designee, shall annually review their site-specific EOP and submit updated plans (or report of no changes) to the Superintendent for review by September 1st. [[1] delete fn.]

If, after such review, the plan remains unchanged, then the Superintendent/Principal shall notify the New Hampshire Department of Safety by October 15 that the plan is unchanged. If an Emergency Operations Plan is updated/revised, the Superintendent/Principal shall submit the updated Emergency Operations Plan to the Director of Homeland Security and Emergency Management of the Department of Safety by October 15. ***All hazard and fire evacuation drills shall be conducted annually pursuant to Board policy EBCB.***

B. **District-wide Crisis Prevention and Response Plan.**

The Superintendent, in consultation with appropriate personnel, and in coordination with local emergency authorities, shall develop a District-wide Crisis Prevention and Response Plan (the "District Crisis Plan"). The District Crisis Plan shall serve as a compilation of each site-specific Emergency Operations Plan for each District school and shall include the current Sports Injury Emergency Action Plan as required under Board policy JLCJA and RSA 200:40-c. To the extent that any school or District property as defined above is not included in a site-specific EOP, the District Crisis Plan will include the same information for such property as is required under Section A for site specific EOPs.

The District-wide Crisis Plan will include provisions addressing coordination of crisis prevention and responses between and among the different schools, grounds, school buses, and other facilities of the District. ~~Additionally, the District Crisis Plan should address:~~

~~*[Insert other provisions or issues the Board wishes such plan to address.]*~~

In order to avoid plan/policy conflicts, the District Crisis Plan will reference applicable sections of other pertinent plans rather than restate (e.g., crisis communications should be addressed in the District Communication Plan, *{**}*EG-E(1), emergencies relating to hazardous chemicals use should be addressed in the Chemical Hygiene Plan created under policy *EBCH*.

The District Crisis Plan shall be updated and provided to the Board for review by October 31 each year (i.e., after the site-specific EOP's are submitted to the state).

C. **Coordination.** The Superintendent will establish a relationship with local and state emergency services (e.g., police, fire, ambulance, etc.). Unless otherwise provided in a site-specific EOP, the District-wide Crisis Prevention and Response Plan or the District Communication Plan, the Superintendent, or his/her designee, will serve as the coordinator/liaison with these authorities. Additionally, the Superintendent should designate personnel to explore the availability of any training or support provided by the New Hampshire Departments of Education and/or Safety associated with risk assessment, crisis management, and other matters related to this policy.

[1] [Delete fn.] This date should be early enough to allow the Superintendent/facilities director sufficient time for review before the October 15 deadline to submit to the state.

District Policy History:
Approved by the WRSB: November 17, 2025
Approved by the WRSB: January 17, 2023
Approved by the WRSB: June 20, 2022
Revised – Sept. 2021
Revised and Approved by the WRSB: March 30, 2020
Revised: November 2019
Revised and Approved by the WRSB: November 20, 2017
Revised: September 2017
Approved by the WRSB: November 17, 2014
Revised: September 2014
Revised: July 1998, August 2007

WRSD Policy EHB (DRAFT): Data/Records Retention

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –

Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.
b. **General –** Highlighted language or blank, underscored spaces ___, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.
c. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.
d. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: **Revised:** May 2026, Aug. 2022; Sept. 2018; May 2018; May 2017; May 2008; Oct. 2005.

NHSBA revision note: May 2026, revisions include: (1) included a specific definition for the meaning of record, using language better aligning to the definition of governmental record" in RSA 91-A:1-a; (2) added a provision outlining the amorphous relationship of certain student records to various legal requirements; and (3) added a provision relating to records connected to use of Federal Funds as required by policy DAF. **Aug. 2022,** revised to include more specific provisions relating to destruction of records, and clarify relation to District Record Retention Schedule. **Sept. 2018,** revised to (1) reflect the 2018 passage of HB 1551 which added new section RSA 186-C:10-a regarding destruction of special education records and (2) include information pertaining to digital or electronic records. **May 2018,** minor style and grammatical changes. **May 2017,** revised to (1) comply with 2017 N.H. DOE rule requiring a policy on the retention and destruction of special education records and (2) add information regarding litigation holds or receipt of a Right-to-Know law request.

~ ~

The Superintendent shall develop and maintain (a) a schedule for the minimum retention of various district records ("Record Retention Schedule") as required under RSA 189:29-a, and (2) procedures for records retention and/or destruction.

The procedures should ensure that all pertinent records are stored safely and are stored for such durations as are required by state or federal law. The Superintendent shall develop procedures necessary to protect individual rights and preserve confidential information.

As used in this policy, "records" means all written communications or other information, whether in paper, electronic, digital, cloud or other physical form. ~~irrespective of the specific medium of the record, i.e., paper, electronic, digital, cloud, etc..~~

A. **Record Retention Schedule.** Records of the District shall be retained no less than the time prescribed in District's Record Retention Schedule EHB-R. The Superintendent shall update the

Record Retention Schedule from time-to-time in accordance with legislative or regulatory changes, directives of the Board, as recommended by the New Hampshire School Boards Association, or upon advice of counsel. The Superintendent shall inform the Board of any revisions to EHB-R no later than the second School Board meeting after the changes were made.

B. **Special Holding or Destruction Provisions.** Notwithstanding the District's Record Retention Schedule, (a) special destruction rules may apply to student special education records, and, (b) for other records, the normal retention periods may be suspended when the records are implicated by either a litigation hold or a request for records under the New Hampshire Right to Know law, RSA 91-A.

1. **Student/Pupil Register.** Pursuant to RSA 189:27 through 189:27-b, the District is required to maintain permanently a "Pupil Register" for each pupil/student ("student" throughout). The registers must include the data and information from time-to-time designated by the Department of Education, but at a minimum, basic enrollment information, attendance and scholarship. **Although such student registry records are also "student records" under the Family Educational Rights and Privacy Act ("FERPA"), not all student records are registry records. This Paragraph B.1 applies only to registry records.** Registry records may be maintained "through the use of computers," provided that the software allows printing of the required information. RSA 189:27-a. Additionally, whether stored electronically digitally, or in paper form, "complete and accurate records of students' attendance and scholarship" must be "permanently kept and safely stored in a fire-resistant file, vault or safe." Ed 306.04 (b)(4)(a).

2. **Records Relating to Federal Funds.** Before any records related to federal funds are destroyed, the requirements of the General Education Provisions Act (GEPA) 20 U.S.C. 1232f shall be observed. Namely, that statute requires that the district "keep records which fully disclose the amount and disposition by the recipient of [federal] funds, the total cost of the activity for which the funds are used, the share of that cost provided from other sources, and such other records as will facilitate an effective financial or programmatic audit for three years after the completion of the activity for which the funds are used." Therefore, if the purchase is made in part or in whole with federal funds, the record must be retained for three years after the completion of the activity for which the funds are used, notwithstanding any shorter retention period for similar records under the retention schedule, EHB-R. Accordingly, to the extent that EHB-R), or other authorities, suggest a different retention period for a type of document (e.g., purchase order, with accompanying documentation), the longer retention period will apply.

3. **Special Education Records.**

    a. Upon a student's graduation from high school, his or her parent(s)/guardian(s) may request in writing that the District destroy the student's special education records, including any final individualized education program.

    b. The District shall provide public notice of its document destruction policy at least annually.

    c. The District shall provide parents/guardians, or where applicable, the adult student, with a written notice of the District's document destruction policies upon the student's graduation with a regular high school diploma or at the transfer of rights, whichever occurs first.

    d. A permanent record of a student's name, address, and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation. 34 CFR 300.624.

    e. Absent any request by a student's parents to destroy the records prior to the twenty-sixth birthday, or to retain such records until the student's thirtieth birthday, the District shall destroy a student's records and final individualized education program within a reasonable time after the student's twenty-sixth birthday, provided that all such records be destroyed by the student's thirtieth birthday.

    f. The parent(s)/guardian(s) may, at any time prior to the student's twenty-sixth birthday, request, in writing, that the records be retained until the student's thirtieth birthday.

4. **Litigation Hold**. On receipt of notice from legal counsel representing the District in that a litigation hold is required, the routine destruction of governmental records, including paper and electronic or digital records, which are or may be subject to the litigation hold shall cease. The destruction of records subject to a litigation hold shall not resume until the District has received a written directive from legal counsel authorizing resumption of the routine destruction of those records in accordance with the retention requirements of this policy and the associated procedures.

5. **Right-to-Know Request Hold.** On receipt of a Right-to-Know law request to inspect or copy governmental records, the Superintendent shall cease any destruction of governmental records which are or may be the subject of the request. The records shall be retained regardless of whether they are subject to disclosure under RSA Chapter 91-A, the Right-to-Know law. If a request for inspection is denied on the grounds that the information is exempt under this chapter, the requested material shall be preserved for no less than ninety (90) days and until any lawsuit pursuant to RSA 91-A:7-8 has been finally resolved, all appeal periods have expired, and a written directive from legal counsel representing the District authorizing destruction of the records has been received.

C. **Disposal of Sensitive Information & Media Sanitization . District records which include "Sensitive Information" shall be destroyed as provided in this paragraph.** All electronic devices with storage capacity shall be deemed to contain sensitive information. For purposes of this section, **"Sensitive Information"** shall mean and include:

- Records containing student or employee personally identifiable information (PII) as defined in RSA 189:65, VII and VII-a;
- Criminal History Records Information (see Board policy GBCD);
- Drug test records;
- Child labor permits;
- Cobra notices;
- Accident reports;
- Special education student records;
- Records pertaining to civil rights investigations;
- Bonds and continuation certificates;
- Accident reports;
- Banking records;
- Business correspondence including confidential information such as account numbers, banking or digital transaction information;
- Tax forms, unemployment records, etc. with confidential data; and
- Any other information that would be exempt from disclosure under RSA 91-A:5 or deemed sensitive information by the Board, the Superintendent, Building Principal or their designees.

1. **Physical media** (i.e., "hard copies", print-outs, etc.) including sensitive information shall be destroyed by one of the following:

   - shredding using District issued cross-cut shredders;
   - placed in locked shredding bins approved by the Superintendent to come on-site and shred, witnessed by District personnel throughout the entire process; or
   - incineration using District incinerators or if conducted by non-authorized personnel offsite, witnessed by the Superintendent or Superintendent's designee.

2. **Electronic media.** *All electronic media should be assumed to contain sensitive information.* When no longer usable, hard drives, diskettes, tape cartridges, CDs, ribbons, hard copies, and other similar items used to process, store and/or transmit district records with sensitive data shall be disposed of as follows:

   - Overwriting (at least three times)
   - Degaussing (removal of magnetism)
   - Physical destruction (i.e., dismantling by methods of crushing, disassembling, etc., ensuring that the platter or other storage device has been physically destroyed so that no data can be extracted).

   Computers and other digital or electronic devices or systems that have been used to process, store, or transmit sensitive information shall not be released from the District's direct control until the equipment has been sanitized and all stored sensitive information has been destroyed using one of the above methods.

D. **Destruction of District Records with No Sensitive Information.** All records which do not include sensitive information should be destroyed as soon as practicable upon the expiration of the applicable retention period and in a manner deemed most efficient and practical.

***District Policy History*:**

Approved by the WRSB: March 27, 2023
Revised: August 2022
Approved by the WRSB: March 25, 2019
Revised: September 2018
Approved by the WRSB: September 18, 2017
Revised: May 2017
Policy Committee Reviewed: May 2016
Approved by the WRSB: August 17, 2009
Revised: May 2008
Revised: October 2005

WRSD Policy JFABD (DRAFT): Admission of Homeless Children and Unaccompanied Youth

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –
Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

b. **General –** Highlighted language or blank, underscored spaces ___, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

c. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

d. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised - May 2026, July 2019, May 2018, May 2008, February 2005

NHSBA revision notes, May 2026, **r**evised to include specific language in Sections C, & G-I as requested by NHED and relating to requirements of McKinney-Vento Act that the housing circumstances and living situation of a student protected under the act is confidential information, and may not be considered directory information under FERPA or any corresponding district policy (e.g., sample JRA), as well as language in Section B relating to the rights of formerly homeless students who become housed during the school year. **July 2019,** NHSBA substantially revised sample policy JFABD with the aim to reflect changes to the McKinney-Vento Act, most specifically the removal of children "awaiting foster care" from the definition of homeless, (see new policy JBABE) and requirements regarding transportation of homeless students. The revisions to JFABD, also include clarification of an LEA's responsibilities and limitations when dealing with disputes and decision making with respect to enrollment or transportation of homeless students.

