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*Student Data Privacy*  

6400
The superintendent of schools will be the executive officer of the Kaniak Joint School District No. 304 Board of Trustees and the administrative head of all divisions and departments of the school system. The superintendent is directly responsible to the board for the execution of its policies, for the faithful and efficient observance of its rules by all employees throughout the system, and for the enforcement of all provisions of the law relating to the operation of the schools.

LEGAL REFERENCE:
Idaho Code Sections
33-506
33-513

ADOPTED:
7-19-99
Certificated and non-certiﬁcated administrators may be appointed by the Kamiah Joint School District No. 304 Board of Trustees, as determined necessary. Such individuals are directly responsible to the superintendent and will perform those duties set forth in the speciﬁc job descriptions.

All certificated district administrators will be employed using the appropriate contract approved by the State Superintendent of Public Instruction, and will be properly certiﬁed for the position.

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LEGAL REFERENCE:
Idaho Code Sections
33-513
33-1201

ADOPTED:
7-19-99
The Kamiah Joint School District No. 304 Board of Trustees will employ a superintendent of schools for a term not to exceed three (3) years. The superintendent is the executive officer of the board with such powers and duties as the board may prescribe to him or her. The general administration of the entire school district, including facilities, educational and related programs, and personnel is vested in the superintendent. The superintendent supervises all schools in the district and all district employees are responsible to him or her through their respective principals or supervisors. The superintendent is charged with the execution of district policies as adopted by the board. The superintendent is expected to, at all times, endeavor to provide the maximum educational programs for the students of the district. The superintendent acts as the authorized representative of the district whenever it is required, unless some other person is named by the board to act as its authorized representative.

EVALUATION OF THE SUPERINTENDENT

The board will conduct an annual, written formal evaluation of the work of the superintendent. The evaluation will indicate the strengths and weaknesses of the superintendent’s job performance and set forth areas for improvement in the superintendent’s job performance, if, in the view of the board, it is called for.

SUPERINTENDENT’S CONTRACT

The board will enter into a written contract with the superintendent using the Superintendent’s Teacher Contract form approved by the State Superintendent of Public Instruction. With the exception of initial appointment, the superintendent’s contract will be reviewed at the regular board meeting each January and, if approved, may be extended for not less than one (1) additional year beyond the established expiration date of the contract. The superintendent does not acquire renewable contract rights.

If the superintendent and board determine that another contract will be used, prior approval for another contract form must be received from the State Superintendent of Public Instruction.

TERMS OF EMPLOYMENT

The superintendent will be employed for a twelve-month period. Term of employment will be determined by the board.

QUALIFICATIONS

The superintendent will hold not less than a Masters Degree and must be properly certified pursuant to State Board of Education rules.
LEGAL REFERENCE:
Idaho Code Sections
  33-513
  33-515
  33-1201

ADOPTED:
7-19-99
Principals

Principals are the chief administrators of their assigned schools. The primary responsibility of Principals is to supervise the operation and management of their assigned schools and shall be under the direct supervision of the Superintendent. The majority of the principals’ time shall be spent on curriculum and staff development through formal and informal activities, establishing clear lines of communication regarding the school rules, accomplishments, practices, and policies with parents, students, and teachers. Principals are responsible for management of their staff, maintenance of the facility and equipment, administration of the educational program, control of the students attending the school, management of the school’s budget, and communication between the school and the community.

Evaluation of Principals

Each principal shall receive at least two (2) written evaluation to be completed by no later than February 1st and May 1st for each annual contract year of employment. Each principal evaluation shall use multiple measures that are research based and aligned to the State minimum standards based on the Interstate School Leaders Licensure Consortium (ISLLC) and include proof of proficiency in conducting teacher evaluations using the State’s adopted model, the Charlotte Danielson Framework for Teaching Second Edition.

The process of developing criteria and procedures for principal evaluations will allow opportunities for input from stakeholders, including the Board, administrators, teachers, and parents and guardians.

