DISTRICT-WIDE SCHOOL SAFETY PLAN

Mechanicville City School District 2024-2025 School Year

Adopted by BOE:

Public Comment Period/posted on District website beginning June 6, 2024

Reviewed by DWSST: June 3, 2024

Safety Team Appointed by BOE: June 6, 2024

TABLE OF CONTENTS

Introduction	Page 1
 Section I: General Considerations and Planning Guidelines Purpose Identification of Chief Emergency Officer Identification of School Teams Concept of Operations Plan Review and Public Comment 	Pages 1-3
 Section II: General Emergency Response Planning Identification of Potential Emergency Sites Response Plan Options District Resources District Resource Coordination Annual Multi-Hazard Training Annual Drills and Exercises 	Pages 3-5
 Section III: Responding to Threats and Acts of Violence Responding to Threats of Violence Responding to Acts of Violence and Zero-Tolerance Law Enforcement Involvement Identification of Appropriate Responses 	Pages 5-6
Section IV: Communication with Others Obtaining Local Emergency Assistance Obtaining County and State Emergency Assistance Educational Agencies within District Boundaries NYS/BOCES Communication Flow Chart ICS Communication	age 7
 Section V: Prevention and Intervention Strategies Building Security Early Detection Prevention/Intervention Strategies Student Programs Job Duties (hall monitors and security) 	Pages 7-8
Section VI: Recovery Appendix A: District Buildings, Contacts and Phone Numbers Appendix B: Saratoga County Sheriff's SRO Contract Appendix C: Potential Hazardous Sites Appendix D: Communicable Disease Plan Appendix E: Remote Instruction Plan Appendix F: Cybersecurity Incident Response Plan	Pages 10-11 Page 12 Page 13 Page 14 Page 15 Page 33-36 Page 37

Introduction

Emergencies and violent incidents in school districts are critical issues that must be addressed in an expeditious and effective manner. Districts are required to develop a district-wide school safety plan (district plan) designed to prevent or minimize the effects of serious violent incidents, declared state disaster emergencies involving a communicable disease or local public health emergency declaration and other emergencies and to facilitate the coordination of the district with local and county resources in the event of such incidents or emergencies. The district plan is responsive to the needs of all schools within the district and is consistent with the more detailed emergency response plans required at the school building level. Districts stand at risk from a wide variety of acts of violence, natural, and manmade disasters. To address these threats, the State of New York has enacted the Safe Schools against Violence in Education (SAVE) law. Project SAVE is a comprehensive planning effort that addresses prevention, response, and recovery with respect to a variety of emergencies in each school district and its schools.

The Mechanicville City School District supports the SAVE Legislation and intends to facilitate the planning process. The Superintendent of Schools encourages and advocates on-going district-wide cooperation and support of Project SAVE.

Section I: General Considerations and Planning Guidelines

Purpose

The Mechanicville City School District's district plan was developed pursuant to Commissioner's Regulation 155.17. At the direction of the Mechanicville City School District Board of Education, the Superintendent of the Mechanicville City School District appointed a district-wide school safety team and charged it with the development and maintenance of the district plan.

<u>Identification of Chief Emergency Officer</u>

The Mechanicville City School District designates the Business Manager, Colleen DiCaprio, whose duties shall include, but not be limited to:

- Coordination of the communication between school staff, law enforcement, and other first responders;
- Lead the efforts of the district-wide school safety team in the completion and yearly update by September 1st, of the district plan and the coordination of the district plan with the building-level emergency response plan (building plan);
- Ensure staff understanding of the district—wide school safety plan;
- Ensure the completion of the building plans for each school building and yearly update by September 1st;
- Assist in the selection of security related technology and development of policies for the use of such technology;
- Coordinate appropriate safety, security, and emergency training for district and school staff, including annual required training in the emergency response plan by September 15th; and

• Ensure the conduct of required evacuation and lock-down drills in all district buildings as required by Education Law section 807.

Contact Information

Name: Colleen DiCaprio Phone: (518) 664-5727 x1100

Email: cdicaprio@mechanicville.org

Address: 25 Kniskern Avenue, Mechanicville, NY 12118

<u>Identification of School Teams</u>

The Mechanicville City School District has created a district-wide school safety team appointed by the board of education consisting of, but not limited to, representatives of the school board, teacher, administrator, and parent organizations, school safety personnel and other school personnel, including bus drivers and monitors. The members of the team by title are as follows:

Superintendent
Business Manager
Elementary School Principal
Elementary School Teachers (2)
Junior/Senior High School Principal
Middle School Teacher
High School Teacher
School Board Member
(Chair) BOE Member
School Resource Officer
BOCES Safety Specialist
Transportation Supervisor
Buildings and Grounds Supervisor

Concept of Operations

The district plan is directly linked to the individual building plans for each school building. Protocols reflected in the district plan guide the development and implementation of the individual building plans.

In the event of an emergency or violent incident, the initial response to all emergencies at an individual building is by the building-level emergency response team. Upon the activation of the building-level emergency response team, the Superintendent of Schools or their designee is notified and, where appropriate, local emergency officials are notified. Efforts may be supplemented by County and State resources through existing protocols.

Plan review and public comment

This plan shall be reviewed and maintained by the Mechanicville City School District district-wide school safety team and reviewed on an annual basis on or before September 1st of each year. This plan is posted to the district's webpage.

Pursuant to Commissioner's Regulation 155.17 (e) (3), this plan was made available for public comment 30 days prior to its adoption. The district plan is adopted by the Board of Education after one public hearing that provides for the participation of school personnel, parents, students and any other interested parties.

While linked to the district plan, the building plan shall be confidential and shall not be subject to disclosure under Article 6 of the Public Officers Law or any other provision of law, in accordance with Education Law Section 2801-a. The building plan shall be kept confidential and shall not be disclosed except to authorized department or school staff and law enforcement officers.

The district plan and any amendments are submitted to the New York State Education Department within 30 days of adoption by posting this public plan on the district's website. The building plan is supplied to law enforcement agencies in Saratoga County and the NYS State Police within 30 days of adoption.

Section II: General Emergency Response Planning

The district plan provides the framework for the building plan. The purpose of a uniform plan is to ensure district-wide continuity for emergency responses. These general emergency responses are used to assist school employees, students, parents and emergency responders learn one system that can be used in the Mechanic ville City School District.

Identification of sites of potential emergency, including:

- The district-wide school safety team in conjunction with local officials has identified areas
 outside of school property that may impact a district facility during an emergency. Factors that
 were considered included population, presence of hazardous materials, and potential for
 emergency based on national trends and proximity to district property.
- A list of areas has been identified as having the potential to impact within the district. This list has been created for reference and awareness. The list is not all-inclusive for every emergency. However, these areas have been identified as having the most probable impact on district facilities or district boundaries should they have or create an emergency. A list of potential community-based hazards or emergency situations has been noted in the building plan.
- The district- wide school safety team has recognized that there are many factors that could
 cause an emergency within our school building. There are also factors that need to be
 considered when responding to an emergency. A list of potential internal and external hazards or
 emergency situations has been noted in the building plans.

The district has developed multi-hazard response guides. These guidelines are located in the building plan and are in Incident Command System (ICS) format. Plans for taking the following actions in response to an emergency where appropriate include, but are not limited to:

- Initial Actions
- Command Post Location (primary and secondary)
- Shelter in Place: Used to shelter students/staff inside the school
- Severe Weather

- Bomb Threat
- HazMat Incident
- Hold-In Place: Limits student/staff movement while dealing with short term emergencies
- **Evacuation**: Used to evacuate students/staff from the school
- Before, during and after school hours, including security during evacuation and evacuation routes
- Evacuation/Relocation Sites (internal and external)
- **Lockout**: Used to secure school buildings and grounds during incidents that pose an imminent concern outside of the school
- **Lockdown**: Used to secure school buildings and grounds during incidents that pose an immediate threat of violence in or around the school.
- School Cancellation
- Early Dismissal

Emergencies include, but are not limited to:

Air Pollution	Earthquake	Heating System Failure	Natural Gas Leak
Anthrax/Biological	Elec. System Failure	Hostage Situation	Radiological
Aviation Crash	Energy Supply Loss	Intruder Situation	Roof Leak/Failure
Bldg. Structural Failure	Epidemic	Loss of Building	School Bus Accident
Bomb Threat	Explosion	Loss of Buses	Severe Weather
Civil Disturbance	Fire Alarm Evacuation	Mass Casualty	Threats of Violence
Crimes Against People	Flood	Medical Emergency	Water Emergency

The district has identified various district resources that may be available for use during an emergency, including the identification of personnel, equipment and shelters.

Using ICS the district has identified the school officials authorized to make decisions during an emergency. Through ICS, the procedures to coordinate the use of school district resources and manpower during emergencies, including the identification of the officials authorized to make decisions and of the staff members assigned to provide assistance during emergencies are clearly defined. ICS also identifies the staff members and their backups assigned to provide assistance during emergencies.

The district has policies and procedures for annual multi-hazard school safety training for staff and students, including strategies for implementing training related to multi-hazards. By October 1 of each school year, the superintendent provides written information to all students and staff about emergency procedures. All staff receive annual training by September 15th on the building plan which includes components on violence prevention and mental health. New employees hired after the start of the school year receive this training within 30 days of hire or as part of the district's existing new hire

training program, whichever is sooner. The district certifies that this training is completed by October 1st every year in the New York State Education Department (NYSED) Basic Education Data System (BEDS).