~ ~

It is the Board's intent to remove barriers to the identification, enrollment and retention in schools of homeless children and youth. All staff shall take reasonable steps to ensure that homeless students and children are not segregated or stigmatized and that educational decisions are made in the best interests of those students.

A. Homeless Students.

Under the federal McKinney-Vento Homeless Assistance Act ("McKinney-Vento"), and guidance provided by the New Hampshire Department of Education ("NHDOE"), the term "homeless children and youths" means "individuals who lack a fixed, regular and adequate nighttime residence." Under both section 752(2) of McKinney-Vento and the NHDOE guidance*, the term includes children and youth who are:

1. sharing the housing of other persons due to loss of housing, economic hardship or a similar reason;

2. living in motels, hotels, trailer parks or camping grounds due to lack of alternative adequate accommodations;
3. living in emergency or transitional shelters;
4. abandoned in hospitals;
5. have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
6. living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
7. are migratory children who qualify as homeless because they are living in circumstances described above.

Additionally, as used in this policy, the terms "unaccompanied youth," "school of origin," "enrollment," and "attendance area school" shall have the same meanings as set forth in the McKinney-Vento Homeless Assistance Act ("McKinney-Vento") and guidance provided by the New Hampshire Department of Education ("NHDOE"). For purposes of this policy and its accompanying regulation, "homeless students" shall refer to and include "homeless children and youth" and "unaccompanied youth."

> *Note: under RSA 193:12, IV, the definition of "homeless children and youth" also includes children "awaiting foster care placement", see RSA 193:12, IV (a). That criterion, however, was removed from McKinney-Vento in 2015 as well as NHDOE guidance documents regarding McKinney-Vento. Under both McKinney-Vento, and NHDOE guidance, children who are awaiting foster care may fall within the definition of a homeless student if they meet other criteria as set forth above. See also Policy *JFABE*.

Each homeless student shall have access to and shall be provided education services for which the student is eligible comparable to services provided to other students in the school, including career and technical education programs, gifted education programs, and school nutrition programs. Transportation services for homeless students shall be provided in accordance with applicable law and as generally described below.

B. Enrollment and School Stability.

Enrollment of a homeless student shall be immediate even if the homeless student lacks records routinely required prior to enrollment or has missed application or enrollment deadlines (academic, immunization, etc.). The District shall make arrangements to obtain any necessary records and to have the student receive any necessary immunizations. When feasible, the District shall seek immunization through no- or low-cost health care providers. If an expense is incurred, the District shall seek reimbursement through Medicaid if possible.

If a homeless student becomes permanently housed during the school year, the student shall no longer be considered homeless and may only continue enrollment in the District for the remainder of that school year. All McKinney-Vento rights and services, including transportation and free lunch, shall be continued for the remainder of that year for such students.

C. Homeless Liaison.

The Superintendent shall appoint a staff member to serve as the local liaison for homeless students and their families/guardians (the "Homeless Liaison" or the "District Homeless Liaison"). The District shall provide training and other technical assistance to Homeless Liaison and other appropriate District staff regarding the District's obligations to homeless students, including the obligation to keep confidential information about a homeless student's housing situation. Duties of the District Homeless Liaison shall be as provided in state and federal law, as well as local policies and procedures. The duties shall include, among others: procedures for identification, enrollment, transportation, dispute resolution for homeless students, as well as direct assistance shall be made in accordance with the accompanying regulation and applicable law.

Among other things, the District Homeless Liaison shall:

a. assist in requesting the student's records;
b. mediate and assist with disputes concerning school enrollment and homelessness determinations;

c. assist in making transportation arrangements;
d. ensure that homeless students receive the educational services for which they are eligible or entitled;
e. coordinate with other Districts, entities, institutions and agencies to help assure that homeless children and youths are identified by school personnel;
f. ensure that unaccompanied youth and/or parents of homeless students are informed of the educational and related opportunities available to homeless students;
g. work to assure that parents/guardians of such students are provided with opportunities to participate in the education of their children (excepting instances when court or other protective orders indicate otherwise);
h. ensure that unaccompanied youth and/or parents of homeless students are informed of all transportation services including transportation to the school of origin;
i. assure that notice is publicly disseminated of the educational rights of homeless children and youths;
j. coordinate with other Districts and with local social services agencies and other agencies or programs providing services to homeless students as needed;
k. assist any unaccompanied youth with enrollment, credit accrual, and career and college readiness decisions;
l. work with the Superintendent or designee to monitor regulations and guidance related to this policy that may be issued by applicable state and federal agencies (e.g., DCYF, NHDOE, and the U.S. Department of Education).

D. Enrollment Determinations for Homeless Students.

Enrollment determinations shall be based upon the best interests of the homeless student, with the presumption that keeping the homeless student in the school of origin is in the homeless student's best interests, except when doing so is contrary to the request of the parent/guardian, or if applicable, unaccompanied youth.

E. Transportation of Homeless Students.

Under McKinney-Vento, homeless students are entitled to transportation to their school of origin or the school where they are to be enrolled. If the homeless student is located outside of District boundaries but a determination has been made that the student shall remain in the school of origin within the District, or, if a homeless student is located within this District, but a determination had been made that the student shall remain in the school of origin outside of the District, then the two Districts shall agree on a method to apportion cost and responsibility for the student's transportation or share the cost and responsibility equally.

F. Dispute Resolution.

For any decision in the enrollment process of a homeless student, including any determination whether a living situation meets the definition of homeless, if the decision is in conflict with the wishes of the homeless student's parent/guardian, or, if applicable, the unaccompanied youth, the District shall provide a written explanation, in a manner and form understandable to the student's parent, guardian or unaccompanied youth. District personnel receiving enrollment requests or information pertaining to homeless students should immediately refer those requests to the District Homeless Liaison and Superintendent's office.

In the event of a dispute, the District shall immediately enroll the student in the school in which the parent/guardian or unaccompanied youth seeks to enroll, which enrollment shall continue pending resolution of the dispute. Additionally, while enrollment disputes are pending, students have the right to participate fully in school and receive all services for which they would be eligible, as the definition of enrollment includes "attending classes and participating fully in school activities."

1. **Notification of Appeal Process**

   If the District seeks to place a homeless child in a school other than the school of origin or the school requested by the parent, or the District has determined that the living situation does not qualify as homeless ("eligibility decision"), the District shall inform the parent or the unaccompanied youth of the right to appeal. The District shall provide the parent or unaccompanied youth with written notice including:

a. A succinct explanation of the child's placement/eligibility decision and contact information for the District Homeless Liaison, as well as the NHDOE State Coordinator for Education of Homeless Children and Youth;

b. Notification of the parent's right to appeal(s);

c. Notification of the right to enroll in the school of choice pending resolution of the dispute;

d. A description of the dispute resolution process including a petition/appeal form that can be returned to the school to initiate the process and timelines; and

e. A summary of the McKinney-Vento Act.

While the Superintendent or Homeless Liaison may prepare and make available forms for the process, use of such forms is not required to initiate the appeal process.

2. **Appeal to the District Homeless Liaison – Level I**

a. If the parent or unaccompanied youth disagrees with the District's placement decision, he/she/they may appeal by filing a written request for dispute resolution/appeal ("appeal") with the school, the District Homeless Liaison, or Superintendent. The request for dispute resolution should be submitted within fifteen business days of receiving notification of the District's placement.

b. If the appeal/request for dispute resolution is submitted to the school or Superintendent, it will be immediately forwarded to the Homeless Liaison.

c. The District Homeless Liaison must log the complaint including a brief description of the situation and reason for the dispute and the date and time of the appeal was filed. Upon receipt, the District Homeless Liaison will forward a copy of the appeal document to the Superintendent.

d. Within five business days of receiving the appeal, the Homeless Liaison must provide the parent or unaccompanied youth with a written decision and notification of the parent's right to further appeal, with a copy to the Superintendent. At this time, the Homeless Liaison will also provide to the parent or unaccompanied youth an "appeals package" consisting of a copy of the written decision, a copy of the original appeal document, and copies of any additional materials provided to the Homeless Liaison by the parent or unaccompanied youth.

3. **Appeal to the Superintendent – Level II**

The parent or unaccompanied youth may appeal the Level I decision to the Superintendent or the Superintendent's designee, using the appeals package provided at Level I.

a. The Superintendent/designee will arrange for a personal conference to be held with the parent or unaccompanied youth within five business days of receiving the Level I appeals package. (Upon the request of the parent or unaccompanied youth, this conference may be held telephonically).

b. Within five business days of the conference with the parent or unaccompanied youth, the Superintendent/designee will provide that individual with a written decision with supporting evidence and notification of their right to appeal to NHDOE.

c. The Superintendent/designee shall provide a copy of the Superintendent's decision to the District's Homeless Liaison, as well as the NHDOE State Coordinator for Education of Homeless Children and Youth.

G. Confidentiality & Records

In furtherance of the District's commitment to minimizing the stigma that otherwise might attach to homelessness, all information relating to a homeless student's housing information shall remain confidential notwithstanding any provision relating to directory information under FERPA.

The District shall maintain copies of all written decisions, appeals and notifications concerning eligibility or enrollment requests made under this policy for the same period as it does for Title I records.

H. Administrative Procedures/Regulations

The Superintendent, in consultation with the Homeless Liaison, shall develop written procedures/ to implement this policy. Such procedures shall include provisions relating to how records relating to a homeless student's housing information (including any records relating to appeals) are stored, who may access them, and any appropriate provisions for how confidentiality will be maintained in practice.

I. Training

The Superintendent is directed to assure that all relevant staff responsible for the proper implementation of this policy, including, but not limited to, any staff or volunteers who, by nature of their position, have information concerning a homeless student's housing information, receive sufficient training to carry out their duties consistent with this policy, and any applicable procedures.

District Policy History:

Revised and Approved by the WRSB: November 18, 2019
Revised: July 2019
Approved by the WRSB: October 20, 2014
Revised May 2014
Approved by the WRSB: July 20, 2009
Revised: May 2008
Revised: February 2005
Reviewed: October 2004
New Policy: April 2003

WRSD Policy JLCD (DRAFT): Administering Medication to Students

Category: Priority/Required by Law

~ ~

ADOPTION/REVISION NOTES –

Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

b. **General –** Highlighted language or blank, underscored spaces ___, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

c. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

d. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised – May 2026, July 2020, September 2016, September 2015, February 2007

NHSBA revision notes, May 2026, revised to include 2025 amendments to RSA 200:42 -45 (2025 NH Laws Chapter 204:2 (HB677) relative to authorization, training, use, supply, and student self-administration, of Epinephrine in the schools. **June 2020**, amendments, made with the assistance of the New Hampshire School Nurses Association, included general organization, removal of redundant provisions and clarification of respective authority, and better alignment with other policies. **June 2016**, Amended to reflect enactment of RSA 200:44-a, 200:53-57, all regarding self- administration of certain medications.

~ ~

A. General Provisions for Administration of Medication

Medication whether prescription or over-the-counter ("OTC"), shall only be administered to or taken by students during the school day in accordance with this policy, and the corresponding administrative procedures record-keeping found in JLCD-R.

This policy shall extend to any school-sponsored activity, event, or program.

Medication is to be administered by a school nurse, as defined in RSA 200:29 ("the school nurse"). The school nurse may delegate the administration of medication to others only as permitted under the New Hampshire Nurse Practice Act, and N.H. Code of Administrative Regulations Nur 404. If no such person is available, the building principal or the principal's designee is permitted to assist students in taking required medications by:

i. making such medications available to the student as needed;

ii. observing the student as he/she takes or does not take his/her medication; and

iii. recording whether the student did or did not take his/her medication.

Whenever possible, medications should not be taken during the school day. Upon receiving a request from the parent, guardian, or physician relative to a particular student's need for medication during school hours, the school nurse may contact the parent, or guardian to discuss whether the student should remain at home, or whether the medication should be taken before, during, and/or after school. The nurse may also inquire about any other medical conditions requiring medications and any special side effects, contraindications, and adverse reactions to be observed.

a. *Prescription Medication* will be only be administered in school only after receiving and filing in the student's health record the following:

   a. A written statement from the licensed prescriber conforming to the requirements of N.H. Department of Education Rule 311.02 (i)(1) (included in District procedures JLCD-R).

   b. A written authorization from the parent/guardian as provided in N.H. Department of Education Rule 311.02 (i)(2) & (3) (included in District procedures JLCD-R).

b. *Over-the-Counter Medication* may be administered to a student with previous written authorization from the parent/guardian. The school nurse may, however, require a licensed prescriber's order, or further information/direction from a licensed health care provider (i.e., physician, advanced registered nurse practitioner, licensed physician's assistant or dentist), before administering an OTC medication to a student. The authorization shall contain the same information, with the same access, as is required relative to prescription medications.