Evaluation Objectives

The District’s Principal Evaluation Program is designed to:

1. Maintain or improve each principal's job satisfaction and morale by letting him or her know that the Superintendent is interested in his or her job progress and personal development;
2. Serve as a systematic guide for planning each principal's further training and professional development;
3. Assure considered opinion of a principal's performance and focus maximum attention on achievement of assigned duties;
4. Assist in determining and recording special talents, skills, and capabilities that might otherwise not be noticed or recognized;
5. Assist in planning personnel moves and placements that will best utilize each principal's capabilities;
6. Provide an opportunity for each principal to discuss job problems and interests with the Superintendent; and
7. Assemble substantiating data for use as a guide, although not necessarily the sole governing factor, for such purposes as wage adjustments, promotions, disciplinary action, and termination.

Responsibility

The Superintendent shall have the responsibility for administrating and monitoring the District’s Principal Evaluation Program and will ensure the fairness and efficiency of its execution, including:

1. Creating and implementing a plan for ongoing training and professional development and the funding thereof for principals in the District’s Performance Evaluation Program, including evaluation standards, forms, procedures, and processes and a plan for collecting and using data gathered from evaluation forms. The plan will include identification of the actions, if any, available to the District as a result of the evaluation as well as the procedure(s) for implementing each action;

2. Creating a plan for ongoing review of the District’s Principal Evaluation Program that includes stakeholder input from teachers, Board members, administrators, parents and guardians, and other interested parties;

3. Creating a procedure for remediation for principals that receive evaluations indicating that remediation would be an appropriate course of action;

4. Creating an individualizing evaluation rating system plan for how principal evaluations will be used to identify proficiency and record growth over time with a minimum of three (3) rankings used to differentiate performance of principals including: unsatisfactory being equal to a rating of 1; basic being equal to a rating of 2; and proficient being equal to a rating of 3;

5. Completing Principal Evaluation Forms annually and ensuring proper safeguards and filing of completed forms; and


Evaluation Form and Procedure

An Evaluation Form will be completed for each principal by the Superintendent no later than February 1st for the 1st Evaluation and May 1st for the 2nd Evaluation for each annual contract year of employment. A copy will be given to the principal. The original will be retained by the Superintendent. This Form shall be reviewed annually and revised as necessary to indicate any significant changes in duties or responsibilities. The Form is designed to increase planning and
relate performance to assigned responsibilities through joint understanding between the Superintendent and the principal as to the job description and major performance objectives.

The Evaluation Form will identify the sources of data used in conducting the evaluation. Proficiency in conducting observations and evaluating effective teacher performance shall be included as one (1) source of data.

Evaluation Measures and Criteria

**Professional Practice**

Sixty-seven percent (67%) of the evaluation will be based upon measures of Professional Practice. All measures within the Professional Practice portion of the evaluation must be aligned at a minimum to the following Domains and Components:

**Domain 1: School Climate** - The principal promotes the success of all students by advocating, nurturing, and sustaining a school culture and instructional program conducive to student learning and staff professional development. The principal articulates and promotes high expectations for teaching and learning while responding to diverse community interest and needs.

i. School Culture – The principal establishes a safe, collaborative, and supportive culture ensuring all students are successfully prepared to meet the requirements for tomorrow’s careers and life endeavors.

ii. Communication – The principal is proactive in communicating the vision and goals of the school or District, the plans for the future, and the successes and challenges to all stakeholders.

iii. Advocacy – The principal advocates for education, the District and school, teachers, parents, and students that engenders school support and involvement.

**Domain 2: Collaborative Leadership** - The principal promotes the success of all students by ensuring management of the organization, operations and resources for a safe, efficient, and effective learning environment. In collaboration with others, uses appropriate data to establish rigorous, concrete goals in the context of student achievement and instructional programs. The principal uses research and/or best practices in student achievement and instructional programs. The principal uses research and/or best practices in improving the education program.

i. Shared Leadership – The principal fosters shared leadership that takes advantage of individual expertise, strengths, and talents, and cultivates professional growth.

ii. Priority Management - The principal organizes time and delegates responsibilities to balance administrative/managerial, educational, and community leadership priorities.
iii. Transparency – The principal seeks input from stakeholders and takes all perspectives into consideration when making decisions.

iv. Leadership Renewal - The principal strives to continuously improve leadership skills through, professional development, self-reflection, and utilization of input from others.

v. Accountability – The principal establishes high standards for professional, legal, ethical, and fiscal accountability for self and others.