The following procedures, which have been established to provide this training on an annual basis, include but are not limited to: early dismissal/go home drill, shelter-in place, hold-in-place, evacuation/fire drills, lockout, lockdown, table top exercises and Incident Command System training.

The district conducts drills and other training exercises to test components of the emergency response plan, including the use of tabletop exercises, in coordination with local, county, and state emergency responders and preparedness officials. A debriefing concludes each test to determine if changes to the plan are necessary.

Fire and Emergency Drills

The school district, at least once every school year, and where possible in cooperation with local county emergency preparedness plan officials, conducts one test of its emergency response procedures under its building plan, including sheltering, lock-down, or early dismissal, at a time not to occur more than 15 minutes earlier than the normal dismissal time.

The Education Law §§ 807(1-a), 807 (b): Fire and Emergency Drills July 2016 amendments expanded fire drill requirements to also include emergency drills to prepare students to be able to respond appropriately in the event of a sudden emergency. The statute now requires twelve drills be conducted each school year, four of which must be lock-down drills. The remaining eight are required to be evacuation drills. There is still a requirement that eight of the required twelve drills must be completed in the first half of the school year (September 1 to December 31st).

The statute explicitly requires schools to conduct lock-down drills, which are essential, because they prepare students and staff to respond to the highest level of threat with the most urgent action and the least margin for error. The goal is to have schools conduct drills where they immediately clear hallways, lock doors and take positions out of sight to practice their ability to put the building into a protective posture as quickly as possible. These emergency measures allow time for responding law enforcement to arrive on scene and neutralize the threat. If possible, law enforcement should be involved in the drills to help prepare students and staff for their interactions and release from lock-down by uniformed officers. However, law enforcement involvement is not required by the new legislative mandate. Other protective actions such as lock-out or shelter in place are emergency actions that are usually preceded by some degree of warning time and do not require the immediate response necessary for a lock-down. While the school should be well versed in their lock-out and shelter in place protocols, lock-down is the only type of protective action that is specifically required by the statute.

Section III: Responding to Threats and Acts of Violence

The Mechanicville City School District has adopted and implemented a Workplace Violence Prevention program in alignment with the expansion of Section 27-b of Labor Law to elementary and secondary public education facilities that was signed into law in September 2023. As such, the district has adopted a workplace violence policy statement, conducted a workplace risk evaluation, developed a written plan, training program and incident reporting process. The Workplace Violence Prevention program is intended to protect district employees.

Beyond the scope of the Workplace Violence Prevention program, the district refers to its Crisis Intervention Plan via the post-incident response team and the Multi-Hazard Emergency Response Guides located in the building plan. These are reviewed by the district-wide school safety team to ensure content and consistency throughout the district. These policies and procedures

are for responding to implied or direct threats of violence by students, teachers, other school personnel including bus drivers and monitors, and visitors to the school, including threats by students against themselves, which includes suicide. The following types of procedures are addressed in the plan:

- Informing the Superintendent or designee of implied or direct threats.
- Determining the level of threat with the Superintendent and building-level emergency response team members.
- Contacting appropriate law enforcement agency, if necessary.
- Monitoring the situation, adjusting the district's responses as appropriate to include possible implementation of the building-level emergency response team.
- Communication with parent/guardian. When a student implies or specifically threatens self-inflicted violence including suicide, the principal of the school in which the student attends directly contacts the respective parents/guardians.

The Multi-Hazard Emergency Response Guides in the building plan provide guidance on the district's policies and procedures for responding to direct acts of violence (i.e., Crimes Against Persons, Hostage Taking, Intruder and Kidnapping) by students, teachers, other school personnel including bus drivers and monitors, and visitors to the school, including consideration of zero-tolerance policies for school violence. The following types of procedures are addressed in the plan:

- Inform the Superintendent/designee
- Determine the level of threat with the superintendent/designee and the building-level emergency response team.
- If the situation warrants, isolate the immediate area.
- Monitor the situation; adjust the level of response as appropriate; if necessary, initiate lockdown, evacuation, sheltering and/or early dismissal procedures as needed, if needed.
- Contact appropriate law enforcement agency.

NOTE: The Mechanicville City School District's "Code of Conduct" describes policies and procedures for responding to acts of violence by students, teachers, other school personnel and visitors to the school.

Response protocols are identified in the building plan in the ICS format along with definitions of ICS roles and responsibilities. The Multi-Hazard Emergency Response Guides address specific procedures for responding to bomb threat, intruders, hostage takings and kidnapping.

The following protocols for appropriate responses to emergencies are provided as examples of responses to bomb threats, hostage takings, intrusions and kidnappings:

- Identification of decision-makers.
- Plans to safeguard students and staff.
- Procedures to provide transportation, if necessary.
- Procedures to notify parents.
- Procedures to notify the media.
- Debriefing procedures.

The district has established policies and procedures to contact parents, guardians or persons in parental relation to the students in the event of a violent incident or an early dismissal. In the Mechanicville City School District, the following communication methods are used:

- A "ParentSquare" mass notification feature in its phone system, which automatically sends one
 message out to all staff and persons in parental relations, which would inform them of the event.
- A "ParentSquare" mass notification feature in its e-mail system that would send one message out to all staff and persons in parental relations.

Section IV: Communication with Others

The Mechanicville City School District is fortunate to have substantial ties to the community of Mechanicville and Saratoga County. If there were an emergency within our facility, we would call 911 for emergency assistance. If involvement is needed from other local government agencies, the Superintendent or designee would act as the contact person. Additional procedures for communications can be found in the building plan including local emergency contacts and phone numbers, and the NYS/BOCES Communication Flow Chart. These contacts provide guidance for obtaining assistance during emergencies from emergency services organizations and local government.

Arrangements for obtaining advice and assistance from emergency organizations and local government officials, including the county or city officials responsible for implementation of Article 2-B of the Executive Law, are noted in the NYS/BOCES Communication Flow Chart.

If there is a disaster within the district that has the potential to impact other educational agencies within the district boundaries, the Chief Emergency Officer activates the above-referenced phone and/or e-mail mass notification system.

Along with the above-noted notification procedures, the district also maintains the following information about each educational agency in the confidential building plan:

- School population
- Number of staff
- Transportation needs
- Business and home telephone numbers of key officials of each such educational agency

Section V: Prevention and Intervention Strategies

The district has developed policies and procedures related to school building security, including the use of a school resource officer, and security devices and procedures.

Pursuant to Alyssa's Law, the district has installed within the schools and administrative building silent panic alarms that directly alert authorities during emergencies.

The district has a contract with the Saratoga County Sheriff's Office to employ a School Resource Officer (SRO). The contract is attached as Appendix B.

The Mechanicville City School District has implemented procedures for the dissemination of informative materials regarding the early detection of potentially violent behaviors, including, but not limited to: the identification of family, community and environmental factors to teachers, administrators, school personnel including bus drivers and monitors, persons in parental relation to students of the district, students and other persons deemed appropriate to receive such information.

Appropriate prevention and intervention strategies, such as:

- Collaborative arrangements with State and local law enforcement officials, designed to ensure that school safety officers and other security personnel are adequately trained, including being trained to de-escalate potentially violent situations, and are effectively and fairly recruited;
- Nonviolent conflict resolution training programs;
- Peer mediation programs and youth courts; and
- Extended day and other school safety programs;

The district has created and supported strategies for improving communication among students and between students and staff and reporting of potentially violent incidents, such as the establishment of youth-run programs, peer mediation, conflict resolution, creating a forum or designating a mentor for students concerned with bullying or violence and establishing anonymous reporting mechanisms for school violence.

The Elementary School has established the following program:

- No Place for Hate (Anti-Defamation League)
- Second Step Programming
- P2 (Positivity Project)

The Junior/Senior High School has established the following initiatives to help students make better choices in conflict resolution and to alleviate bullying:

- P2 (Positivity Project)
- No Place for Hate (Anti-Defamation League)
- Mediation
- Restorative Justice
- An informal format for conflict resolution that involves social workers, school counselors, teachers and administrators
- Anonymous reporting of school violence and bullying by students to social workers, guidance counselors, teachers, and the principal

The Mechanicville City School District has created descriptions of duties of hall monitors and any other school safety personnel, the training required of all personnel acting in a school and the hiring and screening process for all personnel acting in a school security capacity.

The Mechanicville City School District does employ hall monitors and a school resource officer. In accordance with Project SAVE, after July 1, 2001, all new full and part-time employees are finger-printed and have background checks completed.

Section VI: Recovery

Recovery addresses the help needed for all involved to heal and to restore the school community to "normal" operations. The District Plan supports the school building plan by deploying district resources that support the school's building-level emergency response team and the post-incident response team.

Recovery plans include mental health/emotional recovery, academic, physical and business recovery, and can continue long after the actual emergency.

<u>District Support for the Mechanicville City School</u> District

The building plan provides resources for supporting the building-level emergency response team and post-incident response team. The district's ICS identifies back-ups to relieve team members. This provides team members the opportunity to rotate personnel, to fill in if assigned personnel are unavailable and to debrief in a supportive environment.