To the extent consistent with New Hampshire's Nurse Practices Act, RSA 326-B, the school nurse may at his/her discretion accept verbal instructions from a licensed health care provider relative to administration of a prescription medication, and verbal instructions from a parent/guardian with respect to an OTC medication. In both instances, the verbal instructions shall be followed by written statements as provided above.

B. Emergency Administration of Medication

The school nurse or other properly designated personnel may administer other medications to students in emergency situations provided such personnel has all training as is required by law, and is consistent with the provisions of Board policy JLCE. Students may self administer epinephrine in accordance with section F below.

C. Field Trips and School Sponsored Activities

A single dose of medication may be transferred by the school nurse from the original container to a newly labeled container for the purposes of field trips or school sponsored activities. For trips or activities necessitating more than one dose, special arrangements for administering medication must be approved by the school nurse or, in the school nurse's absence, the Principal.

D. Other Uses/Administration Prohibited

No person shall share or otherwise administer any prescription or over-the counter medication with any student except as provided in this policy. Notice of this prohibition will be provided in student handbooks. Students acting in violation of this prohibition will be subject to discipline consistent with applicable Board policies.

E. Delivery, Storage and Disposal of Medication

Medications provided by the student's parent/guardian may only be delivered to the school nurse or principal/principal's designee. All such medication should be delivered in its original container. The school nurse is directed to keep such medications in a locked cabinet or refrigerator. No more than a 30-day supply will be kept and maintained by the school. The school nurse will contact the parent/guardian regarding any unused medication. Such medication shall be picked up by parent/guardian within ten days after its use is discontinued. If the parent/guardian does not pick up the medication within ten days, the school nurse may dispose of the unused medication and record as such in the student's health record file.

The school nurse may maintain a supply of asthma related rescue medication. The school nurse may also determine the quantity of doses and type of epinephrine, prescribed in the school's name, to maintain.

F. Administration and Self-Administration of Epinephrine ~~Auto-Injectors~~ and Inhalers

Students may possess and self-administer ~~an~~ epinephrine ~~auto-injector~~ if the student suffers from potentially life-threatening allergies. Both the student's parent/guardian and ~~physician~~ healthcare provider must authorize such self-possession and self-administration. If a student finds it necessary to use his/her epinephrine ~~auto-injector~~ , s/he shall immediately report to the nearest supervising adult. The school nurse or building principal may maintain at least one dose of epinephrine ~~auto-injector~~ , provided by the student, in the nurse's office or other suitable location. Additionally, students may possess and self-administer a metered dose inhaler or a dry powder inhaler to alleviate or prevent asthmatic symptoms, auto-injectors for severe allergic reactions, and other injectable medications necessary to treat life-threatening allergies. Both the student's parent/guardian and healthcare provider ~~physician~~ must authorize such self-possession and self-administration. Such authorization must include the same information required under A.1 of this policy, and Policy JLCE.

Other emergency medications, such as insulin, may be carried and self-administered by the student only with prior approval by the school nurse and written statements from a licensed health care provider and a parent/guardian and in the same manner as described in A.1 of this Policy, and subject to other conditions as the school nurse may require.

The school nurse and designated personnel may administer a student's prescribed epinephrine, or school maintained epinephrine to any student during a severe allergic reaction.

G. Medication Records

The school nurse is responsible for keeping accurate records regarding the administration of medication to students. Such records shall be retained as required under Board policy EHB, Data/Records Retention.

H. Implementation: Procedures and Protocols

The Superintendent, in consultation with the school nurse(s), shall be responsible for establishing specific procedures necessary and appropriate to control (e.g., delivery, storage, authorization, record-keeping, reporting, etc.) medications in the schools. Such procedures shall be in writing, and coded as JLCD-R. The procedures should be reviewed no less than every two years.

Additionally, and pursuant to N.H. Administrative Rule Ed. 311.02(k), each school nurse shall also develop and implement building specific protocols regarding receipt and safe storage of prescription medications.

District Policy History:

Revised and Approved by the WRSB: February 16, 2026
Approved by the WRSB: November 16, 2020
Approved by the WRSB: February 20, 2017
Revised: September 2016
Policy Committee Reviewed: April 2016
Revised: September 2015
Approved by the WRSB: April 14, 2008
Revised: February 2007

WRSD Policy JLCF (DRAFT): Wellness

Category: Priority/Required by Law

The Board recognizes the importance of proper nutrition and developmentally appropriate physical activity as ways of promoting healthy lifestyles, minimizing childhood obesity, and preventing other diet-related chronic diseases. The Board also recognizes that health and student success are inter-related. It is, therefore, the goal of the Board that the learning environment positively influences a student's understanding, beliefs, and habits as they relate to good nutrition and physical activity.

This policy outlines the District's approach to ensuring environments and opportunities for all students to practice healthy eating and physical activity behaviors throughout the school day while minimizing commercial distractions. This policy applies to all students, staff and schools in the District.

Goals:

1. **The District shall teach, encourage, support and model healthy eating habits for students.**
2. **The District shall teach, encourage, support, and model age appropriate daily physical activity.**
3. **The District shall educate students, employees, school board and community members to the important benefits of a healthy lifestyle and social and emotional wellness.**

I. DISTRICT WELLNESS COMMITTEE

The Superintendent, in consultation with the Food Service Director and the Office of Student Wellness, will facilitate development of updates to the District Wellness Policy, subject to School Board approval, and will oversee compliance with the policy. In addition, the Superintendent shall designate a Building Wellness Coordinator for each school to help ensure compliance with this policy at the building level. Additionally, the Wellness Committee is charged with making recommendations relative to the objectives and requirements of Board Policy IMAH, Daily Physical Activity.

The Superintendent shall convene a representative "District Wellness Committee" (or "Wellness Committee"), whose functions will include review and recommendations regarding implementation of and updates to this policy, and establishment of specific goals for nutrition promotion and education, physical activity and social/emotional wellness.

The Superintendent or his/her designee shall serve as the Chairperson of the District Wellness Committee, and shall maintain an updated roster of Building Wellness Coordinators and other persons serving on the Committee.

The District Wellness Committee shall meet no less than three times per school year.

The District Wellness Committee should represent each school and the diversity of the community, and to the extent feasible include the Superintendent or her/his designee, the Food Service Director, the Office of Student Wellness, each Building Wellness Coordinator, parents, students, physical education teachers, health education teachers, school counselors, school administrators, a school board member, outside health professionals, individual school building representatives, and members of the public.

Staff appointments to the Wellness Committee will be made by the Superintendent. The School Board Chair shall appoint the School Board member. Remaining members, other than those who are ex officio, shall be appointed and approved by the Wellness Committee.

As a statutory committee, the Wellness Committee shall comply with the requirements of RSA 91-A regarding meetings.

II. WELLNESS POLICY IMPLEMENTATION, MONITORING, ACCOUNTABILITY AND COMMUNITY ENGAGEMENT

A. Implementation Plan

Each Building Wellness Coordinator, with the assistance of the Wellness Committee, will conduct a school level assessment based on the Centers for Disease Control and Prevention's School Health Index, using tools available through such programs as the Alliance for a Healthier Generation *Healthy Schools Program*, and to create an action plan and generate an annual progress report. The school-level assessment/report should be completed by September 30th of each school year and provided to the Superintendent.

B. Annual Notification of Policy

The District will annually inform families and the public of basic information about this policy, including its content, any updates to the policy, and implementation status. The District will make this information available via the district website. This information will include the contact information of the District official(s) chairing the Wellness Committee (i.e., the Superintendent or his/her designee) and any Building Wellness Coordinator(s), in addition to on how the public can get involved with the District Wellness Committee.

C. Triennial Progress Assessments

Every three years, the Food Service Director, in conjunction with the Office of Student Wellness and Wellness Committee, will assess:

- The extent to which each of the District's schools are in compliance with the Wellness Policy;
- The extent to which the District Wellness Policy compares to model wellness policies; and
- A description of the progress made in attaining the goals of the District's Wellness Policy.

The Wellness Committee will make recommendations to update the District Wellness Policy based on the results of the annual School Health Index and triennial assessments and/or as District priorities change; community needs change; wellness goals are met; new health science, information, and technology emerges; and new Federal or state guidance or standards are issued. The recommendations should include those relating to the provisions of Board policy IMAH, Daily Physical Activity. The Board will review and act upon such assessments as required or as the Board deems appropriate.

D. Recordkeeping

The Superintendent will retain records related to this Policy, to include at least the following:

- The District Wellness Policy;
- The most recent assessment on the implementation of the local school wellness policy;
- Documentation on how the District Wellness Policy and Policy assessments are/were made available to the public;
- Documentation confirming annual compliance with the requirement that District Wellness Policy, including updates, and the most recent assessment on the implementation of the Policy have been made available to the public; and
- Documentation of efforts to review and update the District Wellness Policy; including who is/was involved in each update and methods the District uses to make stakeholders aware of opportunities to participate on the District Wellness Committee.

E. Community Involvement, Outreach and Communications

The District will communicate ways in which representatives of DWC and others can participate in the development, implementation and periodic review and update of the wellness policy through a variety of means appropriate for that district. The District will also inform parents/guardians of the improvements that have been made to school meals and compliance with school meal standards, availability of child nutrition programs and how to apply, and a description of and compliance with Smart Snacks in School nutrition standards.

III. NUTRITION.

A. School Meals

All schools within the District participate in USDA child nutrition programs, including the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). District schools are committed to offering school meals that:

- Are accessible to all students;
- Are appealing and attractive to children;
- Are served in clean and pleasant settings;
- Promote healthy food and beverage choices; and
- Meet or exceed current nutrition requirements established by local, state, and Federal statutes and regulations. The District offers reimbursable school meals that meet USDA nutrition standards, which may be found at:

https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals

B. Staff Qualifications and Professional Development

All school nutrition program directors, managers and staff will meet or exceed hiring and annual continuing education/training requirements in the USDA professional standards for school nutrition professionals, which may be found at:

https://www.fns.usda.gov/tn/professional-standards

C. Water

To promote hydration, free, safe, unflavored drinking water will be available to all students at every school throughout the school day, including mealtimes.

Students shall be permitted to bring water bottles to school that:

(1) Are made of material that is not easily breakable;
(2) Have lids to prevent spills; and
(3) Are filled exclusively with water

~~School Principals may discipline students for the misuse of water bottles, consistent with Board policy JICD.~~

D. Competitive Foods and Beverages and Marketing of Same in Schools

"Competitive foods and beverages" (i.e., foods and beverages sold and served or marketed during the school day, but outside of the school meal programs) must meet the USDA Smart Snacks in School nutrition standards, which may be accessed at:

http://www.fns.usda.gov/tn/guide-smart-snacks-school

These standards will apply in all locations and through all services where foods and beverages are sold, which may include, but are not limited to, à la carte options in cafeterias and vending machines.

Except as may be provided elsewhere in this Policy, any foods and beverages marketed or promoted to students on the school campus during the school day will meet or exceed the USDA Smart Snacks in School nutrition standards. Food and beverage marketing is defined as advertising and other promotions in schools, including, but is not limited to:

- Brand names, trademarks, logos or tags, except when placed on a physically present food or beverage product or its container.
- Displays, such as on vending machine exteriors.
- Corporate brand, logo, name or trademark on school equipment, such as marquees, message boards, scoreboards or backboards (***note***: immediate replacement of these items are not required; however, districts will replace or update scoreboards or other durable equipment when existing contracts are up for renewal or to the extent that is in financially possible over time so that items are in compliance with the marketing policy.).
- Corporate brand, logo, name or trademark on cups used for beverage dispensing, menu boards, coolers, trash cans and other food service equipment; as well as on posters, book covers, pupil assignment books or school supplies displayed, distributed, offered or sold by the District.
- Advertisements in school publications or school mailings.
- Free product samples, taste tests or coupons of a product, or free samples displaying advertising of a product.

Corporate brand names, logos, and trademarks for companies that market products that comply with the

USDA Smart Snacks in School nutrition standards will not be prohibited because they offer some non-compliant food or beverage items in their product line. Likewise, the marketing restrictions do not apply to clothing or other examples of expression which include brand information for non-compliant food or beverage items.

As the District, school athletic department, and parent teacher associations review existing contracts and consider new contracts, equipment and product purchasing (and replacement) decisions should reflect the applicable marketing guidelines established by the District wellness policy.

