# Windham School District

# District-Wide Crisis Prevention and Response Plan

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**Site-Specific Emergency Operations Plan Overview (RSA 189:64)**

Each Windham School submits the Site-Specific Emergency Operations Plan (EOP) to the state on October 15th each year.
Plan components

**Basic Plan**
- ○ The basic plan provides an overview of the school's approach to operation before, during, and after an incident. The basic plan addresses the overarching activities the school undertakes regardless of the threat or hazard.

**Functional Annexes**
- ○ Functional annexes detail goals, objectives, and courses of action for functions that apply across hazard specific annexes.

**Hazard Specific Annexes**
- ○ Hazard specific annexes detail goals, objectives, and courses of action for a particular threat, hazard, or incident type.
- ○ Required Annexes:
  - ■ Standard Response Protocols (Hold, Secure, Lockdown, Evacuate, Shelter)
  - ■ The Windham School District follows the "I love you guys" standard response protocol which includes, HOLD, SECURE, LOCKDOWN, EVACUATE, and SHELTER
- ○ Biological Incident(s):
  - ■ Activated when it is necessary to protect staff and students from a biological incident that may have lasting effects on the school and the community. Biological hazards may include but are not limited to the following: infectious diseases such as pandemic influenza, SARS-CoV-2, extensively drug-resistant tuberculosis, staphylococcus aureus, and meningitis; toxic materials present in school laboratories; contaminated food outbreaks, such as, Salmonella, botulism, and E. coli.
  - ■ Life safety is the main consideration for all decisions.
- ○ Civil Unrest
  - ■ To protect staff and students from a civil unrest incident and to mitigate injury or death during and incident.
- ○ Cyber Incident(s)
  - ■ To protect students, staff, faculty, and other building occupants from a confirmed or suspected cyber incident.
- ○ Drought Incident(s)
  - ■ To protect students and staff from drought. The National Weather Service describes four types of drought:
    - ● Meteorological drought is based on the degree of dryness (rainfall deficit) and the length of the dry period.
    - ● Hydrologic drought is based on the impact of rainfall deficits on the water supply such as stream flow, reservoir and lake levels, and ground water table decline.
    - ● Agricultural drought is based on the impacts to agriculture by factors such as rainfall deficits, soil water deficits, reduced groundwater, or reservoir levels needed for irrigation.
    - ● Socioeconomic drought is based on the impact of drought conditions (meteorological, agricultural, or hydrological drought) on supply and demand of some economic goods. Socioeconomic drought occurs when

the demand for an economic good exceeds supply as a result of a weather-related deficit in water supply.

- ○ Earthquake
    - ■ Activated when it is necessary to protect staff and students from an earthquake that may have lasting effects on the school and the community. Because earthquakes strike without warning, the immediate need is to protect lives by taking the best available cover. All other actions must wait until the tremor subsides. The main threats during an earthquake include falling objects, broken glass, and other debris. Should the School experience an earthquake, students, faculty, and staff are expected to take immediate action to get all persons into protected areas.
- ○ External Hazardous Material Release
    - ■ Activated when it is necessary to protect students, staff, faculty, and other building occupants from an internal and/or external hazardous material release that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
- ○ Extreme Temperature(s)
    - ■ Activated when it is necessary to protect staff and students from extreme temperatures that may have lasting effects on the school and the community.
    - ■ The National Weather Service (NWS) issues three types of information as it relates to cold weather:
    - ■ Wind Chill Warning: NWS issues a wind chill warning when dangerously cold wind chill values are expected or occurring. If you are in an area with a wind chill warning, avoid going outside during the coldest parts of the day. This level of wind chill will result in frostbite and lead to hypothermia if precautions are not taken. Avoid going outdoors. If you do go outside, dress in layers, cover exposed skin, and make sure at least one other person knows your whereabouts. Update them when you arrive safely at your destination.   National Weather Service – Wind Chill Chart
    - ■ *Wind Chill Watch:* NWS issues a wind chill watch when dangerously cold wind chill values are possible. As with a warning, adjust your plans to avoid being outside during the coldest parts of the day. Make sure your car has at least a half a tank of gas, and update your winter survival kit.
    - ■ *Wind Chill Advisory:* NWS issues a wind chill advisory when seasonably cold wind chill values but not extremely cold values are expected or occurring. If you must venture outdoors, take precautions against frostbite and hypothermia.

The NWS issues four types of information as it relates to warm weather:

- ○ *Excessive Heat Warning:* An Excessive Heat Warning is issued within 12 hours of the onset of extremely dangerous heat conditions. The general rule of thumb for this Warning is when the maximum heat index temperature is expected to be 105° or higher for at least 2 days and nighttime air temperatures will not drop below 75°; however, these criteria vary across the country, especially for areas not used to extreme heat conditions. If you don't take precautions immediately when conditions are extreme, you may become seriously ill or even die.
- ○ *Excessive Heat Watches:* Heat watches are issued when conditions are favorable for an excessive heat event in the next 24 to 72 hours. A Watch is used when the risk of a heat wave has increased but its occurrence and timing is still uncertain.
- ○ *Heat Advisory:* A Heat Advisory is issued within 12 hours of the onset of extremely dangerous heat conditions. The general rule of thumb for this Advisory is when the

maximum heat index temperature is expected to be 100° or higher for at least 2 days, and nighttime air temperatures will not drop below 75°; however, these criteria vary across the country, especially for areas that are not used to dangerous heat conditions. Take precautions to avoid heat illness. If you don't take precautions, you may become seriously ill or even die.

- *Excessive Heat Outlooks:* The outlooks are issued when the potential exists for an excessive heat event in the next 3-7 days. An Outlook provides information to those who need considerable lead-time to prepare for the event.
- Flood
    - Activated when it is necessary to protect students, staff, faculty, and other building occupants from flooding that may have lasting effects on the school and the community.
    - The National Weather Service (NWS) issues four common types of information as it relates to flooding:
        - Flash Flood Warning: A Flash Flood Warning is issued when a flash flood is imminent or occurring. If you are in a flood prone area move immediately to high ground. A flash flood is a sudden violent flood that can take from minutes to hours to develop. It is even possible to experience a flash flood in areas not immediately receiving rain. Flash Flood Warnings are changing to an Impact-Based format to improve public response. Read the factsheet.
        - Flood Warning: A Flood Warning is issued when the hazardous weather event is imminent or already happening. A Flood Warning is issued when flooding is imminent or occurring.
        - Flood Watch: A Flood Watch is issued when conditions are favorable for a specific hazardous weather event to occur. A Flood Watch is issued when conditions are favorable for flooding. It does not mean flooding will occur, but it is possible.
        - Flood Advisory: A Flood Advisory is issued when a specific weather event that is forecast to occur may become a nuisance. A Flood Advisory is issued when flooding is not expected to be bad enough to issue a warning. However, it may cause significant inconvenience, and if caution is not exercised, it could lead to situations that may threaten life and/or property.
    - Hurricane(s)/Severe Storm(s)
        - *Severe Thunderstorm Watch:* Severe thunderstorms are possible in and near the watch area. Stay informed and be ready to act if a severe thunderstorm warning is issued. The watch area is typically large, covering numerous counties or even state
        - *Severe Thunderstorm Warning:* Severe weather has been reported by spotters or indicated by radar. Warnings indicate imminent danger to life and property. Take shelter in a substantial building. Warnings typically encompass a much smaller area (around the size of a city or small county) that may be impacted by a large hail or damaging wind identified by an NWS forecaster on radar or by a trained spotter/law enforcement who is watching the storm.

The NWS issues four types of warnings related to hurricanes:
        - *Storm Surge Warning:* There is a danger of life-threatening inundation from rising water moving inland from the shoreline somewhere within the specified area, generally within 36 hours. If you are under a storm surge warning, check for evacuation orders from your local officials.

- ■ ***Hurricane Warning:*** Hurricane conditions (sustained winds of 74 mph or greater) are expected somewhere within the specified area. The National Hurricane Center (NHC) issues a hurricane warning 36 hours in advance of tropical storm-force winds to give you time to complete your preparations. All preparations should be complete. Evacuate immediately if so ordered.
- ■ ***Tropical Storm Warning:*** Tropical storm conditions (sustained winds of 39 to 73 mph) are expected within your area within 36 hours.
- ■ ***Extreme Wind Warning:*** Extreme sustained winds of a major hurricane (115 mph or greater), usually associated with the eyewall, are expected to begin within an hour. Take immediate shelter in the interior portion of a well-built structure.

The NWS issues three types of watches related to hurricanes:

- ■ ***Storm Surge Watch:*** There is a possibility of life-threatening inundation from rising water moving inland from the shoreline somewhere within the specified area, generally within 48 hours.
- ■ ***Hurricane Watch:*** Hurricane conditions (sustained winds of 74 mph or greater) are possible within your area. Because it may not be safe to prepare for a hurricane once winds reach tropical storm force, the NHC issues hurricane watches 48 hours before it anticipates tropical storm-force winds.
- ■ ***Tropical Storm Watch:*** Tropical storm conditions (sustained winds of 39 to 73 mph) are possible within the specified area within 48 hours.

The NWS issues two types of advisories related to hurricanes:

- ■ *Tropical Cyclone Public Advisory:* The Tropical Cyclone Public Advisory contains a list of all current coastal watches and warnings associated with an ongoing or potential tropical cyclone, a post-tropical cyclone, or a subtropical cyclone. It also provides the cyclone position, maximum sustained winds, current motion, and a description of the hazards associated with the storm.
- ■ Tropical Cyclone Track Forecast Cone: A graphic that shows areas under tropical storm and hurricane watches and warnings, the current position of the center of the storm, and its predicted track. Forecast uncertainty is conveyed on the graphic by a "cone" (white and stippled areas) drawn such that the center of the storm will remain within the cone about 60 to 70 percent of the time. Remember, the effects of a tropical cyclone can span hundreds of miles. Areas well outside of the cone often experience hazards such as tornadoes or inland flooding from heavy rain.

The NWS issues one type of outlook related to hurricanes:

- ■ Tropical Weather Outlook: The Tropical Weather Outlook is a discussion of significant areas of disturbed weather and their potential for development during the next 5 days. The Outlook includes a categorical forecast of the probability of tropical cyclone formation during the first 48 hours and during the entire 5-day forecast period. You also can find graphical versions of the 2-day and 5-day Outlook at www.hurricanes.gov and www.weather.gov/cphc

Additional considerations:

- ■ Hurricane and tropical storm watches and warnings for winds on land as well as storm surge watches and warnings can be issued for storms that the NWS believes will become tropical cyclones but have not yet attained all of the characteristics of a tropical cyclone (i.e., a closed low-level circulation, sustained thunderstorm activity, etc.). In these cases, the forecast conditions on land warrant alerting the public. These storms are referred to as "potential tropical cyclones" by the NWS.

- Hurricane, tropical storm, and storm surge watches and warnings can also be issued for storms that have lost some or all of their tropical cyclone characteristics, but continue to produce dangerous conditions. These storms are called "post-tropical cyclones" by the NWS.
  - ○ Internal Hazardous Material Release
    - Activated when it is necessary to protect students, staff, faculty, and other building occupants from an internal and/or external hazardous material release that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
  - ○ Medical Emergencies
    - Activated when it is necessary to respond to a medical emergency and to protect other students, staff, faculty, and other building occupants of the school and the community. Life safety is the main consideration for all decisions.
  - ○ Structural Fire
    - Activated when it is necessary to protect students, staff, faculty, and other building occupants from a confirmed or suspected structural fire that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
  - ○ Threat
    - Activated when it is necessary to protect students, staff, faculty, and other building occupants from a threat that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
  - ○ Tornado
    - Activated when it is necessary to protect staff and students from a confirmed or suspected tornado that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
    - The National Weather Service (NWS) issues two types of information as it relates to tornados:
    - *Tornado Watch*: Tornadoes are possible in and near the watch area. Review and discuss your emergency plans and check supplies and your safe room. Be ready to act quickly if a warning is issued or you suspect a tornado is approaching. Acting early helps to save lives! Watches are issued by the Storm Prediction Center for counties where tornadoes may occur. The watch area is typically large, covering numerous counties or even states.
    - *Tornado Warning: A* tornado has been sighted or indicated by weather radar. There is imminent danger to life and property. Move to an interior room on the lowest floor of a sturdy building. Avoid windows. If in a mobile home, a vehicle, or outdoors, move to the closest substantial shelter and protect yourself from flying debris. Warnings typically encompass a much smaller area (around the size of a city or small county) that may be impacted by a tornado identified by a forecaster on radar or by a trained spotter/law enforcement who is watching the storm.
  - ○ Wildfire
    - Activated when it is necessary to protect students, staff, faculty, and other building occupants from a confirmed or suspected wildfire that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
    - The National Weather Service (NWS) issues three types of information as it relates to wildfires:

- ■ *Red Flag Warning:* Be extremely careful with open flames. NWS issues a Red Flag Warning, in conjunction with land management agencies, to alert land managers to an ongoing or imminent critical fire weather pattern. NWS issues a Red Flag Warning when fire conditions are ongoing or expected to occur shortly.
- ■ *Fire Weather Watch:* A Watch alerts land managers and the public that upcoming weather conditions could result in extensive wildland fire occurrence or extreme fire behavior. A watch means critical fire weather conditions are possible but not imminent or occurring.
  - ● *Extreme Fire Behavior:* This alert implies a wildfire likely to rage of out of control. It is often hard to predict these fires because they behave erratically, sometimes dangerously. One or more of the following criteria must be met:
    - ○ Moving fast: High rate of spread
    - ○ Prolific crowning and/or spotting
    - ○ Presence of fire whirls
    - ○ Strong convection column
- ○ Winter Storm
  - ■ Activated when it is necessary to protect staff and students from winter storms that may have lasting effects on the school and the community. Life safety is the main consideration for all decisions.
  - ■ The NWS five types of information as it relates to impending winter storms:
    - ● *Blizzard Warnings*: NWS issues a blizzard warning for frequent gusts greater than or equal to 35 mph accompanied by falling and/or blowing snow, frequently reducing visibility to less than 1/4 mile for three hours or more. A Blizzard Warning means severe winter weather conditions are expected or occurring. Falling and blowing snow with strong winds and poor visibility are likely, leading to whiteout conditions making travel extremely difficult. Do not travel. If you must travel, have a winter survival kit with you. If you get stranded, stay with your vehicle and wait for help to arrive.
    - ● *Winter Storm Warnings:* NWS issues a winter storm warning for a significant winter weather event including snow, ice, sleet or blowing snow or a combination of these hazards. Travel will become difficult or impossible in some situations. Delay your travel plans until conditions improve.
    - ● *Ice Storm Warnings:* NWS issues ice storm warnings for ice accumulation of around 1/4 inch or more. This amount of ice accumulation will make travel dangerous or impossible and likely lead to snapped power lines and falling tree branches. Travel is strongly discouraged.
    - ● *Winter Storm Watches:* NWS issues winter storm watches for when conditions are favorable for a significant winter storm event (heavy sleet, heavy snow, ice storm, heavy snow and blowing snow or a combination of events.)
    - ● *Winter Weather Advisories:* NWS issues winter weather advisories when snow, blowing snow, ice, sleet, or a combination of these wintry elements is expected but conditions should not be hazardous enough to

meet warning criteria. Be prepared for winter driving conditions and possible travel difficulties. Use caution when driving.

**Reunification Plan**
- ○ The district reunification site is Castleton Banquet and Conference Center, 58 Enterprise Drive, Windham, NH 03087.  603-898-6300
- ○ The district maintains reunification site plan information at the SAU for review.

**Windham School District Cybersecurity Plan**

**Introduction**

The Windham School District is committed to protecting our students' and staffs' privacy through maintaining strong privacy and security protections. The privacy and security of this information is a significant responsibility, and we value the trust of our students, parents, and staff.

The Windham School District's Data Governance Manual includes information regarding the data governance team, data and information governance, applicable School Board policies, District procedures, as well as applicable appendices and referenced supplemental resources.

This manual outlines how operational and instructional activity shall be carried out to ensure the District's data is accurate, accessible, consistent, and protected. The document establishes who is responsible for information under various circumstances and specifies what procedures shall be used to manage and protect it. Definitions of terminology can be found in Appendix A: Definitions.

The Windham School District's Data Governance Manual shall be a living document. To make the document flexible, details are outlined in the appendices and referenced supplemental resources. This document and any future modifications to this document will be posted on the District's website.

**Data Governance Team**

The Windham School District's Data Governance team consists of the following positions: Superintendent, Assistant Superintendent, Business Administrator, Facilities Director, Human Resources Manager, Director of Special Services and the Director of Technology. Members of the Data Governance Team will act as data stewards for all data under their direction. The Director of Technology will act as the Information Security Officer (ISO), with assistance from members of the full Technology team. The Business Administrator is the district's alternate ISO and will assume the responsibilities of the ISO when the ISO is not available. All members of the district administrative team will serve in an advisory capacity as needed.

**Purpose**

The School Board recognizes the value and importance of a wide range of technologies for a well-rounded education, enhancing the educational opportunities and achievement of students. The Windham School District provides its faculty, staff, and administrative staff access to technology devices, software systems, network and Internet services to support research and education. All components of technology must be used in ways that are legal, respectful of the rights of others, and protective of juveniles and that promote the educational objectives of Windham School District.

To that end, the district must collect, create and store confidential information. Accurately maintaining and protecting this data is important for efficient district operations, compliance with laws mandating confidentiality, and maintaining the trust of all district stakeholders. All persons who have access to district data are required to follow state and federal law, district policies and procedures, and other rules created to protect the information.

It is the policy of the Windham School District that data or information in all its forms, written, electronic, or printed, is protected from accidental or intentional unauthorized modification, destruction or disclosure throughout its life cycle. This protection includes an appropriate level of security over the equipment, software, and practices used to process, store, and transmit data or information. All staff and authorized district contractors or agents using confidential information will strictly observe protections put into place by the district.

**Scope**

The data security policy, standards, processes, and procedures apply to all students and staff of the district, contractual third parties and agents of the district, and volunteers who have access to district data systems or data. This policy applies to all forms of Windham School District data and information, including but not limited to:

- Speech, spoken face to face, or communicated by phone or any current and future technologies.
- Hard copy data printed or written.
- Communications sent by post/courier, fax, electronic mail, text, chat and/or any form of social media.
- Data stored and/or processed by any electronic device, including servers, computers, tablets, mobile devices.
- Data stored on any type of internal, external, or removable media or cloud based services.
- The terms data and information are used separately, together, and interchangeably throughout the policy, the intent is the same.
- Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device may be referred to as systems, assets or resources.
- All involved systems and information are considered assets of the Windham School District and shall be protected from misuse, unauthorized manipulation, and destruction.

**Regulatory Compliance**

The district will abide by any law, statutory, regulatory, or contractual obligations affecting its data systems (see Appendix B: Laws, Statutory, and Regulatory Security Requirements). The Windham School District complies with or exceeds the NH Minimum Standards for Privacy and Security of Student and Employee Data approved in January 2019 and standards applicable to data governance are addressed throughout this Data Governance Manual. The Windham School District complies with all other applicable regulatory acts including but not limited to the following:

- Children's Internet Protection Act (CIPA)
- Children's Online Privacy Protection Act (COPPA)

- Family Educational Rights and Privacy Act (FERPA)
- Health Insurance Portability and Accountability Act (HIPAA)
- Payment Card Industry Data Security Standard (PCI DSS)
- Protection of Pupil Rights Amendment (PPRA)
- Individuals with Disabilities in Education Act (IDEA)
  - New Hampshire State RSA - Student and Teacher Information Protection and Privacy NH RSA 189:65 Definitions
  - NH RSA 189:66 Data Inventory and Policies Publication NH RSA 189:67 Limits on Disclosure of Information
  - NH 189:68 Student Privacy
  - NH RSA 189:68-a - Student Online Personal Information
- New Hampshire Minimum Standards for Privacy and Security of Student and Employee Data
- New Hampshire State RSA - Right to Privacy:
  - NH RSA 359-C:19 - Notice of Security Breach Definitions NH RSA 359-C:20 - Notice of Security Breach Required NH RSA 359-C:21 - Notice of Security Breach Violation

**Data User Compliance**

The Data Governance Manual applies to all users of Windham School District's information including: staff, students, volunteers, and authorized district contractors or agents. All data users are to maintain compliance with School Board Policies and District administrative procedures,

- EHAA (Computer Security, E-Mail, and Internet Communications)
- EGA (School District Internet Access for Students)
- GBEF (School District Internet Access for Staff)
- GCSA (Employee Computer and Internet Use)
- IJNDB (School District Internet Access for Students)

and all policies, procedures, and resources as outlined within this Data Governance Manual and School Board Policy.

A consistently high level of personal responsibility is expected of all users granted access to the district's technology resources. Any violation of district policies or procedures regarding technology usage may result in temporary, long-term or permanent suspension of user privileges. User privileges may be suspended pending investigation into the use of the district's technology resources.

Unless permission has been granted by the ISO or designee, no staff, vendor or other person may remove confidential or critical data from the district's premises or the district's network, remove a device containing confidential or critical data from the district's premises, or modify or copy confidential or critical data for use outside the district. If permission is given, the data may be accessed only on a district-provided device with appropriate security controls or through a secure virtual private network (VPN). When users access confidential or critical data from a remote location, the user must take precautions to ensure that the confidential or critical data is not downloaded, copied or otherwise used in a manner that would compromise the security and confidentiality of the information.

Staff who fail to follow the law or district policies or procedures regarding data governance and security may be disciplined or terminated. Volunteers may be excluded from providing services to the district. The district will end business relationships with any contractor who fails to follow the law, district

policies or procedures, or the confidentiality provisions of any contract. In addition, the district reserves the right to seek all other legal remedies, including criminal and civil action and seeking discipline of a staff member's teaching certificate.

The district may suspend all access to data or use of district technology resources pending an investigation. Violations may result in temporary, long-term or permanent suspension of user privileges. The district will cooperate with law enforcement in investigating any unlawful actions. The Superintendent or designee has the authority to sign any criminal complaint on behalf of the district.

Any attempted violation of district policies, procedures or other rules will result in the same consequences, regardless of the success of the attempt.

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

- Unauthorized disclosure of PII or Confidential Information
- Sharing your user IDs or passwords with others (exception for authorized technology staff for the purpose of support)
    - Applying for a user ID under false pretenses or using another person's ID or password.
    - Unauthorized use of an authorized password to invade student or staff privacy by examining records or information for which there has been no request for review.
    - The unauthorized copying of system files.
    - Attempting to secure a higher level of privilege without authorization.
    - Installation or use of unlicensed software or software not approved for district technological systems.
    - The intentional unauthorized altering, destruction, or disposal of district information, data and/or systems. This includes the unauthorized removal of technological systems such as but not limited to laptops, internal or external storage, computers, servers, backups or other media, that may contain PII or confidential information
    - The introduction of computer viruses, hacking tools or other disruptive or destructive programs.


**Data Lifecycle**

Data Governance is necessary at each phase in the data lifecycle. This lifecycle starts at evaluating the need for data collection and ends when the data is destroyed. It is important that appropriate safeguards, policies, procedures and practices are in place for each phase of the data lifecycle.

Identifying Need & Assessing Systems for District Requirements

To accomplish the district's mission and to comply with the law, the district may need to maintain confidential information, including information regarding students, parents/guardians, staff, applicants for employment and others. The district will collect, create or store confidential information only when the Superintendent or designee determines it is necessary.

**New Systems**

District staff members are encouraged to research and utilize online services or applications to engage students and further the district's educational mission. However, before any online service or application

is purchased or used to collect or store confidential or critical information, including confidential information regarding students or staff, the ISO or designee must approve the use of the service or application and verify that it meets the requirements of the law and School Board policy and appropriately protects confidential and critical information. This prior approval is also required when the services are obtained without charge.