The district realizes that some emergencies may overwhelm an individual school's ability to manage an extreme crisis. If/when the school is faced with an emergency such as threats of violence or actual violent incidents, the district-wide school safety team assists as follows:

- Acting as a sounding board regarding the implied or direct threats and/or violent acts.
- Assisting in determining the level of threat and appropriate response.
- Monitoring the situation and adjusting the district's response as appropriate.
- Assisting with parent/guardian, faculty/staff, and media communication.
- Assisting with coordinating building and grounds security in conjunction with local and State Police.
- Assisting with offering a backup post-incident response team (i.e., another school district's team and/or an outside group) as needed, if needed.
- Offering debriefing sessions as needed working in conjunction with local Mechanicville City,
 Saratoga County, and/or State emergency responders.

Disaster Mental Health Services

If/when a building-level emergency response team or post-incident response team is faced with an emergency that may overwhelm the school's ability to manage an extreme crisis, the district-wide school safety team assists as follows:

- Activating the district-wide post-incident response team.
- Offering district support and looking for continued feedback from those directly impacted during the incident, with projected plans to assist if needed during heightened stressful times such as a re-occurrence of a similar event and anniversaries of the original event.
- Assisting with parent/guardian, student, and faculty/staff debriefing and/or post-incident crisis intervention. The debriefing is also used in part to evaluate the district's plan for possible revisions. If needed, assisting in contacting additional outside mental health resources such as the National Organization for Victim Assistance (1-800-try-nova; www.try-nova.org).
- Assisting the schools with written statements going out to faculty/staff, parents/guardians, press releases and media requests through the district's Superintendent's office.

The district supports the recovery phase and reevaluates current multi-hazard and violence prevention practices and school safety activities.

Section VII: Communicable Disease

On September 7, 2020, Governor Cuomo signed into law Chapter 168 of the Laws of 2020 that requires public employers, including public school districts, to adopt a continuation of operations plan in the event that the Governor declares a state disaster emergency involving a communicable disease. The legislation (amended subdivision 2 of section 2801-a of New York Education Law to require that District Safety Plans include protocols for responding to a declared state disaster emergency involving a communicable disease that are "substantially consistent" with the provisions of section 27-c of the Labor Law. The operations plan includes, but is not limited to:

- A. A list and description of the types of positions considered essential in the event of a State-ordered reduction of in-person workforce. For this purpose, essential is defined as required to be physically present at a work site to perform his or her job. Such designation may be changed at any time at the sole discretion of the employer.
- B. A description of protocols the employer will follow in order for nonessential employees to telecommute.
- C. A description of how the employer will, to the extent possible, stagger work shifts of essential employees to reduce overcrowding on public transportation and at worksites.
- D. Protocols the employer will implement to procure personal protective equipment (PPE) A plan for storage of equipment and access to equipment must be included.
- E. Protocols in the event an employee is exposed to a known case of the disease, exhibits symptoms of the disease, or tests positive for the disease to prevent the spread or contraction in the workplace.
- F. Protocols for documenting hours and work locations, including off-site visits, for essential employees. The protocol shall be designed only to aid in tracking of the disease and to identify exposed employees and contractors to facilitate the provision of any benefits which may be available.
- G. Protocols for working with the employer's locality to identify sites for emergency housing for essential employees to further contain the spread of the communicable disease to the extent applicable to the needs of the workplace.
- H. Protocols for implementing any other requirements determined by the Department of Health such as contact tracing or testing, social distancing, hand hygiene and disinfectant, or mask wearing.

The Communicable Disease – Pandemic Continuity of Operations Plan can be found in Appendix D.

Section VIII: Remote Instruction

Beginning with the 2023-2024 school year, all public schools, boards of cooperative educational services (BOCES), and county vocational education and extension boards must include plans for remote instruction. The emergency remote instruction plan details how a school or district will provide education to students during times of closure due to an emergency.

The Mechanicville City School District Emergency Remote Instruction Plan describes the ways in which continued education will be provided through the availability of devices, internet access, provision of special education and related services for students and students with disabilities, as well as the expectations for the length of time spent in remote learning situations.

The remote instruction plan will be reviewed annually by district and building-level emergency response teams, adopted annually by the Board of Education, and submitted to the New York State Education Department.

The Remote Instruction Plan is attached as **Appendix E.**

APPENDIX A District Buildings, Contacts and Phone Numbers

The address for the three main buildings (Junior/Senior High School, the Elementary School) is 25 Kniskern Avenue, Mechanicville, NY 12118. The address for the Bus Garage is 10 Industrial Drive, Mechanicville, NY 12118.

Building	Title	Name	Contact Number
District Office – Junior/Senior High School	Superintendent	Kevin Kolakowski	518-664-5727 Ext. 1103
Elementary School	Principal	Don Dieckmann	518-664-7336 Ext. 2116
Junior/Senior High School	Principal	Michael Mitchell	518-664-9888 Ext. 2418
Bus Garage	Transportation Supervisor	Michael Pratt	518-664-9881

Appendix B

Saratoga County Sheriff's Office School Resource Officer Contract

SROContract.November 2023.pdf

https://drive.google.com/file/d/1pivRrUBLJjzZ8QIoQWTP0j4TDKI5sikg/view?usp=sharing

APPENDIX C Potential Hazardous Sites

COMMUNITY BASED LIST: A list of areas has been identified as having the potential to impact within the district. This list was created for reference and awareness. It is not all-inclusive for every emergency. However, these areas have been identified as having the most probable impact on district facilities or district boundaries should they have or create an emergency. A list of potential community-based hazards or emergency situations has been noted in the building plan.

SCHOOL BASED LIST: The district team has recognized that there are many factors that could cause an emergency within our school building. There are also factors that need to be considered when responding to an emergency. A list of potential internal and external hazards or emergency situations has been noted in the building plan.

Appendix D: COMMUNICABLE DISEASE PLAN

Communicable Disease - Pandemic Continuity of Operations Plan

This Continuity of Operations Plan (plan) has been developed to meet the requirements of subsection (2)(m) of Education Law §2801-a which requires public employers to prepare a plan for the continuation of operations in the event that the Governor declares a public health emergency involving a communicable disease. This plan is built upon the components of the District-Wide School Safety and the Building-Level Emergency Response Plan(s). The Plan includes elements of COVID-19 Reopening Plan and will be updated regularly to reflect current guidance and best practices. The District-Wide School Safety Team assumes responsibility for development and compliance with all provisions of this plan and implementation at the building level through the Building-Level Emergency Response Team.

The Mechanicville City School District will work closely with the Saratoga County Department of Health to determine the need for activation of this plan. The district will report suspected and confirmed cases of communicable diseases (e.g., influenza, coronavirus, etc.) on the monthly Communicable Disease Report, (DMS-485.7/93; HE-112.4/81) and submit it to the local health department. Depending on the severity of the disease, the district may be required to report information more frequently and in another format (i.e., daily for COVID-19).

The local health department will monitor county-wide communicable disease cases and inform school districts as to appropriate actions.

When this plan is activated, the District-Wide School Safety Team may invite additional people to the meetings to aid in the planning efforts:

- · District Medical Director
- School nurse(s)
- · Technology Director
- Business Official/ Human Resources
- Facility Director
- Food Service Director
- · Transportation Supervisor
- · Public Information Officer
- · Curriculum Director

Communication with parents, students, staff, and the school community is important throughout a pandemic outbreak. Communication methods will include postings to the district website, general mailings, email, social media, school communication apps, and the public media. The Superintendent's

Office has been designated to coordinate this effort and will work closely with the Assistant Superintendent for STEAM and Innovation to ensure proper function of all communication systems.

Essential Positions/Titles

The district has developed this plan to prepare for any future government ordered shutdowns that may occur, similar to the coronavirus shutdown in the spring of 2020. Attachment 1 includes a list of essential positions that would be required to be on-site or in district to continue to function as opposed to those positions that could work remotely. The list includes:

- Title a list of positions/titles considered essential (i.e., could not work remotely) in the event of a state-ordered reduction of in-person workforce.
- · Description brief description of job function.
- Justification brief description of critical responsibilities that could not be provided remotely.
- · Work Shift brief description of how work shifts of essential employees and/or contractors will be staggered in order to reduce overcrowding in the district.
- · Protocol how precise hours and work locations, including off-site visits, will be documented for essential employees and contractors.

Working/Learning Remotely

The District will assess devices and technology needs of all non-essential employees and contractors in order to enable telecommuting.

Options for assessing district needs include stakeholder meetings or surveys to determine:

- · Who will need devices and/or peripherals at home,
- · What programs will need to be added to these devices, and
- The availability of viable existing at-home Internet service.

The information from these surveys will be used to determine what items need to be purchased, which programs need to be installed on devices and if appropriate Internet bandwidth can be provided to those in need

Reducing Risk

Depending on the exact nature of the communicable disease and its impact, the district is prepared to use the strategies below to reduce traffic congestion and maintain social distancing:

Limiting building occupancy to 25%, 50% or 75% of capacity or the maximum allowable by state or local guidance.

- · Forming employee work shift cohorts to limit potential contacts.
- · Limit employee travel within the building and/or between buildings.
- · Limit restroom usage to specific work areas.
- Stagger arrival and dismissal times.
- · Alternate work-days or work weeks.
- · Implement a four-day work week.
- · Limit or eliminate visitors to the building.

The district may need to include additional strategies based on updated federal, state, and local guidance.

Personal Protective Equipment (PPE) and Face Coverings

The district will procure a six-month supply of face coverings and PPE required for essential work tasks. Disposable PPE will be provided in quantities of at least two pieces per work day.

PPE Type	Task/Role
N-95	Nurses/Nurses' Aides
	Cleaners/Custodians (based on disinfectants used)
Face Shields	Nurses/Nurses' Aides
Tase sinicias	Special Education
Cowns	Nurses/Nurses' Aides
Gowns	Special Education
Gloves	Nurses/Nurses' Aides
dioves	Special Education
	Cleaners/Custodians
	Maintenance/Mechanics
Cloth Face Coverings*	All faculty, staff and students

* OSHA does not consider cloth face coverings to be personal protective equipment because their capability to protect the wearer is unknown. However, cloth face coverings are important as a source control for COVID-19 and provides some protection to the wearer. As such, OSHA strongly encourages workers to wear face coverings.

Those individuals that are required to wear N-95 respirators will be fit-tested and medically screened prior to use to ensure they are physically able to do so.

The use of cloth face coverings to reduce the spread of communicable diseases is important to the health and safety of faculty, staff and students. Cloth face coverings are meant to protect other people in case the wearer is unknowingly infected (asymptomatic) and are essential when physical distancing is difficult. Information will be provided to faculty, staff and students on proper use, removal, and cleaning of cloth face coverings. All faculty, staff and students will be encouraged to utilize their own personal face coverings but the district will secure and provide face coverings as needed.

PPE and face coverings will be stored in a manner which will prevent degradation. These supplies will be monitored to ensure integrity and track usage rates.

Continuity of Operations

Continuity of operations could be severely impacted by a loss of staff. The table below describes the procedures for maintaining essential functions and services by planning for backup personnel.

Role/Topic	Task	Backups
Overall Operations	Have decision-making authority for the district.	Those listed below are assigned to this role: Superintendent
	Make district policies and procedures to reflect crisis response.	Business Official Director of Facilities

Business Office	Maintain overall function and facilities operation. Review essential functions and responsibilities of back-up personnel. Monitor utilization of supplies, equipment, contracts, and provided services and adjust as necessary	Purchasing Purchasing Agent Payroll District Treasurer Accounts Payable Senior Typist
Facilities	Keep the Business Office informed of staffing issues and of the point at which buildings can no longer be maintained	Buildings and Grounds Supervisor
	Provided building administrators with procedures for maintaining essential building functions (e.g., HVAC system operation, alarms, security, etc.) along with a list of telephone numbers of outside companies and alternates for repair and maintenance of these systems	
	Meet with staff and monitor their ability to maintain essential function	

Human Resources	Resources appropriate delegation of authority Work with bargaining units to develop	Recruitment/Staffing ·Business Manager		
	the plan for emergency use of personnel in non-traditional functions and changes	Workplace Safety		
	in the normal work-day such as alternate or reduced work hours, working from home, etc.	·Superintendent/Business Manager		
		Training		
		·Business Manager		
		Labor Law Compliance		
		·Business Manager		
		Compensation Planning		
		· Business Manager		
Continuity of	Implemented in the event of significant abs	sences or school closure.		
Instruction	Alternate learning strategies will include:			
	· Hard copy, self-directed lessons			
	· Use of mobile media storage devices for lessons (CDs, Jump Drives, IPads)			
	On-line instruction; on-line resources; on-line textbooks			
	Communication modalities for assignment postings and follow-utelephone; Postal Service; cell phone, cell phone mail, text messages; e-maautomated notification systems; website postings			

Response

The District-Wide School Safety Team will meet to determine the need for activation of a pandemic response based on internal monitoring and correspondence with the local health department and other experts.

- · The Incident Command Structure at both the District and Building level will be informed that the response effort has been enacted. These individuals will meet to discuss the plan's activation and review responsibilities and communication procedures.
- · Communications will work closely with the Informational Technology Department to re-test all communication systems to ensure proper function. The District-wide School Safety Team and Building-Level Emergency Response Teams will assist in this effort.

- An alert will be sent to the school community upon activation of this plan. The communication will be based on the latest information from federal, state and local health authorities.
- · If the decision is made to close a school building, the district will notify the NYS Education Department and District Superintendent.

The district will assign a communicable disease safety coordinator for the district, whose responsibilities include continuous compliance with all aspects of the district's reopening plan and any phased-in reopening activities necessary to allow for operational issues to be resolved before activities return to normal or "new normal" levels. The coordinators shall be the main contact upon the identification of positive communicable disease cases and are responsible for subsequent communication. Coordinators shall be responsible for answering questions from students, faculty, staff, and parents or legal guardians of students regarding the public health emergency and plans implemented by the school.

Hand Hygiene

Faculty, staff, and students will be trained on proper hand hygiene. Information will be provided to parents and/or legal guardians on ways to reinforce hand hygiene at home. The district will provide stations around the school buildings:

- o For hand washing: soap, running water, and disposable paper towels.
- For hand sanitizing: an alcohol-based hand sanitizer containing at least 60% alcohol for areas where hand washing facilities may not be available or practical.
- o Accommodations for students who cannot use hand sanitizer will be made.

Communicable Disease Exposures

The district must be prepared for communicable disease outbreaks in their local communities and for individual exposure events to occur in their facilities, regardless of the level of community transmission. The Centers for Disease Control and Prevention (CDC) and New York State Department of Health (NYSDOH) have provided recommendations for strategies to follow after an exposure:

- · Close off areas used by a sick person and not using these areas until after cleaning and disinfection has occurred;
- · Open outside doors and windows to increase air circulation in the area.
- · Wait at least 24 hours before cleaning and disinfection. If waiting 24 hours is not feasible, wait as long as possible;
- · Clean and disinfect all areas used by the person suspected or confirmed to have a communicable disease, such as offices, classrooms, bathrooms, lockers, and common areas.
- · Once the area has been appropriately cleaned and disinfected it can be reopened for use.

- · Individuals without close or proximate contact with the person suspected or confirmed to have a communicable disease can return to the area and resume school activities immediately after cleaning and disinfection.
- · If more than seven days have passed since the person who is suspected or confirmed to have a communicable disease visited or used the facility, additional cleaning or disinfection is not necessary, but routine cleaning and disinfection should continue.

Contact Tracing

The district will notify the state and local health department immediately upon being informed of any positive communicable disease diagnostic test result by an individual within school facilities or on school grounds, including students, faculty, staff, and visitors of the district.

Districts may assist with contact tracing by:

- Keeping accurate attendance records of students and staff members
- · Ensuring student schedules are up to date
- · Keeping a log of any visitor which includes date and time, and where in the school they visited
- Assisting the local health departments in tracing all contacts of the individual in accordance with the protocol, training, and tools provided through the NYS Contact Tracing Program

The district, in consultation with the local health department, will determine what process will be followed when communicable disease cases are discovered in the school (e.g., how many individuals will be guarantined, closing of areas or classrooms, etc.).

Confidentiality must be maintained as required by federal and state laws and regulations. School staff should not try to determine who is to be excluded from school based on contact without guidance and direction from the local health department.

Returning after Illness

The district has established protocols and procedures, in consultation with the local health department(s), about the requirements for determining when individuals, particularly students, who screened positive for communicable disease symptoms can return to the in-person learning environment at school. This protocol includes:

- · Documentation from a health care provider following evaluation
- · Negative COVID-19 diagnostic test result
- · Symptom resolution, or if positive for a communicable disease, release from isolation

The district will refer to the NYSDOH's "Pre-K to Gr 12 COVID-19 Toolkit" and other applicable guidance regarding protocols and policies for faculty, staff, and students seeking to return to work after a suspected or confirmed communicable disease case or after the faculty or staff member had close or proximate contact with a person with a communicable disease.

The district requires that individuals who were exposed to a communicable disease complete quarantine and have no symptoms before returning to in-person learning. The discharge of an individual from quarantine and return to school will be conducted in coordination with the local health department.

Cleaning/Disinfecting

The district will ensure adherence to hygiene and cleaning and disinfection requirements as advised by the CDC and NYSDOH, including "Guidance for Cleaning and Disinfection - Public Spaces, Workplaces, Businesses, Schools and Homes" and other guidance, as applicable.

Attachment 2 describes cleaning and disinfection protocols and procedures for the district. Regular cleaning and disinfection of the facilities will occur, including more frequent cleaning and disinfection for high-risk and frequently touched surfaces. This will include desks and cafeteria tables, which will be cleaned and disinfected between each individual's use. Cleaning and disinfection will be rigorous and ongoing and will occur at least daily, or more frequently as needed.

The district will ensure regular cleaning and disinfection of restrooms. Restrooms will be cleaned and disinfected more often depending on frequency of use.

The school district has determined employee policies for available leave in the event of the need of an employee to receive testing, treatment, isolation, or quarantine. These policies are consistent with existing federal, state, or local law, including regarding sick leave or health information privacy.

Housing for Essential Employees

The school district, in coordination with the local health department, will determine when the emergency housing of essential workers is necessary. Essential workers who will be required to use emergency housing will be identified.

Recovery

Re-establishing the normal school curriculum is essential to the recovery process and should occur as soon as possible. The district will

- · Work toward a smooth transition from the existing learning methods to the normal process.
- · Use the described communication methods to keep the school community aware of the transition process.
- · Work closely with the New York State Education Department to revise or amend the school calendar as deemed appropriate.

• Evaluate all building operations for normal function and re-implement appropriate maintenance and cleaning procedures.