E. Celebrations and Rewards

All foods offered during the school day on the school campus will meet or exceed the USDA Smart Snacks in School nutrition standards. Food and beverages will not be used as a reward or withheld as punishment for any reason. **Teachers are encouraged not to use food or beverages as instructional tools. Class celebrations should be limited to three times per year, and only prepackaged, labeled foods are allowed.** The District's School Nutrition Services will make available a list of healthy party ideas to parents and teachers, including non-food celebration ideas, and a list of foods and beverages which meet Smart Snack nutrition standards.

F. Food Sale Fundraising

Foods and beverages that meet or exceed the USDA Smart Snacks in Schools nutrition standards may be sold through fundraisers on the school campus during the school day. Fundraising groups are encouraged to choose non-food fundraisers, and to consider healthy fundraising ideas. Notwithstanding this provision, each school may allow up to nine fundraising food sales of non-compliant foods (i.e., that do not meet Smart Snack standards), which are no more than one day in duration each.

G. Nutrition Promotion

The District will promote healthy food and beverage choices for all students throughout the school campus, as well as encourage participation in school meal programs. This promotion will include.

- Implementation of at least one or more evidence-based healthy food promotion techniques in the school meal programs using methods included in the Smarter Lunchroom Movement, which may be found at:

  https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies

- Ensuring 100% of foods and beverages promoted to students during the school day meet the USDA Smart Snacks in School nutrition standards. Additional promotion techniques that the District and individual schools may use are available through the Smart Flood Planner of the Alliance for a Healthier Generation, available at:

  https://foodplanner.healthiergeneration.org/access-to-address-health-equity/smart-food-planner.

H. Nutrition Education

The District will teach, model, encourage and support healthy eating by all students.

- Nutrition education shall be included in the health curriculum so that instruction is sequential and standards-based and provides students with the knowledge, attitudes, and skills necessary to lead healthy lives.
- Nutrition education posters will be displayed in each school cafeteria.
- Consistent nutrition messages shall be disseminated throughout the school.

Schools should provide additional nutrition education that:

- Is designed to provide students with the knowledge and skills necessary to promote and protect their health;
- To the extent practicable is integrated into other classroom instruction through subjects such as math, science, language arts, social sciences and elective subjects;
- May include enjoyable, developmentally-appropriate, culturally-relevant and participatory activities, such as cooking demonstrations or lessons, promotions, taste-testing, farm visits and school gardens;
- Promotes fruits, vegetables, whole-grain products, low-fat and fat-free dairy products and healthy food preparation methods;
- Emphasizes caloric balance between food intake and energy expenditure (promotes physical activity/exercise);
- Links with school meal programs, cafeteria nutrition promotion activities, school gardens, Farm to School programs, other school foods and nutrition-related community services;
- Teaches media literacy with an emphasis on food and beverage marketing; and
- Includes nutrition education training for teachers and other staff.

I. Food Accommodations for Allergies:

Food alternatives and allergen labeling are required for common food allergies such as peanut, dairy and gluten allergies at all district-sponsored and school-sponsored events where food is served. This accommodation policy does not extend to private functions, fundraisers, events hosted on school property by external organizations, student-led functions, staff members acting outside of their professional role, and such other events and activities that ares not sponsored by a school or the district. For all district or school sponsored events, organizers must review the school's student health needs in advance to ensure safe participation.

IV. PHYSICAL ACTIVITY

The District will provide physical education consistent with national and state standards. In addition, the District will promote developmentally appropriate physical activity as provided in Board policy IMAH, Daily Physical Activity. Physical activity during the school day (including but not limited to recess, classroom physical activity breaks or physical education) will not be withheld as punishment but a portion may be used for restorative practices. ~~for any reason~~.

A. Classroom Physical Activity Breaks

In addition to any recess periods provided in the ordinary daily schedule, students will be offered ***periodic opportunities*** to be active or to stretch throughout the day. The District recommends teachers provide short (3-5 minute) physical activity breaks to students during and between classroom time at least three days per week. These physical activity breaks will complement, not substitute, for physical education class, recess, and class transition periods.

B. Before and After School Activities.

The District offers opportunities for students to participate in physical activity after school through interscholastic and intramural sports and clubs.

C. Walking and Biking to School.

The District will support walking or biking to school by students or faculty only ~~if determined safe by the building principal~~. where safe routes are available.

V. OTHER ACTIVITIES TO PROMOTE STUDENT WELLNESS

The District will endeavor to integrate social/emotional wellness activities across the entire school setting, not just in the cafeteria or physical education and athletic facilities. In furtherance of this objective, each school in the District will engage in social/emotional curriculum implementation such as RULER, Choose Love, and Nurtured Heart each school year.

VI. PROFESSIONAL LEARNING

When feasible, the District will offer annual professional learning opportunities and resources for staff to increase knowledge and skills about promoting healthy behaviors in the classroom and school (e.g., increasing the use of kinesthetic teaching approaches or incorporating nutrition lessons into math class).

District Policy History:

Revised and Approved by the WRSB: May 15, 2023
Revised: August 2022
Revised and Approved by the WRSB: June 17, 2019
Revised: May 2014
Revised: February 2006. September 2009

Legal References:

42 U.S.C. 1751, Richard B. Russell National School Lunch Act

42 U.S.C. 1771, Child Nutrition Act of 1966

Section 204 of Public Law 108-265, Child Nutrition and WIC Reauthorization Act of 2004

The Healthy Hunger-Free Kids Act of 2010

7 C.F.R 210, National School Lunch Program

7 C.F.R 220, School Breakfast Program

RSA 189:11-a, Food and Nutrition Programs

N.H. Dept. of Education Administrative Rule - Ed 306.04 (a)(20), Wellness

N.H. Dept. of Education Administrative Rule - Ed 306.11 (g), Food and Nutrition Services

N.H. Dept. of Education Administrative Rule - Ed 306.38 (b)(1)b, Family and Consumer Science Education Program (middle schools)

N.H. Dept of Education Administrative Rule - Ed 306.40, Health Education Program

Legal References Disclaimer*: These references are not intended to be considered part of this policy, nor should they be taken as a comprehensive statement of the legal basis for the Board to enact this policy, nor as a complete recitation of related legal authority. Instead, they are provided as additional resources for those interested in the subject matter of the policy.*

WRSD Policy JICK (DRAFT): Bullying Prevention - Pupil Safety and Violence Prevention

Category: Priority/Required

~ ~

ADOPTION/REVISION NOTES –

Text between the highlighted lines "~ ~ ~ ~", and highlights in this sample should be removed prior to adoption.

a. **Specific -** Many of the changes to JICK in the 2026 revision are required by the passage of HB131 (amending RSA 193-F:4). That statute further requires that each school board " *to the greatest extent practicable, involve pupils, parents, administrators, school staff, school volunteers, community representatives, and local law enforcement agencies in the process of developing the policy."* Because **substantive provisions of the amendment take effect on August 1, such that they should be in place by the beginning of the school year, NHSBA recommends that boards waive the second reading of the policy and adopt the policy at the earliest meeting after August 1, 2026**. Thereafter, the policy committee or whomever in the district is responsible for preparing recommended policies, should attempt to convene representatives of the groups indicated in the quoted language above (e.g., pupils, parents, law enforcement, etc.) with the intent of recommending changes to the policy while retaining those portions that are required by the statute. The object would be to propose changes, if any, to the board, ideally before the beginning of December.

b. **Specific** - note that HB131 added the following requirement: "**By January 1, 2027**, each public school district
... shall make available a report or link to a report on how their policy has been integrated into the school's curriculum, discipline policies, behavior programs, and other violence prevention efforts. The report or link shall be provided to office (sic) of commissioner in the department, chair of the state board of education, the senate president, speaker of the house and members of the house and senate education committees." See 2026 N.H. Laws 205:3 (codified as RSA 193-F:4, V) (setting a sunset repeal of this paragraph of January 1, 2027). The requirement is embedded in this policy in the second paragraph of Section I.4.

c. **General –** As with all sample policies/procedures, NHSBA recommends that each district carefully review this sample prior to adoption/revision to assure suitability with the district's own specific circumstances, internal coding system, current policies, and organizational structures. **NOTE:** as some of the content in the sample is governed by specific statutes, care should be taken to review the legal references (footnotes) prior to modification of substantive provisions.

d. **General –** Highlighted language or blank, underscored spaces ___, with or without brackets [ ] or { } indicate specific areas which Boards should review, change or complete to reflect local personnel titles, internal/ external policy references, duty assignments etc. Peach highlights indicate internal paragraph references which might change if a district modified suggested language.

e. **General –** *{**}* indicates a reference to another NHSBA sample policy. A district should check its own current policies and codes to assure internal consistency.

f. **General –** Withdrawn & earlier versions of revised policies should be maintained separately as part of the permanent records of the District.

NHSBA history: Revised - July 2026, Nov. 2025, Sept. 2015, Sept. 2014, Sept. 2010, May 2008, Aug. 2006. **New policy -** July 2004.

NHSBA revisions notes, July 2026 - revisions include: (a) changes to definitions and reporting/investigation procedures mandated by 2026 passage of HB131 (2026 N.H. Laws Chapter 205, amending RSA 193-F:3 and 4); (b) two corrections to the November 2025 revision, the first correcting misalignment of language in the definition of bullying in Section B.1, and the second, and more significant, reinserting changes which were dropped off during the final pre-publication editing that had reflected the requirements of 2025's HB108 regarding cross-district/state bullying incidents, which can now be found in new D.5 and new D.1, below (note that the new paragraphs required renumbering of the other paragraphs of Sections D and E; (c) moving of language in A.1 to the umbrella paragraph to A, and moving the off-campus language from B.1 to A.1; (d) restructuring of Section I to include new requirements of HB131; (e) re-lettering paragraph and sub-paragraph references for RSA 193-F:4, II as a result of the re-lettering within HB131; (f) addition in B.1 and B.2 of examples of conduct that could constitute bullying or cyberbullying; (g) correction to what is now F.4, changing reference to policy ECF to ECAF, with reference to EEAA removed to reflect the rescission of that sample with the May2026 update to ECAF; (h) inclusion of a notice relating to school bus audio recordings; and (i) other minor corrections of typographic errors. **November 2025 -** New content (1) added to reflect 2025 passage of HB108 which amended RSA 193-F to address investigations of alleged bullying involving more than one district, (2) changed the title to emphasize connection to bullying, (3) additional definitions, some from 193-F, some as aids for clarity, and (4) reflecting statutory provisions relating to immunity and liability. In addition, sample JICK was completely reformatted and restructured. **September 2015 -** added provision relating to limitations under RSA 189:70 relative to accessing student social media during investigations. **September 2014** - added provision for appeals to reflect that the NH State Board of Education will accept directly from the initial bullying investigative decision unless there is an intervening district appeal process.

~ ~

A. **Purpose and Intent.** The [School District Name] is committed to providing a safe and respectful learning environment for all students. Through education, prevention, and consistent enforcement, we aim to eliminate bullying and promote positive peer relationships for all of our students. This policy defines and prohibits bullying and related conduct, and establishes clear procedures for reporting, investigating, and responding to incidents.

1. Prohibition of Bullying or Cyberbullying of a Student - RSA 193-F:4, II(a). This policy is intended to comply with and implement RSA 193-F. Bullying, in any form—whether physical, verbal, social, or cyber—is strictly prohibited and will not be tolerated. ~~This policy defines bullying and related conduct, and establishes clear procedures for reporting, investigating, and responding to incidents.~~ The prohibition against bullying and cyberbullying, also applies to conduct that occurs on, or is delivered to, school property or a school-sponsored activity or event on or off school property, or occurs off school property or outside of a school-sponsored activity or event, if the conduct interferes with a student's educational opportunities or substantially disrupts the orderly operations of the school or any school-sponsored activity or event.

2. Protection of all School Aged Children - RSA 193-F:4, II(c). This policy shall apply to all students and school-aged persons on school district grounds and participating in school district functions, whether or not such school-aged person is a student within the District and regardless of status under the law.

3. Prohibition of Retaliation and False Accusations - RSA 193-F:4, II(b). This policy further prohibits retaliation or false threats against a victim, witness, or anyone else who, in good faith, provides information about an act of bullying or cyberbullying.