Domain 3: Instructional Leadership - The principal promotes the success of all students by facilitating the development, articulation, implementation, and stewardship of a vision of learning that is shared and supported by the school community. The principal provides leadership for major initiatives and change efforts and uses research and/or best practices in improving the education program.

i. Innovation – The principal seeks and implements innovative and effective solutions that comply with general and special education law.

ii. Instructional Vision – The principal insures that instruction is guided by a shared, research-based instructional vision that articulates what students do to effectively learn.

iii. High Expectations – The principal sets high expectation for all students academically, behaviorally, and in all aspects of student well-being.

iv. Continuous Improvement of Instruction – The principal has proof of proficiency in assessing teacher performance based upon the Charlotte Danielson Framework for Teaching Second Edition and aligns resources, policies, and procedures toward continuous improvement of instructional practice guided by the instructional vision.


vi. Recruitment and Retention – The principal recruits and maintains a high quality staff.

The evaluation will also include at least one (1) of the following as a measure to inform the Professional Practice portion:

1. input received from parents or guardians;
2. input received from students;
3. input received from teachers; and/or
4. portfolios.
The District has chosen one thru four as measures to inform the Professional Practice portion. The Board shall determine the manner and weight of parental input, student input, teacher input, and/or portfolios on the evaluation.

**Student Achievement**

Thirty-three percent (33%) of the evaluation must be based on growth in student achievement as measured by Idaho’s statewide assessment for federal accountability purposes. This portion of the evaluation may be calculated using current and/or past year’s data and may use one (1) or multiple years of data.

**Proof of Proficiency in Teacher Evaluations**

Proof of proficiency in evaluating teacher performance shall be required of all individuals assigned the responsibility for appraising, observing, or evaluating certificated personnel performance. Proof of proficiency in evaluating performance shall be demonstrated by passing a proficiency assessment approved by the State Department of Education as a onetime recertification requirement prior to September 1, 2018.

**Communicating Evaluation Results**

Each evaluation shall include a meeting between the Superintendent and principal wherein the Superintendent will:

1. Discuss the evaluation with the principal, emphasizing strong and weak points in job performance. Commend the principal for a job well done if applicable and discuss specific corrective action if warranted. Recommendations should specifically state methods to correct weaknesses. Set mutual goals for the principal to reach before the next performance evaluation.

2. Allow the principal to make any written comments he or she desires. Inform the principal that he or she may turn in a written rebuttal of any portion of the evaluation within seven (7) days and outline the process for rebuttal. Have the principal sign the evaluation form indicating that he or she has been given a copy.

**Rebuttals**

Within seven (7) days from the date of the evaluation meeting with the Superintendent the principal may file a written rebuttal of any portion of the Evaluation Form. The written rebuttal shall state the specific content of the Evaluation Form with which the principal disagrees, a statement of the reason(s) for disagreement, and the amendment to the Evaluation Form requested.

If a written rebuttal is received by the Superintendent within seven (7) days, the Superintendent shall provide the principal with a written response within ten (10) working days either amending
the Evaluation Form as requested by the principal or stating the reason(s) why the Superintendent will not be amending the Evaluation Form as requested.

If the Superintendent chooses to amend the Evaluation Form as requested by the principal then the amended copy of the Evaluation Form will be provided to, and signed by, the principal and retained in the principal’s personnel file.

If the Superintendent chooses not to amend the Evaluation Form as requested by the principal then the Evaluation Form along with the written rebuttal, and the Superintendent’s response, if any, will be retained in the principal’s personnel file.

**Action**

Should any action be taken as a result of an evaluation to not renew a principal’s contract the District will comply with the requirements and procedures established by State law.

**Records**

Permanent records of each principal evaluation will be maintained in the principal’s personnel file. All evaluation records will be kept confidential within the parameters identified in state and federal law regarding the right to privacy.

**Reporting**

By July 1, 2014, the District shall submit an evaluation plan to the State Department of Education for approval. Any subsequent changes to the District’s evaluation plan shall be resubmitted to the State Department of Education for approval.