Each Building-Level Post-incident Response Team will assess the emotional impact of the crisis on students and staff and make recommendations for appropriate intervention. The District-Wide School Safety Team and Building-Level Emergency Response Teams will meet to de-brief and determine lessons learned with input from *all essential functions*. The District-Wide School Safety Plan and Building-Level Emergency Response Plans will be updated accordingly.

Curriculum activities that may address the crisis will be developed and implemented.

Mechanicville City School District - District-Wide School Safety Plan

Attachment 1 – Essential Positions

Title	Description	Justification	Work Shift	Protocol
Superintendent	Responsible for the planning, operation, supervision and evaluation of the education programs, services, and facilities of the district	Oversees District Day to Day operations	Individual office	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Business Manager	Oversee the day-to-day operational departments of the district. Directs, supervises, and manages all financial management, budget, general accounting, payroll, accounts payable, financial reporting, and grant management activities and practices for the district	Responsible for oversight of business office, school lunch department, buildings & grounds, and transportation departments	8 am – 4 pm Individual office	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper

Other District Office Personnel	Processes purchases for the entire district. Human resource administrative work and Accounts payable Payroll, accounting entries and cash management.	Enters prints and processes all district purchase orders. Assists with human resource paperwork and issues district payment to vendors Processes payroll for all employees of the district. Maintains all district accounting records and is responsible for the day-to-day cash management of district funds.	Work shifts vary Hours are between 7:30AM – 4PM All desks are socially distanced	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
District Clerk/Executive Assistant to Superintendent	Liaison between parents/community and superintendent & BOE			

Mechanicville City School District - District-Wide School Safety Plan

		Oversees district level/state data reporting		When on-site: Sign in sheets will be used to track times entering and leaving
Buildings and Grounds Supervisor · Maintenance & Grounds · Cleaners & Custodians	Oversees buildings and grounds employees. Maintains the functioning of all district building systems (interior and exterior) Cleans, disinfects, and supplies district buildings Removes snow and leaves, maintains lawns, and trims bushes/trees	Daily building walkthroughs to determine if building systems are functioning properly Cleaning/disinfection of buildings	One person will be assigned to each area of a building so there is no overlap	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper

Transportation Supervisor	Oversees all school bus drivers and bus mechanics	Coordinates transportation of students and when applicable delivery of meals, classroom materials and technological devices	7 am – 3 pm	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Food Service Director	Responsible for	Ensures students receive breakfast and lunch each day whether in person or deliveries for remote learners. Food preparation needs to be performed in a DOH permitted facility	·	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Communications	Develops and implements a program of planned and strategic two-way communication. Responsible for information output, press releases and media requests, and social media.	Will come in to assist with various district needs as required.	As deemed necessary	When on-site: · Sign in sheets will be used to track times entering and leaving · Health assessment will be completed electronically or on paper

Technology	Responsible for planning, purchasing, installing and maintaining physical technology systems.	Setup and distribution of technological devices to teachers, student and staff as needed.	As deemed necessary	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Instructional Programs	Responsible for preparing lesson plans and educating students at all levels, assigning homework, grading tests, and documenting progress. Teachers must be able to	Provide lessons to in school and/or virtual students	As deemed necessary Will be socially distanced based on assignments to classrooms	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Security	Provides security for the district's faculty, staff and students	Will come in to assist with various district needs as required Will help with organization of meals and technology that will be distributed to students	As deemed necessary	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper

Nurses	Provides technical assistance regarding health screenings, management of ill persons, isolation areas, and day-to-day school health issues	Aid in the tracking of cases Answer parent and staff health related questions Manage ill students	As deemed necessary	When on-site: · Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Safety Personnel	Provides technical assistance on matters related to compliance with federal, state and local regulations Aids in the development of plans/programs and training	Will come in to assist with various district needs as required	As deemed necessary	When on-site: Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper
Support Staff (Buildings)	Provides support to building principal, teachers, parents Liaison between parents and teachers/principal Assist in communications to parents/community from building	Will come in to assist with various district/building needs as required	Work shifts vary between 7:30AM – 4PM All desks are socially distanced	When on-site: · Sign in sheets will be used to track times entering and leaving Health assessment will be completed electronically or on paper

Attachment 2 –Cleaning and Disinfection Protocols and Procedures

Room Types/Areas	Cleaning Frequency	Disinfection Frequency	Responsible Party	Additional Information
Classrooms	Daily	Daily	Custodial staff; staff and teachers	Doors, desks, chairs, and floors
Restrooms	2x daily	2x daily	Custodial staff	Doors and sinks will be done twice daily. Floors will be done once daily.
Health Offices/Isolation Rooms	Various	Various	Nursing staff; Custodial staff	Cots, bathrooms and health office equipment will be cleaned after each use. Floors will be done once daily.
Breakrooms	Daily	Daily	Custodial staff	Doors, tables, chairs and floors
Cafeterias/Kitchens	Various	Various	Custodial staff; staff and teachers	Tables and chairs will be cleaned/disinfected in between each group's use. Floors will be done once daily.
Outside Seating Areas	Various	Various	Custodial staff; staff and teachers	Tables and chairs will be cleaned/disinfected in between each group's use. Floors will be done once daily.
Computer Labs	Various	Various	Custodial staff; staff and teachers	Equipment to be cleaned/disinfected between each use. Doors, tables, chairs and floors will be done once daily.
Science Labs	Daily	Daily	Custodial staff; staff and teachers	Equipment to be cleaned/disinfected between each use. Doors, tables, chairs and floors will be done once daily.

			I	
Maintenance Office and Work Areas	Daily	Daily	Custodial staff	Doors, desks, chairs, and floors
Bus Garage	Daily	Daily	Custodial staff; Transportation staff	Bathroom, doors, desks, chairs, and floors
Libraries	Daily	Daily	Custodial staff; Librarians	Equipment to be cleaned/disinfected between each use. Doors, tables, chairs and floors will be done once daily.
Playgrounds	N/A	N/A	N/A	These areas are not going to be used. When these areas will be returned to use, then an appropriate frequency for cleaning/disinfection will be established.
School Buses	Daily	Daily	Transportation staff	High contact spots will be cleaned after the morning (AM) runs and cleaned/disinfected after the afternoon (PM) run.
School Vehicles	After each use	After each use	Staff using vehicles	
Administrative Offices	Daily	Daily	Custodial staff	Doors, desks, chairs, and floors
Large Meeting Areas (e.g., gymnasiums, auditoriums, music rooms)	N/A	N/A	N/A	These areas are not going to be used. When these areas will be returned to use, then an appropriate frequency for cleaning/disinfection will be established.
Athletic Training Rooms, Locker Rooms	N/A	N/A	N/A	These areas are not going to be used. When these areas will be returned to use, then an appropriate frequency for cleaning/disinfection will be established.

Mechanicville City School District - District-Wide School Safety Plan

Frequently touched surfaces (e.g., doorknobs, light switches, elevator buttons, copy machine buttons, handles, etc.)	2x daily	2x daily	Custodial staff	
Shared frequently touched surfaces (e.g., keyboards, desks, phones, laptops, tablets, remote controls, etc.)	After each use	After each use	Staff using shared surfaces	
Shared equipment (e.g., hand tools, facilities equipment, groundskeeping equipment, golf cart, etc.)	After each use	After each use	Staff using equipment	

^{*} Only district approved chemicals will be used. At no time will students be allowed to use cleaners or disinfectant

APPENDIX E: EMERGENCY REMOTE INSTRUCTION PLAN

Following the COVID-19 pandemic, school districts in New York are required to have a plan for how children will be educated if a school or schools must close under emergency conditions. These Emergency Remote Instruction Plans (ERIPs) are included as part of the district-wide school safety plan, which is reviewed annually by district and building-level emergency response teams, adopted annually by the Board of Education and submitted to the New York State Education Department.

Communication and Engagement

To help inform our Emergency Remote Instruction Plan, the district completes an annual Student Digital Resources data collection report to better understand the level of access students have to devices (e.g., laptop, Chromebook, cell phone) and the Internet.

The district conducts the survey yearly via website notification, email reminders, and parent square communications. Data is collected via online survey platforms with paper copies being made available as needed. If a response to the survey is not received, parents are notified and administered the survey over the phone to ensure accurate data collection.

The purpose of this survey is to ensure that, to the extent possible, students can access the Internet and receive remote instruction, if necessary, under emergency conditions. This survey is conducted on an annual basis. Students and families may update their access information at any time by contacting the student's school. It is our goal that this plan is aligned with the information provided by families in the Student Digital Resources data collection.

The district has also developed a plan for communicating all necessary information should a school or schools need to close. The district will use existing internal and external communications channels to notify staff, students, and families/caregivers about remote learning schedules with as much advance notice as possible. This communication will include information about how computing devices (e.g., computers, hot spots, etc.) are being disseminated to students and families who need them.

Mechanicville City School District will utilize a variety of channels and methods to communicate schedules and information, to contact schools and teachers during remote learning. The district will utilize electronic and social media platforms such as parent square messages, facebook, school closing network, and email. Robo calls will be utilized to alert parents to check social media and electronic outlets. For students without connectivity, personalized phone calls will be made to provide detailed instructions, information, and next steps. Information will be available in native languages for parents and families. Detailed messages and steps will be provided to communicate with families about the dissemination of

computing devices if needed. Devices will be disseminated alphabetically by grade level and delivery of devices will be available for families that experience transportation barriers.

Device, Internet, and Platform Access

To support remote learning, the district will make computer devices available to all students and families who need them.

Need for computing devices will be assessed based on the Student Digital Resources survey. Survey results are and will be analyzed to determine needs of students which will drive next steps. Devices for those in need will be distributed with set times for distribution based on grade level and last name. If devices are not able to be picked up due to a transportation barrier, devices will be delivered the address on file. Device needs will be consistent with data collected in the student digital resources data collection survey. The district is committed to ensure that all students have access to a computing device. If service or repair is needed on a device, set hours will be established for drop off. The technology ticketing system will be utilized to alert technology of the need for service. At that time the technology department will schedule a time for the device's repair or replacement. If transportation is a barrier the device will be obtained from the address on file and replaced or repaired and returned.

To the extent possible, the district will also support students and families with accessing the internet at home. Where that is not possible, the district will work with community partners to secure Wi-Fi access points for students and families so that they may participate in remote learning. Mechanicville City School District will utilize the Student Digital Resources Survey to determine the need for access to the internet in students' residences. The survey will be utilized to ensure that students have access to the internet. We will work with the Mechanicville Area Community Center and activate the hotspot devices previously purchased and disseminate as needed to ensure all students have connectivity and access to the internet.

There will be those students in our community for whom remote learning through digital technology is not appropriate or possible. For these students, the district will assess each student's individual needs and whether in-person learning is an option. Other methods that will be considered include instruction by phone and/or the delivery of hard-copy materials to the student's home. The Mechanicville City School District administration, Special Education Director, and special education teachers will access and determine students for which remote instruction via a digital platform will not be appropriate. The Special Education Director will communicate with the families and provide them with steps and access to synchronous learning opportunities for these students.

The district will also take steps to ensure that school staff members have the necessary tools, i.e., computing devices and Internet access, to deliver emergency remote instruction from their place of residence. The Mechanicville City School District will ensure teachers have devices and adequate Wi-Fi to deliver remote instruction from home. We will ensure teachers have devices and hotspots if Wi-Fi is not available to ensure timely, reliable, and consistent instruction will be delivered to students.

To ensure high-quality remote learning experiences, the district has standardized the use of a single online learning platform, I.E. Google classroom, and to the extent possible, developed a common, coordinated set of guidelines for teachers to follow when using the platform with students. All assignments, lessons, and links for livestream will be in each teacher specific Google classroom. Parents and students may access Google classroom for all assignments, lessons, notes, and videos. If support is needed, the teacher or helpdesk can be contacted at any time for assistance. For students participating in synchronous instruction, work will be tangible and not in the digital format. Work will be delivered by teaching staff, Special Education Director, Administrators, and/or Teaching Assistants with detailed instructions and explanations necessary for completion.

Teaching and Learning

Our district has developed an emergency remote instruction plan that would support all students. When a remote learning model is necessary, certain groups of students will be prioritized for in-person learning to the greatest extent possible, depending on the nature of the emergency. This includes, but is not limited to, special education students, English language learners, and students with technology or connectivity needs.

Acknowledging that the typical content in each grade level or course may need to be adjusted, content will be prioritized to ensure that students receive instruction for the prioritized learning standards, key understandings, and skills necessary for students' success in future study.

Instruction will focus on "core" subject areas; however, elective courses will continue to be offered in a remote learning environment. All instruction will continue to be aligned to the New York State Learning Standards.

Virtual learning schedules have been developed by grade level. If an emergency requires the district to move to virtual learning, these schedules will be shared with students and families in accordance with the communication strategies outlined earlier in this plan. Students will be given opportunities to engage with teachers and classmates through live instruction, question and answer periods with teachers and group work (i.e., synchronous learning). Teachers will ensure that their students are directly engaged with them and their class peers in experiential learning on a regular basis. Supplementing this time will be self-guided projects, readings and other age-appropriate assignments that can be completed by the students remotely (i.e., asynchronous learning).

The district recognizes that there will be students for whom remote instruction via digital technology is not appropriate. In an emergency, as the district is assessing which students need devices or access to the Internet, the district will also assess which students may require additional support. Depending on the nature of the emergency, this may involve some level of in-person instruction for these students either at a school building within the district or at a community location, as appropriate. These decisions will be made in partnership with local health officials and

emergency personnel, as applicable. Other instructional methods that will be considered include instruction by phone and/or the delivery of hard-copy materials to the student's home.

Support Services

Based on the learning model we have developed, students with disabilities and/or an Individualized Education Plans (IEPs), will continue to receive support services in accordance with their IEP, should remote learning become necessary. It is the expectation that all service providers (e.g., teachers, paraprofessionals, related service providers) will sign-on to the remote learning platform to support students as needed. This will include large classroom settings in the remote learning environment, as well as the use of breakout rooms or one-on-one virtual meetings as necessary. Special Education and related services will be provided in accordance with student's IEPs to ensure the continued provision of Free Appropriate Public Education (FAPE). All services will be provided in a digital environment via teletherapy with related services staff for all IEP related services. If unable to participate via teletherapy sessions, communications will be held via telephone to ensure services are delivered. Special education services will be provided remotely via Google classroom just as if the student was in-person. The same schedule and grouping of students will be followed, just in a digital environment. Programs and services will be documented in IEP Direct in the notes section as well as related service notes section. Progress monitoring of goals will continue, progress reports will be sent electronically or via another method if the parent prefers. It is the district's expectation that each student will receive the same quality of services that would be provided in-person.

The district will follow its existing engagement and communication protocols with parents regarding the provision of special education services for their child. The Mechanicville City School District will ensure that parents/guardians are receiving meaningful engagement in their preferred language and preferred mode of communication. In addition for those parents who are not able to read or understand materials we will ensure that all materials are explained in a parent-friendly format. All needs of students will be met including modifications as indicated on students IEP and assistive technology. The Mechanicville City School district will continue to provide the same level of services and programs.

Collaboration between the committee on preschool special education and program providers will continue to be a priority ensuring evaluations and services are delivered to CPSE students.

Cybersecurity Incident Response Plan

Prepared by: Mechanicville CSD

Last Modified: July 11, 2023

PURPOSE

The Mechanicville City School District is a trusted public education provider to K-12 students in Mechanicville, NY. Mechanicville CSD stores information related to students, staff, and internal business operations, as well as manages and maintains technical infrastructure required to house and maintain this information. This Cyber Security Incident Response Plan outlines the procedures Mechanicville CSD uses to detect and respond to unauthorized access or disclosure of private information from systems utilized, housed, maintained or serviced by Mechanicville CSD. More specifically, this plan defines the roles and responsibilities of various Mechanicville CSD staff with respect to the identification, isolation and repair of data security breaches, outlines the timing, direction and general content of communications among affected stakeholders, and defines the different documents that will be required during various steps of the incident response.

Mechanicville CSD also implements practices designed to proactively reduce the risk of unauthorized access or disclosure, such as training staff with respect to legal compliance requirements, following appropriate physical security and environmental controls for technical infrastructure, and deploying digital security measures such as firewalls, malware detection and numerous other industry standard systems.

In the event of a cyber security incident, Mechanicville CSD staff have been trained to expeditiously deal with the matter. Mechanicville CSD staff are trained on a yearly basis to recognize anomalies in the systems they regularly utilize, and to report any such anomalies as soon as possible to the Incident Response Manager so the Incident Response Team can be mobilized. Throughout the year the Incident Response Manager and members of the Incident Response Team are kept up to date on the latest security threats and trained in modern techniques of incident remediation.

The availability and protection of the information resources managed by the systems we maintain is of paramount importance to our school district and will always be a core value of our organization.

DEFINITIONS

Cyber Security Incident -

A Cyber Security Incident is any event that threatens the confidentiality, integrity or availability of the information resources we support or utilize internally, especially sensitive information whose theft or loss may be harmful to individual students, our partners or our organization.

Incident Response Team (IRT) -

The IRT is made up of experts across different fields in the organization whose charge is to navigate the organization through a Cyber Security Incident from the initial investigation, to mitigation, to post incident review. Members include an Incident Response Manager, technical hardware and networking experts, front-end software experts, communications experts and legal experts.

Incident Response Manager (IRM) -

The IRM oversees all aspects of the Cyber Security Incident, especially the IRT. The key focuses of the IRM will be to ensure proper implementation of the procedures outlined in the Cyber Security Incident Response Plan, to keep appropriate Incident Logs throughout the incident, and to act as the key liaison between IRT experts and the organization's management team. At the conclusion of a Cyber Security Incident, the IRM will conduct a review of the incident and produce both an Incident Summary Report and a Process Improvement Plan.

Cyber Security Incident Log -

The Cyber Security Incident Log will capture critical information about a Cyber Security Incident and the organizations response to that incident, and should be maintained while the incident is in progress.

Incident Summary Report (ISR) -

The ISR is a document prepared by the IRM at the conclusion of a Cyber Security Incident and will provide a detailed summary of the incident, including how and why it may have occurred, estimated data loss, affected parties, and impacted services. Finally, it will examine the procedures of the Cyber Security Incident Response Plan, including how the IRT followed the procedures and whether updates are required. The template for the ISR may be seen in Appendix A.

Process Improvement Plan (PIP) -

The PIP is a document prepared by the IRM at the conclusion of a Cyber Security Incident and will provide recommendations for avoiding or minimizing the impact of future Cyber Security Incidents based upon the "lessons learned" from the recently-completed incident. This plan should be kept confidential for security purposes. The template for the PIP may be viewed in Appendix B.

INCIDENT RESPONSE TEAM

INCIDENT RESPONSE MANAGER

Name: Brian Gidley	Email: bgidley@mechanicville.org
Work Phone: (518) 652-2288	Mobile Phone: (518) 423-0064

TECHNICAL CONTACTS

Name: Dan Giacumo	Email: dgiacumo@mechanicville.org
Phone: (518) 652-2288	

Name: BOCES Network Team

Phone: (518) 581-3590

LEGAL COUNSEL

Name: Girvin and Ferlazzo, Ryan Mullahy

Phone: (518) 462-0300

CYBER INSURANCE CONTACT

Name: Ann Maher, Utica National/Amsure

Phone: (518) 584-5300

SUPERINTENDENT & COMMUNICATIONS SPECIALIST

Name: Kevin Kolakowski	Email: kkolakowski@mechanicville.org
Work Phone: (518) 664-5727	Mobile Phone: (518) 590-3500

BUSINESS OFFICIAL

Name: Colleen DiCaprio	Email:cdicaprio@mechanicville.org
Work Phone: (518) 664-5727	Mobile Phone: (518) 421-2861

BUILDING PRINCIPALS

Name: Mike Mitchell (MS/HS)	Email: mmitchell@mechanicville.org
Work Phone: 518-664-9888	Mobile Phone: 518-626-1240

Name: Don Dieckmann (ES)	Email: ddieckmann@mechanicville.org
Work Phone: 518-664-7336	Mobile Phone: 518-466-3370

INCIDENT MANAGEMENT PRINCIPLES

CONFIDENTIALITY

Investigation

During a Cyber Security Incident investigation, the IRM or members of the IRT will be gathering information from multiple computer systems and/or conducting interviews with key personnel based on the scope of the incident in question. All information gathered or discovered during a Cyber Security Incident will be strictly confidential throughout the investigative process. All members of the Cyber Security Incident Response Team are trained in information security and data privacy best practices. At the conclusion of the investigative process, the IRM will brief District Administration on the relevant details of the incident and the investigation (see Briefing of Administration in the Response Phase on page 12). During this phase, no confidential information will be shared unless it is strictly relevant to the investigation and/or the incident itself.

Affected Stakeholders

In the event the incident involves the unauthorized access or disclosure of confidential student or staff information, Mechanicville CSD will communicate information relevant to the incident as well as any additional requested information to which they have a right (e.g. specific student records, staff records, etc.). Mechanicville CSD does reserve the right to withhold certain information at the discretion of the IRM if that information may jeopardize current or future investigations, or pose a security risk to Mechanicville CSD or other entities.

In the event the incident involves information of a non-Mechanic ville Central School District stakeholder group, such as a neighboring district or vendor partner, Mechanic ville CSD will take appropriate steps to notify those entities as efficiently as possible.

In the event the incident is limited to Mechanicville CSD systems not containing sensitive or confidential information, it will be at the discretion of Mechanicville CSD administration and the IRM whether or not to share information related to the incident with outside stakeholders.

Report Management

All reports generated during an investigation along with any evidence gathered will be stored and managed by the IRM. Any physical records will be stored in the IRM's office in a locked file. Any digital records will be stored on the internal school district network in a network share only accessible by the IRM and approved District Administrators. That share will be backed up and stored in accordance with Mechanicville CSD's regular backup procedures. In the event past records of incidents need to be reviewed, a written request must be made to the IRM that **includes the requestor, the information requested and the reason** for the request. The IRM will review the request and has the discretion to approve or deny any request. Incident summary information will always be made available by the IRM.

COMMUNICATION GUIDELINES

- Communication with parents/community members, will be disseminated via the school district superintendent or designee.
- Although every incident is unique, sample communications that can be used as guidelines can be found in Appendices D-F in this document.
- Initial communication to affected stakeholders should occur as expeditiously as possible upon the identification of the incident. In some cases, this may include an initial communication (letter, email, phone call) that simply states that this district is aware of the issue and is addressing it, with the promise of a follow up. Scenarios for the release of Personally Identifiable Information (PII) are as follows:
- Should the unauthorized release of student data occur, the district shall notify the parents (or eligible students) affected by the release in the most expedient way possible. Part 121 of the Commissioner's Regulations requires this notification to occur within 14 calendar days after the breach is discovered.
- Should the unauthorized release of protected staff data occur, the district shall notify the staff members affected by the release in the most expedient way possible. Part 121 of the Commissioner's Regulations requires this notification to occur within 14 calendar days after the breach is discovered.
- Should the unauthorized release of student and/or protected staff data occur, the district shall notify the Chief Privacy Officer (CPO) at the New York State Education Department (NYSED) within 10 calendar days, as required by Part 121 of the Commissioner's Regulations.
- Should the release of Social Security Number, Driver's License or Non-Driver ID Number, Account Number, or Credit/Debit Card number combined with PII occur, districts should consult Section 208 of the NYS Technology Law for notification obligations (https://its.nv.gov/sites/default/files/documents/Business-

Data-Breach-Form.pdf).

- Updated communications will come from the superintendent or the Incident Response Manager. As staff receive requests from districts for information, they should pass those requests along to the Incident Response Manager.
- District staff should be clearly informed by the Management Team what information is public and what is internal/confidential. However, district leadership should be aware that any material or information communicated to staff can and likely will be shared with the public, including the news media.
- Communication with news media will be initiated by the school district superintendent and/or designee. Incoming news media calls and requests for information will be directed through Incident Response Team Communication Specialists. A communication response plan (talking points, interview refusal statement, etc.) will be formulated as needed, with information coming from the superintendent or designee.

• ETBS messages, if used, should have broad language that offer basic information (1 sentence) and reassurance, and refer to separate detailed communication pieces as a follow up.

Additional Communication Guidelines for Ransomware Incidents:

As per the NYSED Memo dated July 31, 2019, all districts all educational agencies that believe they may be compromised/infected with ransomware should immediately contact:

- NYS Intelligence Center (NYSIC) at 1-844-628-2478.
- NYSIC is a counter terrorism unit within the NYS Division of Homeland Security & Emergency Services (DHSES) and collaborates with a team that includes the NYS Chief Information Security Officer and the Multi-State Information Sharing & Analysis Center (MS-ISAC).
- They have experienced investigators & additional resources that will assist in detection & remediation efforts
- WSWHE BOCES District Superintendent: Dr. Turina Parker, District Superintendent, tuparker@wswheboces.org
- Northeastern Regional Information Center: Dr. Michael J. Doughty, Assistant Superintendent, michael.doughty@neric.org, 518-862-5424
- NYSED Chief Privacy Officer: Louise DeCandia, privacy@nysed.gov 518-474-0937
- Additional District Cybersecurity Resources contracted to address cybersecurity incidents.

CYBER SECURITY INCIDENT

PHASES

IDENTIFY

Overview

All Mechanicville CSD staff have a responsibility to remain vigilant and protect the data stored within the systems we support. Any event that threatens the confidentiality, integrity or availability of the information resources we support or utilize internally should immediately be reported to a supervisor or the IRM if a supervisor is unavailable.

Supervisors should immediately bring the incident to the attention of the IRM. Parents are encouraged to notify the district of possible breaches or improper disclosures of data using a form on the district website (see Appendix G).

Incident Types

Types of cyber incidents that may threaten the organization are:

- Unauthorized attempts to gain access to a computer, system or the data within
- Service disruption, including Denial of Service (DoS) attack
- Unauthorized access to critical infrastructure, such as servers, routers, firewalls, etc.
 - Virus or worm infection, spyware, or other types of malware
 - Non-compliance with security or privacy protocols
 - Data theft, corruption or unauthorized distribution

Mechanicville City School District - District-Wide School Safety Plan

Incident Symptoms

Signs a computer may have been compromised include:

- Abnormal response time or non-responsiveness
- Unexplained lockouts, content or activity
- Locally hosted websites won't open or display inappropriate content or unauthorized changes
- Unexpected programs running
- Lack of disk space or memory
- Increased frequency of system crashes
- Settings changes
- · Data appears missing or changed
- Unusual behavior or activity by Mechanicville CSD staff, students, partners or other actors

ASSESS

Overview

Once anomalous activity has been reported, it is incumbent upon the IRM to determine the level of intervention required. Other members of the IRT may be required to provide input during this phase to help determine if an actual security threat exists. If it is determined there is an active security threat or evidence of an earlier intrusion, the IRM will alert the entire IRT immediately so that the situation may be dealt with as expeditiously as possible.

Considerations

- What are the symptoms?
- What may be the cause?

- What systems have been / are being / will be impacted?
- How widespread is it?
- Which stakeholders are affected?

Documentation

Regardless of whether it is determined there is a security threat, the IRM will accurately document the scenario in a Cyber Security Incident Log. All Cyber Security Incident Logs will be stored in a single location so incident information may be reviewed in the future. This report should contain information such as:

- Who reported the incident
- Characteristics of the activity
- Date and time the potential incident was detected
- Nature of the incident (Unauthorized access, DDoS, Malicious Code, No Incident Occurred, etc.)
- Potential scope of impact
- Whether the IRT is required to perform incident remediation?

RESPOND

Briefing of Administration

Upon determining that a significant incident or breach has occurred, District Administration should be notified immediately. As additional information is uncovered throughout the investigation, Administration should be briefed by the IRM so appropriate decisions, such as allocating additional staff, hiring outside consultants and involving law enforcement can be made. Additionally, based on the incident, it will be incumbent upon the Administration to determine the appropriate stakeholders to notify of the incident and the appropriate medium to do so.

Mechanicville City School District - District-Wide School Safety Plan

Administration should take into consideration the nature of the information or systems involved, the scope of the parties affected, timeliness, potential law enforcement interests, applicable laws and the communication requirements of all parties involved. Sample communications documents may be found in Appendices C - F.

Initial Response

This first step in any cyber incident response should be to determine the origin of the incident and isolate the issue. This may involve measures up to and including immediately disconnecting particular workstations, servers or network devices from the network to prevent additional loss. While this is occurring, it is necessary to examine firewall and system logs, as well as possibly perform vulnerability scans, to ensure the incident has not spread to other areas in order to define the entire scope of the incident.

Throughout this process, it will be critical to preserve all possible evidence and document all measures taken in detail. Thorough review and reporting on the incident will be required once the threat has been removed, the vulnerabilities have been removed and the systems have been restored.

Remediation and Recovery

Once the cause has been determined and appropriately isolated, the IRT will need to remove the vulnerabilities leading to the incident. This may involve some or all of the following:

- Install patches and updates on systems, routers, and firewalls
- Infections cleaned and removed
- Re-image or re-install operating systems of infected machines
- Change appropriate passwords
- Conduct a vulnerability scan of any compromised machines before reconnecting them to the network
- Restore system backups where possible
- Document all recovery procedures performed and submit them to the IRM
- Closely monitor the systems once reconnected to the network

REPORT

Overview

Once the threat has been mitigated and normal operation is restored, the IRM will compile all available information to produce an accurate and in-depth summary of the incident in an Incident Summary Report (ISR). A copy of the ISR is located in Appendix A. Throughout the incident, the IRT will have kept Incident Logs that contain detailed records wherever possible, and these shall serve as the basis of the report. Interviews will also be conducted with appropriate members of the IRT to obtain any additional information that may be available to augment the logs and records kept throughout the process. Additionally, as required by Part 121 of the Commissioner's Regulations the district will maintain a record of all complaints of breaches or unauthorized releases of student data and their disposition in accordance with applicable data retention policies using the log in Appendix H.

Report Contents

The Incident Summary Report (ISR) will include all pertinent information to the incident, but at minimum:

- Dates and times of milestones throughout the process (e.g. incident detection, verification, notifications, remediation steps, completion, etc.)
- List of symptoms or events leading to discovery of the incident
- Scope of impact
- Mitigation and preventative measures
- Restoration logs
- Stakeholder communications (including copies of memos, emails, etc. where

possible) Timeframe

The ISR should be prepared as expeditiously as possible following the incident so future preventative measures may be taken as quickly as possible. Information to prepare the ISR and interviews with the IRT should be conducted immediately to ensure the greatest possible accuracy of information.

REVIEW

Post-Incident Review Meeting

After the conclusion of the incident, the IRM and possibly select members from the IRT will meet with management to discuss the event in detail, review response procedures and construct a Process Improvement Plan (PIP) to prevent a recurrence of that or similar incidents. The compiled Incident Report constructed by the IRM will serve as a guide for this meeting.

In the meeting, a full debrief of the incident will be presented and findings discussed. The IRM will share the full scope of the breach (as comprehensively as possible), causes of the breach, how it was discovered, potential vulnerabilities that still exist, communication gaps, technical and procedural recommendations, and the overall effectiveness of the response plan.

As a whole, the group will review the information presented and will determine any weakness in the process and determine all the appropriate actions moving forward to modify the plan, address any vulnerabilities and what communication is required to various stakeholders.

Process Improvement Plan

The IRM will draft a Process Improvement Plan (PIP) based on the results of this meeting. The plan should discuss any applicable items necessary to prevent future incidents to the extent practicable, including cost and time frame requirements where possible. The PIP will also include a review strategy to ensure all recommendations made in the PIP are met in a timely fashion and functioning appropriately. Areas of focus may include, but are not limited to:

- New hardware or software required
- Patch or upgrade plans
- Training plans (Technical, end users, etc.)
- Policy or procedural change recommendations
- Recommendations for changes to the Incident Response Plan
- Regional communications recommendations

Additionally, the PIP must be kept strictly confidential for security purposes. Any communication required to clients or to the public must be drafted separately and include only information required to prevent future incidents.

ADDENDUM A:

INCIDENT SUMMARY REPORT INCIDENT SUMMARY

Type of Incident	
Date Incident Originated	
Date Incident Was Detected	
By Whom Was Incident Detected	
How Was Incident Detected	
Scope of Incident (Districts / Systems Affected)	
Date Incident Corrected	
Corrective Action Types (Training, Technical, etc)	

Summary of Incident Symptoms

Summary of Incident Type and Scope
Summary of Corrective Actions
Summary of Mitigation Processes and Internal Communication
Communications Log (Attach drafts for written communications, synopsis for verbal communication)

Communication Date	Communication Type	Recipient(s)	Purpose

ADDENDUM B:

PROCESS IMPROVEMENT PLAN

PROCESS IMPROVEMENT PLAN

Areas of Success Summary
Areas in Need of Improvement Summary
Recommended Improvements to Avoid Future Incidents
Recommended Improvements to the Cyber Security Incident Response Plan

Improvement	Timeframe	Cost

ADDENDUM C: INCIDENT LOG

INCIDENT LOG

Incident Title

Incident Opened Date

Incident Description

Action / Event	Date / Time	Performed / Reported by	Details

ADDENDUMD: SAMPLE PARENT LETTER

Mechanicville City School District – District-Wide School Safety Plan

Insert District Letterhead

DATE

Dear Parents/Guardians,

This letter is to inform you of an incident that occurred within the **Mechanicville City School District**. This incident resulted in student/staff/etc data being compromised by an outside entity. Our Incident Response Team acted quickly to assess and mitigate the situation.

At this time, we are able to share the following details:

[insert a brief description of the breach or unauthorized release, the dates of the incident and the date of discovery; a description of the types of personally identifiable information affected; an estimate of the number of records affected; a brief description of the educational agency's investigation or plan to investigate]

Please know that **Mechanicville CSD** is committed to protecting and securing educational data. Our team has extensive training in data security and privacy, and our systems have many controls in place to protect your child's educational records. Our team is working with a group of experts to review the incident and implement appropriate measures to protect against this type of incident from occurring in the future.

Please contact (Add Name, Title & contact info) with any questions you may have regarding this incident and our response.

Sincerely,

ADDENDUM E:

SAMPLE STAFF MEMO

Mechanicville City School District – District-Wide School Safety Plan

Insert District Letterhead

DATE

Dear Staff.

This letter is to inform you of an incident that occurred on **DATE** within the **Mechanicville CSD**'s **YYYYYYY** system. This incident resulted in **student/staff/etc** data being compromised by an outside entity. Our response team acted quickly to assess and mitigate the situation.

I wanted to ensure that you have key details of the incident so you are well-informed when speaking with your students and colleagues. Please note that **Mechanicville CSD** administration is handling communication with the community and affected parties. Should you receive any related inquiries, please direct them to **(add name, title & contact info)**.

At this time, we are able to share the following details:

[insert a brief description of the breach or unauthorized release, the dates of the incident and the date of discovery; a description of the types of personally identifiable information affected; an estimate of the number of records affected; a brief description of the educational agency's investigation or plan to investigate]

As more details become available we will be disseminated as appropriate. Please contact (add name, title & contact info) should you have any questions or immediate concerns regarding this incident.

Sincerely,

ADDENDUM F: SAMPLE ETBS MESSAGE

ETBS MESSAGE

The **Mechanicville Central School District** experienced a technical issue today with its **YYYYYYY** system that may have resulted in **[student/staff]** data being compromised. The issue is currently under investigation. More detailed information will be distributed shortly via **ZZZZZZZZ**.

ADDENDUM G:

PARENT COMPLAINT FORM

Mechanicville City School District – District-Wide School Safety Plan

Insert District's Complaint Form Here

ADDENDUM H: PARENT COMPLAINT LOG

PARENT COMPLAINT LOG

Complainant Name	Date Complaint submitted
Description of the Complaint	
Findings	
Date the Finding Report was Shared with Complainant	

PART 121 OF THE COMMISSIONER'S REGULATIONS REQUIREMENT

Educational agencies must maintain a record of all complaints of breaches or unauthorized releases of student data and their disposition in accordance with applicable data retention policies, including the Records Retention and Disposition Schedule ED-1 (1988; rev. 2004), as set forth in section 185.12, Appendix I of this Title.

ADDENDUM I:

SAMPLE PARENT COMPLAINT REPORT

Insert District Letterhead

DATE

Dear XXXXXXX,

On (date of complaint) you notified (name of district staff) about a possible breach or improper disclosure of student data. Our Incident Response Team acted quickly to assess the situation and the report below summarizes the results of our investigation.

[insert a brief description of the complaint and findings]

The Mechanicville Central School District is committed to protecting and securing educational data. Please contact (add name, title & contact info) with any questions you may have regarding the investigation and this report.

Sincerely,

PART 121 OF THE

Following its investigation, the educational agency s report of its findings within a reasonable period but r such complaint by the educational agency. In exten agency requires additional time to investigate the co where releasing the report may compromise security educational agency shall provide the parent or eligible the approximate date when the educational agency

COMMISSIONER'S REGULATIONS REQUIREMENT