The Windham School District has an established process for vetting new digital resources. Staff are required to complete steps outlined in the New Software Adoption Procedure posted on the District's website, to ensure that all new resources meet business and/or instructional need as well as security requirements.

Memorandums of understanding (MOU), contracts, terms of use and privacy policy for any system that creates, collects or uses personally identifiable information (PII), student records or confidential data must be reviewed by the ISO prior to initiation.

All new resources shall be properly evaluated against the following criteria, when applicable:

- Impact on technology environment including storage and bandwidth
- Hardware requirements, including any additional hardware
- License requirements/structure, number of licenses needed, and renewal cost
- Maintenance agreements including cost
- Resource update and maintenance schedule
- Funding for the initial purchase and continued licenses and maintenance
- Evaluate terms of service, privacy policy, and MOU/contract that meet the following criteria:
  - The district continues to own the data shared, and all data must be available to the district upon request.
  - The vendor's access to and use of district data is limited; the data cannot be used for marketing, targeted advertising or data mining; and the data cannot be shared with third parties unless allowed by law and authorized by the district. If metadata is collected, it will be protected to the same extent as the district's confidential or critical information.
  - District data will be maintained in a secure manner by applying appropriate technical, physical and administrative safeguards to protect the data.
  - The provider will comply with district guidelines for data transfer or destruction when contractual agreement is terminated.
  - No API will be implemented without full consent of the district.
  - All data will be treated in accordance to federal, state and local regulations
  - The provider assumes liability and provides appropriate notification in the event of a data breach.

Note: Exceptions can be made by the ISO when not all the criteria can be met for a legitimate reason while still meeting all regulatory requirements for use. Parent permission is requested from parents during the yearly online registration process for district vetted and approved applications and tools.

**Review of Existing Systems**

The District will ensure that data collection is aligned with School Board Policy. Data systems shall be regularly reviewed to ensure that only necessary data is being transmitted and collected.

Individual student level data is submitted to different approved service providers in order to ensure business operations and instructional services. At times, these imports include personally identifiable information (PII) for staff and students. The District must ensure that each piece of PII is necessary for operations or instruction and that the providers are abiding by their terms of service.

The District will audit data imports annually. These audits should include:

- Review of provider's terms of service to ensure they meet the District's data security requirements.
- Verification that software imports are accurate and pulling the correct information.
- Verification that, when applicable, the staff, students and classes included in the imports are still necessary for instructional purposes (only those that need data collected are included in import).
- Determine if the fields included in the imports are still necessary for the intended purpose.

### Acquisition and Creation

After completing the requirements for adoption of any new systems, staff shall complete a Technology Help Desk Ticket for any application/service that collects staff or student data or needs to be deployed to District devices (see Appendix C: Digital Resource Acquisition and Use). If there is a cost associated with the purchase of this application/service then the appropriate purchase procedure must also be followed. All staff must adhere to the following guidelines regarding a new technology acquisition:

- Contracts for any system that creates, collects or uses personally identifiable information (PII), student records or confidential data must be reviewed by the ISO prior to initiation. Staff should speak with their building Technology Integrator before using ANY new app/online tool with students and seek their assistance with the evaluation/vetting process. This includes any online tool that a student interacts with where they may be creating content and/or any site that requires any student login.
- It is the responsibility of the staff requesting to use new digital content to properly vet the resource to ensure that it meets district business objectives, is in line with curriculum or
- behavioral standards, is age appropriate, is instructionally sound, and is appropriate for the intended use.
- Digital resources that accompany adopted instructional and/or curriculum materials will be vetted by the Assistant Superintendent, Curriculum Directors, and the ISO, or designee, prior to purchase.

### Management and Storage

### Systems Security

The district will provide access to confidential information to appropriately trained district staff and volunteers only when the district determines that such access is necessary for the performance of their duties. The district will disclose confidential information only to authorized district contractors or agents who need access to the information to provide services to the district and who agree not to disclose the information to any other party except as allowed by law and authorized by the district (School Board Policy EHAB). Therefore, systems access will only be given on an as-needed basis as determined by the

data manager and ISO. Further information regarding Electronic Access Security Controls is contained in the Security/Protection section of this manual.

**Data Management**

The effective education of students and management of district personnel often require the district to collect information, some of which is considered confidential by law and district policy. In addition, the district maintains information that is critical to district operations and that must be accurately and securely maintained to avoid disruption to district operations.

Data Managers are responsible for the development and execution of practices and procedures that ensure the accuracy and security of data in an effective manner. All district administrators are data managers for all data collected, maintained, used and disseminated under their supervision as well as data they have been assigned to manage. Data managers will:

- ensure that system account creation procedures and data access guidelines appropriately match staff member job function with the data on instructional and operational systems.
- review all staff with custom data access beyond their typical group's access.
- review district processes to ensure that data will be tracked accurately.
- review contracts with instructional and operational software providers to ensure that they are current and meet the district data security guidelines.
- ensure that staff are trained in the district's proper procedures and practices in order to ensure accuracy and security of data.
- assist the ISO in enforcing district policies and procedures regarding data management.

**Security/Protection**

**Risk Management**

A thorough risk analysis of all Windham School District's data networks, systems, policies, and procedures shall be conducted on at least a monthly basis by an external third party or as requested by the Superintendent, ISO or designee. An internal audit of District network security will be conducted annually by District Technology staff. This analysis shall be completed using the risk management steps outlined in the Data Security Checklist (Appendix D). The product of the risk analysis will be referred to as the risk assessment. The risk assessment shall be used to develop a plan to mitigate identified threats and risk to an acceptable level by reducing the extent of vulnerabilities.

**Security Logs**

The District will maintain a comprehensive list of critical system events that will be logged and monitored to ensure data security. These events will include, but are not limited to, access to critical systems and modification of critical data. When applicable, notifications will be established for critical event triggers.

**Physical Security Controls**

Technology telecommunication closets are housed in secure locations. Access authorization is assigned through the Director of Technology, Network Administrator and or Director of Facilities. In addition,

access to areas in which information processing is carried out shall be restricted to only appropriately authorized individuals (see appendix G: Physical Security Controls).

No technological systems shall be disposed of or moved without adhering to the appropriate procedures (see Appendix H: Asset Management).

**Inventory Management**

The district shall maintain a process for inventory control in accordance with federal and state requirements and School Board policy. All district technology assets will be maintained in inventory and verified through the regular inventory verification process (see Appendix H: Asset Management).

**Virus, Malware, Spyware, Phishing and SPAM Protection**

The District uses a multi-layered approach to ensure that all electronic files are appropriately scanned for viruses, malware, spyware, phishing and SPAM. These include, but are not limited to, enterprise virus/malware/ spyware software, group policy, gateways, firewalls, and content filter. Users shall not turn off or disable district protection systems or install other systems (see Appendix I: Virus, Malware, Spyware, Phishing and SPAM Protection).

**Electronic Access Security Controls**

District staff will only access personally identifiable and/or confidential information if necessary to perform their duties. The district will only disclose this information to authorized district contractors or agents who need access to the information to provide services to the district and who agree not to disclose the information to any other party except as allowed by law. All staff are required to read and acknowledge applicable district policies via the Staff Handbook sign-off form annually.

Mechanisms to control access to personally identifiable information (PII), confidential information, internal information and computing resources include, but are not limited to, the following methods:

- **Identification/Authentication:** Unique user identification (user ID) and authentication are required for all systems that maintain or access PII, confidential information, and/or internal information. Users will be held accountable for all actions performed on the system with their User ID. User accounts and passwords shall not be shared.
- **Authorization:** Access controls are maintained through a partnership between the technology department, human resources (HR) and data managers.

Additionally, only members of the District Technology staff will be granted access to domain level administrator and local machine administrator accounts in order to complete their job functions.

Access security is audited annually or whenever access permission requirements are changed for a particular application/software or when an application/software is no longer necessary.

**Staff Users**

All new staff accounts are authorized through an HR hiring process (see Appendix J: Account Management). Role-based permissions and security groups are used to establish access to all systems

(see Appendix K: Data Access Roles and Permissions). If a staff member requires additional access, a request must be made directly to the ISO with a clear justification for access.

**Contractors/Vendors**

Access to contractors/vendors is governed through the same process using School Board Policy EHAB. All contractor/vendor access must be approved by HR and the ISO. All contractors doing business on district premises must also pass a background check unless other security measures are addressed in a vendor contract. All contractors/vendors accessing district data will be considered on premise users. Once the approval has been obtained, the technology department will create the account, only granting access to the server/application that the contractor/vendor supports.

**Password Security**

The District will enforce secure passwords for all systems within their control (see Appendix L: Password Security). When possible, the district will utilize Single Sign On (SSO) or LDAP/Active Directory Integration to maintain optimal account security controls.
Concurrent Sessions

When possible, the district will limit the number of concurrent sessions for a user account in a system.

**Remote Access**

Access into the District's network from outside is strictly prohibited without explicit authorization from the ISO. Remote access will be granted through virtual private network (VPN) connection through the district's network VPN appliance; no other method of remote access shall be granted without explicit authorization from the ISO. PII, confidential information and/or Internal Information that is stored or accessed remotely shall maintain the same level of protection as information stored and accessed within the District's network.

In the event that VPN access is needed by a contractor/vendor, access must be approved by the ISO. The Network Administrator will establish the contractor account, only granting access to the server/application that the contractor/vendor supports.

All VPN accounts will be reviewed at least annually.

**Securing Data at Rest and Transit**

District data security applies to all forms of data, including data stored on devices, data in transit and data stored on additional resources. All district external hard drives will be maintained in inventory and verified through the regular inventory verification process. Regular transmission of student data to internal and external services is managed by the technology department using a secure data transfer protocol.

Users must ensure that they are securely storing their data. Guidelines have been established for Cloud Storage and File Sharing, External Storage Devices, and File Transmission Practices. (see Appendix F: Securing Data at Rest and Transit). These guidelines are outlined in the following section.

**Usage and Dissemination**

A consistently high level of personal responsibility is expected of all users granted access to the district's technology resources. All district staff, volunteers, contractors and agents who are granted access to critical and confidential information are required to keep the information secure and are prohibited from disclosing or assisting in the unauthorized disclosure of confidential information. All individuals using confidential and critical information will strictly observe protections put into place by the district including, but not limited to, maintaining information in locked rooms or drawers, limiting access to electronic files, updating and maintaining the confidentiality of password protections, encrypting and redacting information, and disposing of information in a confidential and secure manner.

All users are responsible for the security and integrity of the data they create, store or access. Users are expected to act as good stewards of data and treat data security and integrity with a high degree of responsibility and priority. Users must follow all guidelines outlined with Board policies.

District staff, contractors and agents will notify the ISO or designee immediately if there is reason to believe confidential information has been disclosed to an unauthorized person or any information has been compromised, whether intentionally or otherwise.

**Data Storage and Transmission**

All staff and students that log into a district owned computers will be provided with several options for data storage and transmission. Staff and students will need to ensure that they are securely storing their data.

Staff and students will be able to store data on the local device, but it is recommended to use one of the cloud-based options provided for permanent storage. It is important to note that this data is not a part of the district's continuity plan, and thus will not be backed up by the district's backup solution.

Cloud Storage and File Sharing

The term "Cloud Storage" is used to define all types of remote server storages accessed by users through the internet. All staff and students are provided with a Google GSuite for Education account that provides unlimited storage. Users are responsible for all digital content on their district provided Google GSuite for Education Drive (see Appendix F: Securing Data at Rest and Transit).

**File Transmission Practices**

Staff are responsible for securing sensitive data for transmission through email or other channels. Staff should not transmit files labeled classified, confidential, or restricted through email or third party file transfer services without district approval. When possible staff should de-identify or redact any PII or confidential information prior to transmission. Regular transmission of student data to services such as a single sign-on provider is managed by the technology department using a secure data transfer protocol (see Appendix F: Securing Data at Rest and Transit).

**Credit Card and Electronic Payment**

Users of systems that process electronic payments, including but not limited to processing credit card information, must adhere to strict guidelines regarding the protection of payment information and

cardholder data. These users are responsible for adhering to the appropriate level of PCI compliance when handling such data (see Appendix F: Securing Data at Rest and Transit).

**Mass Data Transfers**

Downloading, uploading or transferring PII, confidential information, and internal information between systems shall be strictly controlled. Requests for mass download of, or individual requests for, information

for research or any other purposes that include PII shall be reviewed and approved by the Superintendent or designee. All other mass downloads of information shall be approved by the ISO and include only the minimum amount of information necessary to fulfill the request.

**Printing**

When possible, staff should de-identify or redact any PII or confidential information prior to printing. PII and confidential information shall not be downloaded, copied or printed indiscriminately or left unattended and open to compromise.

**Oral Communications**

Staff shall be aware of their surroundings when discussing PII and confidential information. This includes, but is not limited to, the use of cellular telephones in public areas. Staff shall not discuss PII or Confidential Information in public areas if the information can be overheard. Caution shall be used when conducting conversations in: semi-private rooms, waiting rooms, corridors, elevators, stairwells, cafeterias, restaurants, or public areas.

**Training**

The district shall create and maintain a data security training program. This program will consist of the following:

- Training for all staff on technology policies and procedures, including confidentiality and data privacy.
-  Additional training for new instructional staff on federal regulations and the use of digital resources and student electronic records.
- Training for all instructional staff on federal regulations and the use of digital resources and student electronic records.
- Training for district administration on federal regulations, data privacy and security.
- All training or professional learning that includes the use of data systems shall include data security.

**Archival and Destruction**

Once data is no longer needed, the ISO or designee will work with the data managers to ensure that it is appropriately destroyed. Special care will be taken to ensure that confidential information is destroyed

appropriately and in accordance with law. Confidential paper records will be destroyed using methods that render them unreadable, such as shredding. Confidential digital records will be destroyed using methods that render the record irretrievable.

**District Data Destruction Processes**

The district will regularly review all existing data stored on district provided storage for the purposes of ensuring data identification and appropriate destruction. Data destruction processes will align with School Board Policy. District data managers will regularly review systems and data to ensure that data that is no longer needed is destroyed. The following exceptions will be made:

- Data in an active litigation hold will be maintained until the conclusion of the hold.
- Student GSuite for Education account will be maintained for one school year after the student's final date of attendance.
- Staff GSuite for Education accounts will be suspended after the final workday, unless HR or the ISO approves a district administrator to maintain access.

**Asset Disposal**

The district will maintain a process for physical asset disposal in accordance with School Board Policy. The district will ensure that all assets containing PII, confidential, or internal information are disposed of in a manner that ensures that this information is destroyed (see Appendix H: Asset Management)

**Critical Incident Response**

Controls shall ensure that the District can recover from any damage to or breach of critical systems, data, or information within a reasonable period of time. Each school, department, or individual is required to report any instances immediately to the ISO or designee for response to a system emergency or other occurrence (for example, fire, vandalism, system failure, data breach and natural disaster) that damages/breaches data or systems.

**Business Continuity**

The District's administrative procedure EHB-R, delineates the timeline for data retention for all district data. The District will maintain systems that provide near-line and off-site data backup. These systems shall allow for the full recovery of critical systems in the event of a disaster.

**Disaster Recovery**

The District's Technology Disaster Recovery Plan outlines critical staff, responsibilities, and processes in the event of a disaster or critical data loss. The District shall maintain a list of all critical systems and data, including contact information. The Technology Disaster Recovery Plan shall include processes that enable the District to continue operations and efficiently restore any loss of data in the event of fire, vandalism, natural disaster, or critical system failure (see Appendix M: Disaster Recovery Plan).

**Data Breach Response**

New Hampshire's data breach law (RSA 359-c:19, 20, 21) is triggered when a School District computer system is breached and personal information is acquired without authorization in a way that compromises the security or confidentiality of the information. The law requires a school district experiencing a breach to conduct a good faith and reasonably prompt investigation to determine the likelihood that personal information was, or will be, misused. The Data Breach Response Plan enables the District to respond effectively and efficiently to a data breach involving personally identifiable information (PII) as defined by NH Law, confidential or protected information (ie-FERPA), district identifiable information and other significant cybersecurity incidents. The Data Breach Response Plan shall include processes to validate and contain the security breach, analyze the breach to determine scope and composition, minimize impact to the users, and provide notification (see Appendix N: Data Breach Response Plan).

**Appendix A - Definitions**

**Confidentiality:** Data or information is not made available or disclosed to unauthorized persons.

**Confidential Data/Information:** Information that the district is prohibited by law, policy or contract from disclosing or that the district may disclose only in limited circumstances. Confidential data includes, but is not limited to, personally identifiable information (PII) regarding students and staff.

**Critical Data/Information:** Information that is determined to be essential to district operations and that must be accurately and securely maintained to avoid disruption to district operations. Critical data is not necessarily confidential.

**Data:** Facts or information. Data can be in any form; oral, written, or electronic.

**Data Breach, Breach of Security or Breach:** A security incident in which there was unauthorized access to and unauthorized acquisition of personal information maintained in computerized form that compromises the security, confidentiality or integrity of the information.

**Data Integrity:** Data is current, accurate and has not been altered or destroyed in an unauthorized manner.

**Data Management:** The development and execution of policies, practices, and procedures in order to manage the accuracy and security of district instructional and operational data in an effective manner.

**Data Owner:** User responsible for the creation of data. The owner may be the primary user of that information or the person responsible for the accurate collection/recording of data. Ownership does not signify proprietary interest, and ownership may be shared. The owner of information has the responsibility for:
- knowing the information for which she/he is responsible.
- determining a data retention period for the information according to Board policy and state statute.
  - ensuring appropriate procedures are in effect to protect the integrity, confidentiality, and availability of the data used or created.
- reporting promptly to the ISO the loss or misuse of data.
- initiating and/or implementing corrective actions when problems are identified.

  ○ following existing approval processes for the selection, budgeting, purchase, and implementation of any digital resource.

**Information Security Officer:** The Information Security Officer (ISO) is responsible for working with the Superintendent, Data Governance Team, data managers, data owners, and users to develop and implement prudent security policies, procedures, and controls. The ISO will oversee all security audits and will act as an advisor to:

- data owners for the purpose of identification and classification of technology and data related resources.
- systems development and application owners in the implementation of security controls for information on systems, from the point of system design through testing and production implementation.

**Systems:** Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device, whether hosted by the district or provider.

**Security Incident:** An event that 1) actually or potentially jeopardizes the confidentiality, integrity or availability of an information system or the information the system processes, stores or transmits, or 2) constitutes a violation or imminent threat of violation of security policies, security procedures or acceptable-use policies.

**Personally Identifiable Information (PII):** Any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, State Assigned Student Identification, date and place of birth, mother's maiden name, or biometric records and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

**Risk:** The probability of a loss of confidentiality, integrity, or availability of information resources.

**User:** The user is any person who has been authorized to read, enter, print or update information. A user of data is expected to:

- access information only in support of their authorized job responsibilities.
- comply with all data security procedures and guidelines.
- keep personal authentication confidential (user IDs, passwords, secure cards, PINs, access codes).
- report promptly to the ISO the loss or misuse of data.
- follow corrective actions when problems are identified.


**Appendix B - Laws, Statutory, and Regulatory Security Requirements**

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

including interacting with other individuals on social networking websites and in chat rooms, and cyberbullying awareness and response. https://www.fcc.gov/consumers/guides/childrens-internet-protection-ac

**COPPA:** The Children's Online Privacy Protection Act regulates operators of commercial websites or online services directed to children under 13 that collect or store information about children. Parental permission is required to gather certain information. https://www.ftc.gov/tips-advice/business-center/privacy-and- security/children%27s-privacy

**FERPA:** The Family Educational Rights and Privacy Act applies to all institutions that are recipients of federal aid administered by the Secretary of Education. This regulation protects student information and accords students specific rights with respect to their data. http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html

 **HIPAA:** The Health Insurance Portability and Accountability Act applies to organizations that transmit or store Protected Health Information (PII). It is a broad standard that was originally intended to combat waste, fraud, and abuse in health care delivery and health insurance, but is now used to measure and improve the security of health information as well. https://www.hhs.gov/hipaa/index.html

**IDEA:** The Individuals with Disabilities in Education Act (IDEA) is a law that makes available a free appropriate public education to eligible children with disabilities throughout the nation and ensures special education and related services to those children. https://sites.ed.gov/idea/

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

**PPRA:** The Protection of Pupil Rights Amendment affords parents and minor students' rights regarding our conduct of surveys, collection and use of information for marketing purposes, and certain physical exams. https://www2.ed.gov/policy//gen/guid/fpco/ppra/index.html

**New Hampshire State RSA 189:65-189:68:** Student and Teacher Information Protection and Privacy as defined by the following sections:

- NH RSA 189:65 (http://www.gencourt.state.nh.us/rsa/html/XV/189/189-65.htm) Definitions
- NH RSA 189:66 (http://www.gencourt.state.nh.us/rsa/html/XV/189/189-66.htm) Data Inventory and Policies Publication
- NH RSA 189:67 (http://www.gencourt.state.nh.us/rsa/html/XV/189/189-67.htm) Limits on Disclosure of Information
- NH 189:68 (http://www.gencourt.state.nh.us/rsa/html/XV/189/189-68.htm) Student Privacy
- NH RSA 189:68-a (http://www.gencourt.state.nh.us/rsa/html/XV/189/189-68-a.htm) Student Online Personal Information
- New Hampshire Minimum Standards for Privacy and Security of Student and Employee Data

New Hampshire State RSA Chapter 359-C Right to Privacy:

- NH RSA 359-C:19 ([http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-19.htm](http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-19.htm)) Notice of Security Breach - Definitions
- NH RSA 359-C:20 ([http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-20.htm](http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-20.htm)) Notice of Security Breach Required
- NH RSA 359-C:21 ([http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-21.htm](http://www.gencourt.state.nh.us/rsa/html/xxxi/359-c/359-c-21.htm)) Notice of Security Breach Violation

**Appendix C - Digital Resource Acquisition and Use**

The purpose of the Digital Resource Acquisition and Use process is to:

- ensure proper management, legality and security of information systems,
- increase data integration capability and efficiency,
- and minimize malicious code that can be inadvertently downloaded.

**New Resource Acquisition**

The Windham School District has an established process for vetting new digital resources. Staff are required to complete steps outlined in the New Software Adoption Procedure posted on the District's website, to ensure that all new resources meet business and/or instructional needs as well as security requirements. All staff must adhere to the following guidelines regarding digital resource acquisition:

- Contracts for any system that creates, collects or uses personally identifiable information (PII), student records or confidential data must be reviewed by the ISO, or designee, prior to initiation. Staff should speak with their building Technology Integrator before using ANY new app/online tool with students and seek their assistance with the evaluation/vetting process. This includes any online tool that a student interacts with where they may be creating content and/or any site that requires any student login.
- It is the responsibility of the staff requesting to use new digital content to properly vet the resource to ensure that it meets district business objectives, is in line with curriculum or behavioral standards, is age appropriate, is instructionally sound, and is appropriate for the intended use.
- Digital resources that accompany adopted instructional and/or curriculum materials will be vetted by the appropriate Assistant Superintendent, Curriculum Directors, and the Director of Technology, or designee, prior to purchase.

All new resources shall be properly evaluated against the following criteria, when applicable:

- Impact on technology environment including storage and bandwidth
- Hardware requirements, including any additional hardware
- License requirements/structure, number of licenses needed, and renewal cost
- Maintenance agreements including cost
- Resource update and maintenance schedule
- Funding for the initial purchase and continued licenses and maintenance
- Evaluate terms of service, privacy policy, and MOU/contract that meet the following criteria:
  - The district continues to own the data shared, and all data must be available to the district upon request.