**Legal Reference:**
- I.C. § 33-513 Professional personnel
- I.C. § 33-518 Employee Personnel Files
- IDAPA 08.02.02.121 Local District Evaluation Policy – School Principal

**Policy History:**
Adopted on: 02/20/2014
Revised on:
The superintendent of Kamiah Joint School District No. 304 has the authority to make administrative decisions on issues not specifically covered by written board policy when circumstances and time restrictions make such action necessary. The superintendent’s decision will be subject to review by the board at its next regular or special meeting.

LEGAL REFERENCE:
Idaho Code Section 33-513

ADOPTED:
7-19-99
Principals employed by Kamiah Joint School District No. 304 are the administrative heads of their respective schools and are supervised directly by the superintendent. Principals are responsible for the enforcement of all board policies and for carrying out all directives of the superintendent in their respective schools. Additionally, as members of the administrative staff, principals are required to assist the superintendent, as necessary, to accomplish the district goals.

Principals may be issued a one (1) or two (2) year contract on the contract form approved by the State Superintendent of Public Instruction. The superintendent will make recommendations to the board regarding each respective principal’s contract.

The board will review Principals’ contracts at the March Board meeting. The Board will notify any principal, prior to May 25, if it intends to cancel any extension of the Principal’s contract or terminate employment.

Service performed under such contract will be included in meeting the renewable contract provisions set forth in Idaho Code Section 33-515.

QUALIFICATIONS

Each principal must be properly certificated pursuant to State Board of Education rules.

TERMS OF EMPLOYMENT

Each principal will be paid an annual salary as determined by the board, for a period of 210 days, and will receive the same leave, insurance and other benefits as received by other certificated personnel.

LEGAL REFERENCE:

Idaho Code Sections
33-513
33-515
33-1201

ADOPTED:
7-19-99
All administrators' expenses to be paid by Kamiah Joint School District No. 304 for travel, lodging, and food for district-related activities must be pre-approved by the superintendent.

Travel outside the state of Idaho must have prior approval of the superintendent for expenses to be reimbursed to the administrator.

LEGAL REFERENCE:
Idaho Code Section 33-506

ADOPTED:
7-19-99

SECTION 300: ADMINISTRATION
The school calendar for Kamiah Joint School District No. 304 will be based on a minimum number of instructional hours as follows:

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<td>4-8</td>
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<td>1-3</td>
<td>810</td>
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The school calendar, for the following school year, will be drafted and submitted through administrative channels for staff reaction during the second semester of the school year. The board will approve the calendar for the upcoming school year no later than the regular June board meeting.

LEGAL REFERENCE:
Idaho Code Sections
33-506
33-512

ADOPTED:
7-19-99
The educational program for Kamiah Joint School District No. 304 is based on the 5-4-4 plan. Elementary school consists of grades kindergarten through four (K-4), middle school consists of grades five through eight (5-8), and senior high school consists of grades nine through twelve (9-12).

LEGAL REFERENCE:
Idaho Code Section 33-512

ADOPTED:
7-19-99
The superintendent is granted the power by the Kamiah Joint School District No. 304 Board of Trustees to close the schools or dismiss students early in the event of hazardous weather or other emergencies which threaten the safety or health of the students or staff.

When such emergency closure occurs, the superintendent will bring it to the attention of the board at the next regular meeting for approval.

Upon approval by the board, up to eleven (11) hours of emergency school closure due to adverse weather conditions and/or facilities failures may be reduced from the annual instructional hour requirements.

+++ LEGAL REFERENCE: Idaho Code Section 33-512(1) +++

ADOPTED: 7-19-99
In light of the integral role that school districts play in protecting the health and safety of the district's employees, students, and their families, and the resource that school facilities may provide in the community, the board of trustees adopts this policy regarding readiness and response to emergency situations in the local community, such as an influenza pandemic, or other health emergency, or a state or national emergency.

**LIAISON WITH GOVERNMENT AGENCIES**

The superintendent will appoint a designee(s) to act as the liaison with the local district health department relative to state and regional planning to provide for the health and safety of the citizenry in times of a health emergency. As determined appropriate, district personnel will participate in necessary training as made available by state and regional agencies.

The superintendent will appoint a designee or designees to act as the liaison(s) with state and local law enforcement personnel and/or public safety officials to provide for the safety and security of students, district personnel, and patrons in times of a state or national emergency as declared by the Governor or President.