B. **Definitions** - (RSA 193-F:3).

1. "Bullying" means a single significant incident or a pattern of incidents involving a written, verbal, or electronic communication, or a physical act or gesture, or any combination thereof, directed at any student which:

~~Bullying shall also mean and include actions motivated by an imbalance of power based on a student's actual or perceived personal characteristics, behaviors, or beliefs, or motivated by the student's association with another person and based on the other person's characteristics, behaviors, or beliefs.~~ [[i delete note]]

~~As used throughout this or other Board policies, and unless the context indicates otherwise, the term "bullying" as used in this policy will include cyberbullying.~~

~~Bullying prohibited and covered by this policy includes any action or communication described above that~~

a. Physically harms a student or damages the student's property;

b. Causes emotional distress to a student;

c. Interferes with a student's educational opportunities;

d. Creates a hostile educational environment; ~~or~~

e. Substantially disrupts the orderly operation of the school; or

f. occurs on, is delivered to, school property or a school-sponsored activity or event on or off school property.~~; or~~

g. ~~Occurs off of school property or outside a school-sponsored activity or event, if the conduct interferes with a student's educational opportunities or substantially disrupts the orderly operations of the school or any school-sponsored activity or event.~~

Examples of bullying conduct include, but are not limited to:

i. mocking a student's appearance, speech, or abilities.

ii. Spreading rumors to damage a student's reputation.

iii. Intentionally excluding a student from social or school activities.

iv. Threatening a student with physical harm or intimidation.

v. Encouraging others to target or ridicule a specific student.

vi. Taking, hiding, or damaging a student's personal belongings.

vii. Using slurs or derogatory names to demean a student.

2. "Cyberbullying" means conduct defined above as bullying committed or undertaken through the use of electronic devices. Unless the context indicates otherwise, the term "bullying" as used in this policy will include acts of cyberbullying.

   Additional examples of cyberbullying conduct include, but are not limited to:

   a. "Doxxing" - sharing through digital means another student's private information, such as their address(es), telephone number, images with the intent to cause embarrassment or damage to personal reputation.

   b. "Cyberstalking" — repeatedly contacting another student through electronic devices, repeatedly attempting or requesting a connection on social media or messaging apps when that other student has requested not to be contacted or in any other manner that causes fear or distress.

   c. "Catfishing" - creating fake accounts or pretending to be another student.

   d. Sharing of "deepfakes" - distributing or communicating through electronic devices digitally altered images, video, audio or other content that impersonates another student, misrepresents facts, harasses, embarrasses or otherwise causes or is intended to cause reputational harm. (See also Board policy EHAG for definition and prohibition on creating or sharing of deepfakes.)

3. "Electronic devices" includes, but is not limited to, telephones, cellular or smartphones, computers, pagers, or any other device which is used for or can transmit: voice calls or messages; electronic mail; text/instant or other verbal messaging; images or videos; and websites.

4. "Parent" means a person who has legal custody of a minor child as a natural or adoptive parent, as a legal guardian, or who is functioning in a parental role if the actual parent or guardian is absent from the child's daily life. Additionally, "parent" may include students who have been emancipated, either by age or legal process. The term "parent", shall not, however,

include a parent as to whom the parent-child relationship has been terminated by judicial decree or voluntary relinquishment.

5. "Perpetrator" means a student who engages in bullying or cyberbullying.

6. "Principal" shall mean and include the building Principal or other senior building administrator of a school, as well as any "designee" (qualified person) designated ~~appointed~~ by the Principal to carry out all or some Principal functions as described in this policy.

7. "Retaliation" means and includes such conduct as intimidation, threats, coercion, harassment, or discrimination in response to (or an effort to prevent) a victim, witness or other person, who in good faith provides information about an act or conduct that the person providing the information believes is bullying or cyberbullying.

8. "School property" means all real property and all physical plant and equipment used for school purposes, including public or private school buses or vans.

9. "Staff" means and includes all district, school or SAU employees, bus drivers, coaches, designated volunteers (as defined in Board policy GBCD) or other volunteers who are regularly on school property, or who have significant contact with students, and any contracted consultants or employees of a company under contract to the District or SAU ~~and~~ who provide services on school property. ~~have significant contact with students~~.

10. "Student" shall have the same meaning as "pupil" as used in RSA 193-F and this or any other Board policy.

11. "Superintendent" means the Superintendent (Senior Education Official) or other person designated by the Superintendent to carry out all or some Superintendent functions as described in this policy.

12. "Victim" means a student against whom bullying or cyberbullying has been perpetrated.

C. **Retaliation & False Accusations** - RSA 193-F:4, II(b). Retaliation or false accusations related to bullying or cyberbullying shall be deemed a violation of this policy. Upon receiving any report of bullying or cyberbullying, the Principal will immediately assess the need to develop a plan or take steps to protect the alleged victim or any witnesses against retaliation. The same assessment shall be made at any point upon a report of retaliation or false accusations made during or after a bullying/cyberbullying investigation.

   Reports of retaliation or false accusations relating to a bullying/cyberbullying report may be made in the same manner as for reports of bullying/cyberbullying as provided in this policy.

   Investigations, and responses (i.e., interventions, supportive measures, disciplinary consequences) to reports of retaliation or false accusations may be made as provided in the same manner as provided in Sections E - H for reports or incidents of bullying/cyberbullying, or in accordance with procedures and provisions set forth in the [Code of Conduct / Student handbook______].

D. **Procedures for Reporting Bullying, Cyberbullying, Retaliation or False Accusations** - RSA 193-F:4, II(f)- (h). At each school, the Principal is responsible for receiving reports or complaints of bullying or cyberbullying.

   1. Student Reporting. Any student who believes he or she has been the victim of bullying/cyberbullying, retaliation, or false accusations should report the alleged acts immediately to the Principal, or to a school district employee or volunteer that the student feels more comfortable making the report.

   2. Staff Reporting. Any school employee or volunteer who receives a report of, witnesses, or has knowledge or belief that bullying/cyberbullying or retaliation may have occurred, shall inform the Principal as soon as possible, but no later than the end of that school day.

   3. Parent Reporting. Parents and other adults are also encouraged to report any concerns about possible bullying/cyberbullying or retaliation of students to the Principal.

   4. Anonymous Reports. The Principal may develop a system or method for receiving anonymous

reports of bullying within the building. Although students, parents, volunteers and visitors may report anonymously, an investigation based upon such reports may by necessity be incomplete. More significantly, formal disciplinary action may not be based solely on an anonymous report, and, likewise, other remedial or supportive measures may require some form of evidentiary verification.

5. Reports Involving Students from Different Districts. Reports of bullying which relate to students from different districts should, when possible, be made to the Principal of the school in which the victim(s) is enrolled/attending, otherwise to the Principal of the school in which the perpetrator is enrolled/attending.

6. Report Forms. The administration may develop student reporting forms to assist students and staff in filing such reports. An investigation shall still proceed even if a student is reluctant to fill out the designated form and chooses not to do so.

E. **Actions Upon Receipt of Report of Bullying or Cyberbullying.**

1. Notice when Allegations Involve Students from Other Districts/Schools/States - RSA 193-F:4, II(k). When a report of bullying involves conduct across multiple districts or students from multiple school districts, the Principal/designee will immediately inform the Principal(s) of each of the other schools/districts. Additionally, if the report concerns bullying across state lines, the Principal/designee will inform the New Hampshire Attorney General's office.

2. Information to Alleged Victim - Upon a receipt of a report of bullying, the Principal/designee shall provide the alleged victim with a written copy of their rights, protections, and support services available. RSA 193-F:4, II(i).

3. Parental Notice of Bullying Report — RSA 193-F:4, II(ih). Within 48 hours of receiving a report of bullying, the Principal will notify the parents of any student reported as a victim of bullying, as well as the parents of any student who has been reported as a perpetrator of bullying. The notification to parent(s)/guardian(s) will include the measures being taken to ensure the safety of the victim (alleged) and to prevent further acts of bullying. Such notification may be made by telephone, writing or personal conference. The date, time, method, and location (if applicable) of such notification and communication shall be included in the investigative report. Notifications shall be consistent with the applicable provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA) relative to the student privacy rights of each student indicated in the report.

   The Principal may request of the Superintendent designee a waiver of the parental notification requirement, which may be granted only if the Superintendent deems such a waiver to be in the best interest of either the alleged victim or alleged perpetrator. Details of any request for a waiver and any grant of such request will be included in the investigative report. However, notification to parents/guardians may not be waived for longer than 5 school days except for reports of bullying across multiple school districts (see Section E.1). RSA 193-F:4, II(j).

4. Receipt of Report. Upon receipt of a report of bullying, the Principal shall commence an investigation consistent with the provisions of Section F of this policy, shall assess:

   a. the need for a plan to protect students against retaliation,

   b. whether the conduct may be construed as illegal discrimination or harassment related to a protected class as set forth in Board policy AC. If so, the Principal shall confer with the District staff member(s) charged with handling such discrimination or harassment to determine how to proceed (e.g., parallel or combined investigations); and

   c. whether such conduct constitutes a safe schools violation requiring a report pursuant to RSA 193-D:4 and Ed 317.05.

F. **Investigative Procedures -** RSA 193-F:4, II(k).

1. Upon receipt of a report of bullying, the Principal shall, within 5 school days, initiate an investigation into the alleged act. If the Principal is directly and personally involved with a complaint or is closely related to a party to the complaint, then the Superintendent shall direct another district employee to conduct the investigation.

2. Under state law, when bullying is alleged to occur across multiple New Hampshire school districts, the Principals/designees for each New Hampshire school involved, are expected to collaborate and cooperate in the investigation. The Principal who first learns of the incident(s) is required to initiate the investigation.

3. The investigation should include documented interviews with the alleged victim, alleged perpetrator and any witnesses. All interviews shall be conducted privately, and shall be confidential to the extent permitted by law. Each individual will be interviewed separately and at no time will the alleged victim and perpetrator be interviewed together during the investigation.

4. The investigation should include review of any available surveillance recordings subject to the provisions of Board policy ECAF ~~and {**} EEAA~~. As required under RSA 507-A:2, II(k), parents/guardians and students are notified that surveillance recordings with audio may occur on school buses if authorized under Board policy ECAF.

5. If the alleged bullying was in whole or in part cyberbullying, the Principal may ask students and/or parents to provide the District with printed copies of e-mails, text messages, website pages, or other similar electronic communications, consistent with Board policy JIH and RSA 189:68~~RSA 189:6~~. The Principal may not, however, require or request a student to disclose or to provide access to a personal social media account through the student's user credentials.

6. T~~Factors t~~he Principal or other investigator may consider all relevant facts and circumstances during the course of the investigation, including but not limited to:

   a. Description of incident, including the nature of the behavior;

   b. How often the conduct occurred;

   c. Whether there were past incidents or past continuing patterns of behavior;

   d. The characteristics of parties involved, (name, grade, age, etc.);

   e. The identity and number of individuals who participated in bullying behavior;

   f. Where the alleged incident(s) occurred;

   g. Whether the conduct adversely affected any student's education or educational environment;

   h. Whether the alleged victim felt or perceived an imbalance or power as a result of the reported incident; and/or

   i. Whether the conduct violated any other District or school policies or rules.; and

   j. ~~The date, time and method by which parents or legal guardians of all parties involved were first contacted~~.

7. In most instances, the Principal shall complete the investigation within 10 school days of receiving the initial report. See RSA 193-F:4, II(o). If the Principal needs more than 10 school days to complete the investigation, the Superintendent may grant an extension of up to 7 school days. In the eve~~nt such e~~xtension is granted, the ~~Principal~~Superintendent/designee shall notify in writing all parties involved of the granting of the extension and the reason for the extension. To the extent not previously communicated, the Superintendent shall ensure that the victim's parent(s) or guardian(s) are notified of the investigation, the extension, and the reason for the extension.

   Without limiting what might constitute sufficient cause for an extension under this paragraph, the Superintendent may consider the interests of the victim or alleged perpetrator related to any investigation into some or all of the same alleged conduct which other investigation includes procedures and timelines mandated by a regulation or statute other than RSA 193-F (e.g., Title IX, criminal investigations, etc.). Before waiving the time requirement on account of such other investigation, the Superintendent should confer with counsel and or the District's [Human Rights/Non-Discrimination Officer {check title used in the District's anti-discrimination policy} ______________________________].

8. In cases involving reports of bullying across multiple districts or states, the Principal(s) of any and all districts in New Hampshire that are involved SHALL collaborate with any other principals or districts involved.

G. **Completion of Investigation and Report**.

1. Investigative Determination and Report. Whether a particular action or incident constitutes bullying/cyberbullying, retaliation or other violation of this policy – requires review and consideration of available evidence of all facts and surrounding circumstances. The investigative determination along with a summary of the investigation, shall be included in a comprehensive report. If the determination is that the bullying allegation is substantiated, the report shall include provisions describing any disciplinary consequences, interventions, supportive measures or other assistance for the victim or perpetrator, and, when indicated, any steps appropriate to protect all students from retaliation of any kind. The report may also include policy, training or other recommendations for preventing future bullying conduct within the school.

2. Communication with Students and Parents Upon Completion of Investigation - RSA 193-F:4, II(m) and (o).

   a. ~~The Principal will meet promptly with each student directly involved in the incident(s) and communicate the general investigative determination as to whether the allegations of bullying/cyberbullying were substantiated, and any initial consequences or interventions appropriate to the determination.~~

   b. Within 10 school days, the Principal will notify the parents of the alleged victim and of the alleged perpetrator regarding the school's remedies and assistance, within the boundaries of applicable state and federal law. The initial communication may be in writing, in person or by telephone, but if verbally, the Principal will also send a letter confirming earlier determination to the parents within 2 school days confirming the earlier notification.

   c. The Principal/Designee shall conduct a conference with each perpetrator, and the perpetrator's parents/guardians and applicable school personnel for age-appropriate discussion that includes at a minimum the impacts of bullying. The conference shall occur even if the parent or parents or guardian or guardians decline to participate or fail to attend. Information concerning the date, time, place and attendees of the conference, and any other information from the conference deemed pertinent by the Principal/designee shall be appended to the investigative report provided to the Superintendent.

   d. If the victim's parents request, the Principal shall schedule a meeting with them to further explain the investigative determination.

   e. In accordance with the Family Educational Rights and Privacy Act (FERPA) and other laws concerning student privacy, the District will not disclose educational records of other students,including the disciplinary consequences ~~and remedial action~~ assigned to the perpetrator(s).~~those~~ ~~students and the parents of other students involved in a bullying incident.~~

3. Appeals.[ii delete note] A parent aggrieved by the investigative determination of the Principal may appeal the determination in accordance with the standards and procedures set forth for Level II and Level III appeals in Board policy ACA.

4. Additional Reporting Requirements.

   a. Reporting Substantiated Incidents - RSA 193-F:4, II(n~~l~~). The Principal shall forward all substantiated reports of bullying or retaliation to the Superintendent upon completion of the Principal's investigation.

   b. Department of Education Reports - RSA 193-F:6~~4, II(g)~~. The Principal shall be responsible for completing such reports/forms as required by the New Hampshire Department of Education (NHED) for all substantiated incidents of bullying. Irrespective of the time/date a form/report is due to be filed with NHED, the report/form or the information required for the report/form shall be completed/compiled within 10 school days following an investigative finding of a substantiated bullying/cyberbullying report. The Principal or designee shall retain a copy and shall forward one copy to the Superintendent. Hard copies are not necessary if the digital form/data is retained and accessible to both the building administration and SAU.

c. Reporting to NH Department of Education - RSA 193-F:6, I. The Superintendent shall annually report the District's substantiated incidents of bullying to the New Hampshire Department of Education. Pursuant to FERPA, such reports shall not contain any personally identifiable information pertaining to any student.

H. **Substantiated Instances of Bullying or Retaliation: Interventions, Remedial Measures and Disciplinary Consequences** — ~~RSA 193-F:4, II(k).~~

While students who have been found to have committed an act of bullying/cyberbullying (i.e. perpetrators) shall ~~can~~ face disciplinary consequences as provided in Paragraph H.2.a below, the Board encourages the administration and school district staff to explore ~~alternative or~~ additional measures, remedies and interventions to address the substantiated instances of bullying/cyberbullying, and prevent their reoccurrence. See also Paragraph H.3, below.

1. Interventions and Other Remedial Measures. Examples of interventions and remedial measures include, but are not limited to:

   a. Restitution,

   b. Parent conferences,

   c. Student counseling,

   d. Behavior assessment,

   e. Corrective instruction or other relevant learning experience,

   f. Peer support group, and

   g. Mediation (but only after the investigation has been completed).

   Interventions and other remedial measures shall be designed to correct the problem behavior, prevent another occurrence of the problem, protect and provide support for the victim, and take corrective action for documented systematic problems related to bullying.

2. Disciplinary Consequences - RSA 193-F:4, II(d), VI & VIII.

   a. Students found to have committed one or more acts of bullying or retaliation shall receive disciplinary consequences. Such consequences for students shall be consistent with the [Student Code of Conduct______] for the conduct that constituted bullying/cyberbullying. Disciplinary consequences should be varied according to specific circumstances such as: the nature of the behavior, the developmental age of the student, the student's prior disciplinary history, or performance. Students will be afforded any due process applicable to the level of consequences as provided in Board policy JICD, RSA 193:13 and Ed 317. ~~Disciplinary consequences for students shall be consistent with the [Student Code of Conduct______________________] for the conduct that constituted bullying/cyberbullying. Disciplinary consequences should be varied according to specific circumstances such as: the nature of the behavior, the developmental age of the student, the student's prior disciplinary history, performance. Students will be afforded any due process applicable to the level of consequences as provided in Board policy {**} JICD, RSA 193:13 and Ed 317.~~

   b. Staff (see definition above) who fail to report bullying or retaliation as required by this policy, fail to adhere to the timelines described above, submit inaccurate or false information with respect to reports or investigations under this policy, or commit an act of retaliation against a reporter of bullying or any parent, will be disciplined up to and including dismissal. Additionally, under RSA 193-F:4, VI, any such violation by an "educator" as defined by state law or regulation will constitute a violation of the Code of Conduct for New Hampshire Educators.~~Consequences and appropriate remedial actions for a staff~~

~~member who commits one or more acts of bullying/cyberbullying,or retaliation, failure to report as required by this policy, failure to adhere to the may range from up to and including dismissal from employment for staff members, with additional reports, if appropriate, in accordance with the Code of Conduct for New Hampshire Educators.~~

3. Additional Requirement of Principal(s)/Designee(s) - RSA 193-F:4, II(l). Upon a determination that a bullying report is substantiated, the Principal or designee will, in addition to the specific interventions and disciplinary responses described above, will, in appropriate circumstances, make recommendations to the Superintendent strategies for "protecting all pupils from retaliation of any kind."

I. **Dissemination of Policy and Bullying Prevention Education** - RSA 193-F:4, II(e) and 193-F:5.

1. Staff, Coaches, Bus Drivers, Designated Volunteers, Employees of Contracted Companies/Contracted Consultants. ~~Staff and Volunteers.~~ All staff (see definition section above) will be provided with a copy of this policy annually. The Superintendent may determine the method of providing the policy (employee handbook, hard copy, website, workshops, etc.). The Superintendent will ensure that all school employees and volunteers receive **annual** training on bullying and related Board policies, consistent with RSA 193-F:5.

2. Students and Parents, and Student Handbooks. RSA 193-E:4, II(e) and (f). The Superintendent may determine the method of providing information about this policy to students and parents. Methods may include student handbooks, mailing, hard copy, website, etc. At the very least, all student/parent handbooks will include a summary of the prohibitions and other provisions of Sections A.1-3, the definitions of bullying, cyberbullying and retaliation in Sections B.1, 2 and 3, and the verbatim language relating to the procedures found in Section D.1 for students and parents to report bullying/cyberbullying or retaliation. Additionally, that provision of the student handbook(s) will include information as to where the entirety of this policy may be found on the District's website.

   ~~All students will be provided with a copy of this policy annually. The Superintendent may determine the method of providing the policy (student handbook, mailing, hard copy, website, etc.).~~

   ~~Each year, all students will participate in programming that includes anti-bullying/cyberbullying materials presented in age-appropriate language. The materials and information should, among other things, describe expectations for student behavior, emphasize an understanding of what bullying/cyberbullying, harassment and intimidation is and looks like, the District's prohibition of such conduct and the reasons why the conduct is destructive, unacceptable, and how and when the conduct can lead to disciplinary consequences.~~
   ~~The Superintendent, in consultation with staff, will, to the extent reasonably possible, integrate student anti-bullying training and education into the district's curriculum, behavior programs and other violence prevention efforts.~~

   ~~Parents. he Superintendent will ensure that all parentsare annually provided with a copy of this policy or informed in writing where a copy of the policy may be located on the District and/or school's website. Student/family handbooks will include information of the District/school's anti-bullying program, as well as the means for students to report bullying acts either experienced or witnessed, and how parents, themselves, may inform/report to the school when they believe their child is being bullied or is bullying other students and encourage their children to report bullying when it occurs.~~

3. Curriculum. Each year, all students will participate in programming that includes anti-bullying/cyberbullying materials presented in age-appropriate language. The materials and information should, among other things, describe expectations for student behavior, emphasize an understanding of what bullying/cyberbullying, harassment and intimidation is and looks like, the District's prohibition of such conduct and the reasons why the conduct is destructive, unacceptable, and how and when the conduct can lead to disciplinary consequences.

   The Superintendent, in consultation with staff, will, to the extent reasonably possible, integrate student anti-bullying training and education into the district's curriculum, behavior programs and other violence prevention efforts.

   The following two sentences may be deleted from this policy any time after March 15, 2027

without further action of the School Board. No later than **December 15 2026,** the Superintendent shall cause a report or a link to a report on how the District's policy has been integrated into the school's curriculum, discipline policies, behavior programs, and other violence prevention efforts. Such report or link shall be provided to the office of the Commissioner of Education, the Chair of the State Board of Education, the President of the New Hampshire Senate, the Speaker of the New Hampshire House of Representatives, and to members of the New Hampshire House and Senate education committees.

4. Additional Notice and School District Programs. The Board may, from time to time, host or schedule public forums in which it will address this anti-bullying policy, discuss bullying in the schools, and consult with a variety of individuals, including teachers, administrators, guidance counselors, school psychologists and other interested persons.

J. **Summary of School Officials' Duties to Implement Policy** - RSA 193-F:4, II(p~~n~~).

The Superintendent, as the person charged with supervision of all employees of the District, is responsible for the implementation of this policy and the provisions of RSA 193-F. The School Principal(s) are expected and required by statute to implement this policy within their respective school buildings and ensure the procedures are followed.

Consistent with this Policy, the Principal(s) shall receive reports of alleged bullying or retaliation, investigate the alleged conduct, and communicate with the parties involved (including their parents) consistent with privacy laws, and communicate/report to the Superintendent. The Superintendent shall oversee the Principal(s) in their duties relative to this policy and shall ensure each school is compliant with this policy. Additionally, the Superintendent, will receive reports of substantiated incidents, review waivers and time extension requests, and communicate with the Principal(s), the School Board, and the NH Department of Education, all as provided in this policy.

K. **Immunity and Liability** – RSA 193-F:7 & 9.

Under 193-F:7, employees, volunteers, students, parents and any other person covered by this policy will be immune from civil liability for **good faith** conduct arising from or pertaining to the reporting, investigation, findings, recommended response, or implementation of a recommended response under this policy or RSA 193-F. (Note – civil liability could arise, (including for attorneys fees) in the event of gross negligence or willful misconduct for violations of this policy.)

District Policy History:

Revised and Approved by the WRSB: March 16, 2026
Revised and Approved by the WRSB: June 20, 2019
Approved by the WRSB: January 19, 2016
Approved by the WRSB: November 17, 2014
Revised: September 2014
Revised: July 2004, August 2006, May 2008, September 2010

---

[i] [Delete endnote from final version of policy.] This language was formerly in the statutory definition of "bullying" found at RSA 193-F:3, I(b), but was removed with the passage of HB131.

[ii] [Delete endnote from final version of policy.] Review of appeals made to the School Board is at the discretion of the Board. There is no legal requirement that aggrieved parents have a right to appeal to the Board, but could be helpful to show the Board has given careful consideration to the decision, and perhaps additional defenses if the parent fails to follow the administrative process included in the policy. Discuss with local counsel in considering not having an appeals opportunity to the Board. The reference in this section to ACA to sample policy ACA released by NHSBA in July 2024. In the interest of preserving, to the extent possible a uniform process, NHSBA

redirects bullying appeals to the uniform process of ACA. Districts which have not adopted ACA, should replace the reference to ACA and instead incorporate the Level II and III appeal provisions

***Legal References Disclaimer**: These references are not intended to be considered part of this policy, nor should they be taken as a comprehensive statement of the legal basis for the Board to enact this policy, nor as a complete recitation of related legal authority. Instead, they are provided as additional resources for those interested in the subject matter of the policy.*

NH Statutes	Description
RSA 189:70	Educational Institution Policies on Social Media
RSA 193-D:4	Written Report Required (Safe School Zones)
RSA 193-F	Pupil Safety and Violence Prevention
RSA 193-F:3	Definitions (Pupil Safety and Violence Prevention)
RSA 193-F:4	Policy Requirements (Pupil Safety and Violence Prevention)
RSA 193-F:7	Immunity (Pupil Safety and Violence Prevention)
RSA 570-A:2	Capture of Audio Recordings on School Buses Allowed

NH Dept of Ed Regulation	Description
N.H. Code Admin Rules Ed 317.05	Reporting Procedures for Acts of Theft, Violence, or Destruction
N.H. Code Admin. Rules Ed 204.01	Board Hearings
N.H. Code Admin. Rules Ed 306.04(b)(7)	Student Harassment

VIDEO AND AUDIO SURVEILLANCE ON SCHOOL PROPERTY

Category: Recommended ***Related Policies: ECAF, EHB, JIC, JICC, JICD, & JRA***
Related Administrative Procedures: EHB-R, JICC-R & EE-R

The Board authorizes the use of video and/or audio devices consistent with applicable law and School Board policies. Notwithstanding other Board policies, the Superintendent is authorized to allow video and/or audio recordings to the extent either required or prohibited by law.

A. Surveillance.

Video surveillance is authorized on District property, including, without limitation, school buses and other district provided transportation, to ensure the health, welfare, and safety of all students, staff, and visitors to District property and to safeguard District buildings, grounds, and equipment.

1. **Audio Surveillance.**

   Although video surveillance is permissive, surveillance with audio recording is only permitted on school buses – whether such buses are operated by the District or not - in accordance with RSA 570:A-2, II (k) and Board policy *ECAF*. Audio recordings are also authorized in classrooms per Section D below.

2. **Video Surveillance.**

   The Superintendent or his/her designee will approve appropriate locations for surveillance cameras. Placement of cameras will be based on the presumption and belief that students, staff and visitors have no reasonable expectation of privacy in areas or at events that occur in plain view. However, such devices are not to be placed in bathrooms, or dressing or locker rooms.

   Signs will be posted on school property to notify students, staff, and visitors that video recording devices may be in use. (More specific notice is required for audio recordings on school buses as provided under Board policy ECAF.) At the Superintendent's discretion, parents and students may also be notified through the Student-Parent Handbook as well as the District and school websites. All persons will be responsible for any violations of school rules recorded by cameras.

   The district will retain copies of video recordings until they are erased, which may be accomplished by either deletion or copying over with a new recording.

B. Video and Audio Recordings Used for Student Discipline Matters.

Video/audio recordings in District possession, whether or not recorded by District equipment, that contain evidence of a violation of student conduct rules, school board policy, and/or state or federal law, will be retained until the issue of the misconduct is no longer subject to review or appeal, as determined by board policy or applicable law. Any release or viewing of the recording will be in accordance with the law. Notwithstanding this paragraph, use of video/audio surveillance on school buses shall be in accordance with Policy ECAF.

In the event any audio or video recording (from whatever source) is used as part of a student discipline proceeding, such video may become part of a student's education record. If recording does become part of a student's education record, the provisions of Policy JRA shall apply. (In accordance with RSA 570:A-2 and Board policy ECAF, retention and use of audio recordings gathered via bus surveillance have stricter requirements than video only or recordings from non-District sources.)

C. Video and Audio Recordings Used for Special Education Purposes.

Video and audio recordings may be used for special education or Section 504 purposes, when a student's individualized education program or accommodation plan includes audio or video recording as part of the child's education. All such recordings will be maintained in accordance with the Family Education Rights and Privacy Act, 20 U.S.C. section 1232g, and other applicable law(s).

D. Additional Video and Audio Recordings Authorized.

The school board permits the video and audio recording of the following school-related activities. The following purposes is not intended to be exhaustive and may be expanded or contracted by either administrative determination or school board action.

- Extracurricular/co-curricular activities
- Musical performances, band, concert band, ensemble, orchestra, choir
- Drama activities
- Club events
- Sporting events, including both inter and intra-scholastic
- Other activities such as student senate, yearbook, school pride, ROTC
- Ceremonies, orientation, presentations, school assemblies or meetings, or any school events which occur outside of the physical classroom.

E. Consultation with Counsel.

The Superintendent (and other administrators if the Superintendent is unavailable) is specifically authorized to seek and obtain legal advice from the School Board/District's attorney with respect to any new use of surveillance or audio recordings, and/or relative to the use, sharing, ownership, retention and/or destruction of video or audio recordings.

District Policy History:

Approved by the WRSB: June 20, 2022 Revised- Sept. 2021
Approved by the WRSB: January 17, 2017, Revised: September 2016
Revised and Approved by the WRSB: January 21, 2014, Revised: September 2013
Revised and Approved by the WRSB: March 21, 2011
Revised: November 1999, April 2004, May 2006, August 2006, August 2008

Legal Referenes:

RSA 189:65, Definitions
RSA 189:68, Student Privacy
RSA 570-A:2
20 U.S.C. §1232g, Family Educational Rights and Privacy Act (FERPA)

***Legal References Disclaimer**: These references are not intended to be considered part of this policy, nor should they be taken as a comprehensive statement of the legal basis for the Board to enact this policy, nor as a complete recitation of related legal authority. Instead, they are provided as additional resources for those interested in the subject matter of the policy.*

School District Meeting Calendar
Budget 2027/2028

September

21	School Board sets directive for budget cycle

October

20-23	*Post notice of public hearing and a summary of the preliminary budget in a newspaper - 7 days before hearing (RSA 194-C:10)*

November

5	*School Board to hold a public hearing on the SAU budget at WRMS Cafeteria at 6:00PM (RSA 194:C:10)*
9	Admin budget books ready for pickup
16	2027-2028 Budget presented to the School Board
16	*School Board to hold a meeting to adopt the SAU budget under (RSA 194-C:9)*

November-December

School Board budget review

December

14	School Board delivers the budget to the Budget Committee
24	*Last day to post notice of public hearing and a summary of the preliminary budget in a newspaper - 7 days before hearing (RSA 194-C:10)*
31	*Last day for the School Board to hold a a public hearing on the SAU budget (RSA 194-C:10)*
31	*Last day for the School Board to hold a meeting to adopt the SAU budget under (RSA 194-C:9)*

December-January

Budget Committee budget review

January

12	*First deadline to post and publish notice of Bond Hearing (RSA 33:8-a)*
19	*First day to hold Public Hearing for bond issue over $100,000 (RSA 33:8-a)*
19	*Public Bond Hearing*
20	*Snow Date - Bond Hearing*

February

1	*Budget submission date finalized (RSA 273-A:1, III)*
1	*Post mandatory report to voters (RSA 189:76, I)*
2	*Post and publish notice in newspaper on Public Hearing on Budget - 7 days prior to hearing (RSA 195:12, RSA 32:5, I)*
5	*Last Day for petitioned warrant articles and cost items (RSA 32:5-a; 197:6 - No later than 30 days prior to second Tuesday in March)*
9	*7:00 PM Public Hearing on WRSD Budget at WRMS Cafeteria (RSA 195:12 -- At least 30 days prior to Annual Meeting, see also RSA 32:5,I)*
10	*Snow date - Public Hearing on WRSD Budget*
26	*Last day to post and publish notice of bond hearing*
26	*Last day for Budget Committee to deliver budget and warrant article recommendations to School Board for posting (at least 20 days before Meeting) (RSA 32:16, IV)*

March

1	Annual reports ready at SAU office
5	*Last day to hold public hearing for bond*
5	*Post Warrant, Budget & MS-27 (RSA 197:7, 32:5, VII(a)). One copy of warrant and budget posted at place of meeting (WRHS), in addition to each Town within the District (RSA 195:12)*
5	*Annual Report and Budget passed out to community (RSA 32:5, VII(a))*
9	Election Day
13	Towns of Sanbornton, Northfield, and Tilton Town Meetings
20	*9:00 AM Annual School District Meeting at WRHS Gymnasium (RSA 197:1)*

April

9	*Send forms to DRA (20 days after Annual Meeting) (RSA 21-J:34)*

Signature ______________________ *Date* ______________________

Items in italics approved by WRSD Attorney

HB 1300				HB 564			
FY27 SAU-X (potential for FY28 Cap)				**FY27 CO-P** (FY28 Adjusted Budget)			
Function	*Title*	*2627 Budget*	*Description*	*Function*	*Title*	*2627 Budget*	*Description*
2321	Office of Superintendent	$338,373	Salaries & benefits for **Superintendent & Admin Assistant**	2321	Office of Superintendent	$365,451	Sal/Ben for **Super & Admin Asst**; *Supplies, Equip, Postage, Printing, Phones, Dues & Fees*
2331	Special Admin - Curriculum	$329,364	Salaries & benefits for **Curriculum Director & RtI Coordinator**	2331	Special Admin - Curriculum	$329,364	Sal/Ben for **Curriculum Director & RtI Coordinator**
2510	Fiscal Services	$341,169	Salaries & benefits for **BA**, **HR**, **Finance**, **Payroll & Purchasing**	2510	Fiscal Services	$390,501	Sal/Ben for **BA & Accounting**, *Grant Services, $80k software*
2390	IT Director	$159,783	Salary & Benefits for **IT Director**	2511	HR/Accounting	$73,668	Sal/Ben for **HR**, *$17k software*
2318	Legal Services	$57,000	**Legal Services**	2318	Legal Services	$57,000	**Legal Services**
TOTAL:		**$1,225,689**	$736,298 *below FY27 est. cap**	**TOTAL:**		**$1,215,984**	
*FY27 estimated cap = $1,961,987**							

Voters will see this question twice - Nov '26 & '28 General Elections.

If adopted, the local property tax cap & SAU expenditure fixed cap will be in place for 2 years, meaning:

- WRSD budget cannot exceed the prior fiscal year property tax levy (minus bonded capital costs) adjusted for inflation (with March '26 CPI) + net new taxable property growth
- SAU-Expenditure (SAU-X) budget cannot amount to more than 6% of the total WRSD budget appropriation

The question cannot be bifurcated. It requires a 3/5 majority of ALL ballots cast to pass (RSA 32:5-I, VI).
In cooperative districts, all votes are collected and counted (Y/N/Abstention) to determine if 60% is achieved.

This Central Office-Preliminary (CO-P) budget must have a public hearing (RSA 194-C:10), its own Warrant Article & paper ballot (simple majority) vote.

The CO-P may not be amended or changed in any way prior to the vote (no floor amendments).

If it fails, the *Adjusted Budget* (previous year's Central Office budget, without pay & benefit increases, new positions or new services) governs.

CHAPTER 324
HB 1300 - FINAL VERSION

11Mar2026... 0980h
11Mar2026... 1117h
05/14/2026 1851s
05/14/2026 1876s
4Jun2026... 2109CofC
4Jun2026... 2173EBA

2026 SESSION

26-2870
05/06

HOUSE BILL ***1300***

AN ACT establishing a school district local tax cap question for the state general elections of 2026 and 2028 and related limitations on central office administrative expenses in school districts.

SPONSORS: Rep. Ankarberg, Straf. 7; Sen. Innis, Dist 7

COMMITTEE: Election Law

AMENDED ANALYSIS

This bill:

I. Establishes a school district local tax cap question for the state general elections of 2026 and 2028.

II. Establishes limitations on central office administrative expenses in school districts.

III. Requires that the commissioner of the department of revenue administration adopt rules relative to the school district local tax cap question and limitations on central office administrative expenses in school districts.

- -

Explanation: Matter added to current law appears in ***bold italics.***
Matter removed from current law appears [~~in brackets and struckthrough.~~]
Matter which is either (a) all new or (b) repealed and reenacted appears in regular type.

CHAPTER 324
HB 1300 - FINAL VERSION

11Mar2026... 0980h
11Mar2026... 1117h
05/14/2026 1851s
05/14/2026 1876s
4Jun2026... 2109CofC
4Jun2026... 2173EBA

26-2870
05/06

STATE OF NEW HAMPSHIRE

In the Year of Our Lord Two Thousand Twenty-Six

AN ACT establishing a school district local tax cap question for the state general elections of 2026 and 2028 and related limitations on central office administrative expenses in school districts.

Be it Enacted by the Senate and House of Representatives in General Court convened:

324:1 New Section; Municipal Budget Law; Preparation of Budgets; School District Local Tax Cap and School Administrative Fixed Cap on Central Office Administrative Budgets. Amend RSA 32 by inserting after section 5-h the following new section:

32:5-i School District Local Tax Cap and School Administrative Fixed Cap on Central Office Administrative Budgets.

I. During the November 2026 and November 2028 state general elections, every town and ward in a city shall conduct a vote on a local tax cap question for their school district and a fixed cap on the school administrative unit central office administrative budget. The question shall appear on the ballot by operation of law and shall not require a warrant article, citizen petition, or separate local legislative approval.