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○ the vendor's access to and use of district data is limited; the data cannot be used for marketing, targeted advertising or data mining; and the data cannot be shared with third parties unless allowed by law and authorized by the district. If metadata is collected, it will be protected to the same extent as the district's confidential or critical information.
○ District data will be maintained in a secure manner by applying appropriate technical, physical and administrative safeguards to protect the data.
○ The provider will comply with district guidelines for data transfer or destruction when contractual agreement is terminated.
○ No API will be implemented without full consent of the district.
○ All data will be treated in accordance to federal, state and local regulations
○ The provider assumes liability and provides appropriate notification in the event of a data breach.

Note: Exceptions can be made by the ISO when all the criteria cannot be met for a legitimate reason while still meeting all regulatory requirements for use. Parent permission is requested from parents during the yearly online registration process for district vetted and approved applications and tools.

**Approved Digital Resources**

In order to ensure that all digital resources used meet security guidelines and to prevent software containing malware, viruses, or other security risk, digital resources that have been vetted are categorized as Approved or Denied.

● It is the responsibility of staff to submit a request to use a new digital resource if a resource is not listed.
● Digital resources that are denied or have not yet been vetted will not be allowed on district owned devices or used as part of district business or instructional practices.

**Digital Resource Licensing/Use**

All computer software licensed or purchased for district use is the property of the District and shall not be copied for use at home or any other location, unless otherwise specified by the license agreement.

All staff must adhere to the following guidelines regarding digital resource licensing/use:

● Only approved district resources are to be used.
● District software licenses will be:
  ○ kept on file in the technology office.
  ○ accurate, up to date, and adequate.
  ○ in compliance with all copyright laws and regulations.
  ○ in compliance with district, state and federal guidelines for data security.
● Software installed on Windham School District systems and other electronic devices will have a current license on file or will be removed from the system or device.
● Resources with or without physical media (e.g. downloaded from the Internet, apps, or online) shall still be properly vetted and licensed, if necessary, and is applicable to this procedure.
● Under no circumstances can staff act as a parental agent when creating student accounts for online resources; resources requiring this permission must be approved at the district level.

**Appendix D - Data Security Checklist**

A thorough risk analysis of all Windham School District data networks, systems, policies, and procedures shall be conducted on a monthly basis or as requested by the Superintendent, ISO or designee by an independent third party. The risk analysis will include internal and external vulnerability cybersecurity risk assessments and external penetration testing of the District network. An internal audit of District network security will be conducted annually by District Technology staff.

The Data Security Checklists examine the types of threat that may affect the ability to manage and protect the information resource. The analysis also documents any existing vulnerabilities found within each entity, which could potentially expose the information resource to threats. Finally, the analysis includes an evaluation of the information assets and the technology associated with its collection, storage, dissemination and protection.

From the combination of threats, vulnerabilities, and asset values, an estimate of the risks to the confidentiality, integrity and availability of the information is determined. The product of the risk analysis will be referred to as the risk assessment. The risk assessment shall be used to develop a plan to mitigate identified threats and risk to an acceptable level by reducing the extent of vulnerabilities.

Data Security Checklist for District Hosted Systems

- Types of potential threats (internal, external, natural, manmade, electronic and non-electronic)
- Physical security of system
    - Location within network including network systems protection (firewall, content filter) and if system is externally facing or only allows for district network access
- Access controls including password security (can district password requirements be enforced)
- Authentication methods (LDAP/Active Directory, Single Sign On, District managed account, user managed account)
- Server/system security patch frequency
- Ability to access from mobile devices
- Ability to maintain critical system event logs
- Ability to receive notification for critical system events

**Data Security Checklist for Provider Hosted Systems**

- Types of potential threats (internal, external, natural, manmade, electronic and non-electronic)
- Contract, terms of service and privacy policy are current and meet district data security requirements
- Provider has adequate data security measures including data management and incident response
- Ability to ensure proper access controls including password security (ie- can district password requirements be enforced)
- Authentication methods (LDAP/Active Directory, Single Sign On, District managed account, user managed account)
- Server/system security patch frequency
- Ability to access from mobile devices
    - Notification practices in the event of a system compromise or security breach

**Appendix E - Data Classification Levels**

Personally Identifiable Information (PII)

PII is information about an individual maintained by an agency, including:

- Any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records.
- Any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

Unauthorized or improper disclosure, modification, or destruction of this information could violate state and federal laws, result in civil and criminal penalties, and cause serious legal implications. This information may only be disclosed as permitted in School Board Policy

**Confidential Information**

Confidential Information is very important and highly sensitive material that is not classified as PII. This information is private or otherwise sensitive in nature and shall be restricted to those with a legitimate business need for access. Examples of confidential information may include: student records, personnel information, key financial information, proprietary information, system access passwords and encryption keys.

Unauthorized disclosure of this information to individuals without a business need for access may violate laws and regulations, or may cause significant consequences for the district, its staff, parents, students or other stakeholders. Decisions about the provision of access to this information shall always be cleared through the data manager and/or ISO.

**Internal Information**

Internal Information is intended for unrestricted use within the district and in some cases within affiliated stakeholders. This type of information is already widely-distributed within the district, or it could be distributed within the organization without advance permission from the information owner. Examples of Internal Information include internal policies and procedures and handbooks.

Unauthorized disclosure of this information to outsiders may not be appropriate due to copyright, legal or contractual provisions.

**Public Information**

Public Information has been specifically approved for public release by the Superintendent or appropriate district administrator. Examples of public information may include patron mailings and materials posted to the district's website. This information may be disclosed outside of the district.

**Appendix F - Securing Data at Rest and Transit**

All staff and students that log into a district owned computers will be provided with several options for data storage and transmission. Staff and students will need to ensure that they are securely storing their data. Staff and students will be able to store data on the local device, but it is recommended to use one

of the cloud-based options provided for permanent storage. It is important to note that this data is not a part of the district's continuity plan, and thus will not be backed up by the district's backup solution.

Confidential and critical information will be saved and maintained in a secure manner using encryption or other password-protected security measures. Likewise, when data is transmitted, the district will use encryption or password-protected security measures.

Cloud Storage and File Sharing

The term "Cloud Storage" is used to define all types of remote server storages accessed by users through the internet. All staff and students are provided with a GSuite for Education account that provides unlimited storage. Users are responsible for all digital content on their district provided GSuite for Education Drive.

When using cloud storage, staff must adhere to the following guidelines:

- Staff and students may not access cloud storage through third party applications outside of approved internet browsers and Google Drive App on Android & iOS. This will ensure that native operating systems do not replace cloud sharing security.
- Users need to be aware of default sharing settings on folders when they upload files. Users are required to limit sharing files to an as needed basis.
- Staff and students must ensure that any cloud storage providers used are approved by the district and meet district student data and data security standards.
- When exiting the district, students should responsibly copy their content to their own personal storage solution.
- When exiting the district, staff should ensure that they are only copying personal content that they created. Staff are prohibited from copying content that contains confidential information, student records or data.
- Data with personally identifiable information of staff or students may be posted to users' district provided Google Drive with appropriate security settings. Users may not post this data to other cloud sharing platforms without consent of district administration.
- Staff should never post any documents labeled classified, confidential, or restricted to any cloud storage including district provided Google Drive accounts without district approval.
- All users shall immediately report any cloud storage security problems of the district's technology resources to a teacher or administrator.
- Attempting to gain or gaining unauthorized access to cloud storage or the files of another is prohibited.
- As with other forms of district technology, district staff, students, and other GSuite for Education drive users have no expectation of privacy on data stored on this platform.

The term "File Sharing" is used to define all activities that share access to digital information whether in the cloud or on district administered mapped drives. When file sharing, staff must adhere to the following guidelines:

- Users must abide by all policies and procedures regarding professional conduct and communication when sharing, reviewing, updating, commenting and re-sharing.
- When sharing content, users must ensure that other users accessing the information in the files have appropriate access to the information based on job function.

- All users shall immediately report any inappropriate sharing of the district's technology resources to an administrator.

**External Storage Devices**

The term "External Storage Devices" is used to define all portable storage devices (including USB drives, rewritable CD/DVD, memory cards, and external hard drives) used by staff and students. While the district recognizes the advantages for staff and students to maintain information on these devices, users are strongly encouraged to rely on their district provided GSuite for Education Drive account for all storage needs. When using external storage devices, staff must adhere to the following guidelines:

- Users are responsible for all content on external storage devices that have been connected to district technology resources.
- Users must ensure that they will not introduce harmful software including computer viruses, malware, non-district approved software, or hacking tools to district technology resources.
- Users must ensure that the data will remain secure through appropriate encryption or password protection when transferring files containing PII or protected information to an external storage device
- Users should only keep the information stored on the external device for the duration of the project, and then promptly remove.
- Staff should never transfer any documents labeled classified, confidential, or restricted to any external storage device.
- Staff should never transfer or create confidential data or student records on personal storage devices.

**File Transmission Practices**

- Staff are responsible for securing sensitive data for transmission through email or other channels. When possible, staff should de-identify or redact any PII or confidential information prior to transmission.
- Staff should never include a password in any electronic communication unless directed to do so by Technology Staff.
- Staff should not transmit files labeled classified, confidential, or restricted through email or third party file transfer services without district approval.
- Regular transmission of student data to services such the District Library Management system, Food Service Management system, and Single Sign-On Provider systems is managed by the technology department using a secure data transfer protocol. All such services are approved by a district/building administrator and the Director of Technology.

**Credit Card and Electronic Payment**

Users of systems that process electronic payments, including but not limited to processing credit card information, must adhere to strict guidelines regarding the protection of payment information and cardholder data. These users are responsible for adhering to the following requirements and appropriate level of PCI compliance when handling such data:

- Never store cardholder data on district systems or in written form. All cardholder data may only be entered in secured payment systems approved by the district. Any cardholder data collected in written form must be shredded immediately after entry into the approved system.
- The district will never maintain a data system for payment information. All payment information will be stored and processed by a 3rd party accessible through a secure portal.
- Never request cardholder information to be transmitted via email or any other electronic communication system.
- Payment information shall be entered directly into the approved payment system by individuals making payment. If the individual is not able to directly input the payment, designated staff may gain verbal approval for the payment process either in person or via phone (after identification is verified). If verbal payment information is received, that information must be entered directly into the payment system and not written down during the process.
- If payment information is collected via a physical form, that form must be shredded or payment information redacted immediately upon receipt and entry into the payment system.

**Appendix G - Physical Security Controls**

The following physical security controls shall be adhered to:

- Network systems shall be installed in an access-controlled area. The area in and around the computer facility shall afford protection against fire, water damage, and other environmental hazards such as power outages and extreme temperature situations.
- Monitor and maintain data centers' temperature and humidity levels.
- File servers and/or storage containing PII, Confidential and/or Internal Information shall be installed in a secure area to prevent theft, destruction, or access by unauthorized individuals.
- Ensure network systems and network equipment are properly secured to prevent unauthorized physical access and data is properly safeguarded to protect from loss.
- Computers and other systems shall be secured against use by unauthorized individuals. It is the responsibility of the user to not leave these devices logged in, unattended, and open to unauthorized use.
- Monitor and control the delivery and removal of all data-storing technological equipment or systems. Maintain a record of all such items entering or exiting their assigned location using the district approved technology inventory program. No technology equipment regardless of how purchased or funded shall be moved without the explicit approval of the technology department.
- Ensure that technological equipment or systems being removed for transfer to another organization or being designated as surplus property is appropriately sanitized in accordance with applicable policies and procedures (see Appendix I: Asset Management).

**Appendix H - Asset Management**

Data security must be maintained through the life of an asset, including the destruction of data and disposal of assets. Any computer, laptop, mobile device, printing and/or scanning device, network appliance/equipment, AV equipment, server, internal or external storage, communication device or any other current or future electronic or technological device may be referred to as a system, asset or device.

All involved systems and information are assets of the district and are expected to be protected from misuse, unauthorized manipulation, and destruction.

Inventory

All technology devices or systems considered an asset are inventoried by the technology department. This includes, but is not limited to, network appliances, servers, computers, laptops, mobile devices, and external hard drives. The technology department will conduct annual inventory verification of all district devices. It is the responsibility of the technology department to update the inventory system to reflect any in-school transfers, in-district transfers, or other location changes for district technology assets.

Disposal Guidelines

Assets shall be considered for disposal in accordance with state/federal regulations and School Board Policy DN. The following considerations are used when assessing an asset for disposal:

- End of useful life
- Lack of continued need
- Obsolescence
- Wear, damage, or deterioration
- Excessive cost of maintenance or repair
- Salable value


The Director of Technology shall approve disposals of any district technology asset.

**Methods of Disposal**

Once equipment has been designated and approved for disposal (does not have salable value), it shall be handled according to one of the following methods. It is the responsibility of the technology department to update the inventory system to reflect the disposal of the asset.

**Discard**

All technology assets shall be discarded in a manner consistent with applicable environmental regulations. Electronic equipment may contain hazardous materials such as mercury, lead, and hexavalent chromium. When possible, any re-usable hardware that can be used as parts to repair and/or maintain district technology assets shall be removed (motherboards, screens, adapters, memory). In addition, systems may contain Personally Identifiable Information (PII), Confidential, or Internal Information. Systems shall be wiped clean of this information prior to leaving the school district.

A district-approved vendor shall be contracted for the disposal of all technological systems/equipment. The vendor shall provide written documentation verifying the method used for disposal and a certificate stating that no data of any kind can be retrieved from the hard drive or any other component capable of storing data.

Under no circumstances should any technological systems/equipment be placed in the trash.

**Donation/Gift**

In the event that the district determines that an asset shall be donated or gifted, systems shall be wiped clean of Personally Identifiable Information (PII), Confidential, and/or Internal Information prior to leaving the school district. The Windham School District will not support or repair any equipment that is donated. In addition, software licenses are not transferred outside the district. Therefore, systems must be returned to factory installation prior to donation.

**Appendix I - Virus, Malware, Spyware, Phishing and SPAM Protection**

Virus, Malware, and Spyware Protection

Windham School District PC desktops, laptops, and file servers are protected using enterprise virus/malware/spyware software. Definitions are updated daily and an on-access scan is performed on all "read" files continuously. A full scheduled scan runs weekly. A full scheduled scan is performed on all servers weekly during non-peak hours. All files and systems are scanned.

Internet Filtering

Student learning using online content and social collaboration continues to increase. The Windham School District views Internet filtering as a way to balance safety with learning, letting good content, resources, and connections in while blocking the bad. To balance educational Internet resource and application use with student safety and network security, the Internet traffic from all devices on the district network is routed through the district firewall and content filter. Filtering levels are based on the role of the user, staff or student and student grade level. All sites that are known for malicious software, phishing, spyware, etc. are blocked.

Phishing and SPAM Protection

Email is filtered for viruses, phishing, spam, and spoofing using Google services.

Security Patches

Server patch management is performed regularly. Security patches are applied on an as needed basis, but at least biweekly.

**Appendix J - Account Management**

Access controls are essential for data security and integrity. The Windham School District maintains a strict process for the creation and termination of district accounts. All new staff accounts are authorized through an HR hiring process prior to creation. Role-based permissions are used to establish access to all systems. Access security is audited at least annually or whenever access permission requirements are changed for a particular application/software or when an application/software is no longer necessary.

Staff Accounts

When a staff member is hired by the Windham School District, the following process ensures that each staff member has the correct access and permissions to the resources that are required for their position.

- Notification of new staff member is sent from Human Resources to the Technology Department. This notification includes position, building assignment(s), and start date.

- Only after notification has been received from Human Resources, the Technology Department creates user accounts. The user is given access and permissions to the necessary resources based on their position and building assignment(s) (see Appendix K: Data Access Roles and Permissions).
- Any exception to permissions must be approved by the district administrator responsible for the system (data manager) and the Director of Technology.
- When a staff member's employment is ended, either by termination or resignation, account permissions are revoked in one of two ways.
    - In the event of termination, HR will notify the Technology Department via email or phone call requiring the account to be disabled at once, preventing any further access to district resources.
    - In the event of resignation, HR will notify the Technology Department via email indicating the termination date. The account is disabled at the end of business on the termination date, preventing further access to district resources.
    - In the event that a user having elevated permissions to any system separates from the district, additional measures are taken to ensure that all elevated accounts to those systems are secure.

**Local/Domain Administrator Access**

Only members of the District Technology staff will be granted access to domain level administrator and local machine administrator accounts in order to complete their job functions.

**Remote Access**

Access into the District's network from outside is strictly prohibited without explicit authorization from the ISO. Remote access will be granted through virtual private network (VPN) connection through the district's network VPN appliance; no other method of remote access shall be granted without explicit authorization from the ISO. PII, confidential information and/or Internal Information that is stored or accessed remotely shall maintain the same level of protection as information stored and accessed within District's network.

In the event that VPN access is needed by a contractor/vendor, access must be approved by the ISO. The Network Administrator will establish the contractor account, only granting access to the server/application that the contractor/vendor supports.

All VPN accounts will be reviewed at least annually.

**Contractors/Vendors**

Access to contractors/vendors is governed through the same process using School Board Policy EHAB. All contractor/vendor access must be approved by HR and ISO. All contractors doing business on district

premises must also pass a background check unless other security measures are addressed in a vendor contract. All contractors/vendors accessing district data will be considered on premise users. Once the approval has been obtained, the technology department will create the account.

**Appendix K - Data Access Roles and Permissions**

**Student Information System (SIS)**

District-Wide Crisis Prevention & Response Plan 10/17/23

Staff are entered into the Windham School District's student information system. Only staff whose roles require access are provided accounts for the system. Access accounts for the District's SIS are set up based on staff role/position, building and required access to student data and are assigned by the Director of Technology or designee. Teacher accounts are created for all staff responsible for taking student attendance and entering and maintaining grades. Teacher accounts login to the SIS Teacher Portal. Staff assigned a Teacher account only have access to students they teach or provide services to. Administrative accounts are created based on the staff member's role/position and function and further restrictions to data are controlled through security groups. Security groups control access permissions to certain data sets such as attendance, demographic data, grades, discipline etc. and whether the staff member can view or maintain data. Additional page level permissions are assigned to the security groups. Administrative accounts log into the SIS Admin Portal.

**Financial System**

All staff members are entered into the District's financial system for the purpose of staff payroll and HR tracking. Only staff requiring access are provided accounts for the financial/personnel system.

After basic information and user ID are created, a security role is assigned to the account granting them access to designated areas of the financial system to complete their job responsibilities.

**Special Education System**

The State of New Hampshire provides the District access to the NH Special Education Information System (NHSEIS) that houses all student IEP information. Access accounts to NHSEIS is maintained by the District's Director of Special Services office through the MyNHDOE single sign-on portal. A user role determines the user's authority and applicable permissions within the NHSEIS system.

Health Software System

School District Nurses, Nurse Substitutes and Technology Staff are the only staff members granted access to the District's Health Software system. Technology Staff access is for the purpose of upgrades, and technical support for the use of the system. The medical data that is collected and maintained by the school nurses on the system includes immunizations, conditions, medications, and clinic logs (Time in/out of clinic and action taken). School nurses are the only accounts that can view and maintain medical information.

**Food Services System**

The District uses a Food Services software management system to track data and perform functions necessary for the efficient operation of the Food Service Program. Food service staff are granted accounts with access to only the parts of the system that are necessary to complete their job functions. Technology Staff access is for the purpose of upgrades, and technical support for the use of the system and cash registers. Strict security roles and permissions are in place to ensure that confidential information is only viewable by authorized staff.

**Appendix L - Password Security**

The District requires the use of strictly controlled passwords for network access and for access to secure sites and information. All passwords to district systems shall meet or exceed the below requirements.

- Passwords shall never be shared with another person.
- When possible, user created passwords should adhere to the same criteria as required for district network access as outlined below.
- Passwords shall never be saved when prompted by any application with the exception of single sign-on (SSO) systems as approved by the Technology Department.
- Passwords shall not be programmed into a computer or recorded anywhere that someone may find and use them.
- When creating a password for secure information or sites, it is important **not** to use passwords that are easily guessed due to their association with the user (i.e. children's names, pets' names, or birthdays).
- Users and staff who have reason to believe a password is lost or compromised must notify the Director of Technology or designee as soon as possible. The technology department will verify the identity of the person requesting the change before resetting the password.

District network access to resources managed through LDAP/SSO:

- Passwords must be "strong," and must be a minimum of 8 characters long, must include at least one uppercase character, one number and one special character (! @ # $ % & ?)
- Passwords will only be changed in the event the user shares their password with another staff member or they believe their account has been hacked.
- Your password should not be too similar to your username.
- Do not use your district password for any non-district systems.

Where possible, system software should enforce the following password standards:

- Passwords routed over a network shall be encrypted.
- Passwords shall be entered in a non-display field.
- System software shall enforce the changing of passwords and the minimum length
- System software shall disable the user password when more than five consecutive invalid passwords are given.

**Objectives**


**Appendix M - Technology Disaster Recovery Plan**

The primary purpose of the Technology Disaster Recovery Plan (TDRP) is to enable the Windham School District to respond effectively and efficiently to a natural disaster or critical failure of the district's data center and/or core systems. The objectives during a natural disaster or critical failure are the following:

- Minimize the loss or downtime of core systems and access to business critical data.
- Recover and restore the district's critical systems and data.
- Maintain essential technology resources critical to the day to day operations of the district.
- Minimize the impact to the staff and students during or after a critical failure.

**Planning Assumptions**

The following planning assumptions were used in the development of Windham's TDRP:

There may be natural disasters that will have a greater impact than others.

- There will be factors that are beyond the department's control or ability to predict during a disaster.
- There is the possibility of complete loss of the current data center.
- District data is hosted by 3rd party providers.
  - In the event of a critical failure to network infrastructure in the datacenter, District networking may be significantly impacted.

**Disaster Recovery/Critical Failure Team**

The Windham School District has appointed the following people to the disaster recovery/critical failure team: Director of Technology, Network System Administrator, Information Technology Support Coordinator, and Information Technology Data Coordinator.

In the event the TDRP is activated, overall management of the response is delegated to this team. Their primary responsibilities include:

- Determining the impact of the natural disaster/critical failure.
- Communication of impact and or loss, and updates of progress to the Superintendent.
- Communication of outages and updates to district staff.
- Oversight of the TDRP implementation and restoration of critical systems and data.
- Allocation and management of technology staff during the event.
- Working with vendors during the recovery and restoration of critical systems and data.
- Oversight of TDRP implementation debrief.

**Activation**

The TDRP will be activated in the event of the following:

- A natural disaster has occurred and affects the operation of the District's data center. A natural disaster includes but is not limited to the following: tornado, earthquake, lightning, and floods.
- A fire has impacted the data center.
- Water or flooding has impacted the data center.
- Critical system failure.

The Information Security Officer (ISO) will act as the incident response manager (IRM). If the ISO is not able to act as the IRM, a member of the Superintendent's Leadership Team will assume the role of IRM, with assistance from the IRT.

**Notification**

The following groups will be notified in the event the plan has been activated:

- Superintendent
- Superintendent's Leadership Team
- Technology Staff

Information will be disseminated to the above groups through whichever means of communication is available at the time. This could include any one or combination of the following:

- Phone
- Email
- Social Media/Website
- Radio or Television

The TDRP team will work with the Superintendent on which information will be conveyed to each above group and what means will be used. Information that needs to be distributed to other groups including staff, parents, students, or local emergency response personnel will be determined by the Superintendent or designee.

**Implementation**

The TDRP team has the following in place to bring the District back online in the least amount of time possible:

- Maintained spreadsheet listing all server names, physical and virtual, and their function. A hard copy of this document will be secured at the technology office. An electronic version will be housed on external cloud storage.
- Maintained a secure application to store all system administrator accounts, passwords and vendor contact information. This will be accessible only to applicable Technology Staff who need access to perform their job functions.
- The District's data is all stored externally and uses cloud-based backups. The District's critical virtual servers can be run directly from the cloud with limited access. Snapshot copies of the critical virtual servers are performed regularly.
- In the event of a critical system failure, the District can restore that server back to our current environment from the backup solution.