**EMERGENCY PLAN**

The superintendent or designee(s) will prepare an emergency plan to address the potential contingencies that may occur in such emergencies. The board will approve the emergency plan and review it annually.

The emergency plan will address the ongoing operation of the district schools during an emergency and will allow the district to coordinate response efforts with local and regional agencies. The components of the emergency plan will include, but are not limited to, the following:

1. **Continuity of educational programs;**
2. **Alternative means for continuing educational programs, in the event of school closure;**
3. **Continuity of extracurricular programs, if appropriate;**
4. **Continuity of essential operations, such as, but not limited to, payroll and the supply of necessary utilities, including drinking water and sanitation;**
5. **Effective communications with students, parents, and employees, ensuring language, culture, and reading level appropriateness in communications;**
6. **Effective infection prevention procedures to help limit the spread of disease;**
7. First aid/nursing/counseling services for those who become ill or are otherwise impacted while at school;

8. Use of district facilities by state and regional agencies;

9. Reporting absenteeism to the local district health department, as may be required; and

10. Provide for the security of school facilities.

LEGAL REFERENCE:
http://www.pandemicflu.gov/plan/schoolchecklist.html
Idaho Pandemic Influenza Response (Idaho Dept. of Health & Welfare, March 2006)

ADOPTED: ____________

REVIEWED: ____________

REVISED: April 2008

*Language in text set forth in italics is optional.
EMERGENCY PREPAREDNESS

The board of trustees recognizes the importance of providing a safe environment for all students and staff members. The board also recognizes that district personnel must be able to effectively respond to any natural or manmade disaster or emergency that occurs and has an impact on the schools. As a result, the district will take reasonable measures to prepare for and respond to any such disaster or emergency.

Further, the board recognizes that the district and communities it serves have unique challenges and resources which should be considered in developing an emergency response plan. The district will work with local, state, tribal, regional, and national agencies, and nongovernmental organizations, as appropriate, to develop an emergency response plan.

The district will adopt an emergency preparedness plan to be implemented throughout the district. The district adopts the National Incident Management System (NIMS) to address emergency preparedness because it is intended to create a consistent nationwide approach for federal, state, tribal, and local governments to work effectively and efficiently to prepare for and respond to the full variety of disasters and emergencies which a community may face. The district’s emergency preparedness plan will comply with NIMS objectives, as set forth below.

NIMS OBJECTIVES

1. **Emergency Management Team.** The district will designate a school emergency management team which will be responsible for implementing this policy, and complying with NIMS.

2. **Adoption of NIMS.** The district will take steps to adopt NIMS, including but not limited to the following:
   a. Designate and maintain a principle coordinator, Point of Contact (POC) in the district related to implementation of NIMS.
   b. Establish and maintain a planning process to communicate, monitor and implement all NIMS requirements, including a process to measure progress and facilitate reporting.

3. **Preparedness/Planning.**
   a. Revise and update emergency operations plans (EPOs), standard operating procedures (SOPs), and standard operating guidelines (SOGs) to incorporate NIMS and National Response Framework (NRF) components, principles and policies, to include planning, training, response, exercises, equipment, evaluation, and corrective actions.
b. Promote and/or develop interagency mutual aid agreements and assistance agreements, including governmental entities, as well as nongovernmental organizations.

c. Involve preparedness organizations in development of emergency operations plans.

d. Identify students and staff members who may need special assistance in responding to an emergency and develop a plan for addressing their individual needs.

4. **Training of personnel.** The district will identify key personnel at each of its sites. "Key personnel" is defined as any individual that would be involved in the response and incident command structure during an incident or event. The school emergency management team will determine what training the key personnel should receive, including NIMS training, based on their roles in the overall school emergency management program.

   a. Personnel with any role or responsibility in emergency preparedness, incident management, or response;

   b. Emergency management personnel with a critical role in response; and

   c. Emergency Management personnel with leadership role in emergency response who would be required to command and manage an incident in the absence of traditional incident response personnel.