II. The question required under paragraph I shall be printed on the state general election ballot administered pursuant to RSA 656:13, following the offices columns. If the secretary of state determines that sufficient space on the front of the state general election ballot does not permit inclusion of the question, the secretary of state shall cause the question to be printed on the reverse side of the state general election ballot and shall cause a notice to be printed on the front of the ballot directing voters to turn the ballot over to vote on the question. If the secretary of state determines that printing on the reverse side is also impracticable, the question shall be printed on a separate official ballot to be distributed, cast, collected, and counted at the same polling place and during the same hours as the state general election ballot. The secretary of state shall adopt any procedures necessary to ensure that ballot counting devices used pursuant to RSA 656:40 are programmed to read and count votes cast on both sides of the ballot where the reverse side is used.

III. Nothing in this section shall prohibit a municipality, school board, or school administrative unit board from holding a public hearing on the question for the local tax cap and for the school administrative fixed cap on central office administrative budgets.

IV. Whenever the question required under paragraph I is printed on the state general election ballot or on a separate official ballot pursuant to paragraph II, the secretary of state shall ensure that said question is also included on all applicable absentee ballots consistent with RSA 656:36.

V. The school district local tax cap and school administrative unit fixed cap question on the ballot for towns and wards with an annual school district meeting shall read:

"Shall the [name of municipality] limit property tax growth for [name(s) of school district(s)] under RSA 32:5-i? If adopted for a two-year period: (1) the local property tax levy may not grow beyond the prior year's amount, adjusted for inflation and new construction; (2) SAU central office spending may not exceed 6 percent of total school district appropriations; and (3) bonded capital costs are excluded from both limits. These caps apply only to administrative operations of the SAU central office and do not affect classroom instruction, school-based services, or other municipal expenditures. These limits may be overridden as provided in RSA 32:5-i. Adoption requires a three-fifths (3/5) majority vote."

Towns and wards serving more than one school district shall include the names of all such school districts in the question.

VI.(a) The moderator of each municipality or ward in the school district shall report the results on the question to the secretary of the school administrative unit board for the school district. If a 3/5 majority of the voters voting in the municipalities and wards served by the school district approve the question, then the maximum allowable levy per the local tax cap for the district under paragraph VIII shall be binding.

(b) The moderator of each municipality or ward in the school administrative unit shall report the results on the question to the secretary of the school administrative unit board served by the municipality or ward. If a 3/5 majority of the voters voting in the municipalities and wards served by the school administrative unit approve the question, then the SAU fixed cap for the SAU central office administrative budget under paragraph IX shall be binding.

(c) The secretary of the school administrative unit board shall certify the results of the votes to the department of revenue administration. Preservation of ballots shall be pursuant to RSA 33-A:3-a, XXXVII.

VII.(a) Any 10 registered voters from any municipality served by a school district, before the expiration of 7 days from the date of the general election, may apply in writing to the school district clerk for a recount of the ballots for the question on a school district local tax cap under this section. The secretary shall schedule a recount, to be conducted by the school board, not earlier than 5 days nor later than 10 days after the date the secretary receives the petition. The applicants for such a recount shall pay to the school clerk a fee of $10 for conducting the recount.

(b) Any 10 registered voters from any municipality served by a school administrative unit, before the expiration of 7 days from the date of the general election, may apply in writing to the secretary of the school administrative unit for a recount of the ballots for the question on a school administrative unit fixed cap under this section. The secretary shall schedule a recount, to be conducted by the school administrative unit, not earlier than 5 days nor later than 10 days after the date the secretary receives the petition. The applicants for such a recount shall pay to the secretary of the school administrative unit board a fee of $10 for conducting the recount.

VIII.(a) The maximum allowable levy shall equal:

Prior fiscal year property tax levy (excluding bonded capital costs as defined in paragraph XVI) × (1 + inflation + net new taxable property growth).

Bonded capital costs, as defined in paragraph XVI, shall be excluded from both the prior fiscal year property tax levy and the maximum allowable levy calculated under this paragraph. No amount attributable to bonded capital costs shall be included in the prior fiscal year levy for purposes of calculating the maximum allowable levy in any subsequent year.

(b) "Inflation" means the one year (12 month) percentage change in the Consumer Price Index for All Urban Consumers, Northeast Region, as published by the Bureau of Labor Statistics, United States Department of Labor, using the amount published for the month of March in the prior fiscal year.

(c)(1) "Net new taxable property growth" means the percentage increase in assessed valuation from the prior year attributable to:

(A) New construction;

(B) Physical expansion or improvement of structures;

(C) Subdivision or redevelopment of land;

(D) Conversion from exempt to taxable status; or

(E) Any physical change that increases taxable market value.

(2) "Net new taxable property growth" shall not include:

(A) Market appreciation;

(B) Revaluation or reassessment; or

(C) Changes in assessment methodology.

(d) The department of revenue administration shall certify annually the net new taxable property growth for each taxing jurisdiction.

IX. In the municipalities and wards served by a school administrative unit where the school administrative unit fixed cap question under this section is approved by the voters, the fixed cap for school administrative unit central office administrative budgets shall be 6 percent of the sum of the total school district appropriation amounts, except costs of bonded capital projects pursuant to paragraph XVI, in the school districts comprising the SAU. “School administrative unit central office administrative budgets” means expenditures for the general management and administration of a school administrative unit. These expenditures include superintendent services; assistant or deputy superintendent services; business administration; human resources; finance; payroll; purchasing; district-level information technology administration; legal services; public relations; and other non-school-based administrative functions, regardless of physical location or building assignment. The term also includes district-level curriculum directors, directors of instruction, or similarly titled positions who are not employed under a collective bargaining agreement or who do not provide direct classroom instruction for more than 50 percent of their work time, as well as any personnel reported to the department of education as employed by the central office. The term does not include school-based administrative staff; classroom instruction; instructional support services; special education services; transportation; food services; or facilities operations and maintenance.

X. The legislative body may vote to exceed the school district local tax cap or the school administrative unit fixed cap using the override procedures provided in these subparagraphs.

(a) The provisions of this subparagraph shall apply only to districts with an annual meeting. The legislative body may override the school district local tax cap under paragraph VIII, or the school administrative unit fixed cap under paragraph IX, by the usual procedures applicable to annual meetings of the legislative body, provided that: when a proposed appropriation will cause the cap to be exceeded or the cap has already been exceeded, exclusive of bonded costs defined in paragraph XVI, voting on the appropriation question shall be by ballot, but the question shall not be placed on the official ballot used to elect officers, except in the case of a legislative body that uses an official ballot form of meeting under RSA 40:13 or under a charter adopted pursuant to RSA 49-D. If a 3/5 majority or the super majority as determined under a charter pursuant to RSA 49-D of those voting on the question vote "yes," the appropriation is approved. Only votes in the affirmative or negative shall be included in the calculation of the 3/5 majority or the super majority as determined under a charter pursuant to RSA 49-D.

(b) The provisions of this subparagraph shall apply only to districts without an annual meeting. If the school district local tax cap has been adopted, the legislative body shall adopt a school district budget, exclusive of bonded costs defined in paragraph XVI, that does not exceed the local tax cap established under paragraph VIII, unless the legislative body overrides the cap by the supermajority defined in its charter pursuant to RSA 49-C:33, I(d) or RSA 49-D:3, I(e). If the school administrative unit fixed cap has been adopted, the legislative body overrides that cap by the supermajority defined in its charter pursuant to RSA 49-C:33, I(d) or RSA 49-D:3, I(e).

XI. No municipal tax rate shall be set that causes a taxing authority to exceed its certified limits under this section.

(a) For a school district that has adopted the school district local tax cap or a school administrative unit that has adopted the school administrative unit fixed cap under this section, the governing body shall forward, at a time and in a form prescribed by the department of revenue administration, documentation demonstrating compliance with the adopted caps. Such documentation shall include:

(1) The computation of the school district local tax cap or school administrative unit fixed cap for the applicable year;

(2) Proposed appropriations by the governing body and budget committee and estimated revenues going into the annual meeting, showing the estimated amount of property taxes to be raised for the school district budget or school administrative unit central office administrative budgets, or both;

(3) Appropriations voted by the annual or special meeting of the legislative body; and

(4) The count of any ballot votes taken to override the school district local tax cap or school administrative unit fixed cap.

(b) Upon review of documentation submitted under subparagraph (a), if the commissioner of the department of revenue administration determines that the certified school district budget results in estimated taxes exceeding the adopted school administrative unit fixed cap and that no valid override vote was obtained as provided in this section, the governing body shall reduce the appropriation of the certified budget by the amount that the certified budget exceeds the cap.

(c) Upon review of documentation submitted under subparagraph (a), if the commissioner of the department of revenue administration determines that the certified school administrative unit central office administrative budget results in estimated taxes exceeding the adopted school administrative unit fixed cap and that no valid override vote was obtained as provided in this section, the governing body shall reduce the appropriation of the certified budget by the amount that the certified budget exceeds the cap.

(d) The department of revenue administration shall not approve any tax rate that exceeds the certified limit and shall withhold rate approval until the municipality demonstrates compliance either by showing the certified budget is within the certified cap or by showing a valid override vote in accordance with RSA 40:13 or applicable annual meeting procedures.

(e) Nothing in this section shall prohibit the department of revenue administration from requiring additional information, documentation, or schedules reasonably necessary to determine compliance with the adopted local tax cap or fixed cap under this section.

XII. If approved at the November 2026 state general election, the school district local tax cap or the school administrative unit fixed cap, or both, shall apply beginning with the fiscal year 2028 school district total budget or school administrative unit budget, as applicable. If approved at the November 2028 state general election, the school district local tax cap or the school administrative unit fixed cap, or both, shall apply beginning with the fiscal year 2030 school district total budget or school administrative unit budget, as applicable.

XIII. Any taxpayer in a member school district or school district of the school administrative unit, as applicable, shall have standing to enforce this section in superior court.

XIV. Nothing in this section may be construed to repeal, supersede, or diminish any property tax limitation that is more restrictive under existing law, a municipal charter, or a local ordinance. When more than one property tax limitation, tax cap, local tax cap, or budget cap applies, each applicable limitation must be fully satisfied.

XV. This section shall operate solely as a local tax cap limitation on the estimated amount of local taxes to be raised for the fiscal year attributable to the school district or a fixed cap on the school administrative unit central office administrative budget, as applicable.

XVI.(a) Bonded capital costs shall include principal or interest on bonds or notes only if the bonded indebtedness is issued solely for the acquisition, construction, or major structural renovation of real property, reported pursuant to RSA 198:4-a.

(b) The department of revenue administration shall certify annually the portion of debt service that qualifies for exclusion.

(c) No exclusion shall apply unless certified by the department.

XVII. The provisions of this section shall expire on January 1, 2032. Any school district local tax cap or school administrative unit fixed cap adopted pursuant to this section shall cease to have legal effect as of that date. The expiration of this section shall not affect the validity of any appropriation, budget, or tax rate lawfully established prior to January 1, 2032.

324:2 New Paragraph; Department of Revenue Administration; Rulemaking Authority. Amend RSA 21-J:13 by inserting after paragraph XIV the following new paragraph:

XV. The forms, promulgation of forms, and any other information necessary to implement the provisions of RSA 32:5-i.

324:3 Prospective Repeal. RSA 32:5-i, relative to the school district local tax cap and school administrative fixed cap on central office administrative budgets, is repealed.

324:4 Effective Date.

I. Section 3 of this act shall take effect January 1, 2032.

II. The remainder of this act shall take effect September 1, 2026.

Approved: July 15, 2026
Effective Date:
I. Section 3 effective January 1, 2032
II. Remainder effective September 1, 2026

THE TRUTH ABOUT HB 1300

TAX CAPS

HB 1300 establishes tax caps on WRSD operating & SAU budgets. MAKE NO MISTAKE - **these caps will directly impact students and limit their educational experiences.**

WRSD TAX CAP

WRSD budget will be capped at the PRIOR FISCAL YEAR property tax levy adjusted for inflation (with March ‘26 CPI). This outdated rate may not reflect current economic trends or allow WRSD to address hiring needs

6% FIXED SAU CAP

SAU budget expenditures can not amount to more than 6% of the total WRSD budget appropriation

ADEQUACY AID

As State adequacy aid continues to decline in each Winnisquam town, WRSD will be forced to eliminate staff, programming, and services to stay within the cap.

CALL TO ACTION

Don’t punish our students because the State of NH refuses to adequately fund public education!
STAND UP FOR OUR KIDS,
THEY ARE THE FUTURE!