**Deactivation**

The TDRP team will deactivate the plan once services are fully restored.

**Evaluation**

An internal evaluation of the Windham School District's TDRP response will be conducted. This will entail gathering documentation from the response and feedback from all stakeholders and incorporate into an after action report and corrective action plan. The result will be an update to the TDRP and other emergency response plans as appropriate.

**Appendix N - Data Breach Response Plan**

The purpose of the Technology Data Breach Plan (TDBP) is to enable the Windham School District to respond effectively and efficiently to an actual or suspected data breach involving personally identifiable information (PII), confidential or protected information, district identifiable information and other significant cybersecurity incidents. The objectives of the TDBP are:

- Convene the Incident Response Team (IRT) as necessary.

- Validate and contain the data security breach.
- Analyze the breach to determine scope and composition.
- Minimize impact to the staff and students after a data breach has occurred.
- Notification of data owners, legal counsel, state/federal agencies and law enforcement as deemed necessary.

**Data Breach/Incident Response Team**

Windham School District has appointed the following people to the data breach/incident response team: Director of Technology, Network System Administrator, Information Technology Support Coordinator, and Information Technology Systems Specialist.

In the event the TDBP is activated, overall management of the response is delegated to this team. Their primary responsibilities include:

- Determine the nature of the data compromised and its impact to staff, students and the district itself.
- Communicate impact, the number of affected individuals, the likelihood information will be or has been used by unauthorized individuals and updates of progress to the Superintendent and Business Administrator.
- Coordinate with the Superintendent to ensure communication with district staff and or parents as deemed appropriate.
- Oversight of the TDBP implementation and data breach resolution.
- Allocate and manage technology staff resources during the event.
- Work with vendors, 3rd party providers, manufacturers, legal counsel, district data breach insurance provider, state/federal agencies and law enforcement while correcting the data breach and its repercussions.
- Oversight of TDBP implementation debrief.

**Activation**

The TDBP will be activated in the event of the following:

- A data breach has occurred and affects the district itself. A data breach includes but is not limited to an incident in which sensitive, protected or confidential data has potentially been viewed, stolen or used by an individual unauthorized to do so.
- Network hack/intrusion has occurred.

The Information Security Officer (ISO) will act as the incident response manager (IRM). If the ISO is not able to act as the IRM, a member of the Superintendent's Leadership Team will assume the role of IRM, with assistance from the IRT. The breach response and reporting process will be documented according to state and federal requirements. The Director of Technology will work with the Superintendent to dispense and coordinate the notification and public message of the breach.

**Notification**

The following groups will be notified in the event the plan has been activated:

- Superintendent
- Superintendent's Leadership Team
- Technology Staff

Information will be disseminated to the above groups through whichever means of communication deemed appropriate. This could include any one or combination of the following:

- Email
- Social Media/Website
- Television
- Written Notice
- Phone

The TDBP team will work with district leadership on which information will be conveyed to each above group, timing of that communication and what means will be used. Information that needs to be distributed to other groups including staff, parents, students, or local emergency response personnel will be determined by the Superintendent or designee.

**Implementation**

The TDBP team has the following processes in place to contain the data breach in the least of amount of time possible:

- Data inventory of all systems containing sensitive data. A hard copy of this document will be secured at the technology office. An electronic version will be housed on secure cloud-based storage.
- Data dictionary of all district hosted information systems. A hard copy of this document will be secured at the technology office. Due to non-disclosure agreements, this data may not be available in other locations/formats. The appropriate vendor(s) can be contacted for this information.
- Maintained spreadsheet listing all server names, physical and virtual, and their function. A hard copy of this document will be secured at the technology office. An electronic version will be housed on secure cloud-based storage.
- Maintained a secure application to store all system administrator accounts, passwords and vendor contact information. This will be accessible only to applicable Technology Staff who need access to perform their job functions.

The following will take place during the incident response:
- The members of the IRT will be assembled once a breach has been validated. The IRT will be composed of the Director of Technology, Network System Administrator, and Information Technology Data Coordinator. Additional members of the Windham School District's administrative team and technology department may be designated to assist on the IRT.
- The IRT will determine the status of the breach, on-going, active, or post-breach. For an active and ongoing breach, the IRT will initiate appropriate measures to prevent further data loss. These

measures include, but are not limited to, securing and blocking unauthorized access to systems/data and preserving any and all evidence for investigation.

- The IRT will work with the data managers and data owners to determine the scope and composition of the breach, secure sensitive data, mitigate the damage that may arise from the breach and determine the root cause(s) of the breach to devise mitigating strategies and prevent future occurrences.
- The IRM will work with legal counsel and the Superintendent's Leadership Team to determine appropriate course of action pursuant to state statute. This includes notification of the authorities, and local law enforcement.
- Collaboration between the authorities and the IRT will take place with the IRM. The IRT will work with the proper authorities to make sure any and all evidence is properly handled and preserved.
- On advice from legal counsel, an outside party may be hired to conduct the forensic investigation of the breach. When the investigation has concluded, all evidence will be safely stored, recorded or destroyed (where appropriate).
- All affected data, machines and devices will be identified and removed from the network as deemed appropriate for the investigation. Interviews will be conducted with key personnel and facts of the incident will be documented and the evidence preserved for later examination.
- The IRT will work with the Superintendent's office to outline the notification of the data owners and those affected. Communication will be sent out as directed by legal counsel and advised by the district communications team. The types of communication will include, but not limited to, email, text message, postal mail, substitute notice and/or phone call.
- The IRM, in conjunction with the IRT, legal counsel and the Superintendent's Leadership Team will determine if notification of affected individuals is necessary. Once the determination is made to notify affected individuals, a letter will be written in accordance with all federal and state statutes, and local procedures. If it is determined that identity theft or other fraud is not reasonably likely to occur as a result of the breach, such a determination shall be documented in writing and filed at the Superintendent's office.

**Deactivation**

The TDBP team will deactivate the plan once the data breach has been fully contained.

Evaluation

Once the breach has been mitigated, an internal evaluation of the Windham School District's TDBP response will be conducted. The IRT, in conjunction with the IRM and others that were involved, will review the breach and all mitigation steps to determine the probable cause(s) and minimize the risk of a future occurrence. Feedback from the responders and affected entities may result in an update to the TDBP and other emergency response plans as appropriate. Information security training programs will be modified to include countermeasures to mitigate and remediate previous breaches so that past breaches do not recur. The reports and incident review will be filed with all evidence of the breach.

**Crisis and Grief Management Plan**

# WINDHAM SCHOOL DISTRICT

# 2023-2025
# CRISIS/ GRIEF MANAGEMENT

**Statement of Purpose:**

The purpose of this plan of action is to provide the means for an organized and systematic school wide response to a crisis. It is designed so that a policy and process is in place that will ensure that the Windham School District (WSD) is an environment where students and faculty have the best opportunity to understand, grieve, and commemorate a crisis involving loss, and return to normalcy. This plan of action is the means by which the WSD seeks to provide an authentic and sensitive response to a crisis within the context of relatively normal school operations. Last, it takes purpose from the sense (value) that the WSD is a community that is dedicated to fully sharing the responsibility of helping one another at a time of loss.

**Crisis Management Reference Guide**

1. **Administration contacts family for information surrounding incident:**
   - Offer condolences
   - Inquire what the school can do to assist
   - Discuss what student-body should be told

2. **Formation of a Crisis Management Team:**
   - Superintendent
   - Assistant Superintendent
   - Administrators
   - School Counselors
   - School Psychologist
   - School Nurse
   - School Resource Officer

3. **Additional Members who may be contacted:**
   - Fire Personnel
   - Police
   - Community Faith Leaders (i.e., St. Matthews, Windham Presbyterian Church, Windham Bible Chapel, etc.)
   - Center for Life Management (CLM) 603-434-1577
   - NH Disaster Behavioral Health Response Team (DBHRT) our contact, DBHRT LIAISON Skylar Conway 603-271-9460 and/ or Bureau Chief Stephanie Locke 603-271-9451

4. **Complete Critical Incident Assessment Tool (next page)**

5. **Distribute checklists to Superintendent, Principal and Crisis Team (following pages)**

**CRITICAL INCIDENT ASSESSMENT TOOL**
**WHS - WMS - Center - GBS**

**Crisis Team Members Present:**                                              **Date:**

1.  Incident:
Date & time of occurrence:
Location:
Name(s) of decedents:
Official cause of death:

2.  Who were the responders to the incident? (i.e., police, fire, school personnel, others)

3.  Who has been contacted so far: (Superintendent, Principal, Other Schools, etc.)?

4.  Are there siblings and have they been notified?  What schools do they attend?  Have school personnel \been notified?

5.  Who is aware of the incident so far? (Students, parents, media, etc.)

6.  Were there witnesses to the incident?  If yes, who?

7.  If the incident involves a student(s), what school and community related activities are/were they involved in?

8.  Are there any past events that may impact this incident?

9.  What behavioral health supports are available? (i.e., CLM, DBHRT, churches, etc.)

10. Recommendations:

11. Key Contacts and Phone Numbers:
New Hampshire DBHRT 603-271-9460 can provide consultation about appropriate handout materials, support services and interventions that might be appropriate at this stage.

**CHECKLIST FOR SUPERINTENDENT**

1. _____ Contact law enforcement to verify death and circumstances

2. _____ Notify key District Administrators and School Board Members

3. _____ Assemble District Crisis Response Team and Identify a School Psychologist who will  respond to the school-remove

4. _____ Work with Principal to write statements/letters for release to faculty, parents and students (SEE ADDITIONAL FORMS FOR SAMPLES)

5. _____ Work with the District Communication Director.  If requested, provide media with written statements and/or meet with media

6. _____ Provide support to school(s)  Identify and provide additional support and personnel to schools as needed

7. _____ Remind staff not to have contact with the media

8. _____ Develop a District/School Plan for faculty, staff and student participation in memorial activities

9. _____ Refer to established District Plan for Memorialization (pg 27)

**CHECKLIST FOR PRINCIPAL**

1. _____ Contact and assemble school-based Crisis Response Team

2. _____ Reach out to family

3. _____ Notify faculty and staff depending on the day and/or time the incident occurred and conduct a faculty meeting **(see reverse page).** Address use of cell phones and Facebook by students to minimize rumors and inaccurate information

4. _____ Determine how classes will be run (See Classroom Procedure Sheet)

5. _____ Alert local behavioral health resources (CLM, DBHRT) to school situation and plans

6. _____ Work with Superintendent to write statements/letters for release to faculty, parents and students (SEE ADDITIONAL FORMS FOR SAMPLES)

7. _____ In coordination with Superintendent plan strategy to respond to requests from parents for information

8. _____ Provide support and concise information for secretaries to respond to the community

9. _____ Develop plan for student/staff dismissal the day of the reported incident

10. _____ Relay information about visiting hours and funeral services to staff, students and community as it becomes available

11. _____ Refer to established District Plan for Memorialization *

12. _____ Meet with school-based Crisis Response Team throughout crisis period

13. _____Reassemble Crisis Response Team to  debrief (Form on Page 8)

14. _____ If needed, designate a staff member to coordinate volunteers and donations

15. _____ Hold a staff meeting at the end of the day to allow faculty to review the day, share information, resources, stress/grief reactions and coping strategies (APPENDIX H)

**NOTIFICATION OF FACULTY AND STAFF**

<u>Incident occurs in the evening or over the weekend:</u>
Faculty will be called via school messenger that night (or Sunday night if during the weekend) informing them of a 7:00am faculty meeting in the auditorium the next morning. The Crisis Response Team will meet at 6:30am prior to the faculty meeting.

<u>Incident occurs in the afternoon during school:</u>
The Crisis Response Team will meet as soon as possible followed by an informational Faculty meeting directly after school (make this appropriate for all the schools)
    ----or----
The Crisis Management Team will meet directly after school followed by a faculty meeting the next morning at 7:00am (this will require the use of school messenger if an announcement can not be made before the end of the school day).

<u>Incident occurs early in the school day, before lunch:</u>
The Crisis Management Team will meet as soon as possible followed by faculty notification. Teachers will be asked to attend during their lunch or after school

<u>Incident requires near immediate notification:</u>
If circumstances warrant an immediate announcement, members of the Crisis Response Team will go to each classroom and notify teachers.

<u>Preliminary announcement required:</u>
It may be necessary, in some cases, to make a preliminary announcement indicating the school's intention to verify any rumors that may be circulating and having an impact on normal school operations.

**NEEDS OF VARIOUS GROUPS**

Following a critical incident impacting a school, it is necessary to assess the needs, including behavioral health needs of specific groups. The response to this event should take into account these various needs.

**Common Needs of Everyone Affected:**
- Information about the event
- Permission and a place to grieve, as necessary
- Emotional Support

**Administrator Needs:**
- Information about the deceased
- System for contacting necessary crisis resources
- Strategy for responding to staff, students, parents, community and media requests

**Faculty Needs:**
- Information about the school's response plan
- Preparation for the student's reactions
- Guidance in structuring the school activities
- Involvement in the identification of high-risk students
- Information about resources within the school and community

**Student Needs:**
- Outreach, especially to those most affected by the incident
- Information about resources within the school and community

**Parent Needs:**
- Knowledge that their children are safe
- Information about the school's response
- Information on preparing for their children's reactions and questions
- Opportunity to be of service in appropriate ways

**Community Needs: (depending on event)**
- General information about how the school is managing the incident
- Opportunity to be of service in appropriate ways

**DEBRIEFING**

**Person(s) completing the review:**                                    **Date:**

**1.  Identify your role in responding to this incident.**

**2.  What services were provided and to whom?**

**3.  What went right?  What worked?**

**4.  What may not have worked? What could have been improved?**

**5.  Did the school policies and procedures assist or impede the response and delivery of services?**

**6.  What did you learn from the event?**

**CHECKLIST FOR CRISIS RESPONSE TEAM**

1. _____ Identify roles and assign tasks

2. _____ In consultation with Principal, contact community behavioral agencies for support and assistance if needed

3. _____ Identify personnel to oversee students in the support center

4. _____ Identify areas for individual support and locate an area for a support center (have age-appropriate materials available i.e., crayons, paper, support materials, etc.)

5. _____ Provide crisis updates to community-based behavioral supports regarding the response plan

6. _____ Identify and monitor at-risk students

7. _____ Identify and monitor at-risk faculty (may need assistance in classroom and/or substitute teachers)

8. _____ Contact counselor and nurse at schools where siblings/relatives of the identified student is enrolled

9. _____ Review special considerations in managing the impact of the incident (especially in the instance of a suicide) to avoid copycat behavior

10. _____ Provide stress management and self-care techniques for faculty (see Self-Care Suggestion sheet)

11. _____ Schedule daily meetings to assess the current status of the crisis and the effect of the interventions

12. _____ Assign a member of the Crisis Response team to monitor social media sites utilized by students and staff (APPENDIX G).

13. _____ Evaluate continuing needs for support services.

14. _____ Follow District Memorial format.

**SELF CARE SUGGESTION**

**Take care of your physical needs:**
- Stay Hydrated – drink enough water to maintain healthy hydration levels.
- Balanced Diet: Eat well, balanced meals, with a variety of protein, fruits, and veggies.
- Physical Exercise. Plan to make exercise part of your regular routine to support health and wellness.
- Adequate Sleep – healing takes place during sleep.  If there is difficulty falling asleep, consider restful and meditative activities that will assist you in getting to sleep.  Try herbal teas, showers, hot baths, prayer, soothing music, etc.

**Take care of your emotional needs:**
- Get grounded – sit comfortably and really feel your feet on the floor.  Notice your body in the chair.  Observe your heart rate and your breath.  Notice what happens as you pay more attention to your system.
- Talk to friends, family, counselor or cleric.  Do not isolate.  Carry a list of friends you care about, who support you no matter what and who are available to talk at any hour and vice versa.
- Write in a journal.
- Follow spiritual practice, if you have one.  Review your personal beliefs about meaning and purpose.
- Have fun, laugh.  Laughter is a powerful elixir.  Many people feel uncomfortable laughing or having any fun when life is feeling chaotic.  This discomfort is common; however, it is equally normal to find yourself laughing as part of healing and coping.

**Learn to help yourself before helping others:**
- Continue to learn about normal reactions to change.
- Remember that you are responsible for your own attitudes and reactions.  Recognize that feeling overwhelmed by change and chaos may signal a need for consultation or support.
- Recognize your own warning signs of stress – buddy up and commit to checking in with your partner.  It may be difficult to assess your own reactions, especially as your personal trauma history may be triggered.
- Manage your work load – take breaks and set manageable goals for yourself

**DAY OF FUNERAL**

Depending on the family's wishes, help disseminate information about the funeral to students, parents and staff, including:

- Location
- Time of the funeral (maintain normal school hours if funeral is during the day)
- Guidance regarding how to express condolences to the family
- What to expect (i.e., whether there will be an open casket)
- Policy for releasing students during school hours to attend (i.e., students will only be released with permission of parents/guardian)

Follow District Memorial format

Parents and caretakers may be asking you if it is appropriate for their child to attend the wake, funeral or other burial services. There is no clear-cut answer, however various factors such as the student's wishes, the parent's knowledge of their child's development, temperament and capabilities should all be considered when making the decision regarding their attendance. (APPENDIX I)

**Recognize that the day of the funeral may be difficult. Have additional supports available.***

**SCHOOL'S ATTENDANCE AT THE SERVICE**

The family of the deceased wishes for attendance at their loved one's service, needs to be considered. The family may openly invite and encourage the school's and students' attendance and participation. On the other hand, there may be factors, including cultural, that may lead them to not want the presence of students. If there was a sudden, traumatic or violent death, the emotional response by adults attending may be overwhelming for certain age children. Sitting through a long service may be too much for younger children. Refer to APPENDIX J for information on memorials/services.

While at first glance, schools may appear to provide an obvious setting for a funeral or memorial service because of their connection to the community and their ability to accommodate a large crowd, it is strongly advised that such service **not** be held on school grounds, to enable the school to focus instead on maintaining its regular schedule, structure and routine. Additionally, using a room in the school for a funeral service can inextricably connect that space to the death, making it difficult for students to return there for regular classes or activities. Follow the District Memorial format.

**ONGOING/POST MEMORIAL SERVICE**

- Continue to monitor stress or grief reactions in both students and staff
- Provide support as necessary
- Update plans and phone tree as needed to prepare for the future
- Schedule an After-Action Meeting to review the response to the critical incident, the school's emergency plan and to capture any lessons learned from the incident (APPENDIX K)
- Note the date for anniversary planning. Designate a staff member to notice milestones that may come up as the year moves along and plan how to manage these times with students and staff.

**ANNIVERSARY**

Recognize that the anniversary date may evoke stress or grief reactions from involved parties. Provide support or check in with the students or staff who may have been significantly impacted.

# Sample Letters

- Notification of Faculty and Staff
- Sample Notification Letters
  - Faculty Letters
  - Phone Statements
  - Parent Letters

**SAMPLE NOTIFICATION LETTERS**

**Confidential Faculty Memorandum, Death of a Student**

To: Windham High School Faculty and Staff
From: Crisis Response Team/Principal
Date:

We are saddened to learn of the death of XXXXXXX, who died yesterday as a result of XXXXXXX. This is a loss for the XXX family, our school and the community.

The Crisis Response Team met this morning *before school hours* to plan for the school's response. As we look to the hours and days ahead, we need to keep the following in mind:

General: (*Pick and choose statements below*)
Any information released to the public will be through the District's Public Information Officer/Superintendent.

No student is to be released without parental permission or unless accompanied by an adult.

We have contacted XXXXX for assistance as we deal with this loss. ~~Guidance~~ School Counselors XXXXXX will be here on XXXXXXXX to help students, parents, and staff members. Also, our school psychologist and mental health counselors will be here as well. Further, we have contacted the Center for Life Management who will send XXXX to further support our students.

If you know of any students or staff members that may need support during this time, please encourage them to contact one of these counselors. Attached to this memo is a list of behavioral traits that may be cues to an individual having difficulty. If you notice that anyone appears to be in crisis or having difficulty, please notify our own school counseling staff or the additional counselors immediately.

If students begin discussing memorials for XXXX, please refer them to the administration. Many students did not know XXX and school wide events will not be appropriate for them, nor will permanent structures on the school grounds. It is important to make every effort to maintain as normal an instructional program as possible, since familiar routines will be a comfort for many.

**\*\*\*Make certain that every student has the "Parent letter" with him/her as he/she leaves school.**

**Sample Faculty Letter, Death of a Student**

To: Faculty and Staff
From: Crisis Response Team/Principal
Date:

We are all saddened to learn of the death of XXXX and XXX, who were involved in an automobile accident on XXXX last evening. This is a loss for their families, our school and the community. In your classes first period this morning, I am requesting that you read the following so that information is shared with all students in the same manner:

Last night, XXXX were involved in an automobile accident on XXX road.

This is a loss for both the XX and XXX families, our school and the community. Our condolences go out to their families as they struggle to deal with this tragic event. At the same time, we recognize that the death of someone within our school raises questions and concerns for many people in our school. The loss of two students so young may be difficult to understand. If you wish to speak with someone, please sign out of your class and sign in at the counseling office. School counselors, school psychologists, social workers, and mental health counselors.  are available all day, including after school hours.

Future announcements will be made as more information becomes available about funeral arrangements for XXX and XXX.

***Another Option***

Many of you have known XXX as a (funny, vibrant, quiet, athletic, etc..) member of our school community. For those of you close to XXX, you know that for the past several months he/she has been valiantly battling cancer/heart disease. Early this morning, we have learned that XXX has died, leaving behind her sister and brother. This is a loss for XXX family, our school and the community.

**<u>Sample Faculty Letter, Suicide</u>**

To: Windham High School Faculty and Staff
From: Crisis Response Team/Principal
Date:

There are many differing values and beliefs among the students and their families in your classrooms. Please keep in mind that your own personal values and beliefs must be subrogated to theirs as you discuss this topic. If you are uncomfortable with this issue, contact your counseling department for assistance.

Use the suggestions provided in the training materials, such as using reflective questions or encouraging the student to discuss the situation with his or her parent/guardian to address sensitive questions.

The family has asked that we share the following information with students about the death of their son/daughter, XXXX:

"Yesterday, XXX died by suicide. This is a loss for the XX family, for our school and for the community. Funeral services will be held on XXX at XXXX time. Calling hours will be from XXX to XXX on XXX. The death of someone within our school raises questions and concerns for many people in our school. If you wish to speak with someone, please sign out of your class and sign in at the counseling office. School counselors, school psychologists, social workers, and mental health counselors are available all day, including after school hours."

**Sample Phone Statement for parents regarding suicide or murder**

In the event of a school suicide or murder, parents should be told prior to the students whenever possible. A School Messenger can be used for the purpose of informing parents before the start of school on the first day of the crisis.

Here is a sample statement that can be modified and read to each parent over the phone:

"Mr._____, the school principal has asked members of the _____ to contact all parents to let you know that_____, an eighth-grade student, died suddenly last evening. The death has officially been ruled as (suicide/homicide) OR no official determination has been made at this time regarding the death although we do know that the death was sudden and unexpected. The school will have a behavioral health response team in place today to help students, parents and faculty deal with this tragedy. You will receive more information from the school as plans develop. We encourage you to share this information with your child before you send him/her to school today. You can be assured that the school will be doing everything it can to help our students deal with this tragic loss. If you would like to talk to someone about this tragedy, please call _____ during the school day."

Staff who makes these calls to parents should understand that they are not to discuss the circumstances of the death (beyond what is already stated in the letter) or address rumors. The point of the call is to simply inform all parents of what has occurred before their children arrive at school. Parents who want more information or seem to need to talk in more detail should be encouraged to call the school later in the day.

Some schools, particularly at the middle and high school level have chosen to send letters home to parents informing them of the school's postvention activities. Some sample letters that can be adapted to a variety of situations are included in the next few pages.

**<u>Sample Phone Statement for parents regarding suspected suicide (only used when the official cause of death has not been determined)</u>**

Here is a sample statement that can be modified and read to each parent over the phone or sent home via letter depending on the circumstances:

"Mr. _____, the school principal has asked members of the _____ to contact all parents to let you know _____, an eighth-grade student, died suddenly last evening.  Although we do know the death was sudden and unexpected, no official cause of death has been determined.  Authorities are continuing to investigate the death and no foul play is suspected.  The school will have a behavioral health response team in place today to help students, parents and faculty deal with this tragedy.  You will receive more information from the school as plans develop.  We encourage you to share this information with your child before you send him/her to school today.  You can be assured that the school will be doing everything it can to help our students deal with this tragic loss.  If you would like to talk to someone about this tragedy, please call _____during the school day."

**Sample Parent Letter regarding student homicide**

Dear Parent,

A tragedy occurred this past weekend in our community. _____, a first-grade student at _____ school died unexpectedly last night. A local resident has been arrested and charged in this case. Our focus in the schools will be to support those children and faculty who have been affected by this tragedy. We have gathered both our professional staff members and local mental health professionals to assist students and faculty immediately with the availability of individual and group services.

We also need your assistance. Please observe your own child for any signs which indicate the child may need assistance in dealing with this tragedy. Perhaps a change in eating habits, sleeping problems, stomach discomfort, etc. may be some indication that help is needed. If this occurs, please contact your child's principal so that we may offer some counseling or discuss how we can best support your child as soon as possible.

We offer our sincere condolences to the_____ family in their time of need. Several other families have been affected by _____ death. I suggest that we concentrate our efforts on helping our neighbors cope with their grief. Local religious groups and community agencies are also available to assist those seeking help. A list of phone numbers for these resources is attached to this letter.

Sincerely,

School Superintendent

**Sample Parent Letter regarding student sudden death**

Dear Parents,

Over the weekend, the school experienced the sudden death of one of our students.  We are deeply saddened by this loss.

The school has a behavioral health management procedure in place to help your children with their reactions to this tragedy.  Our school counseling department and administration have been working closely with counselors from _____ to talk with your children and answer their questions.

Your child may have some unresolved feelings that he/she would like to discuss with you.  You can help your child by listening carefully, not overreacting, accepting his/her feelings and answering questions according to your beliefs.  It is important to let them know their feelings, concerns and reactions are normal and that they will experience a number of emotions over the next few days and weeks.

If you have any additional questions or concerns feel free to contact me directly at the school.

Sincerely,


Principal

# Support Center

- Support Center
- Working with Traumatized Staff
- Addressing Parental Concerns

**SUPPORT CENTER**

After a critical incident, an Assistance Center may be set up.  It is a place where parents and faculty members can receive information, resources and support.   Behavioral health professionals should be present to help parents and faculty cope with the critical incident.   It provides a place for the adults to come together for peer or individual support.

The Assistance Center can also help provide factual information, preferably in regular updates and before such information is given to the media.  It also provides the opportunity for parents and faculty to ask questions and seek advice.

In an incident that would involve the closure of a school building, the Assistance Center should be geographically located away from the area of the event itself so as not to re-traumatize adults or children who may have witnessed the original situation that created a need for such an intervention.

The Assistance Center can be a point of resource and referral.   Parents and faculty can have access to written materials.   Helpful handouts should include information regarding children and trauma to grief, strategies for self-care and a list of local service providers (SEE ADDITIONAL FORMS).

An Assistance Center can be utilized to provide parents or guardians with relevant workshops and/or post-event activities.

**\*\*Working with Traumatized Staff\*\***

It is important to remember that faculty may be traumatized by the death of a student, fellow staff member or a critical incident.  Following the death of a member of the school community or a major critical incident, it is recommended to put support in place for those people who were closest to the event or people who died.  Reassigning paraprofessionals or bringing in substitute teachers can allow the teacher time needed to grieve or to leave the classroom when becoming overwhelmed.

When teachers are asked to make phone calls home to share traumatic information with their students' families, they may become distressed and in need of support.  Having behavioral health professionals in the building to check in with teachers between phone calls is quite helpful.

Behavioral supports need to be available for staff as well as students.  Teachers rarely want to turn their classes over to another individual,  but will appreciate support being in place should they become distressed or overwhelmed with grief.  Placing behavioral health professionals in classrooms can give staff the support they might need to get through some difficult conversations that may come up with their students – especially classes where a deceased student was formerly a member.

**ADDRESSING PARENTAL CONCERNS**

There are two different groups of parents to be considered: the parents of the deceased or victim and parents of the other children in the school.

**Parents of the Victim**

It is appropriate for the victim's parents to be contacted by a representative of the school. The school should express condolences and sympathy in a formal and if possible, face to face manner. Often the school will designate one contact person to interact with the family to verify information and minimize intrusion. Returning the contents of a locker and other possessions is another task that requires attention.

Parents should be consulted about any planned memorial activity.

The school may also play a role in referring parents to counseling resources and support groups. By directing a parent to such resources, the school sends a positive message of concern and care.

**Parents of Other Students**

The needs of other parents should also be addressed. Parents may be invited to meet with school administrators individually or to a general informational meeting. These meetings should focus on: providing up to date accurate information, prevention measures to be taken by the school, common reactions to critical incidents, suggested coping measures for adults and children and available school and community resources.

School administrators should be careful in planning large group meetings after a particularly sensational death as emotions may be running high and there may be potential for such a meeting to get "out of control." Another option is to divide parents into small group discussions in a classroom setting, sharing a consistent message and information.

The school administration should decide if media presence will be allowed, possibly in consultation with the parents.

# Teacher Resources

- Classroom Procedures
- Do's and Don'ts
- Helping Student(s) Cope

**CLASSROOM PROCEDURES**

It is the policy of the WSD to respond to a tragedy as sensitively as possible while maintaining normal operating procedures.  Students will be informed of the incident/death in their Advisory groups.  Teachers will provide an opportunity for students to discuss what has happened.  They should provide assistance, support and structure and allow for discussion to the extent to which they are comfortable.  Teachers are asked to help process information about the death with their students (SEE ADDITIONAL FORMS FOR SUPPORT MATERIALS).

As students return to their assigned classes, teachers are asked not to introduce new material, but provide work for those who need to remain busy.

If a student is visibly upset, they should be directed to the Counseling Office or other designated area for students.

If a student is missing from class or leaves class, the teacher should notify the Main Office.  The student will then be located and brought to the Counseling Office (if not already there).

If a student from another class ends up in your class, the teacher should ask the student to return to their assigned class.  If necessary, allow the student to stay and send a message to the Main Office and someone will come for that student.

If a teacher needs assistance or a little time to themselves to regroup, they should contact the Main Office.

Established dismissal procedures should be followed for students who are not able to remain in school.


**\*\*\*CLASSROOM OF DECEASED\*\*\***

Special considerations should be given to the teacher/students/aides who were close with the deceased.  Issues such as the person's belongings, desk and locker need to be discussed.

A member of the Crisis Response Team will be assigned to sit in classes following the deceased's daily schedule.  The Team member can facilitate discussions about the loss by both the students and the teacher, allowing the teacher to join students in their grief.

**DO'S AND DONT'S**

**Do:** model your authentic or real feelings, whatever they are at the moment.

**Do:** listen to each student and encourage the class to listen and to talk  as well.

**Do:** reflect or mirror their feelings; it's validating, e.g "I hear that you're angry.".

**Do:** encourage them to look after one another.

**Do:** challenge their "magical feelings"; e.g., "if only I had…".

**Do:** be inclusive…make sure everyone who wishes to contribute does contribute.

**Do:** accept as normal , students' feelings of ambivalence or even hostility.  Acknowledge them, but encourage the student to address them privately.  Do not invalidate their feelings.

**Do:**  TAKE CARE OF YOURSELF, ESPECIALLY WHEN YOU ARE "OFF DUTY".

**Don't:** worry about having answers…this is a time that the adults do not necessarily have to know.

**Don't:** try to be strong for the kids (it's a cop-out).

**Don't:** forget to ask for support at any time (you will be regarded as enlightened, not needy…we are all needy).

**Don't:** fall into the easy trap of being judgmental about whose grief is worst, who is needier, etc.  It separates people.

**HELPING STUDENTS COPE**

In the aftermath of a sudden death or critical incident, students and others in the community may feel emotionally overwhelmed, which can disrupt the school's ability to return to its primary function of educating students, and can increase the risk of prolonged stress responses.  The following strategies can help students balance the timing and intensity of their emotional expression and restore the school's ability to function effectively.

**KEY CONSIDERATIONS**

The term emotional regulation refers to a person's ability to appropriately experience and express intense emotions such as fear and grief.  Most adolescents have mastered basic skills that allow them to handle strong emotions encountered day to day.  But these skills may be challenged in the face of a sudden death or critical incident.  In addition, young people may not yet have learned how to recognize complex feelings or physical indicators of distress, such as stomach upset, restlessness or insomnia.

It is important for school officials to provide students with appropriate opportunities to express their emotions and identify strategies for managing them, so the school can continue its primary focus of education.  It may be useful for school staff to identify and reach out to families of students who are not coming to school.

If the deceased student participated in sports, clubs or other school activities, the first practice, game, rehearsal or meeting after the death may be difficult for the other students.  These events can provide further opportunities for the adults in the school community to help the students appropriately acknowledge the loss.

**HELPING STUDENTS IDENTIFY AND EXPRESS THEIR EMOTIONS**

Youth will vary widely in terms of emotional expression.  Some may become openly emotional, others may be reluctant to talk at all, and still others may use humor.  Acknowledge the breadth of feelings and diversity of experiences and emphasize the importance of being respectful of others.

Some students may need help to identify emotions beyond simply sad, angry or happy, and may also need reassurance that a wide range of feelings and experiences are to be expected.  They may also need to be reminded that emotions may be experienced as physical symptoms including butterflies in the stomach, shortness of breath, insomnia, fatigue or irritability.  To facilitate this discussion, students may be asked:
- What is your biggest concern about the immediate future?
- What would help you feel safer right now?

**PRACTICAL COPING STRATEGIES**

Encourage students to think about specific things they can do when intense emotions such as worry or sadness begin to well up including:
- simple relaxation and distraction skills, such as taking three deep slow breaths, counting to 10, or picturing themselves in a favorite calm and relaxing place
- engaging in favorite activities or hobbies such as music, talking with friends, reading or going to a movie in
- exercising
- thinking about how they've coped with difficulties in the past and reminding themselves that they can use those same coping skills now
- writing a list of people , they can turn to for support
- writing a list of things s, they're looking forward to
- focusing on individual goals, such as returning to a class or spending time with friends

Often youth will express guilt about having fun or thinking about other things.  They may feel they somehow need permission to engage in activities that will help them feel better and take their mind off the stressful situation.

Students should also be encouraged to think about how they will remember their friend.  Ideas range from writing a personal note to the family, to attending the memorial service, to doing something kind for another person in honor of their friend.   Be sure to educate students about the school's guidelines regarding memorialization.   Acknowledging their need to express their feelings while helping them identify appropriate ways to do so can begin the process of returning their focus to their daily lives and responsibilities

# Media

- Working with the Media
- Social Media

**WORKING WITH THE MEDIA**

After a critical incident, the media may be contacting the school for information.  There may be a conflict between the interests of the media and those of the school administration following a school tragedy.  Usually, from the school's perspective, less publicity is better.  Any tendency to sensationalize the event in the media will undermine efforts within the school to focus on the living.  This is especially important following a suicide where risk of contagion is present.

The Superintendent or designee is the one person who will serve as the contact person between the media and the school.  Advise staff that only the media person is authorized to speak to the media.  Advise students to avoid interviews with the media.

If a student or faculty death gains a great deal of attention, an initial press conference with accurate information will set the tone for future interactions with journalists.  Immediate family members should be advised that they have the right not to talk to the press.  Administrators may wish to limit access to the school grounds as presence of the media may contribute to the distress of vulnerable students.

The school should avoid becoming the principle source of information.  Releasing details about the death is the responsibility of the Office of the Chief Medical Examiner and other authorities.  The school can focus on the positive steps of the postvention plan to help students, parents and faculty through the crisis and provide information regarding helping resources.

**SOCIAL MEDIA**

The term social media refers to the various Internet and mobile communication tools (such as texting, Facebook, Twitter, YouTube, Snapchat and others) that may be used to communicate information extremely rapidly, often to large numbers of people.  In the emotionally charged atmosphere that can follow a suicide death, schools may be inclined to try to control or stifle such communication by students – a task that is virtually impossible in any event, since they generally take place outside school hours and property.  Schools can, however, utilize social media effectively to disseminate information and promote prevention efforts.

**KEY CONSIDERATIONS**

Following a sudden death, students may immediately turn to social media for a variety of purposes, including transmitting news about the death (both accurate and rumored), calling for impromptu gatherings (both safe and unsafe), creating online memorials (both moving and risky), and posting messages (both appropriate and hostile) about the deceased.

Although schools may initially consider social media to be outside of its traditional jurisdiction, they can in fact collaborate with students and utilize these tools to disseminate important and accurate information to the school community, identify students who may be in need of additional support or further intervention, share resources for grief support and mental health care and promote safe message – especially in the instance of a suicide.

**Involve Students**

It can be very beneficial for a designated member of the Crisis Response Team to reach out to friends of the deceased and other key students to work collaboratively in this area.  Working in partnership with student leaders will enhance the credibility and effectiveness of social media efforts, since the students themselves are in the best position to help identify the particular media favored by the student body, engage their peers in honoring their friend's life appropriately and safely, and inform school staff about online communication that may be worrisome.

Students who are recruited to help should be reassured that school staff are only interested in supporting a healthy response to their peer's death, not in thwarting communication.  They should also be made aware that staff members are available and prepared to intervene if any communications reveal cause for concern.

**Disseminate Information**

Schools may already have a website and/or online presence (or page) on one or more social media sites; students can help identify others that are currently popular.  These can be used to proactively communicate with students, teachers and parents about:

- The funeral or memorial service (schools should of course check with the student's family before sharing information about the funeral).
- Where students can go for help or meet with counselors
- Mental illness and the causes of suicide
- Local mental health resources
- The National Suicide Prevention Lifeline number: 800-273-TALK (8255)
- National Suicide and Crisis Lifeline: Text or Call 988
- National suicide prevention organizations such as the National Suicide Prevention Lifeline (http://suicidepreventionlifeline.org), the American Foundation for Suicide Prevention (http://www.afsp.org) and the Suicide Prevention Resource Center (http://www.sprc.org).

Schools should emphasize help-seeking and prevention.  Students can also be enlisted to post this information on their own online pages.

**Online Memorial Pages**

Online memorial pages and message boards have become common practice in the aftermath of a death.

If a student's friends create a memorial page of their own, it is important that school personnel communicate with the students to ensure that the page includes safe messaging and accurate information.  School personnel should also join any student-initiated memorial pages so they can monitor and respond as appropriate.

**Monitor and Respond**

To the extent possible, social media sites (including the deceased's wall or personal profile pages) should be monitored for:
- Rumors
- Information about upcoming or impromptu gatherings
- Derogatory messages about the deceased
- Messages that bully or victimize current students
- Comments indicating students who may themselves be at risk

Responses may include posting comments that dispel rumors, reinforce the connection between mental illness and suicide, and offer resources for mental health care.  In some cases, the appropriate response may go beyond simply posting a comment, safe message or resource information.  It may extend to notifying parents and local law enforcement about the need for security at a late-night student gathering, for example.

In some cases, it may be necessary to take action against so-called trolls who may seek out memorial pages on social media sites and post deliberate offensive messages and pictures.  Most sites have report mechanisms or comparable features, which enable users to notify the site of offensive material and request that it be removed.  The administrator of the memorial page may also be able to block particular individuals from accessing the site.

# Suicide

- Dealing with a Death By Suicide
- Safe and Effective Messaging for Suicide Prevention

**DEALING WITH A SUICIDE**

If the critical incident involves a suicide death, be sure to use safe messaging.  Research has shown that graphic, sensationalized or romanticized descriptions of suicide deaths in the media can contribute to suicide contagion ("copycat" suicides), particularly among youth.

While any sudden traumatic incident can have a profound impact on a school community, death by suicide is more complex and requires special considerations than other types of sudden death.  These considerations include anticipating the personal and complex nature of grief following a suicide; watching out for suicide pacts, reducing the risk of suicide contagion and insuring responsible reporting and safe messaging.  As a result of this, following a death by suicide it is important to provide information about warning signs of suicide (SEE ADDITIONAL FORMS) as well as the **National Suicide Prevention Hotline 1-800-273-8255.**

Complicated bereavement:  Due to the nature of suicide death, friends and family will often be left feeling a range of emotions including guilt, anger, self-blame, regret and rejection, as well as intense grief and shock.  They will often replay over and over again in their minds their last interaction with the person and wonder what they could have or should have done differently.  Since having known someone who dies by suicide is itself an increased risk factor for suicide, it is important to provide supports to these individuals.

Suicide pacts occur when two or more individuals have an agreement to die by suicide.  Following a suicide death or serious attempt, it is important to ask close friends if they have any knowledge of a suicide pact.

Though a rare event, research indicates that the suicide death of an individual may influence others who are at risk for suicide to act on their suicidal impulses.  Young people are especially prone to contagion.  Reducing the risk of contagion is an important consideration when thinking about memorials for an individual who dies by suicide.  Permanent plaques or memorials or dedications such as the high school yearbook may inadvertently increase the risk of contagion.  Research has demonstrated that sensational media reports may contribute to suicide contagion.  Therefore, it is essential that educators become familiar with safe messaging guidelines and should follow these guidelines when crafting any message to faculty, students, community or the media following a suicide death.

Schools sometimes can be under great pressure from the family to not publicly disclose the death was a suicide, however, it is important to recognize that this wish conflicts with the fact that suicide is a public health issue which needs to be addressed in a forthright manner.  One of the biggest risk factors for suicide is knowing someone who dies by suicide.  School can help mitigate this risk by being truthful about the suicide death and actively taking steps to reduce risk and promote healing after a suicide death.

Schools who have not been open about a death being suicide, are typically faced with two very unhealthy scenarios.  One is that most students know it is a suicide death but the administration/teachers/staff won't acknowledge it or deal with it directly, so students deal with it amongst themselves.  The second is that rumors (such as drugs, murder/conspiracy, etc.) and innuendo replace facts and can spread emotional distress and chaos.  These rumors may be far more impactful and unsettling for the entire student body and much more difficult for school staff to contain than truthfully disclosing that the death is a suicide.

There will be some situations where a sudden death occurs and suicide may be suspected, an official cause of death may not be made for weeks pending results of toxicology reports.  School officials should rely exclusively on official determination of death and not speculate as to cause of death when providing information to the students or extended school community.  Even without an official cause of death, the school can openly disclose the death, and if given approval from law enforcement, assure the community that foul play is not suspected.  It will still be

important to take active steps to reduce risk and promote healing which can and should be done without mentioning the (suspected) cause of death.

## SAFE AND EFFECTIVE MESSAGING FOR SUICIDE PREVENTON

**The Do's – Practices that may be helpful in public awareness campaigns:**

- **Do emphasize help-seeking and provide information on finding help.**  When recommending mental health treatment, provide concrete steps for finding help.  Inform people that help is available through the National Suicide Prevention Lifeline (1-800-273-TALK/8255) and through established local service providers and crisis centers (SEE RESOURCES).
- **Do emphasize prevention.**  Reinforce the fact that there are preventative actions individuals can take if they are having thoughts of suicide or know others who are or might be.  Emphasize that death by suicide is reventable and should be prevented to the extent possible.
- **Do list the warning signs, as well as risk and protective factors of suicide.**  Teach people how to tell if they or someone they know may be thinking of harming themselves.  Include lists of warning signs.  Messages should also identify protective factors that reduce the likelihood of suicide and risk factors that heighten risk of suicide.
- **Do highlight effective treatments for underlying mental health problems.**  Over 90 percent of those who die by suicide suffer from a significant psychiatric illness, substance abuse disorder or both at the time of their death.  The impact of mental illness and substance abuse as risk factors for suicide can be reduced by access to effective treatments and strengthened social support in an understanding community.

**The Don't – Practices that may be problematic in public awareness campaigns.**

- **Don't glorify or romanticize suicide or people who have died by suicide.**  Vulnerable people, especially young people, may identify with the attention and sympathy garnered by someone who has died by suicide.  They should not be held up as role models.
- **Don't normalize suicide by presenting it as a common event.**  Although significant numbers of people attempt suicide, it is important to not present the data in a way that makes suicide seem common, normal or acceptable.  Most individuals, and most youth, who seriously consider suicide do not overtly act on those thoughts, but find more constructive ways to resolve them.   Presenting suicide as common may unintentionally remove a protective bias against suicide in a community.
- **Don't present suicide as an inexplicable act or explain it as a result of stress only.**  Presenting suicide as the inexplicable act of an otherwise healthy or high-achieving person may encourage identification with the victim.  Additionally, it misses the opportunity to inform audiences of both the complexity and preventability of suicide.  The same applies to any explanation of suicide as the understandable response to an individual's stressful situation or to an individual's membership in a group encountering discrimination.  Oversimplification of suicide in any of these ways can mislead people to believe that it is a normal response to fairly common life circumstances.
- **Don't focus on personal details of people who have died by suicide.**   Vulnerable individuals may identify with the personal details of someone who died by suicide, leading them to consider ending their lives in the same way.
- **Don't present overly detailed descriptions of suicide victims or methods of suicide.**  Research shows that pictures or detailed descriptions of how or where a person died by suicide can be a factor in vulnerable individuals imitating the act.  Clinicians believe the danger is even greater if there is a detailed description of the method.

# Information for Parents

- Parental Consideration for Children Attending Services

**PARENT CONSIDERATION FOR CHILDREN ATTENDING SERVICES**

**Consider your expectation and involvement in the service.**  Parents need to understand their own involvement as they decide whether to bring their child to a funeral or memorial service.  If a parent is going to be involved in the service, they may want to ask a trusted person to accompany their children.

**Consider what the child wants.**  If the child is adamant in not attending, this wish needs to be seriously considered.  Generally, children appreciate the opportunity to make their own decisions about attendance.  They may not be ready for this type of life experience.  Ask a trusted individual to stay with the child during the service and connect with them immediately afterward.  Although not physically present at the service, they may have questions or feel guilty that they could not attend.

**There is no magic age in which attendance at a service is recommended.**  The child's personality and developmental stage need to be taken into account.

Explain the ritual of the service they will be attending.  Considerations may include:
- Length and type of service
- Open casket – if there is a body to view, explain that the deceased is not hurting, hungry or cold.
- Cremation – assure the child that the deceased was not in any pain during cremation.
- Projected emotional responses by those attending
- Child's development, temperament, capability to acclimate.
- Child's relation to the deceased.
- Child's wishes as to whether or not they want to attend.  It is not recommended to force a child to attend.
- Wake, Religious or Memorial Service, Burial Service – consider who may be there or the amount of people in attendance.
- Spending time with your child after the service is important as emotions may arise after the fact.
- Children are learning from their parents' response during this process.  It is perfectly okay to cry and show emotion.
- Be prepared for many questions after the service.  These questions and concerns from the child may not come until weeks later as the child begins to work through their grief.  Older children may be hesitant to start the conversation.  It is recommended to check in with your child.
- If the child does not go, they may feel guilty, disappointed in themselves, or feel as if they let the deceased person down.  Be prepared to attend to these needs.

If you or your child does not attend the services, there may be other opportunities for honoring the deceased individual.  The child (and parents) might bake for the family, collect pictures of the deceased, or give flowers to the family, hand craft a card with a special message inside, or assist in a Memorial that is occurring in the community such as a fund-raiser for a scholarship, memorial, etc.

# ADDITIONAL FORMS AND HANDOUTS

- Grief and Loss Reactions
- After the Incident
- Children's Reactions

**GRIEF AND LOSS REACTIONS**

Children experience loss and grief in their own way.
Factors that need to be considered as you work with the student include:

age of the child/teenager
their personality
developmental stage
temperament
familial and cultural factors

**GRIEF RESPONSES**

- **Emotional Responses**
  - This will differ for each individual.  There is NO right way to grieve; everyone has their own path with this.  One may experience sadness, anxiety, guilt, shock, feeling numb, feeling lonely, worried.
  - A sense of relief may be felt after the death of a loved one or a close individual who was suffering.  This sense of relief may not be understood by the child and may lead to guilt.
- **Behavior**
  - Sleep disturbance and differences from the child's typical pattern, sleep interruption, social withdrawal, appetite changes, nightmares, anxiety over activities, going to school, being left alone, avoidant behavior (missing or skipping school, not engaging in friendship, sports or activities, etc.)
- **Physical Manifestations**
  - Common signs and symptoms a child may experience include changes in appetite, feeling of being tired, low energy, lethargic, headaches, stomach aches, hypersensitivity to certain stimuli (loud noises, certain smells, etc)
- **Thought Patterns**
  - Changes in a child's thought process and reactions may occur, including nightmares, fears that did not exist before, confusion, difficulty concentrating for any length of time (in school, homework, watching television), denial about the loss of the deceased, etc.

**AGE CONSIDERATIONS**

Developmental factors play a large role in the child's reaction to the death of a loved one, friend, teacher, coach, etc.  The following recommendations and information is from the Children's Grief Education Association.  For more information please visit www.childgrief.org

- **AGES 3-5**
  - As children learn to utilize our symbolic language of words, they can begin to share feelings verbally.  They learn what sad, mad, and scared mean.  They communicate about the concrete world: what they can see, touch, hear, taste and smell.  The future, the idea of "never", is outside their understanding.  They fully expect the return of their loved one.
- **AGES 6-10**
  - Around the age of six, children begin to understand that the loved one is not returning. This can bring about a multitude of feelings at the time of other significant changes in a

child's life, including entering first grade.  Children who do not remember their–loved one? may feel an acute sense of loss as they see peers with their parents and hear their family stories.

- o Elementary age children are interested in biological processes about what happened to their loved one.  Questions about disease processes and what happens to the body are of keen interest.  When asked questions, it is important to clarify what it is the child wants to know.
- o Children's worlds are sometimes messy and have a high level of energy.  Grief is also messy sometimes.  It does not always take a form that makes adults comfortable.  Allowing your child to express feelings through creative, even messy, play can be helpful (i.e. finger painting, making mud pies and throwing them, etc).  You may want to join in the creative play.
- o Peer group support is helpful for children of this age.

- **AGES 11-13**
  - o Middle schoolers are faced with a tumultuous time of body changes and increased performance expectations.  When a death loss is added to that, it increases their sense of vulnerability and insecurity.
  - o Grades may be affected by the death.  It may be difficult to find a balance between studies and emotional distraction, but this is a time to be a bit more careful about insisting about the completion of schoolwork.  With time, middle school children will return to their normal capacity for attention.
  - o Middle school is also a time when abstract thought begins to accelerate.  Children may be considering spiritual aspects of life and death, perhaps questioning their beliefs.  Be open to talking with them or support them in finding someone who is comfortable discussing these issues.

- **AGES 14-18**
  - o Teens are usually in a place of growing independence.  They may feel a need to hide their feelings of grief to show their control of themselves and their environment. Teens often prefer to talk with peers rather than adults when they are grieving.
  - o Teens are more likely to engage in high-risk behavior, especially after a death.  One young person expressed that her mom was always careful and followed all the safety rules, but died anyway.  She asked, "Why should I be careful?" Be sure to monitor teens for changes in their behavior.

**As with all ages, maintain routines and maintain communication with your child's school to ensure appropriate support are in place.**

***It is important to remember that as a child grows, they will continue to grieve their loss in different ways as they progress through each developmental stage.***

**AFTER THE INCIDENT**

Most people experience normal reactions as a result of a sudden death or traumatic incident. Generally, these feelings don't last long, but it is common to feel let down and resentful many months after the event. Some feelings or responses may not appear until weeks or even months after the disaster.

Some common responses are:
- Irritability/Anger
- Fatigue
- Loss of Appetite
- Inability to sleep
- Nightmares
- Sadness
- Headaches or nausea
- Hyperactivity
- Lack of concentration
- Increased alcohol or drug consumption

Many victims will have at least one of the above responses. Acknowledging your feelings and stresses is the first step to feeling better.

Other helpful actions include:
- Talk about your experiences. Sharing your feelings rather than holding them in will help you feel better about the experience.
- Take time off from cares, worries, and home repairs. Engage in recreation, relaxation, or a favorite hobby. Getting away from home for a day or a few hours with close friends can also help.
- Pay attention to your health, a good diet, and adequate sleep. Relaxation exercises may help if you have difficulty sleeping.
- Prepare for possible future emergencies to help lessen feelings of helplessness and to achieve peace of mind.
- Rebuild personal relationships in addition to repairing other aspects of your life.

If stress, anxiety, depression, or physical problems continue you may wish to contact the post-disaster services provided by your local mental health disaster recovery program.

**Please take this sheet with you today and and refer to it as needed. Being aware of your feelings; ~~and~~ sharing them with others is an important part of your recovery.**

**CHILDREN'S REACTIONS**

A sudden death or traumatic incident, whether community wide or involving only a single family, may leave children especially frightened, insecure, or upset about what happened. They may display a variety of emotional responses, and it is important to recognize that these responses are normal. How a parent reacts, will make a great difference in the child's understanding and recovery. Parents should recognize where their child is developmentally, and only share what is needed depending on the age.

The following list includes some of the reaction's parents may see in their children:

- Crying/Depression
- Bedwetting
- Thumb sucking
- Fighting
- Inability to concentrate

- Withdrawal and isolation
- Not wanting to attend school
- Changes in sleeping habits
- Headaches
- Excessive fear of darkness
- Increase in physical complaint
- Nightmares
- Clinging/fear of being left alone
- Regression to previous behavior

Some things that will help your child recover are to:

- Hug and touch your child often
- Reassure the child frequently that you are safe and together
- Talk with your child about their -feelings about the disaster.  Share your feelings too. Provide information the child can understand.
- Talk about what happened
- Spend extra time with your child at bedtime
- Allow children to grieve about their lost treasures; a toy, a blanket and a lost home
- Talk with your child about what you will do if another disaster strikes
-  Let your child help in preparing and planning for future disasters
- Try to spend extra time together in family activities to begin replacing fears with pleasant memories
- If your child is having problems at school, talk to the teacher so that you can work together to help your child

Usually, a child's emotional response does not last long.  Be aware that some problems may not appear immediately or may recur months later.

**Talking openly with your children will help them recover more quickly from the loss.  If you feel our child may need additional help to recover from the disaster, contact your local community mental health agency.**

# SPORTS INJURY EMERGENCY ACTION PLAN

## For Parents and Coaches



Approved by the WSB on 8/22/23

**WSD Emergency Action Plan Purpose**

In 2021, the New Hampshire state legislature passed SB 148-FN, as a to supplement RSA 200:40, requiring emergency action plans for NH high schools in the case of sports injuries or emergencies. In compliance with the new legislation, the Windham School Board adopted Policy JLCJA: Emergency Plan for Sports Related Injuries and Additional Protocols for Athletic Participation. In November 2021, a committee composed of representatives from the Windham School District (WSD), Windham Fire Department (WFD), Windham Police Department (WPD), and contracted health professionals, began work on framing this plan. The plan opens by introducing the WSD Athletic program and its mission, as well as providing relevant contact information. The plan goes on to describe for coaches and users how to respond during sport emergencies and lists steps that should be taken in the event of an emergency.

**Welcome To Windham School District Athletics**

The WSD Athletic Department welcomes you to become a part of our athletic program. Listed below are all NHIAA recognized sports programs offered at WHS and Tri-County Athletics sports programs offered at WMS. Please note that start dates may vary for different sports and seasons.

**WINDHAM HIGH SCHOOL**

| FALL | WINTER / SPRING | |
|------|-----------------|---|
| Bass Fishing | Basketball (Girls) | Baseball |
| Cross Country (Girls) | Basketball (Boys) | Lacrosse (Girls) |
| Cross Country (Boys | Gymnastics | Lacrosse (Boys) |
| Field Hockey | Ice Hockey (Co-Ed) | Outdoor Track (Girls) |
| Football | Indoor Track (Girls) | Outdoor Track (Boys) |
| Golf | Indoor Track (Boys) | Softball |
| Soccer (Girls) | Ski Team (Girls) | Tennis (Girls) |
| Soccer (Boys) | Swimming (Girls) | Volleyball (Boys) |
| Fall Spirit (Co-Ed) | Swimming (Boys) | Wrestling |
| Volleyball (Girls) | Winter Spirit | |

**WINDHAM MIDDLE SCHOOL**

| FALL | WINTER / SPRING | |
|---|---|---|
| Cross Country (Girls) | Basketball (Girls) | Baseball |
| Cross Country (Boys) | Basketball (Boys) | Softball |
| Field Hockey | Winter Spirit (Co-Ed) | Outdoor Track (Girls) |
| Soccer (Girls) | Wrestling (Co-Ed) | Outdoor Track (Boys)) |
| Soccer (Boys) | | Golf (Co-Ed) |
| Volleyball (Girls) | | |

**The Multi-Disciplinary Athlete: Playing Multiple Sports**

WSD encourages student-athletes to pursue participation in multiple sports due to increasingly positive research suggesting that such participation helps to create well-rounded individuals and prevent wear/tear on athletes' bodies.

According to an article written by Dr. Thomas John, published by the NFHS, "Sport specific overtraining can lead to negative health outcomes such as chronic joint issues, constant fatigue, and/or an increase in injuries overall." Dr. John also states that athletes who specialize in one sport are twice as likely to report a lower extremity injury as compared to those who play multiple sports. According to the American Medical Society for Sports Medicine, "88 percent of NCAA Division I male and female athletes participated in an average of at least two or three sports when they were young."

**Benefits And Risks Of Sport Participation**

Benefits of Sport Participation

Academic, social, career, and physical benefits are the four major benefits of competing in sports. According to the Office of Disease Prevention and Health Promotion, "athletes have higher grade point averages, higher standardized test scores, better attendance, lower dropout rates, and a better chance of going to college;...students who played sports were less likely to have smoked cigarettes or used drugs and were more likely to disapprove of others using them; …the leadership skills and development of teamwork, hard work, and determination might help prepare students to be leaders at work and in their communities later in life; and most importantly lower rates of diabetes and high blood pressure, as well as improved cardiovascular and pulmonary function."

Assumption of Risk

Student-athletes, coaches, and spectators knowingly accept the risk of injury and/or physical harm and/or property damage at practices and events. Per the Federal Rules of Civil Procedure, "Assumption of risk refers to a legal doctrine under which an individual is barred from recovering damages for an injury sustained when he or she voluntarily exposed him or herself to a known danger."

**WSD Athletic Training Mission Statement**

The mission of the Windham School District Athletic Training staff is to deliver the highest quality patient care by utilizing an interdisciplinary team. We strive to reach our goals of injury prevention, recognition, and return to sport through continuing education, evidence based information, and effective communication with coaches, parents, and school staff. Furthermore, the Athletic Training staff serve as an advocate for student athletes when such health issues arise, and are available to ensure the athlete reaches and maintains his or her optimum health.

**Athletic Health Care Team**

WHS Athletic Trainer: Kevin Bugeau
kbugeau@windhamsd.org  603-845-1558

WHS Nurses: Nicole Bickford and Casey Bly
nbickford@windhamsd.org , cbly@windhamsd.org  603-845-1558 ext 5810

WMS Nurse: Kaitelyn Bell
kbell@windhamsd.org 603-845 -1557

WHS Director of Athletics: Jon Hall
jhall@windhamsd.org  603-845-1558 ext 5804

Athletics Administrative Assistant: Donna Dizazzo
ddizazzo@windhamsd.org 603-845-1558 ext 5803

WMS Director of Athletics: Kevin Moyer
kmoyer@windhamsd.org  603- 845-1557

The Athletic Training staff is supervised by Northeast Rehabilitation Hospital
70 Butler Street
Salem, NH 03079
603-890-7600

*All Members of the WSD Coaching Staff are First Aid/CPR/AED certified*

**Health Care Team Role Delineation**

Athletic Trainer: The ATC is responsible for providing appropriate emergency medical care, first aid, injury prevention, and injury management to the school's athletic population. This individual is the first point of contact for parents, school staff, and administrators in the event of an injury after school hours. The ATC works in conjunction with the Athletic Director and the Health Office to ensure the best outcome for the student-athlete.

Health Office: The nursing staff is responsible for administering first aid care, following-up with submitted injury reports, keeping contact open with parents/guardians, and keeping a thorough record of physical examinations. The health office is the first point of contact for student-athletes during the school day. The WHS nursing staff meets with the Athletic Trainer one hour a week to review and verify injury reports to maintain accuracy.

Athletic Director: Responsible for the coordination of sporting events, approving eligibility for student-athletes, securing Athletic Training medical documents, maintaining the End of Season Report each year, and handling any athletic issues that may arise throughout the school year.

Coaches: Responsible for initial first aid and assessment of injuries and what level of care is required. Subsequent reporting to the remainder of the HealthCare Team and parents/guardians. To ensure that coaches have gone over emergency procedures with athletes, each head coach will return a signed copy of the Emergency Procedure Coach's Checklist ( see appendix) to the Athletic Director. Returning the checklist indicates that coaches have reviewed and discussed with athletes the steps to take in the event of an emergency.

**Injury Procedure Flow Charts**

**WINDHAM HIGH SCHOOL**

Injury Occurs

Away Event → Injury Reported to AT by Coach & Documented

Home Event → Injury Evaluated by AT & Documented

Injury Report Created by AT & sent to Nurses and AD *See Appendix A

Return to Play is Determined by Highest Level of Medical Training on Site

AT Meets with Nursing Staff 1x per Week to Review

**WINDHAM MIDDLE SCHOOL**



Injury Occurs

↓

Coach Evaluates

↓                    ↓

Injury Deems Server Call Medical Personnel & Parents/Guardians          Injury Treated by Coach

↓

Return to Play is Determined by Doctor/Parents/Guardians

**Emergency Action Plan (EAP)**

Emergency Team Roles (Athletic Trainer, School Administration, Coaches):
   A.   Acute care provided by the most qualified individual at the scene
   B.   Emergency equipment retrieval
   C.    Activation of EMS
   D.   Meet and direct EMS to the scene (unlock all doors and gates)
   E.   <u>Head Coaches must make sure there is at least one cell phone accessible</u> <u>at all times</u>

**Emergency Phone Numbers**

   A.   Emergency: 911
   B.   WHS Athletic Trainer: Kevin Bugeau *
   C.   Windham Fire/Ambulance: (603) 434-4904
   D.   Windham Police: (603) 434-5577
   E.   WHS Athletic Training Room: (603) 845-1558 ext 5280
   F.   Athletic Director:  Jon Hall (603) 845-1558 ext 5804 *
   G.   WMS Athletic Director: Kevin Moyer  (603) 845-1558 ext 4233 *
*Additional emergency numbers, including personal cell phone numbers, are distributed to coaching staff annually*

**Emergency Care of an Athlete**

   A.   <u>Athletic Trainer IS present at game or practice</u>
         a.   Emergency equipment is retrieved by coach or athlete
         b.   Athletic trainers will designate an adult to contact EMS.
               i.    Athletic Trainer is not able, the Head Coach will designate an adult to call EMS
         c.   Information provided to EMS
               i.    Name and phone number of caller
               ii.   Name, age, condition and number of athlete(s) in need of help
               iii.  Treatment given
               iv.  Specific directions to the scene of the injury
               v.   Any other information requested by the dispatcher
         d.   Coordinate EMS arrival
               i.    The AD or coach will be responsible for meeting and directing EMS to the site of emergency and will provide direct access. This includes traffic coordination, and opening locked gates or doors.
   B.   <u>Athletic trainer IS NOT immediately available or present</u>
         a.   The coach will respond to the athlete and provide immediate life sustaining care
         b.   At WHS, the assistant coach or a designated player will attempt to reach the Athletic Trainer
               i.    If the Athletic trainer is not present or at WMS a responsible adult will activate EMS and follow the directions as outlined above in sections A-c and A-d.
   C.   Immediately following the activation of EMS, the athletic trainer, athletic director, or coach will contact the athlete's parents using the phone number(s) provided on their emergency card.
   D.   After the arrival of EMS, care of the injured athlete will be turned over to the qualified persons. At which time the athletic trainer or immediate care provider will inform EMS the details involved with the injury/incident.
   E.   A parent/guardian or a member of the coaching staff should accompany the injured athlete(s) to the hospital.
   F.   The athlete's emergency card should be sent with them to the hospital

**Medical Equipment Needs for Coaches - with Coaches at All Times**

- Medical Kit - stocked regularly by Athletic Trainer/Nurse/AD
- Athlete Emergency Cards

**AED Locations**

**WHS**
- Fixed AED outside the cafeteria and nurses office
- Athletic Dept. in the Training room
- Athletic Trainer carries portable AED when on fields
- Health Office

**WMS**
- Fixed AED outside the cafeteria and main office

*All Members of the WSD Coaching Staff are First Aid/CPR/AED certified*

**Local Hospitals and Clinics**

A. Hospitals:
    a. Parkland Medical Center
        i. (603) 432-1500
        ii. 1 Parkland Drive, Derry, NH 03038
B. Urgent Care Centers
    a. ConvenientMD
        i. (603) 890-6330
        ii. 125 Indian Rock Rd, Windham, NH 03087

**Practice and Competition Fields/Facilities**

**Windham High School**
**64 London Bridge Road, Windham, NH 03087**



1. Soccer/Lacrosse
2. Football/Field Hockey
3. Softball
4. Multi purpose Turf
5. Baseball
6. Practice Field

**Windham Middle School**
**112A Lowell Road, Windham, NH 03087**

**Windham Center School**
**2 Lowell Road, Windham, NH 03087**



**Griffin Park**
**101 Range Road, Windham, NH 03087**

**Athletic Equipment**

Football Equipment

After each Fall season, the football pads and helmets are sent out for reconditioning and inspection by an NOCSE Certified Company.. They are returned to the school to be disbursed once more prior to the beginning of the next Fall season. Equipment is properly fitted and inspected by Windham coaching staff and the Athletic Trainer.

**WHS Athletic Training Room**

Schedule

The Athletic Training room is open and staffed beginning at 2:10pm each school day. There is a board outside the door stating the Athletic Trainer's location when outside. After the treatment window is over, the door will be locked and the individual is responsible for seeking the Athletic Trainer at their designated location.

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Fall Schedule:
Open: 2:10pm
Treatment: 2:10pm- 3:00pm
Practice/Game coverage: 3:00pm until end of all games/practices. Post-Treatment: 30 minutes following the end of the last practice/game.

Winter Schedule:
Open: 2:10pm
Treatment: 2:10pm-3:00pm
Practice/Game coverage: 3:00pm until end of all games/practices. Post-Treatment: 30 minutes following the end of the last practice/game.

Spring Schedule:
Open: 2:10pm
Treatment: 2:10pm-3:00pm
Practice/Game coverage: 3:00pm until end of all games/practices. Post-Treatment: 30 minutes following the end of the last practice/game.

*(Treatment times are subject to change due to changing practice/game times.)*

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**Illness Prevention Strategies**

**Pre-Participation Physical Examinations**

WSD Medical Clearance Policy

WHS

A WHS student-athlete must successfully pass a physical examination and complete the physical examination form provided by the WHS Athletic Department or the issued physical exam form provided by the Doctor's Office. This must be done prior to playing or practicing a sport at WHS. The exam may be valid for 13 months, unless specified yearly by the Physician or Practitioner.

A medical history is also obtained through Family ID Annually.

Prior to the start of each season, the Athletic Director or designee will send out notifications to those who need an updated physical examination and/or ImPACT test or Family ID medical history.

WMS

A WMS student-athlete must successfully pass a physical examination and complete the physical examination form provided by the WMS Athletic Department or the issued physical exam form provided by the Doctor's Office.  The physical examination must have been completed within one calendar year.  *Refer to Appendix B.

**ImPACT Testing**

All WHS student-athletes participating in high-risk sports shall be required to complete the ImPACT test during Freshman and Junior year. The test is an online concussion baseline test taken prior to trying out, playing, or practicing any sport. The Athletic Trainer shall hold and proctor ImPACT baseline testing days for all student-athletes prior to the start of each sport season. Each passing exam will be valid for two (2) years.

ImPACT is a research-based, 20-minute, comprehensive computer test developed to help medical professionals determine an athlete's readiness to return to play after sustaining a concussion. ImPACT testing is recognized as one tool in a concussion management protocol.

*All medical information is managed in accordance with FERPA and HIPAA.*

**NFHS Guidelines**

The National Federation of State High School Association states that "Proper precautions are needed to minimize the potential risk of the spread of communicable disease and skin infections during athletic competition. These conditions include skin infections that occur due to skin contact with competitors and equipment. The transmission of infections such as Methicillin-resistant Staphylococcus aureus (MRSA) and Herpes Gladiatorum, blood-borne pathogens such as HIV and Hepatitis B, and other infectious diseases such as Influenza can often be greatly reduced through proper hygiene."

The Windham School District Athletics Department encourages adherence to the guidelines outlined below to ensure that our athletes care for themselves and their teammates' overall health.

**Universal Hygiene Protocol for All Sports:**

- Shower immediately after every competition and practice.
- Wash all workout clothing after each practice.
- Wash personal gear (knee pads and braces) weekly.
- Do not share towels or personal hygiene products (razors) with others.
- Refrain from full body (chest, arms, abdomen) cosmetic shaving. Infectious Skin Diseases

**Strategies for reducing the potential exposure to these infectious agents include:**
- Athletes shall be required to notify a parent or guardian, Athletic Trainer and coach of any skin lesion prior to any competition or practice. An appropriate health-care professional should evaluate any skin lesion before returning to competition.
- If an outbreak occurs on a team, especially in a contact sport, all team members should be evaluated to help prevent the potential spread of the infection.
- Coaches, officials, and appropriate health-care professionals must follow NFHS or state/local guidelines on "time until return to competition."

Participation with a covered lesion may be considered if in accordance with NFHS, state or local guidelines and the lesion is no longer contagious.

**Blood-borne Infectious Diseases**

Strategies for reducing the potential exposure to these agents include following Universal Precautions such as:

- An athlete who is bleeding, has an open wound, has any amount of blood on his/her uniform, or has blood on his/her person, shall be directed to leave the activity (game or practice) until the bleeding is stopped, the wound is covered, the uniform and/or body is appropriately cleaned, and/or the uniform is changed before returning to activity.
- Athletic trainers or other caregivers need to wear gloves and take other precautions to prevent blood or body fluid-splash from contaminating themselves or others.
- In the event of a blood or body fluid-splash, immediately wash contaminated skin or mucous membranes with soap and water.
- Clean all contaminated surfaces and equipment with disinfectant before returning to competition. Be sure to use gloves when cleaning.
- Any blood exposure or bites to the skin that break the surface must be reported and immediately evaluated by an appropriate health-care professional.

**Other Communicable Diseases**

Means of reducing the potential exposure to these agents include: Appropriate vaccination of athletes, coaches and staff as recommended by the Centers for Disease Control (CDC). During times of outbreak, follow the guidelines set forth by the CDC as well as State and local Health Departments. For more detailed information, refer to the "Infectious Disease and Blood-borne Pathogens" and "Skin Disorders" sections contained in the NFHS Sports Medicine Handbook.

**Environmental Conditions**

⚡Lightning/Thunder

According to the New Hampshire Sports Medicine By-Law Sect. 10 per NHIAA, "Lightning is the most consistent and significant weather hazard that may affect outdoor activities...The existence of blue sky and the absence of rain are not protection from lightning. See it, flee it. Hear it, clear it." In the event of impending weather, the following safety precautions shall be followed.

- All athletic department staff and game personnel are to monitor threatening weather. The Athletic Trainer will monitor via the WeatherBug Spark Lightning application. This provides real time radar and alerts to active lightning strikes in the area.
- If lightning is detected within a 10 mile radius, coaches will be notified of impending weather.
- When a double blast from an airhorn is heard, all athletes, coaches, and spectators are to evacuate the fields and seek shelter.
- The high school is our designated safe zone. In the event that an individual can not reach the high school in time, they are to seek shelter in a nearby vehicle.
- Do not lie down. Do not stay in an open field. Do not stay in a standing pool of water or under a single tall tree.
- Officials and coaches must wait 30 minutes after the last observed lightning or thunder boom before being able to resume activity. A timer will be utilized by the Athletic Trainer, Athletic Director, or Officials, who will in turn notify coaches about resuming activity.
- The Athletic Trainer or Athletic Director has final say over the determination of game/practice play regarding weather conditions.

☼ Heat

According to the NHIAA Sports Medicine By-Law Sect. 10, knowing both the temperature and humidity is important. The greater the humidity, the more difficult it is for the body to cool itself. Windham High School's Athletic Trainer will test the air quality using a Wet Bulb Globe Thermometer (WBGT) prior to practices and/or games. The WBGT takes into account air temperature, relative humidity, radiant heat, and air movement. The NHIAA also has a more simple chart that involves knowing the temperature and relative humidity. The chart, below, describes what humidity levels are dangerous and critical based on the concurrent temperature.   All WHS Coaches are NFHS Heat/Illness Certified..

| AIR TEMPERATURE | DANGER ZONE | CRITICAL ZONE |
|---|---|---|
| 70 degrees | 80% relative humidity | 100% relative humidity |
| 75 degrees | 70% relative humidity | 100% relative humidity |
| 80 degrees | 50% relative humidity | 80% relative humidity |
| 85 degrees | 40% relative humidity | 68% relative humidity |
| 90 degrees | 30% relative humidity | 55% relative humidity |
| 95 degrees | 20% relative humidity | 40% relative humidity |
| 100 degrees | 10% relative humidity | 30% relative humidity |

**Treatment of Exertional Heat Illnesses**

Per the NATA, the goal for any exertional heat stroke victim is to lower core body temperature to less than 102.5°F within 30 minutes of collapse. Cold water immersion is the most effective way to treat a patient with exertional heat stroke. The water should be 35-59°F and continuously stirred to maximize cooling. An athlete suffering from exertional heat stroke should always be cooled first (via cold water immersion) before being transported by EMS to an emergency facility. An athlete recovering from exertional heat stroke should be closely monitored by a physician or athletic trainer and return to gradual activity.

**Heat Acclimatization**

Heat acclimatization is a gradual increase in an athlete's exposure to the duration and intensity of physical activity in the heat and is necessary to minimize the risk of exertional heat-illness.

 Snow/Cold

To prevent cold related injuries, such as frostbite, hypothermia, chilblain, and trench foot, the Athletic Trainer and/or Athletic Director will make decisions about practice and game participation due to cold, wet, and windy temperatures. They will access the temperature and wind chill through the Weather channel and/or WeatherBug applications. They will also check for wind chill advisories, wind chill warnings, and wind chill factor, which will be factored into the "real feel" temperature chart seen below. In the event of school closure, practice/game times are canceled as well.

From the NHIAA:

Cold Weather Policy: If the temperature is below –4 degrees F, for cross country, and –10 degrees F, for alpine and jumping, measured at the coldest point of the course, a competition will be modified, postponed or canceled by the Jury. With difficult weather conditions (e.g., strong wind, high air humidity, heavy snowfall, or high temperature) the Jury may, in consultation with the coaches of the participating teams, modify, postpone or cancel the competition.

| 30 degrees and below | Be aware of the potential for cold injury and notify the appropriate personnel of the potential. | Coaches will be notified of the possibility of modified practice times. |
|---|---|---|
| 25 degrees and below | Provide additional protective clothing, cover as much exposed skin as practical. Provide opportunities and facilities for rewarming. | TRSD recommends no more than 1 hour of outdoor practice. Must have hats, gloves, and jackets. *Frostbite can occur in 30 mins or less* |
| 15 degrees and below | Consider modifying activity to limit exposure or to allow more frequent chances to rewarm. | TRSD recommends no outdoor practice. |
| 0 degrees and below | Consider terminating or rescheduling activities. | TRSD recommends no outdoor practice. |

**Injury Intervention**

The WSD Athletic Training staff is the first point of contact when an injury occurs. When an injury is reported, a comprehensive evaluation is completed and documented. If the parent/guardian is not present during the time of injury, they will be promptly notified. The Athletic Trainer will then make the recommendation for further treatment if necessary. Same game, return to play decisions are made solely by the Athletic Trainer and cannot be overridden by a coach or parent/guardian. In the event that the athlete needs further medical attention, they must provide documentation from a physician before beginning return to play protocol.

Each member of our coaching staff is required to complete training courses in first aid/CPR, AED, concussion in sport, and heat illness. They are required to report any injuries to the Athletic Trainer and to fill out an injury report if it occurs at an away event.

**Concussion**

Per WSB Policy JLCJ and Procedure JLCJ-R, the following concussion protocols are in place.

A concussion is an alteration in the brain and mental function that results from a traumatic head injury.  Sign and symptoms of a concussion may include but are not limited to:

**Signs and Symptoms of a Concussion**

| | | |
|---|---|---|
| Headache | Dizziness | Light-Sensitivity |
| Noise Sensitivity | Nausea/Vomiting | Vision Abnormalities |
| Fatigue | Loss of Consciousness | Memory Loss |
| Difficulty Concentrating | Delayed Reaction Time | Altered Attention Span |
| Behavioral Changes | Irritability | Depression |
| Anxiety | Drowsiness | Insomnia |
| Difficulty Breathing | Sleeping longer than usual | Sleeping less than usual |

Concussion in sport can be a very serious injury and often requires a longer healing time.

At WHS, in the event that a student-athlete is believed to have sustained a concussion, the WHS Athletic Trainer  will complete a comprehensive evaluation and neuro exam.   The Sport Concussion Assessment Tool (SCAT5) is utilized to interpret overall signs and symptoms. It is not a diagnostic tool, but does help the healthcare provider gauge the individual's overall concussion signs and symptoms. If a concussion is diagnosed, the student-athlete will not return to play, the parent/guardian will be notified and provided with educational material on concussion protocol.

When the student-athlete is completely symptom-free for a 24-hour period, the Athletic Trainer will then provide the student-athlete with the NRH Medical Clearance And Parental Permission form to be signed by  the parent/guardian. After this is returned to the Athletic Trainer, the  return to play progression begins. The progression is a five step process to ensure that physical activity does not exacerbate concussion symptoms once more. The student-athlete is brought through this progression under the supervision of the Athletic Trainer and each step is documented. The progression is sport specific, with each step being completed on consecutive days. In the event that concussion symptoms occur, the

student-athlete will be required to rest until symptom-free again, then complete the previous step before progressing to the next day.

At WMS, if a student athlete is suspected of having a concussion, or exhibits signs and symptoms they are immediately removed from the contest or practice. A parent/guardian is notified and the student athlete may not return to play until cleared by an appropriate health care professional.

The Windham School District also has an Academic Protocol that is followed in order to ensure that the student-athlete is allowed ample time to catch up on school work in the event that a modified schedule is deemed necessary.

For more information on sport related concussion, please visit the NHIAA website (NHIAA.org) and click the drop down menu titled "Sports Medicine". From there you select "concussion" and can browse multiple educational sites.

**Return to Play Protocol**

Once the student-athlete has been symptom free for a minimum of 24 hours, cleared by a physician, and in good standing academically, they may begin the return to play protocol. At WHS, an Impact Test, with scores returning to baseline must be passed before being allowed to return to sports.

**IMPORTANT NOTE:** Impact Testing results can pick up an "invalid" result. The score may reflect a lack of understanding of instructions, or an attempt by a student-athlete to lower their own score. If this occurs, the student-athlete will need to **RETAKE** the Impact Test.

Graduated Return to Sport

| Stage | Aim | Activity | Goal of Each Step |
|-------|-----|----------|-------------------|
| 1 | Symptom-limited activity Light aerobic exercise | Daily activities that do not provoke symptoms. Walking or stationary cycling at a slow to medium pace. No resistance. | Gradual reintroduction of work/school activities Light cardio activity. |
| 2 | Moderate aerobic exercise | Stationary cycling or jogging at a moderate pace, increase heart rate. | Increase heart rate to controlled limit. |
| 3 | Sport-Specific exercise | Cycling at a pace to increase heart rate. Running or skating drills. No head impact activities. | Add movement. Increase heart rate. |
| 4 | Non-contact training drills | Harder training drills, may begin resistance training. No scrimmaging. | Exercise coordination and increased thinking. |
| 5 | Full contact practice | Following the completion on Impact Test, participate in normal training activities. | Restore confidence and assess functional skills by coaching staff. |
| 6 | Return to sport | Normal game play. | Have fun |

***NOTE:** An initial period of 24-48 hours physical and cognitive rest is recommended for beginning protocol. There MUST be a minimum of 24 hours between each step. If symptoms occur during a step, the athlete goes back to the previous step.***

**Counseling/Education**

Athletes, parents, and coaches are encouraged to reach out to the Athletic Trainer or Health Office in regards to nutrition and mental health. The Athletic Trainer and Health Office have a strong background in proper nutrition and mental health implementation. These individuals are able to provide us with nutritional programs to follow for optimal performance and guidance on maintaining a healthy mind, body, and soul. Coaches are strongly encouraged to reach out to the Athletic Trainer if they would like to stage a discussion with their team regarding proper nutrition or mental health.

In the event that you see, hear, or witness someone struggling with their overall health and nutrition, individuals are encouraged to reach out to the school's Health Office, the Athletic Trainer, or school administration. All information is kept confidential, unless deemed life threatening or dangerous to oneself or others.

The National Federation of High School Sports also offers courses and handouts for parents on both of these topics. Please go to http://www.nhiaa.org/sports-medicine for more information.

**Closing Remarks**

The WSD Athletic Department views education-based athletics as an extension of the learning experience for student-athletes. The safety and well-being of our students, coaches, and community members is paramount at all our events.

We continue to work in conjunction with Administration, nursing staff, athletic trainers, the NHIAA, Tri-County league, and local authorities to create safe and rewarding experiences for student-athletes.

The work to ensure the safety of our athletes is ongoing. As such, with the implementation of the WSD EAP emergency drills will be formulated and implemented regularly to help coaches, school personnel, and students be prepared in the case of emergencies. The drills will cover the steps to be taken and the roles needed in an emergency situation.

**APPENDIX A - Supplemental Injury Report**

## NRH
### NORTHEAST REHABILITATION
### HOSPITAL NETWORK

## SUPPLEMENTAL INJURY REPORT

NAME:_____GRADE:_____AGE:_____

SPORT:_____DATE AND TIME OF INJURY:_____

GAME OR PRACTICE:_____LOCATION:_____

INJURY:_____

MECHANISM OF INJURY:_____
_____
_____

PREVIOUS INJURY?  YES  NO

ASSESSMENT SUMMARY:(including palpation, rom, strength, stability, and special tests)
_____
_____
_____

TREATMENT OF INJURY:_____
_____
_____

SENT TO HOSPITAL/DOCTOR?  YES  NO  WHERE/WHO?_____

AMBULANCE CALLED?  YES  NO          PARENTS CALLED?  YES  NO     TIME:_____

FOLLOW-UP CARE/DIAGNOSIS:_____

CLEARED TO RETURN TO PLAY?  YES  NO  BY WHOM?_____

_____

CERTIFIED ATHLETIC TRAINER     DATE

Revised 03/13

**APPENDIX B: PRE-PARTICIPATION PHYSICAL EXAM FORM**

Untitled
Results: 1

GENERAL

PARTICIPANT INFORMATION

**PARTICIPANT**
FIRST NAME -
LAST NAME -
BIRTH DATE 01/01/1900

ADDRESS

**HOME ADDRESS**
ADDRESS LINE1 -
ADDRESS LINE2 -
CITY -
STATE -
ZIP CODE -

FIRST PARENT OR GUARDIAN

**PARENT/GUARDIAN**
FIRST NAME -
LAST NAME -
RELATIONSHIP -

E-MAIL -
HOME PHONE   CELL PHONE

**PRIMARY ADDRESS** ADDRESS LINE1
-
ADDRESS LINE2 -

SECOND PARENT OR GUARDIAN

**SECOND PARENT/GUARDIAN** FIRST
NAME -
LAST NAME -
RELATIONSHIP -

**SECOND EMERGENCY CONTACT**
FIRST NAME -
LAST NAME -
HOME PHONE CELL PHONE

RELATIONSHIP -

EMERGENCY CONTACTS

**FIRST EMERGENCY CONTACT**
FIRST NAME -
LAST NAME -
HOME PHONE(603) 845-1550
CELL PHONE   RELATIONSHIP -

E-MAIL -

INSURANCE

**INSURANCE**
CARRIER -
SUBSCRIBER NAME -
GROUP NUMBER -

MEDICATIONS

**MEDICATIONS**
NAME -
DIAGNOSIS -
PHYSICIAN -
DOSAGE AND TIME INSTRUCTIONS -

CONCERNS AND COMMENTS

**HEAD INJURY/CONCUSSION** No |
Traumatic Head Injury
No | Medical Attention for Head Injury No |
Diagnosed Concussion
- | Head Injury/Concussion - Other
**CONTACT**
E-MAIL -@windhamsd.org
HOME PHONE   CELL PHONE

**CONTACT**

**HEALTH/MEDICAL**
No | Diagnosed Allergies
No | Asthma
No | Heart Conditions
- | Epi-pen
No | Hospitalization
- | General Injuries
No | Chronic Medical Conditions
No | Physical Limitations
- | Protective or Corrective Equipment No |
Treatment for Seizures/Epilepsy No | Serious
Illnesses
No | Vision Issues
- | Other
No | Dietary Issues
No | Orthopedic
- | Asthma Medications
No | Cardiac Diagnostic Tests
No | Fluttering/Irregular Heartbeat
No | Heat Illness
No | Missing Organs
**PRIMARY ADDRESS** ADDRESS LINE1
-
ADDRESS LINE2 -

**ALLERGIES**
No | Epi-pen
No | Diagnosed Allergies No | Life-Threatening
Allergies No | Allergies - Other

**APPENDIX C: DRILL**

The Athletic Trainer and Athletic Director will from time to time hold emergency drills to help make sure that teams have reviewed emergency action plans and have a plan on how to respond to an emergency. Coaches will be sent the link below from the Safe Sports Network Describing a "Drop the Dummy Drill" which simulates a cardiac emergency. The attached report card will be filled out by the Athletic trainer or Athletic Director and kept on file in the Athletic Office.

Drop the dummy drill:

https://www.youtube.com/watch?v=dbmJO8EtPME

# "Drop the Dummy" Drill Report Card

SEASON: _____ SPORT:_____ COACH RUNNING THE DRILL: _____

Time drill started: _____

Time drill stopped: _____

1.Time victim discovered (Rescuer 1):_____

2.Staff member's response (check one):

❑ Called for help (vocal):_____ ❑ Called for help (phone):

❑ Assessed victim first, then called for help:

❑ Ran for help:

❑ Other:_____

3.Time rescue team arrived on scene:_____

4.How many people responded to scene:_____

5. Who was contacted by phone: 911, Athletic Director, Athletic Trainer, other?_____

6.Time 911 was called:_____

7.Time other staff/officials notified:_____

8. Did Rescuer direct others to await EMS?_____

9. Time AED sent for:_____

10.Time CPR started:_____

11. CPR started by Rescuer who discovered victim? Yes ____ No, performed by:_____

12.Is the Rescuer doing hard, fast chest compressions, 100 per minute?_____

13. Time AED arrived:_____

14. Time AED applied to victim:_____

15. Who performed AED functions:_____

16.Time other school staff arrived: _____

17.Time EMS arrived on the scene:_____

QUESTIONS:

What did the Rescuers do right?_____

What could the Rescuers do better?_____

What was easy to remember to do?_____

What was hard to remember to do?_____

**APPENDIX D: EMERGENCY PROCEDURE COACHES CHECKLIST**

All coaches will discuss emergency topics below with their teams to ensure student athletes are aware of the steps to take in the event of an emergency. This checklist will be returned to the Athletic Director or Administrator in their respective buildings.

Coaches please check off each item, sign and date at the bottom and return to the Athletic Director:

- The team has discussed overall emergencies and risks
- The team has discussed responses to emergencies at the venues they will be at
- The team has been made aware of the closest AED
- The team is aware of how to access medical personnel at the venue they are at
- The team is aware of how to access emergency response services
- The team has discussed basic responses to possible emergencies
- The team has established tasks for players, in the event of emergencies
- The coach has allowed for questions and answered them based on the EAP to the best of their ability and if unsure has clarified with the Athletic Director or school administration.

Coach Signature_____    Date_____

# District Communication Plan

**District Communication Plan**

1. Plan goals and general provisions - identifies the general goals of the Plan, identifies the multiple audiences/recipients of District communication, and identifies the available methods and modes of communication with some consideration of the pros and cons of each.
    a. The Windham School District communication plan is to improve internal and external communication systems with the specific goal of creating open, two-way communication between the District, administration, staff, students, parents and the Windham community through print, digital platforms, social media platforms, and face-to-face interactions.
2. Implementation – describes how components of the Plan will be implemented and will specify which staff members are responsible.

| Component | Method | People Responsible |
|---|---|---|
| School Board Meetings | Bimonthly meetings (in-person) <br> Live feed and Recordings | School Board <br> WCTV |
| Superintendent Updates | Email through SchoolMessenger <br> Website | Superintendent |
| School Newsletters | Email through SchoolMessenger <br> Website | Building Administration |
| Social Media Posts | Facebook <br> Twitter <br> Instagram | Building Administration <br> Communications Director |
| Parent Council Meetings | Monthly meetings (in-person) <br> Meeting agenda and notes are shared with the group | Building Administration |
| Weather Related Emergency Communications | Email, SMS, social, TV stations | Superintendent <br> Director of Facilities <br> Director of IT <br> Director of Communications |
| Emergency Communications | Email, phone, SMS | Superintendent <br> Assistant Superintendent <br> Building Administration <br> Director of Communications <br> Director of Guidance |
| Community Relations | School Newsletters, website | Building Administration <br> Communications Director |
| Event Promotions | School Newsletters, website, social media | Building Administration <br> Communications Director |

3. Communication to Internal Stakeholders – describes how to best communicate general or specific information to staff, students, and volunteers.

a. District and building administration hold regular meetings, provide weekly newsletters, and utilize department and team meetings to communicate general or specific information to staff, students, and volunteers.

4. Communication to External Stakeholders – describes how to best communicate with external stakeholders (i.e., parents, the community, parent groups, other districts, etc.).

   a. District and building administration communicate weekly with external stakeholders through newsletters that are sent through SchoolMessenger and available on our website. The building administration also hold monthly parent council meetings and attend school PTA meetings. Each building also holds an Open House at the beginning of each school year to inform parents of new or pre-existing school procedures and policies.

5. Crisis Communications Plan – coordinates the Communication Plan to the relevant provisions of the District Crisis Prevention and Response Plan and site-specific Emergency Operations Plans prepared under Board policy EBCA, including staff responsibilities, training requirements, communication tools, media plans, and message-specific templates.

   a. Please view Crisis Communications section for specific details

6. School Cancellations - outlines protocols for communicating a school day cancellation, delay, or early release due to inclement weather or other emergency reasons as provided by Board policy EBCD.

   a. The Windham School District has implemented an updated inclement weather procedure. The district will permit a maximum of 2 snow/weather/emergency days. Any day thereafter, teachers will provide remote learning via Zoom so that no more than 2 days will be added to the school year calendar. It is understood that Zoom snow days must satisfy the 80% student participation rate to qualify as a "school day" when calculating the required length of the district's school year. Outside of the school messaging system, the following outlets will be utilized to communicate to parents about any school closures, delays, or early dismissals:
      i. Social Media:
         1. Facebook
         2. Instagram
         3. Twitter
      ii. Television Stations:
         1. WMUR Channel 9
         2. WBZ Channel 4
         3. WCVB Channel 5
         4. WHDH Channel 7

7. Off-campus School activities - outlines how to best communicate incidents or emergencies that occur while students are off campus on field trips or travel sporting events (i.e., anywhere that students are transported by the District).

   a. Please view Crisis Communications section for specific details

8. Recommendations - outlines suggestions and recommendations relating to infrastructure or resources for future improvements to communication channels

   a. The Windham School District is committed to continued growth and partnership with both external and internal stakeholders. The district will stay abreast of different forms of communications strategies and seek input and buy-in from all stakeholders. District administration will also continue to attend staff meetings and parent council meetings throughout the year to foster positive and lasting relationships.

**Crisis Communication**

- Communication is a critical part of incident management. This section outlines the school's communications procedures while supporting its mission to provide clear, effective internal and external communication between the school, staff, students, parents/guardians, responders, and media.

**Before an Incident**

Communicating with the larger school community begins before an incident occurs. In the event of an incident, parents/guardians, media, and first responders will require clear and concise messages from the school about the incident, what is being done about it, and the safety of the children and staff. The school will:

- Ensure staff is familiar with the mass notification system utilized by the SAU.
- Be prepared to send mass emails at the direction of either the Superintendent (or designee) or School Incident Commander.
- Develop a relationship with parents/guardians so that they trust and know how to access alerts and incident information.
- Inform parents/guardians about the school's EOP, its purpose, and objectives. Information will be included in the school newsletter and a presentation delivered at the parent's open house.
- Identify parents/guardians who are willing to volunteer in case of an incident and include them in preparation efforts.
- Be prepared with translation services for non-English speaking families and students with limited English proficiency.
- Maintain (by the Principal's Administrative Assistant) a list of contacts for the major television and radio stations and websites.

**During an Incident - Internal Communications**

Faculty and staff will be notified when an incident occurs and kept informed as additional information becomes available and as plans for management of the situation evolve. The following practices will be utilized to disseminate information internally when appropriate:

- **Call list:** It originates with the principal, who contacts the members of the Incident Response Team. Team members then in turn will contact groups of staff (teachers, administrators, and support staff) as instructed.
- **Morning Faculty Meeting:** As appropriate, updated information about an incident will be presented at the morning faculty meeting. Any new procedures for the day will also be reviewed at this time.
- **End-of-Day Faculty Meeting:** As appropriate, updated information and a review of the day's events will be presented at the end-of-day meeting. Staff will also have the opportunity to address any misinformation or rumors.

The Principal will notify the SAU office and will designate staff member(s) to monitor all communications.

**During an Incident - External Communications**

The school will communicate with parents/guardians during an incident by:
- Disseminating information via text messages, and emails to inform parents about exactly what is known to have happened.
- Implementing the plan to manage phone calls and parents who arrive at school.
- Describing how the school and Windham School District are handling the situation.
- Providing information regarding possible reactions of their children and ways to talk with them.

- Providing a phone number, website address, or recorded hotline where families can receive updated incident information.
- Informing families and students when and where school will resume.

The SAU representative will communicate with the media during an incident by:
- Designating a Public Information Officer.
- Establishing an off-campus briefing area for media representatives.
- Determining the need to establish or participate in a Joint Information Center.
- Coordinating messages with the Principal and Policy Group.
- Requesting all media contacts broadcast the school's external communications plans, including the information hotline for parents and guardians.

The Incident Commander will maintain communication with first responders during an incident. Transfer of command will occur when community responders arrive on the scene to assume management of the incident under their jurisdiction.

**After an Incident**

After an incident, the school administrators will:

- Schedule and attend an open question-and-answer meeting for parents and guardians as soon as possible.
- Conduct public meetings as needed. These meetings are designed to provide the opportunity for people to ask questions and receive accurate information.

After an incident, the staff/faculty teams will:
- Conduct a comprehensive analysis of the physical and operational recovery needs.
- Assess physical security, data access, and all other critical services (e.g., plumbing, electrical).
- Examine critical information technology assets and personnel resources, and determine the impact on the school operations for each asset and resource that is unavailable or damaged.
- Document damaged facilities, lost equipment and resources, and special personnel expenses that will be required for insurance claims and requests for state and federal assistance.
- Provide detailed facilities data to the Windham Windham School District office so that it can estimate temporary space reallocation needs and strategies.
- Arrange for ongoing status reports during the recovery activities to: a) estimate when the educational program can be fully operational; and b) identify special facility, equipment, and personnel issues or resources that will facilitate the resumption of classes.
- Educate school personnel, students, and parents on available crisis counseling services.
- Inform the School Administrative Unit of recovery status.

After an incident, the Windham School District will:
- Identify recordkeeping requirements and sources of financial aid for state and federal disaster assistance.
- Establish absentee policies for teachers/students after an incident.
- Establish an agreement with mental health organizations to provide counseling to students and their families after an incident.

- Develop alternative teaching methods for students unable to return immediately to classes:  correspondence classes, videoconferencing, tele-group tutoring, etc.
- Create a plan for conducting classes when facilities are damaged (e.g., alternative sites, half-day sessions, portable classrooms).
- Get stakeholder input on prevention and mitigation measures that can be incorporated into short-term and long-term recovery plans.

**School Bus Safety Program**

School Bus Safety Program. The safety and welfare of student riders will be the first consideration in all matters pertaining to transportation. Safety precautions will include the following:

1. The Transportation Coordinator will assure that students using District transportation are provided annual instruction as to the proper procedure for boarding and exiting from a school bus, and in proper and safe conduct while aboard. See School Bus Conduct Rules at JICC-R. Additionally, the Transportation Coordinator will assure that emergency evacuation drills from school buses will be conducted at least two times a year to acquaint student riders with procedures in emergency situations (See RSA 189:6-a, I & II). Additionally, the Transportation Coordinator is encouraged to establish guidelines for families relative to safe practices for students in between home and bus stops.
2. All vehicles used to transport children will be inspected on a regular schedule to see that they meet applicable safety regulations.
3. All drivers, whether employed by the District or a contracted vendor, and whether certified school bus drivers or contracted carriers under RSA 376:2, VII, will be screened before employment for physical condition, proper license, criminal records background check (per Board policy GBCD), and experience. The prior driving record of each driver will be checked for drug and alcohol or other convictions. A criminal records check must also be completed. All checks and screenings will be conducted in accordance with Board policy EEAEA.
4.  To help ensure the health, welfare, and safety of students, passengers and others relative to District provided transportation, the School Board has authorized use of video and/or audio surveillance on school buses. Conducting such surveillance, and the use of any subsequent recordings in student disciplinary proceedings, will be in accordance with Board policy ECAF.
5. The School District or independent contractor will comply with all state and federal laws and regulations pertaining to the operation of school buses and will make these requirements  known to bus drivers. It will also cooperate with local safety officials in formulating and accomplishing its school bus safety program.

Student Conduct on School Buses. Student conduct on District transportation shall be regulated in accordance with Board policy JICC and School Bus Conduct Rules JICC-R. See
also Board policy EEA.

**Additional Procedures**

1. **Supervision and security of school buildings and grounds.(References: Policy ECA)**

   a. The district works closely with local police and fire departments, along with insurance company inspectors to maintain safe and secure school buildings and grounds.

   b. Records and funds shall be kept in a safe place and under lock and key when required.

c. Combinations to school vaults and safes shall be changed each time there are changes in personnel who have had the combinations.

d. Access to school buildings and grounds outside of regular school hours shall be limited to personnel whose work requires it. An adequate key control system shall be established which will limit access to buildings to authorized personnel and will safeguard against the potential of entrance to buildings by keys in the hands of unauthorized persons.

e. School buildings shall be closed and locked after the last school activity has concluded in the afternoon except in those instances when there is continuous activity into the evening, in which case securing of the building at 7:00 pm unless otherwise noted with the group (ie/ school performances, athletics, etc.). Responsibility of participants arriving after 7:00 pm are the responsibility of the group.  No doors shall be propped open once the building is secured for the evening.

f. A building being used by an authorized school or community group in the evening or on non-school days, shall be opened for such activity and secured again after its conclusion.

g. No unauthorized person or group shall be granted access to a secured building by any employee. Authorization may be granted only by the Board, by the Superintendent and his/her staff, and by the Principal of the school.

h. Detailed security regulations are available at the central office.

i. The building principal is responsible for enforcing this policy.

2. **Safety and supervision of students during school hours and school-sponsored activities (References: Policy JLIA)**

a. The Board is committed to ensuring that students are appropriately supervised at times when the District is responsible for providing students with a reasonable duty of care and supervision.

b. The Building Principal is responsible for administering and supervising the school, the general conduct of students, both on school premises and during school-sponsored activities off school grounds.

c. Students should be under the supervision of a member of the school staff at all reasonable times while they are in school or attending school functions. All school staff shall ensure the safety of students even when they are not specifically scheduled for supervisory duty.

d. All dangerous conditions in the school should be reported at once to the Building Principal.

e. In schools where bus transportation is provided, the supervisory duties shall include the loading and unloading, when necessary of the students at the school. Elementary school students shall be escorted to the bus to ensure that the students board the bus safely.

f. During school hours, or while engaging in school-sponsored activities, students will be released only into the custody of parents/guardians or other authorized persons.

g. The Building Principal is authorized to establish administrative rules and/or regulation in furtherance of this policy.

3. **Visiting school buildings and attending school-sponsored activities (References: Policy KI and Policy KFA, KFA-R)**

a. All persons, other than staff and pupils enrolled in the school, who may come to the school for any reason during the school day are considered visitors and must report and sign in at the school office.

b. A visitor (a person not employed by the school system) must report to the school office and receive

permission to be on the school grounds. A visitor must sign in and indicate the purpose of their visit.

c.  Persons wishing to meet with a teacher for the purpose of discussing a particular problem shall do so only at a time when it does not interrupt the normal school program. Persons wishing to make such arrangements may do so by securing an appointment with the teacher through the office of the Principal or by direct contact with the teacher.

d.  No person shall visit a school without first reporting to the office of the Principal as to the purpose and place of the visit.

e.  No person on school property or during any school sponsored or approved activity may:

    i.    Injure, threaten, bully, harass, or intimidate a student, staff member, sports official, coach, or any other person;
    ii.   Engage in behaviors that are harassing or discriminatory in nature based on a person's actual or perceived age, sex, gender identity, sexual orientation, marital status, familial status, disability, religion, national origin race, or color (including those traits historically associated with race, color, or religion, including but not limited to head coverings, hair texture, or protective hairstyles);
    iii.  Impede, delay, disrupt, or otherwise interfere with any school function or any activity sponsored or approved by the Board, the Superintendent, building Principal, Athletic Director, or their designees;
    iv.   Damage or threaten to damage another's property;
    v.    Damage or deface School District property;
    vi.   Smoke or otherwise use tobacco products;
    vii.  Consume, possess, distribute, or be under the influence of alcoholic beverages or illegal drugs/controlled substances; (persons known or suspected to be under the influence of liquor or a controlled substance will not be permitted to enter the school building or grounds, and law enforcement may be contacted);
    viii. Use, or attempt to use, or threaten to use any device, instrument, material, or substance ("prohibited object) with the purpose to injure, threaten, intimidate, or coerce another person; for the purposes of this section, any reckless use of any prohibited object which places or may place another in danger of serious bodily injury is also prohibited; While students are prohibited from possessing firearms on school property under Board policy JICI and RSA 193:13, mere possession or displaying of a firearm by non-student adults shall not, in and of itself and without additional circumstances as described in this paragraph, constitute reckless conduct or a violation of this policy;
    ix.   Enter upon any portion of school property at any time for purposes other than those that are lawful and specifically authorized by the Board, the Superintendent, building Principal, Athletic Director, or their designees;
    x.    Operate (either upon or over school property) a drone or other unmanned aircraft except as provided under Board policy ECD;
    xi.   Violate any state law or regulation, or any duly adopted policy and/or regulation of the Board.
    xii.  Violate any federal law with the exception of any such law that is pre-empted by New Hampshire state law (e.g., RSA 159-E pertaining to firearms, etc.);
    xiii. Operate a motor vehicle in violation of any Authorized District Personnel directive or posted road signs.
    xiv.  Refuse to comply with or obey a directive of any Authorized District Personnel or posted rules or regulations.

f.  Enforcement and Consequences
    i.    Any person who violates this policy or any other acceptable standard of behavior may be ordered to leave school grounds by Authorized Personnel, who may, also at her/his discretion,

contact law enforcement. Students and employees who violate this policy shall be further subject to such consequences or interventions as provided under applicable Board policies or District or school administrative regulations. Additionally, the Board authorizes the Superintendent or his/her designee to issue "no trespass" letters to any person whose conduct violates this policy. The Superintendent is further authorized, upon consultation with district counsel, to file any criminal complaint with respect to such violations.

4. **Staff Emergency Response Training Programs (References: Policy EBCB)**

   a. Staff are trained annually on the district Standard Response Protocols during the first two teacher workshops days prior to staff arriving.

   b. Standard Response Protocols are for internal distribution only as public access would compromise the security of the district, students, and staff.

   c. The district currently utilizes the "I love you guys" Standard Response Protocol in an emergency situation.

5. **Staff and Student Training Programs- Drills (References: Policy EBCB)**

   a. Administration, staff, and students will be trained and will execute a minimum of 6 fire drills a year with the fire department.

   b. Building administration will organize a minimum of four additional emergency drills each year that may involve students or be table top activities to address the following incidents, Fire, Secure, Hold, Lockdown, Evacuate, or Shelter.

6. **Staff and Student Training Programs- Recognizing Threats (References: Emergency Management Plan & Classroom Emergency Procedural Manual, Policy EBCC)**

   a. All Windham Staff should refer to the Emergency Management Plan & Classroom Emergency Procedural Manual which is published yearly.

   b. All staff are trained on the Emergency Management Plan & Classroom Emergency Procedural Manual on the first two professional development days before the start of school.

   c. In the event of a call or notice that a bomb has been placed in a school or any other District building or establishment, the following procedures are required:

      i. Immediate evacuation of the school or buildings.

      ii. If a thorough search has been conducted and nothing found, the Principal of the school or building or his/her designee should be notified by the senior member of the local protective department that re-entry will be permitted.

      iii. Investigation of the incident should be made by the local police department, assisted by the State Police, if requested.

      iv. Any decision concerning the dismissal of school pupils and subsequent action after the above procedures have been followed is the prerogative of the Superintendent.

      v. Students will be trained using the district Standard Operating Procedures within the first month of school in case of an emergency.


7. **WorkPlace Safety Training (References: Mandated District Trainings)**

a. The Windham School District requires all staff members to complete the following workplace safety trainings each year;
   i. Civil Rights in Food Service
   ii. Health Emergencies: Diabetes Awareness
   iii. Safety Data Sheets
   iv. Slips, Trips and Falls
   v. Bullying Recognition & Response
   vi. Sexual Harassment: Staff to Staff
   vii. Bloodborne Pathogen Exposure Prevention
   viii. Workplace Injury Prevention

8. **Student Training and Support- Reporting safety problems**
   a. Training and support for students that aims to relieve the fear, embarrassment, and peer pressure associated with reporting behavior that may indicate impending violence or other safety problems.
      i. Students K-4 meet regularly with guidance staff to review, see something, say something and how to report to relieve fear or embarrassment associated with reporting.
      ii. Students in Grade 5-8 -meet with school counselors at the beginning of the year to discuss their roles and responsibilities. They explain the importance of feeling safe at school and what to do if they hear or see something.  It is also discussed that they can report things and not have their identity shared.
      iii. All students are assigned a School Counselor and Advisor for the four years that they attend WHS.  The goal for having a counselor and Advisor for the four years is to build up trust in which the student would feel comfortable trusting that adult to confide in when a situation occurs.
      iv. The district conveys to the students that all Administration and our School Resource Officers have open door policies.  If a student would like to report something to any of the given resources they can communicate through email, in person or google chats.

9. **Safe and confidential reporting of security and safety concerns**

   a. The Windham School District conducts Homeland Security audits every three years as recommended by the state.
   b. The Windham School District meets monthly with building administration, the police department, and fire department to review safety concerns to be addressed in a timely manner through Emergency Management meetings.

10. **Regular School Safety Audits (References: Homeland Security Audits, Policy ECA)**
    a. The Windham School District conducts Homeland Security audits every three years as recommended by the state.
    b. The Windham School District meets monthly with building administration, the police department, and fire department to review safety concerns to be addressed in a timely manner

11. **School Climate**
    a. The Windham School District informally and formally assesses school climate for both students and staff.
    b. At the high school, students are provided the YRBT survey every two years.  This survey measures the current culture and climate from a student's perspective. Students are paired with a Counselor and Advisor to foster a connection to ensure trust is built and the student has a trusted adult to share concerns with. Results are reviewed and action plans established if necessary with the appropriate staff members.
    c. Questionnaires are sent periodically to the student body to determine the culture and climate of the school.  At Middle School (grades 7-8), they participate in the "Red Dot" activity to determine if students feel they have meaningful connections with the staff and vice versa.  This activity is done 3x per year in hopes of improving connections with the students.

d. Grades K-6 -School counselors and classroom teachers work together to engage students in social emotional learning activities to help students feel comfortable sharing and trusting adults in their school.

e. Prek-8 buildings assess school culture informally through classroom observations, conversations, Instructional Support Teams, PBIS teams, and other methods as appropriate for students.

**12. Restraint and Seclusion**

a. (References: Policy JKAA, Procedure JKAA-R)

b. Procedure for Use of Restraints and Seclusion

c. Circumstances in Which Restraint May Be Used:

   i. Restraint will only be used to ensure the immediate physical safety of any person when there is a substantial and imminent risk of serious bodily harm to the student or others, and only after other approaches to control the behavior have been attempted and been unsuccessful, or are reasonably concluded to be unlikely to succeed based on history of actual attempts to control the behavior of a particular child.

   ii. Restraint will only be used by trained school staff.

   iii. Restraint will not be used as punishment for the behavior of a student. Restraint will not be imposed for longer than is necessary to protect the student or others from the substantial and imminent risk of serious bodily harm.

   iv. No period of restraint of a student may exceed 15 minutes without the approval of a supervisory employee designated by the director to provide such approval.

   v. No period of restraint of a student may exceed 30 minutes unless an assessment of the mental, emotional, and physical well-being of the student is conducted by a trained and authorized employee.

   vi. Each restraint must be documented using the attached form (Physical Restraint Incident Report)

d. Circumstances in Which Seclusion May Be Used:

   i. The School Board recognizes the statutorily imposed conditions of seclusions and hereby adopts those conditions, as defined by RSA 126-U:5-b.

      1. Seclusion may only be used when a student's behavior poses a substantial and imminent risk of physical harm to the student or others, and only after other approaches to control the behavior have been attempted and been unsuccessful, or are reasonably concluded to be unlikely to succeed based on history based on the history of actual attempts to control the behavior of a particular child.

      2. Seclusion will be used only by trained school staff.

      3. Seclusion will not be used as a form of punishment for the behavior of a student.

   Prohibition of Dangerous Restraint Techniques: hereby prohibits the use of "dangerous restraint techniques" as defined in RSA 126-U:4.

**Prohibition of Dangerous Restraint Techniques:**

The use of "dangerous restraint techniques" as defined in RSA 126-U:4 will not be used.

**Reporting Requirements and Parental Notification:**

In the event restraint is used on a student, a **Physical Restraint Incident Report** form must be completed by the end of the school day or within 24 hours, if the restraint occurs at the end of the school day. In the event restraint or seclusion is used on a student, the building principal will, within 24 hours, verbally notify the student's parents/guardian of the occurrence. The building principal will, within 5 business days after the occurrence, submit a written notification/report to the Superintendent. The notification shall contain all the requirements and information as mandated by RSA 126-U:7, II.

The Superintendent may develop a reporting form or other documents necessary to satisfy these reporting requirements. Unless prohibited by court order, the Superintendent will, within 2 business days of receipt of the notification required in the above paragraph, send by first class mail to the child's parent or guardian the information contained in the notification/report.

Each notification/report prepared under this section shall be retained by the school for review in accordance with RSA 541-A.

If a school employee has intentional physical contact with a student in response to a student's aggressive misconduct or disruptive behavior, the building principal will make reasonable efforts to inform the student's parent or guardian as soon as possible, but no later than the end of the school day. The building principal will also prepare a written report of the incident within five (5) business days of the incident. The report will include information required under RSA 126-U:7, V.

**Transportation: (RSA 126-U:12)**
The school district will not use mechanical restraints during the transportation of children unless case-specific circumstances dictate that such methods are necessary.

Whenever a student is transported to a location outside the school, the Superintendent or designee will ensure that all reasonable and appropriate measures consistent with public safety are made to transport or escort the student in a manner which:
1. Prevents physical and psychological trauma;
2. Respects the privacy of the child; and
3. Represents the least restrictive means necessary for the safety of the child.

Whenever a student is transported using mechanical restraints, the Superintendent or designee will document in writing the reasons for the use of the mechanical restraints.

**Definitions (RSA 126-U:1):**
(a) "**Restraint**" means bodily physical restriction, mechanical devices, or and device that immobilizes a person or restricts the freedom of movement of the torso, head, arms, or legs. It includes mechanical restraint, physical restraint, and medication restraint used to control behavior in an emergency or any involuntary medication. It is limited to actions taken by persons who are school or facility staff
members, contractors, or otherwise under the control or direction of a school or facility.
(b) "**Restraint**" shall not include:
(1) Brief touching or holding to calm, comfort, encourage, or guide a child, so long as limitation of freedom of movement of the child does not occur.
(2) The temporary holding of the hand, wrist, arm, shoulder, or back for the purpose of inducing a child to stand, if necessary, and then walk to a safe location, so long as the child is in an upright position and moving toward a safe location.
(3) Physical devices, such as orthopedically prescribed appliances, surgical dressings and bandages, and supportive body bands, or other physical holding when necessary for routine physical examinations and tests or for orthopedic, surgical, and other similar medical treatment purposes, or when used to provide support for the achievement of functional body position or proper balance or to protect a person from falling out of bed, or to permit a child to participate in activities without the risk of physical harm.

(4) The use of seat belts, safety belts, or similar passenger restraints during the transportation of a child in a motor vehicle.

(5) The use of force by a person to defend himself or herself or a third person from what the actor reasonably believes to be the imminent use of unlawful force by a child, when the actor uses a degree of such force which he or she reasonably believes to be necessary for such purpose and the actor does not immobilize a child or restrict the freedom of movement of the torso, head, arms, or legs of any child.

- **"Medication restraint"** occurs when a child is given medication involuntarily for the purpose of immediate control of the child's behavior. This may not be used in schools.

- **"Mechanical restraint"** occurs when a physical device or devices are used to restrict the movement of a child or the movement or normal function of a portion of his or her body. This may only be used during transportation as defined in this policy.

- **"Physical restraint"** occurs when a manual method is used to restrict a child's freedom of movement or normal access to his or her body.

- **"Seclusion"** means the involuntary placement of a child alone in a place where no other person is present and from which the particular child is unable to exit, either due to physical manipulation by a person, a lock, or other mechanical device or barrier. The term shall not include the voluntary separation of a child from a stressful environment for the purpose of allowing the child to regain self-control, when such separation is to an area which a child is able to leave. Seclusion does not include circumstances in which there is no physical barrier between the child and any other person or the child is physically able to leave the place. A circumstance may be considered seclusion even if a window or other device for visual observation is present, if the other elements of this definition are satisfied

13. **Staff and Student Safety Precautions**
    a. Training programs for staff and students in safety precautions and procedures related to fire prevention, natural disaster response, accident prevention, public health, traffic, bicycle and pedestrian safety, environmental hazards, civil defense, classroom and occupational safety, and special hazards associated with athletics and other extracurricular activities.
       i. The district will follow the Emergency Operations Protocols submitted to the New Hampshire Department of Education which provides the training and procedures for safety precautions related to fire prevention, natural disaster response, accident prevention, and environmental hazards.
          1. Staff and students are trained on our Standard Response Protocols (SRPs) using the "I love you guys" foundation guidelines.
          2. Buildings must have 10 emergency response drills each year which are documented with the SAU.
          3. Six drills need to be fire drills with the fire department.
          4. Four drills need to be other emergency drills (with or without students).

       ii. Staff must complete the mandated training each year for the following areas (provided as online training):

          1. Lockout/Tagout: Energy Release

          2. Child Abuse: Mandatory Reporting

          3. FERPA: Confidentiality of Records

    4. Policy: ACAB-R Employee Discrimination and Harassment Complaint Procedure updated 9.2021

    5. Civil Rights in Food Service

    6. Health Emergencies: Diabetes Awareness

    7. Safety Data Sheets

    8. Slips, Trips and Falls

    9. Bullying Recognition & Response

    10. Sexual Harassment: Staff to Staff

    11. Youth Suicide: Awareness, Prevention and Postvention

    12. Bloodborne Pathogen Exposure Prevention

    13. Professional Development - My Learning Plan

    14. Workplace Injury Prevention

All trainings have scheduled due dates by October 15th.

    iii. Traffic, bicycle and pedestrian safety

        1. Students and families are required to sign off on school handbooks which provides the guidance for traffic, bicycle, and pedestrian safety by building.

    iv. FEMA training for civil defense

        1. All staff are required to complete the ISO 100 training.

        2. All administrative staff are required to complete the ISO 100, 200, and 700 training.

## 14. Timely Safe School Reporting to Law Enforcement

a. District and building level procedures to assure timely safe schools reporting to law enforcement the N.H. Department. of Education and the School Board as required under RSA 193-D:4.

b. Whenever the Superintendent delegates tasks relating to the above to other District personnel, that delegation should be recorded in a manner readily accessible to others in the instance of the Superintendent's absence or departure.

c. Any public or private school employee who has witnessed or who has information from the victim of an act of theft, destruction, or violence in a safe school zone shall report such act in writing immediately to a supervisor.

d. A supervisor receiving such a report shall immediately forward such information to the school principal who shall file it with the local law enforcement authority. Such a report shall be made by the principal to the local law enforcement authority immediately, by telephone or otherwise, and shall be followed within 48 hours by a report in writing.

e. If the alleged victim is a student, the principal shall also immediately notify the person responsible for the victim's welfare as defined in RSA 169-C:3, XXII, that a report was made to the local law enforcement authority.

f.  Students, kindergarten through grade 12 should be referred to the District's discipline policy (JICD) for appropriate measures.

g.  All assaults committed against school employees, volunteers, and visitors, shall be reported to the department of education for data collection and examination.

h.  Windham School District shall provide an annual incident report to their local school boards. The report shall include all incidents of violence involving students, employees, volunteers, or visitors.

i.  Each Principal shall be responsible for the supervision and implementation of components of the safety programs in his/her school, inclusive of school busses, school grounds (including playgrounds), during authorized school activities (such as field trips), within school building(s) (including classrooms and laboratories), off school grounds during school sanctioned activities (including, but not limited to, work-based learning and internships), and in the use of online resources.