5. **Emergency Response Exercises.** The emergency management team will coordinate training exercises, as appropriate to provide opportunities to implement the emergency response plan, consistent with NIMS concepts and principles. The district will collaborate with preparedness organizations, including governmental entities, as well as nongovernmental organizations in developing and implementing the training exercises, including designing the exercises, facilitating the exercises, and debriefing. Corrective action plans will be developed following such exercises. District staff members and students will participate in such exercises, as deemed appropriate.

6. **Communication and Information Management.** The district will develop a communication and information management system when responding to emergencies that is consistent with NIMS concepts and principles.

7. **Resource Management.** The district will, consistent with the NIMS concepts and principles:

   a. Develop standards for acquiring and inventorying district resources needed for emergency response.

   b. Ensuring that equipment, communications and data systems are interoperable.

   c. Utilizing resources for mutual aid requests, as appropriate.

   d. Institute protocols to prevent unauthorized use of district resources, and to deploy, track, and recover district resources.
e. Identify potential staff resources and develop a procedure for utilizing volunteers and qualified staff members.

f. Develop a list of mental health resources in the community who may be available to provide services to students following an emergency.

8. **Command and Management.** The district will, consistent with the NIMS concepts and principles:
   a. Manage all incidents/planned events in accordance with Incident Command System (ICS) organizational structures, doctrine and procedures.
   b. Coordinate and support emergency management and incident response objectives through the development and use of integrated multi-agency coordination systems.
   c. Develop, within ICS framework, a system of gathering, verifying, coordinating and disseminating public information during an incident.
   d. Utilize access control measures during an incident, as appropriate.
   e. Develop a plan for communicating with parents and families of students and staff members regarding the status of the emergency and the safety of individuals, as well as the protocol for the students being released from school in the event of an emergency.
   f. Comply with confidentiality requirements, pursuant to *Family Educational Rights and Privacy Act* (FERPA) and *Health Insurance Portability and Accountability Act of 1996* (HIPAA).

This policy, and the procedures and protocols for implementing the policy will be reviewed annually, or more frequently if deemed appropriate, to address changes in NIMS concepts and principles, as well as to address the unique situations facing the district.

* * * * *

**LEGAL REFERENCE:**

Idaho Code Section 33-1612

*National Incident Management Systems*

Federal Emergency Management Agency

*NIMS Implementation Activities for Schools and Institutions of Higher Education*

US Department of Education

The Family Educational Rights and Privacy Act of 1974

20 USC 1232g

34 CFR Part 99

Health Insurance Portability and Accountability Act of 1996

Public Law 104-191

**ADOPTED:** August, 2010

**REVIEWED:**

**AMENDED:**

**SECTION 500:** STUDENTS
School holidays for Kamiah Joint School District No. 304 will include Labor Day, Thanksgiving Day, Christmas Day, New Years Day, Martin Luther King/Idaho Human Rights Day, Presidents' Day, Memorial Day, and Independence Day. No school sessions will be held on these days. Other specified state holidays, if falling on a school day, will be observed with appropriate ceremonies.

Each school in session on Veteran’s Day will conduct and observe an appropriate program for at least one class period remembering and honoring American veterans.

A day during the month of April in each year, designated as Arbor Day, will be observed by such exercises as will encourage the planting, preservation, and protection of trees and shrubs.

LEGAL REFERENCE:
Idaho Code Sections
  33-512
  33-1606

ADOPTED:
7-19-99
Kamiah Joint School District No. 304

STUDENTS

Student Data Privacy and Security

The efficient collection, analysis, and storage of student information is essential to improve the education of our students. As the use of student data has increased and technology has advanced, the need to exercise care in the handling of confidential student information has intensified. The privacy of students and the use of confidential student information is protected by federal and state laws, including the Family Educational Rights and Privacy Act (FERPA) and the Idaho Student Data Accessibility, Transparency, and Accountability Act of 2014 (Idaho Data Accountability Act).

Student information is compiled and used to evaluate and improve Idaho's educational system and improve transitions from high school to postsecondary education or the workforce. The Data Management Council (DMC) was established by the Idaho State Board of Education to make recommendations on the proper collection, protection, storage and use of confidential student information stored within the Statewide Longitudinal Data System (SLDS). The DMC includes representatives from K-12, higher education institutions and the Department of Labor.

This model policy is required by the Idaho Data Accountability Act. In order to ensure the proper protection of confidential student information, the District shall adopt, implement and electronically post this policy to its’ website. It is intended to provide guidance regarding the collection, access, security, and use of education data to protect student privacy. This policy is consistent with the DMC’s policies regarding the access, security, and use of data maintained within the SLDS. Violation of the Idaho Data Accountability Act may result in civil penalties.

Definitions

Administrative Security consists of policies, procedures, and personnel controls including security policies, training, and audits, technical training, supervision, separation of duties, rotation of duties, recruiting and termination procedures, user access control, background checks, performance evaluations, and disaster recovery, contingency, and emergency plans. These measures ensure that authorized users know and understand how to properly use the system in order to maintain security of data.

Aggregate Data is collected or reported at a group, cohort or institutional level and does not contain PII.

Data Breach is the unauthorized acquisition of PII.

Logical Security consists of software safeguards for an organization’s systems, including user identification and password access, authenticating, access rights and authority levels.
measures ensure that only authorized users are able to perform actions or access information in a network or a workstation.

**Personally Identifiable Information (PII)** includes: a student’s name; the name of a student’s family; the student’s address; the students’ social security number; a student education unique identification number or biometric record; or other indirect identifiers such as a student’s date of birth, place of birth or mother’s maiden name; and other information that alone or in combination is linked or linkable to a specific student that would allow a reasonable person in the school community who does not have personal knowledge of the relevant circumstances, to identify the student.

**Physical Security** describes security measures designed to deny unauthorized access to facilities or equipment.

**Student Data** means data collected at the student level and included in a student’s educational records.

**Unauthorized Data Disclosure** is the intentional or unintentional release of PII to an unauthorized person or untrusted environment.

**Collection**

The District shall follow applicable state and federal laws related to student privacy in the collection of student data.

**Access**

Unless prohibited by law or court order, the District shall provide parents, legal guardians, or eligible students, as applicable, the ability to review their child’s educational records.

The Superintendent or designee, is responsible for granting, removing, and reviewing user access to student data. An annual review of existing access shall be performed.

Access to PII maintained by the District shall be restricted to:

1. the authorized staff of the District who require access to perform their assigned duties; and
2. authorized employees of the State Board of Education and the State Department of Education who require access to perform their assigned duties; and
3. vendors who require access to perform their assigned duties.

**Security**

The District shall have in place Administrative Security, Physical Security, and Logical Security controls to protect from a Data Breach or Unauthorized Data Disclosure. The District shall immediately notify the Executive Director of the Idaho State Board of Education and the State Superintendent of Public Instruction in the case of a confirmed Data Breach or confirmed
Unauthorized Data Disclosure. The District shall also notify in a timely manner affected individuals, students, and families if there is a confirmed Data Breach or confirmed Unauthorized Data Disclosure.

Use

Publicly released reports shall not include PII and shall use Aggregate Data in such a manner that re-identification of individual students is not possible.

District contracts with outside vendors involving student data, which govern databases, online services, assessments, special education or instructional supports, shall include the following provisions which are intended to safeguard student privacy and the security of the data:

1. Requirement that the vendor agree to comply with all applicable state and federal law;
2. Requirement that the vendor have in place Administrative Security, Physical Security, and Logical Security controls to protect from a Data Breach or Unauthorized Data Disclosure;
3. Requirement that the vendor restrict access to PII to the authorized staff of the vendor who require such access to perform their assigned duties;
4. Prohibition against the vendor’s secondary use of PII including sales, marketing or advertising;
5. Requirement for data destruction and an associated timeframe; and
6. Penalties for non-compliance with the above provisions.

The District shall clearly define what data is determined to be directory information.

If the District chooses to publish directory information which includes PII, parents must be notified annually in writing and given an opportunity to opt out of the directory. If a parent does not opt out, the release of the information as part of the directory is not a Data Breach or Unauthorized Data Disclosure.

Cross Reference: 3570 – 3570P  Student Records

Legal Reference: 20 U.S.C. § 1232g Family Education Rights and Privacy Act
34 C.F.R. 99  Family Education Rights and Privacy Act
I.C. § 33-133  Idaho Student Data Accessibility, Transparency, and Accountability Act

Policy History:
Adopted on: 09/15/2014
Revised on: