

# Board of Education Regular Meeting

Monday, October 18, 2010 7:00 PM

PPMS Library, 1 Route 164, Preston, CT 06365

I. <b>Call to Order</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
II. <b>Pledge of Allegiance</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
III. <b>Approval of Minutes</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
IV. <b>Public Comment</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
V. <b>Board of Education Committee and Other Reports</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
VI. <b>Superintendent Reports and Recommendations</b>	<b>Speaker (s) :</b> Dr. Welch
VI.A. BOE Expenditure/Projection Report	<b>Speaker (s) :</b> Dr. Welch
VII. <b>New Business</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
VII.A. Votes Required	<b>Speaker (s) :</b> Pauline Andruskiewicz
VII.B. Discussion	<b>Speaker (s) :</b> Pauline Andruskiewicz
VIII. <b>Old Business</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
VIII.A. Votes Required	<b>Speaker (s) :</b> Pauline Andruskiewicz
IX. <b>Executive Session</b>	
X. <b>Information</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
XI. <b>Date and Time of Next Meeting</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz
XII. <b>Adjournment</b>	<b>Speaker (s) :</b> Pauline Andruskiewicz

## **Board of Education Regular Meeting**

September 13, 2010 07:00PM

PVMS Library

### **1. Call to Order**

Pauline Andruskiewicz called the meeting to order at 7:01PM. Other Members Present: Deborah Burke-Grabarek, James Jancewicz, Sandra Gauthier, John Moulson and Charles Raymond. Daniel Harris was absent. Also present: Dr. Welch; Superintendent, Gloria Homiski; Recording Secretary, Gary Miller; Interim Business Manager, Ivy Davis; Director of Curriculum, Instruction and Special Education, Ray Bernier; Principal PPMS, Kathryn Walsh; Principal PVMS, Mike House; Supervisor of Buildings and Grounds, Patricia Hibbard; Transportation Coordinator, and Nick Grello; BOE Attorney. Audience: Leonard Kostek, Norman Gauthier, Glen Babbitt, Mr. and Mrs. Ennis, Jan Clancy, Sherry Guertin, Pearle Potter, Kevin Mercik (CSEA Union Rep), Stacey Wilbur, and Rebecca Boenig.

### **2. Pledge of Allegiance**

### **3. Approval of Minutes**

Moved, to approve the minutes of the regular meeting of the BOE on August 9, 2010. Burke-Grabarek/Andruskiewicz. Unanimous. Motion Carries.

### **4. Public Comment**

Bill Legler asked why the BOE denied the BOF's FOI request. Dr. Welch stated that the document did not meet the criteria under FOI.

Glen Babbitt addressed the Board with regard to outsourcing transportation. He does not believe that a savings will result.

Norm Gauthier addressed the Board with regard to an August 12<sup>th</sup> article in the Norwich Bulletin. He stated that Bill Legler's research prevented the Board from making a poor decision.

Jan Clancy asked why Nick Grello was present. Dr. Welch explained that the Board Attorney was present principally for Executive Session.

### **5. Board of Education Committee and Other Reports**

Dr. Welch announced the appointment of Larissa Klymenko and Bill Legler to the School Consolidation Sub Committee. He explained that there would be a review of information and that the committee would meet again on Oct 18<sup>th</sup>.

### **6. Superintendent Reports and Recommendations**

Dr. Welch reported that the school year is off to a very good start. Grade 4 is the largest with 22 students in each of 2 classes. Grade K enrollment is at 30, which is down 15 students from the projected enrollment.

Dr. Schmoker; school improvement consultant, will present at PPMS on September 15<sup>th</sup> from 8:30 to 11:30. Board members are welcome to attend.

Moved, to take the agenda out of order to discuss item 8.1 Old Business, Votes Required, School Transportation Services. Andruskiewicz/Burke-Grabarek. Unanimous. Motion Carries.

### **6.1. BOE Expenditure/Projection Report**

Gary Miller reviewed the expenditure report with the BOE. Central Office is working on getting the Phoenix Software up and running. Parallel payrolls are being run. The budget has been entered into both systems. John Moulson asked to see a report from Phoenix. Gary said he would present that report next month.

### **6.2. Preston Cafeteria Profit and Loss Report**

## **7. New Business**

### **7.1. Votes Required**

Dr. Welch reviewed his 2010-2011 goals with the BOE.

John Moulson asked that Dr. Welch add the following 3 goals to his list:

1. Fully implement new accounting system
2. Include financials with board packets on the Friday before the meeting
3. Determine a set amount for a transportation savings cost for the year

Dr. Welch's goals will be returned to the BOE with additions.

Moved, to appoint Gerry Grabarek to the Ledyard VoAg Advisory Committee. Andruskiewicz/Jancewicz. Andruskiewicz, Jancewicz, Raymond, Moulson and Gauthier in favor. Burke-Grabarek recused herself from the vote. Motion Carries.

Policies:

Policy 4218.4: Electronic Mail: Rework last paragraph and return to Board.

Policy 4218.5: Employee Use of Computers Networks: Review and return to Board

Policy 4120: Temporary and Part-Time Personnel: Delete this policy

Policy 4121: Substitute Teachers: Approved as presented

Policy 4122: Student Teachers: Remove last paragraph and then it is approved.

Policy 4126: Consultants: Rework and return to the Board

Policy 4131: Staff Development: Approved as presented

Policy 4131.5: CEU's: Approved as presented

Policy 4132: Publication or Creation of Materials: Approved as presented

### **7.2. Discussion**

Van Rental: Gary Miller explained that Preston has decided to rent 2 vans in order to handle more special education transportation needs in house rather than outsourcing. The rental cost is approximately \$100 a week, which is significantly lower than the outsourcing cost.

Synergy: This is a Special Education Program that is working along with the Mystic Aquarium. Their goal is to assist our disabled students with their communication skills so that they may have better social skills.

2010 CMT Performances: In 2006 the Board established their goal for 80% of all students to perform at Goal/Advanced in all subject areas of the CMT Tests. On the whole, grades 6,7,8, are meeting state standards and in some cases meeting the 80% goal. Grades 3,4, and 5 are performing below the state average in some cases.

Preston must look at scores from year to year and also review a cohort analysis; thereby looking for program growth as well as individual student growth.

## **8. Old Business**

### **8.1. Votes Required**

School Transportation Services:

Moved, not to continue in 2010-2011 with the prospect of outsourcing school transportation. Andruskiewicz/Jancewicz. Discussion followed. Moulson, Gauthier, Burke-Grabarek and Raymond in favor. Andruskiewicz and Jancewicz opposed. Motion Carries.

Moved, to take the agenda out of order to go into executive session. Andruskiewicz/Jancewicz. Andruskiewicz, Gauthier, Raymond in favor. Jancewicz, Moulson and Burke-Grabarek opposed. Motion Fails.

Director of Finance and School Business Operations: The original was amended to resemble the look of all of our other job descriptions. It was also amended to better incorporate the needs of both the BOE and the Town.

John Moulson expressed his concern that the person will end up spending more time working for the Town and that the BOE will end up paying for time not actually spent working for the board. Dr. Welch suggested that an MOA be drawn up in order to clarify the position requirements and expectations.

Moved, to approve the amended job description for the Director of Finance and School Business Operations. Burke-Grabarek/Gauthier. Unanimous. Motion Carries.

Moved, to take the agenda out of order to enter executive session. Burke-Grabarek/Jancewicz. Unanimous. Motion Carries.

### **8.2. Discussion**

## **9. Executive Session**

Moved, to enter into executive session in order to discuss strategy with respect to collective bargaining at 9:16PM. Burke-Grabarek/Andruskiewicz. Unanimous. Motion Carries.

Moved, to come out of executive session at 9:46PM. Burke-Grabarek/Andruskiewicz. Unanimous. Motion Carries.

## **10. Information**

### **11. Date and Time of Next Meeting**

October 18, 2010

7PM

PVMS Library

### **12. Adjournment**


Moved, to adjourn the meeting at 10:18PM. Burke-Grabarek/Gauthier. Andruskiewicz and Jancewicz also in favor. Moulson and Raymond opposed. Motion Carries.





## Preston Public Schools

# Memo

**To:** Jack Welch, Superintendent  
**From:** Gary Miller, Interim Business Manager   
**Date:** October 12, 2010  
**Re:** FY2011 Budget Status Report  
**Encl:** (1) Budget Status – September 2010

The attached Budget Status Report reflects the expenses to date for fiscal year 2010-2011. This is the first report for this school year and reflects some minor account classification changes due to the conversion to an improved chart of accounts on the Phoenix Financial System. We are in the process of encumbering funds for known and projected expenses. Consequently, not all accounts show an encumbrance.

1. Personnel (Object 111 and 112) and Benefits (Object 200) reflect all payroll expenses. The Regular Education Teachers account shows the gross salaries including those covered by the ARRA Stabilization Grant offset of \$436,130. The offset is the same amount as last fiscal year.
2. The Substitutes (Object 113) account has an anticipated deficit of \$21,721 based on prior year experience. This account was under-budgeted last fiscal year as well, but the budget amount was not corrected in this year's budget.
3. Repairs & Maintenance (Object 430) has a deficit due to the purchase order (\$50,000) created to encumber funds for Weston Solutions monitoring of the sampling points at PVMS. This expense was not known during budget development.
4. Property/Liability Insurance (Object 520) shows the first quarter payment and encumbrance for quarters 2 through 4 to CIRMA for insurance that was formerly paid by the Town. The BOE budget was set before the bill was forwarded to the BOE to pay. No budget exists for these expenses. The account is in deficit by \$56,096.
5. Tuition (Objects 560-564) provides a better breakout of the various types of tuition that is paid for both regular education and special education students. We are in the process of encumbering special education out-placement tuitions.
6. Technology Software/Licenses (Object 735) is a new category to properly collect expenses previously budget under Technology Equipment (Object 734). These two accounts need to be reallocated. Nearly all of the expenses currently shown will be charged to state and federal grants when the funds are received in the next few months.
7. Dues/Fees (Object 810) account reflects a temporary deficit due to the expense for Project Oceanography (\$7,476) which will be charged to a grant when the funds are received. Otherwise the account is in balance.

**Preston Board of Education**  
**FY2011 Budget Status Report**  
 July 2010 to September 2010

	Account	Current Budget	Expenses	Encumb- Projected	Balance
<b>111 · Certified Personnel</b>					
	Superintendent	115,257	26,598	88,659	-
	Director of Cir., Inst & Sped	84,460	19,917	64,543	-
	Principals	197,713	45,233	152,480	-
	Business Manager	88,000	25,620	62,380	-
	Regular Education Teachers	2,314,053	267,193	2,046,860	-
	<i>ARRA Stabilization Grant Offset</i>	(436,130)	-	(436,130)	-
	Special Education Teachers	581,598	73,420	508,178	-
	Health Services	95,276	15,264	80,012	-
	<b>Total Certified Personnel</b>	<b>3,040,227</b>	<b>473,245</b>	<b>2,566,982</b>	<b>-</b>
<b>112 · Classified Personnel</b>					
	Instructional Assistants	335,699	31,018	304,681	-
	Central Office Staff	97,327	21,998	75,329	-
	Technical Coordinator	48,067	10,590	37,477	-
	School Secretaries	51,457	9,696	41,761	-
	Bldg & Grounds/Custodial	209,525	54,087	155,438	-
	Transportation Staff	529,045	41,216	487,829	-
	113 · Substitutes	81,000	4,509	98,212	(21,721)
	114 · Homebound Tutors	12,000	313	-	11,687
	122 · Stipends	21,700	2,274	-	19,426
	<b>Total Classified Personnel</b>	<b>1,385,820</b>	<b>175,701</b>	<b>1,200,727</b>	<b>9,392</b>
	212 · Health Insurance	900,000	244,755	568,895	86,350
	215 · Life Insurance	9,500	1,425	3,547	4,528
	220 · Social Security	161,085	23,950	137,135	-
	250 · Tuition Reimbursement	7,000	2,226	-	4,774
	260 · Unemployment Comp	44,000	-	-	44,000
	270 · Workers Comp	58,744	13,229	39,687	5,828
	275 · Employee Physicals	-	174	1,340	(1,514)
	291 · Annuity Payments	108,000	53,353	17,000	37,647
	295/297 · Employee Voluntary Insurances	-	1,250	-	(1,250)
	<b>Total Benefits</b>	<b>1,288,329</b>	<b>340,362</b>	<b>767,604</b>	<b>180,363</b>
	320 · Special Education Services	292,146	5,972	33,359	252,815
	322 · Staff Development	10,000	2,181	-	7,819
	330 · Professional Purchased Services	30,970	14,949	13,068	2,953
	331 · Legal Services	40,000	-	30,000	10,000
	420 · Refuse Removal	12,000	-	11,280	720
	421 · Transportation Vehicle Repairs	50,000	9,268	13,794	26,938
	430 · Repairs & Maintenance	60,473	38,199	49,160	(26,886)
	431 · Maintenance Equipment Repairs	25,000	851	-	24,149
	432 · Technology Equipment Repairs	53,982	2,304	36,756	14,922
	442 · Copier Leases	45,000	10,648	35,019	(667)
	450 · Building Improvements	28,000	6,187	17,353	4,460
	<b>Total Purchased Services</b>	<b>647,571</b>	<b>90,559</b>	<b>239,789</b>	<b>317,223</b>

**Preston Board of Education**  
**FY2011 Budget Status Report**  
 July 2010 to September 2010

	Account	Current Budget	Expenses	Encumb- Projected	Balance
	510 · Special Educ Transportation	115,000	6,908	-	108,092
	511/512 · Regular Educ Transportation	-	-	-	-
	520 · Property/Liability Insurance	-	14,024	42,072	(56,096)
	530 · Communications	35,880	7,099	28,378	403
	531 · Postage	6,000	192	576	5,232
	570 · Food Service Stoploss	50,000	-	-	50,000
	580 · Travel	10,000	94	506	9,400
	<b>Total Other Purchased Services</b>	<b>216,880</b>	<b>28,317</b>	<b>71,532</b>	<b>117,031</b>
	560 · Tuition - Designated HS	1,569,575	-	1,558,869	10,706
	561 · Tuition - Vo-Ag, Other	134,016	-	81,232	52,784
	562 · Tuition - Magnet Schools	21,148	-	6,381	14,767
	563 · Tuition - Spec Ed - LEA Placed	1,086,526	44,921	703,016	338,589
	564 · Tuition - Spec Ed - DCF Placed	65,000	-	-	65,000
	<b>Total Student Tuition</b>	<b>2,876,265</b>	<b>44,921</b>	<b>2,349,498</b>	<b>481,846</b>
	611/612 · Instructional/Media Supplies	47,500	14,088	13,568	19,844
	613 · Custodial/Maintenance Supplies	11,800	29,009	8,833	(26,042)
	620/621 · Heat Energy/Propane	87,647	249	79,160	8,238
	622 · Electricity	137,012	24,509	106,747	5,756
	626 · Gasoline/Diesel	107,870	5,062	83,933	18,875
	641/642 · Textbooks/Workbooks/Library	22,500	17,873	856	3,771
	650 · Technology Supplies	10,280	440	1,909	7,931
	690 · Non-Instructional Supplies	10,000	6,951	2,347	702
	<b>Total Supplies/Commodities</b>	<b>434,609</b>	<b>98,181</b>	<b>297,353</b>	<b>39,075</b>
	730 · Instructional Equipment	5,000	-	-	5,000
	733 · Non-Instructional Equipment	25,000	12,354	-	12,646
	734 · Technology Equipment	87,831	13,822	22,781	51,228
	735 · Technology Software/Licenses	-	26,095	504	(26,599)
	<b>Total Equipment</b>	<b>117,831</b>	<b>52,271</b>	<b>23,285</b>	<b>42,275</b>
	810 · Dues/Fees	12,500	19,895	-	(7,395)
	<b>Total Expense</b>	<b>10,020,032</b>	<b>1,323,452</b>	<b>7,516,770</b>	<b>1,179,810</b>

## 5117.1

### Students

#### Designated High School

The Preston Board of Education has designated The Norwich Free Academy (NFA) as the *Designated High School* for Preston secondary students. However, students may also select and apply to the Non-Agricultural Science Program at Ledyard High School under the following circumstances:

1. Students must apply to Ledyard High School for admission. *The Ledyard High School Administration will determine if the student is accepted to Ledyard High School.*

2. Students applying to Ledyard High School for the next academic year must apply on or before November 1. Ledyard High School will review the application and notify the Superintendent of Schools for the Preston Public Schools on or before December 1 if the student has been accepted for the fall academic term.

The Board of Education also recognizes that students may select and apply to other high school programs including:

- State of Connecticut Vocational/Technical Schools
- State of Connecticut Agricultural Science Schools
- State of Connecticut Magnet Schools/Charter Schools
- Thames River Academy
- Community Connections High School
- Private Schools

The Board of Education accepts fiscal responsibility (tuition charges) for students attending NFA, the Agricultural Science Program at Ledyard High School, Thames River Academy, Community Connections High School and the Magnet High School located in New London. The cost for education at State of Connecticut Vocational/ Technical Schools and charter schools is paid by the State of Connecticut, and the cost for education at private schools is paid by the parent(s)/guardian(s).

The Board of Education provides transportation for students attending:

- Norwich Free Academy
- Ledyard High School (Agricultural Science Program)
- Thames River Academy
- Community Connections High School
- State of Connecticut Vocational/Technical School
- New London Magnet School

- *Marine Science Magnet High School of Southeastern Connecticut*

Once enrolled at either NFA or the Non-Agricultural Science Program at Ledyard High School, students may not transfer from NFA to the Non-Agricultural Science Program at Ledyard High School.

All new high school age students who become residents of Preston will attend the designated high school, The Norwich Free Academy, unless enrolling at a Vocational/Technical School, Agricultural Science School, Thames River Academy, Community Connections High School, Magnet School or private school.

Additionally, special education placements at any grade level at any high school may be approved by the Superintendent of Schools upon recommendations for a special education out-of-district placement by the Director of Special Education when necessary to meet a student's special educational needs identified through the special education process in the Preston Public Schools.

Finally, students enrolled in State of Connecticut Vocational/Technical Schools, Ledyard High School, Thames River Academy, Community Connections High School, Magnet Schools or private schools who wish to transfer to a comprehensive high school program will enroll at NFA.

Approved: 5/10/10









**TOWN OF PRESTON and PRESTON BOARD OF EDUCATION**  
**Preston, Connecticut**  
**Job Description**

**POSITION:** DIRECTOR OF FINANCE AND SCHOOL BUSINESS OPERATIONS

**QUALIFICATIONS:**

1. Bachelor's Degree in accounting, finance, business or public administration; Master's Degree, CPFO or CPA desirable.
2. Minimum of ten years of progressively responsible financial, town, school and/or business management experience; including four years of supervisory experience.
3. CT Certification as a Business Manager (085).
4. Such alternatives to the above qualifications as the Board of Selectmen and Board of Education may find appropriate and acceptable.

**GENERAL DESCRIPTION:** This position addresses the administration of all town finance (Town of Preston) and school business operation related functions (Preston Board of Education).

The Director of Finance and School Business Operations is employed nominally four days per week by the Preston Board of Education and one day per week by the Town of Preston.

Specifically, the Director of Finance and School Business Operations is responsible for all aspects of the Town of Preston and the Preston Board of Education's fiscal affairs including the establishment and maintenance of all internal accounting procedures and operational controls, financial planning and reporting, budgeting, capital improvement plan strategy, debt management, management information systems, internal auditing, risk management, collective bargaining (advisory capacity), cash management and grant administration.

The Director of Finance and School Business Operations provides fiscal consultation to all town departments, commissions and boards. (Duties may expand and otherwise be revised as position demands change).

**SUPERVISES:** The Director of Finance and School Business Operations supervises employees of the Preston Board of Education responsible for accounts payable, purchasing, payroll, student transportation, facilities technology, and food services. In addition, he/she supervises employees of the Town of Preston that are responsible for the accounting and recording of all transactions related to accounts payable, payroll, purchasing, accounts receivable, cash receipts and the general ledger.

## **RESPONSIBILITIES:**

**Establish and Maintain all Internal Accounting Procedures and Operational Controls:** Evaluates and ensures that effective comprehensive controls exist to safeguard the assets of the Town of Preston and Board of Education from loss due to unauthorized use or disposition. Oversees purchasing system for compliance with established procedures. Reviews and counter signs purchase orders. Works closely with the external auditors to address any concerns relating to the overall internal and operational control environment which result from their review. Implements recommendations as deemed necessary. Coordinates annual fixed asset inventories and maintains detailed supporting records.

**Financial Planning:** Monitor department spending in conjunction with appropriated budget levels. Manage financial operations to improve cost control by each department and recommend new cost containment procedures. Review and monitor financial and cash forecasts in conjunction with anticipated operational needs and investment strategies.

**Financial Reporting:** Supervises staff to ensure accounting records are maintained in sufficient detail to produce financial and statistical data for management and external report (including grant program) purposes. Present monthly to supervisors a current overview of the Town of Preston and the Board of Education including but not limited to: accurate monthly financial statements, comparisons of department budget and actual results with full year department forecasts including explanations for any significant variances from appropriated amounts, capital improvement plan status, cash management report with full year cash and interest income forecast (in conjunction with the Town Treasurer).

**Budgeting:** Participate in the preparation of annual budgets with departments and commission heads by providing various analytical assistance including cost/benefit analyses for significant funding requests. Present suggestions for interdepartmental cost sharing when noted. Compile budgets and other related statistical and technical information requested for presentation to Board of Selectmen, Board of Finance and Board of Education. Monitor department budgets throughout the year for compliances with underlying assumptions that appropriations were based.

**Capital Improvement Plan (CIP) Strategy:** As an advisor to the Board of Selectmen, Board of Education and CIP committee, establish a financially responsible CIP strategy that recommends funding alternatives, project timing, and spending levels based on the Town of Preston's overall financial condition and the general economic climate. Monitor project status and report results on a monthly basis.

**Debt Management:** Serve as main contact for all external financial matters and liaison between the Town of Preston and its investment advisors. Coordinate with the Town Treasurer the short and long term borrowing needs of the Town of Preston and develop overall borrowing strategy. With the Town Treasurer develop and prepare all necessary information for bonding purposes. Serve as financial advisor to the Town of Preston's bonding committee providing debt redemption schedules, future spending projections and other financial information as requested.

**Management Information Systems:** Administer the management information systems for the Town of Preston and the Board of Education, establishing uniform hardware and software use wherever possible. Assist departments as needed in the updating of technological methods. Initiate and monitor contracts with external system consultants when used. Focus on overall future long term computer and system requirements for the Town of Preston and Preston Board of Education, making recommendations for upgrading systems with new technology when needed. Maintain system security.

Internal Audit: Test the integrity of the established internal controls by incorporating ongoing monitoring procedures in the processes and performing random spot checks on financial related data and various transaction processes throughout the year.

Risk Management: Oversees management of the Town of Preston and Preston Board of Education's insurance program. Maintains all appropriate records, compiles all required information. Initiates bid proposals and coordinates all necessary information requests.

Collective Bargaining: Assists and advises the Preston Board of Education in an advisory capacity on contract language, salary/wage projections, health benefits and other related issues.

Cash Management: Coordinate with the Town Treasurer the short and long term investment and borrowing strategies. Assist the Town Treasurer in the preparation of monthly cash forecasts.

Grant Administration: Responsible for the monitoring and compliance with regulations of all grants including the maintenance of all required supporting documentation. Responsible for tracking grant reimbursements and forecasting future grant receipts.

Food Service Oversight: Oversees the food service program, its maintenance, monthly inspection, its reports and supervision, conferring with interested parties and shall provide economical, satisfactory and efficient management of the lunch program. Approves Free and Reduced lunch applications. Files monthly meal claims and other required reports. Conduct periodic audits of the cafeteria accounts and cash management operation.

Attendance: Attend monthly Board of Selectman, Board of Education and Board of Finance meetings.

**Knowledge, Skills and Abilities:**

Thorough knowledge of the principles, practices and techniques of governmental and school finances, municipal and school budgeting, payroll and data processing.

Thorough knowledge of G.A.S.B. fund accounting, state and federal laws regarding finance, various grants, workers' compensation and unemployment compensation laws, school and municipal administration.

Thorough knowledge of laws, statutes, ordinances and regulations which govern the management and control of municipal and school funds.

Ability to analyze the operations of a variety of municipal and school departments and to identify opportunities for cost savings through efficiency of operations.

Ability to maintain financial reports and prepare specific related reports.

Considerable knowledge regarding computer systems and financial applications.

Strong oral and written communication skills.

Ability to effectively supervise the accounting, payroll, treasury and other financial functions.

Ability to deal tactfully and effectively with members of the Town government, Board of Education, various boards and commissions, subordinates, general public and outside agencies.

Ability to coordinate activities and motivate department staff and others.

**REPORTS TO:** First Selectman (Town)  
Superintendent (BOE)

This is a twelve month position with salary and benefits as established by the Board of Selectmen and Board of Education. **The position is evaluated annually by the First Selectman and the Superintendent.**

8/9/10

**Town of Preston  
Director of Finance  
Job Description**

**General Description:**

This is a highly responsible position involving the operation and administration of all finance related functions for the Town of Preston and the Preston Board of Education.

The position is responsible for all aspects of the Town of Preston and the Preston Board of Education's fiscal affairs and includes: the establishment and maintenance of all internal accounting procedures and operational controls, financial planning, financial reporting, budgeting, capital improvement plan strategy, debt management, management information systems, internal auditing, risk management, collective bargaining (advisory capacity), cash management and grant administration. This position provides fiscal consultation to all town departments, commissions and boards. Duties may expand and otherwise be revised as position demands change.

**Supervision Received:**

This position receives general supervision from the Board of Finance and works under the direct supervision of the First Selectman and the Superintendent of Schools.

**Supervision Exercised:**

This position supervises employees of the Town of Preston and the Preston Board of Education that are responsible for the accounting and recording of all transactions related to accounts payable, payroll, purchasing, accounts receivable, cash receipts and the general ledger.

**Examples of Responsibilities:**

Establish and maintain all internal accounting procedures and operational controls: Evaluates and ensures that effective comprehensive controls exist to safeguard the assets of the Town of Preston and Board of Education from loss due to unauthorized use or disposition. Oversees purchasing system for compliance with established procedures. Reviews and counter signs purchase orders. Works closely with the external auditors to address any concerns relating to the overall internal and operational control environment, which result from their review. Implements recommendations as deemed necessary. Coordinates annual fixed asset inventories and maintains detailed supporting records.

Financial planning: Monitor department spending in conjunction with appropriated budget levels. Manage financial operations to improve cost control by each department and recommend new cost containment procedures. Review and monitor financial and cash forecasts in conjunction with anticipated operational needs and investment strategies.

**Financial reporting:** Supervises staff to ensure accounting records are maintained in sufficient detail to produce financial and statistical data for management and external report (including grant program) purposes. Present monthly to supervisors a current financial overview of the Town of Preston and the Board of Education including but not limited to: accurate monthly financial statements, comparisons of department budget and actual results with full year department forecasts including explanations for any significant variances from appropriated amounts, capital improvement plan status, cash management report with full year cash and interest income forecast (in conjunction with the Town Treasurer).

**Budgeting:** Participate in the preparation of annual budgets with departments and commission heads (including the Board of Education) by providing various analytical assistance including cost/benefit analyses for significant funding requests. Present suggestions for interdepartmental cost sharing when noted. Compile budgets and other related statistical and technical information requested for presentation to Board of Selectmen, Board of Finance and Board of Education. Monitor department budgets throughout the year for compliances with underlying assumptions that appropriations were based.

**Capital improvement plan (CIP) strategy:** As an advisor to the Board of Selectmen, Board of Education and CIP committee, establish a financially responsible CIP strategy that recommends funding alternatives, project timing, and spending levels based on the Town of Preston's overall financial condition and the general economic climate. Monitor project status and report results on a monthly basis.

**Debt management:** Serve as main contact for all external financial matters and liaison between the Town of Preston and its investment advisors. Coordinate with the Town Treasurer the short and long term borrowing needs of the Town of Preston and develop overall borrowing strategy. With the Town Treasurer develop and prepare all necessary information for bonding purposes. Serve as financial advisor to the Town of Preston's bonding committee providing debt redemption schedules, future spending projections and other financial information as requested.

**Management information systems:** Administer the management information systems for the Town of Preston and the Preston Board of Education, establishing uniform hardware and software use wherever possible. Assist departments as needed in the updating of technological methods. Initiate and monitor contracts with external system consultants when used. Focus on overall future long term computer and system requirements for the Town of Preston and Preston Board of Education, making recommendations for upgrading systems with new technology when needed. Maintain system security.

**Internal auditing:** Test the integrity of the established internal controls by incorporating ongoing monitoring procedures in the processes and performing random spot checks on financial related data and various transaction processes throughout the year.

**Risk management:** Oversees management of the Town of Preston and Preston Board of Education's insurance program. Maintains all appropriate records, compiles all required information. Initiates bid proposals and coordinates all necessary information requests.

**Collective bargaining:** Assists and advises the Preston Board of Education in an advisory capacity on financial related issues.

**Cash management:** Coordinate with the Town Treasurer the short and long term investment and borrowing strategies. Assist the Town Treasurer in the preparation of monthly cash forecasts.

**Grant administration:** Responsible for the monitoring and compliance with regulations of all grants including the maintenance of all required supporting documentation. Responsible for tracking grant reimbursements and forecasting future grant receipts.

**Attendance:** Attend all Board of Finance meetings and attends Board of Selectman and Board of Education meetings as needed and/or as requested.

**Knowledge, Skills & Abilities:**

Thorough knowledge of the principles, practices and techniques of governmental and school finances, municipal and school budgeting, payroll and data processing.

Thorough knowledge of G.A.S.B. fund accounting and encumbrance accounting, state and federal laws regarding finance, various grants, workers' compensation and unemployment compensation laws, school and municipal administration.

Thorough knowledge of laws, statutes, ordinances and regulations that govern the management and control of municipal and school funds.

Ability to analyze the operations of a variety of municipal and school departments and to identify opportunities for cost savings through efficiency of operations.

Ability to maintain financial reports and prepare specific related reports.

Considerable knowledge and ability of financial computer systems and applications.

Strong oral and written communication skills.

Ability to effectively supervise the accounting, payroll, treasury and other financial functions.

Ability to deal tactfully and effectively with members of the Town government, Board of Education, various boards and commissions, subordinates, general public and outside agencies.

Ability to coordinate activities and motivate department staff and others.

**Qualifications (minimum):**

Minimum a bachelor's degree in accounting, finance, business or public administration, plus at least ten years of progressively responsible financial, town, school or business management experience with a least four years in a supervisory capacity and have a current CT School Business Administrator (085) certificate. Masters degree, CPFO or CPA desirable.

**TOWN OF PRESTON and PRESTON BOARD OF EDUCATION**  
**Preston, Connecticut**  
**Job Description**

**POSITION:** DIRECTOR OF FINANCE AND SCHOOL BUSINESS OPERATIONS

**QUALIFICATIONS:**

1. Bachelor's Degree in accounting, finance, business or public administration; Master's Degree, CPFO or CPA desirable.
2. Minimum of ten years of progressively responsible financial, town, school and/or business management experience; including four years of supervisory experience.
3. CT Certification as a Business Manager (085).
4. Such alternatives to the above qualifications as the Board of Selectmen and Board of Education may find appropriate and acceptable.

**GENERAL DESCRIPTION:** This position addresses the administration of all town finance (Town of Preston) and school business operation related functions (Preston Board of Education).

Specifically, the Director of Finance and School Business Operations is responsible for all aspects of the Town of Preston and the Preston Board of Education's fiscal affairs including the establishment and maintenance of all internal accounting procedures and operational controls, financial planning and reporting, budgeting, capital improvement plan strategy, debt management, management information systems, internal auditing, risk management, collective bargaining (advisory capacity), cash management and grant administration.

The Director of Finance and School Business Operations provides fiscal consultation to all town departments, commissions and boards. (Duties may expand and otherwise be revised as position demands change).

**SUPERVISES:** The Director of Finance and School Business Operations supervises employees of the Preston Board of Education responsible for accounts payable, purchasing, payroll, student transportation, facilities technology, and food services. In addition, he/she supervises employees of the Town of Preston that are responsible for the accounting and recording of all transactions related to accounts payable, payroll, purchasing, accounts receivable, cash receipts and the general ledger.

**RESPONSIBILITIES:**

Establish and Maintain all Internal Accounting Procedures and Operational Controls: Evaluates and ensures that effective comprehensive controls exist to safeguard the assets of the Town of Preston and Board of Education from loss due to unauthorized use or disposition. Oversees purchasing system for compliance with established procedures. Reviews and counter signs purchase orders. Works closely with the external auditors to address any concerns relating to the overall internal and operational control environment which result from their review. Implements recommendations as deemed necessary. Coordinates annual fixed asset inventories and maintains detailed supporting records.

**Financial Planning:** Monitor department spending in conjunction with appropriated budget levels. Manage financial operations to improve cost control by each department and recommend new cost containment procedures. Review and monitor financial and cash forecasts in conjunction with anticipated operational needs and investment strategies.

**Financial Reporting:** Supervises staff to ensure accounting records are maintained in sufficient detail to produce financial and statistical data for management and external report (including grant program) purposes. Present monthly to supervisors a current overview of the Town of Preston and the Board of Education including but not limited to: accurate monthly financial statements, comparisons of department budget and actual results with full year department forecasts including explanations for any significant variances from appropriated amounts, capital improvement plan status, cash management report with full year cash and interest income forecast (in conjunction with the Town Treasurer).

**Budgeting:** Participate in the preparation of annual budgets with departments and commission heads by providing various analytical assistance including cost/benefit analyses for significant funding requests. Present suggestions for interdepartmental cost sharing when noted. Compile budgets and other related statistical and technical information requested for presentation to Board of Selectmen, Board of Finance and Board of Education. Monitor department budgets throughout the year for compliances with underlying assumptions that appropriations were based.

**Capital Improvement Plan (CIP) Strategy:** As an advisor to the Board of Selectmen, Board of Education and CIP committee, establish a financially responsible CIP strategy that recommends funding alternatives, project timing, and spending levels based on the Town of Preston's overall financial condition and the general economic climate. Monitor project status and report results on a monthly basis.

**Debt Management:** Serve as main contact for all external financial matters and liaison between the Town of Preston and its investment advisors. Coordinate with the Town Treasurer the short and long term borrowing needs of the Town of Preston and develop overall borrowing strategy. With the Town Treasurer develop and prepare all necessary information for bonding purposes. Serve as financial advisor to the Town of Preston's bonding committee providing debt redemption schedules, future spending projections and other financial information as requested.

**Management Information Systems:** Administer the management information systems for the Town of Preston and the Board of Education, establishing uniform hardware and software use wherever possible. Assist departments as needed in the updating of technological methods. Initiate and monitor contracts with external system consultants when used. Focus on overall future long term computer and system requirements for the Town of Preston and Preston Board of Education, making recommendations for upgrading systems with new technology when needed. Maintain system security.

**Internal Audit:** Test the integrity of the established internal controls by incorporating ongoing monitoring procedures in the processes and performing random spot checks on financial related data and various transaction processes throughout the year.

**Risk Management:** Oversees management of the Town of Preston and Preston Board of Education's insurance program. Maintains all appropriate records, compiles all required information. Initiates bid proposals and coordinates all necessary information requests.

**Collective Bargaining:** Assists and advises the Preston Board of Education in an advisory capacity on contract language, salary/wage projections, health benefits and other related issues.

**Cash Management:** Coordinate with the Town Treasurer the short and long term investment and borrowing strategies. Assist the Town Treasurer in the preparation of monthly cash forecasts.

**Grant Administration:** Responsible for the monitoring and compliance with regulations of all grants including the maintenance of all required supporting documentation. Responsible for tracking grant reimbursements and forecasting future grant receipts.

**Food Service Oversight:** Oversees the food service program, its maintenance, monthly inspection, its reports and supervision, conferring with interested parties and shall provide economical, satisfactory and efficient management of the lunch program. Approves Free and Reduced lunch applications. Files monthly meal claims and other required reports. Conduct periodic audits of the cafeteria accounts and cash management operation.

**Attendance:** Attend monthly Board of Selectman, Board of Education and Board of Finance meetings.

**Knowledge, Skills and Abilities:**

Thorough knowledge of the principles, practices and techniques of governmental and school finances, municipal and school budgeting, payroll and data processing.

Thorough knowledge of G.A.S.B. fund accounting, state and federal laws regarding finance, various grants, workers' compensation and unemployment compensation laws, school and municipal administration.

Thorough knowledge of laws, statutes, ordinances and regulations which govern the management and control of municipal and school funds.

Ability to analyze the operations of a variety of municipal and school departments and to identify opportunities for cost savings through efficiency of operations.

Ability to maintain financial reports and prepare specific related reports.

Considerable knowledge regarding computer systems and financial applications.

Strong oral and written communication skills.

Ability to effectively supervise the accounting, payroll, treasury and other financial functions.

Ability to deal tactfully and effectively with members of the Town government, Board of Education, various boards and commissions, subordinates, general public and outside agencies.

Ability to coordinate activities and motivate department staff and others.

**REPORTS TO:** First Selectman (Town)  
Superintendent (BOE)

This is a twelve month position with salary and benefits as established by the Board of Selectmen and Board of Education. The position is evaluated annually by the First Selectman and the Superintendent.

## CABE On-line Policy Manual

5125

### **Students**

#### **Student Records; Confidentiality**

Educational records, defined as records directly related to a student, will be kept for each student and will reflect the physical, emotional, social and academic aspects of a student's development in the educational process.

The Board of Education recognizes the need to comply with the legal state and federal requirements regarding the confidentiality, access to and amendment of student records. The procedures for the confidentiality of student records shall be consistent with federal statutes, including the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, and its implementing and revised regulations, The No Child Left Behind Act of 2001, and the Connecticut General Statutes.

Safeguards shall be established by the school administration to protect the student and the student's family from invasion of privacy in the collection, maintenance and dissemination of information, and to provide accessibility to recorded information by those legally entitled thereto. Access to inspect or review a student's educational record or any part thereof may include the right to receive copies under limited circumstances.

#### **For the purposes of this policy:**

**"Parent"** means a natural parent, an adopted, or a legal guardian or an individual acting as a parent in the absence of a parent or guardian. If parents are divorced or legally separated the parent granted custody and the parent not granted custody of a minor child both have the right of access to the academic, medical, hospital, or other health records of the child, unless a court order prohibits access. Whenever a student has attained the age of 18 years or is attending an institution of post-secondary education, the permission or consent required of, and the rights accorded to, the parents or guardians of the student shall thereafter only be required of, and accorded to, the student.

**"Student"** means an individual who is or has been "in attendance" in person at an educational agency or institution for whom education records are maintained. It also includes those situations in which students "attend" classes but are not physically present, including attendance by videoconference, satellite, Internet, or other electronic information and telecommunication technologies.

**“Student record”** means any item of information directly related to an identifiable student, other than directory information, which is maintained by a school district or required to be maintained by an employee in the performance of his/her duties whether recorded in handwriting, print, computer media, video or audio tape, film, microfilm and microfiche. Student records include information relative to an individual student gathered within or without the school system and maintained within the school system, regardless of the physical form in which it is maintained. Any information maintained for the purpose of review by a second party is considered a student record. Records that pertain to an individual’s previous attendance as a student are “education records” under FERPA regardless of when they were created or received within the school system.

**“Student record”** shall not include informal notes related to a student compiled by a school officer or employee which remain in the sole possession of the maker and are not accessible or revealed to any other person except a substitute. Records of the law enforcement unit of the District or school are not considered student records.

**“Law Enforcement Unit”** means an individual office, department, division, or other component of an education agency or institution that is officially authorized or designated by that agency or institution to (1) enforce laws or refer matters of law enforcement to appropriate authorities, or (2) maintain the physical security and safety of the agency or institution.

**“Substitute”** means a person who performs the duties of the individual who made the notes on a temporary basis, and does not refer to a person who permanently succeeds the maker of the notes in his or her position.

**“School Official”** means a person employed by the District as an administrator, supervisor, instructor, or support staff member, including health or medical staff and law enforcement unit personnel, a person serving on the Board of Education, a person or company with whom the district has contracted to perform a special task (such as an attorney, auditor, medical consultant, or therapist), or a parent or student serving on an official committee such as a disciplinary or grievance committee, or assisting another school official in performing his/her tasks.

The Superintendent shall be responsible for ensuring that all requirements under federal and state statutes shall be carried out by the district. He/She will develop procedures (administrative regulations) providing for the following:

1. Annually informing parents of their rights.
2. Permitting parents to inspect and review educational records, including, at least, a statement of the procedure to be followed by a parent or eligible student who requests to inspect and review the educational records, with an understanding that the procedure may not deny access to educational records; a description of the circumstances in which the district feels it has a legitimate cause to deny a request for a copy of such records; a schedule of fees for copies; and a listing of the types and locations of education records maintained by the school and the titles and addresses of school officials responsible for those records.
3. Not disclosing personally identifiable information from a student’s education records without the prior written consent of the student’s parent, except as otherwise permitted by administrative regulations; including at least a statement of whether the school will disclose personally identifiable information from the records to other school officials within the school who have been determined by

the school to have legitimate educational interests, and, if so, a specification of the criteria for determining which parties are “school officials” and what the school considers to be a “legitimate educational interest”; and a specification of the personally identifiable information to be designated as directory information.

4. Maintaining the record of disclosures of personally identifiable information from a student's education records and permitting a parent to inspect that record.
5. Providing a parent with an opportunity to seek the correction of the student's education records through a request to amend the records or a hearing, and permitting the parent or an eligible student to place a statement in the education records of the student.
6. Guaranteeing access to student records to authorized persons within five days following the date of request.
7. Assuring security of student records.
8. Enumerating and describing the student records maintained by the school system.
9. ~~Annually~~ informing parents under what conditions that their prior consent is not required to disclose information.
10. Ensuring the orderly retention and disposition, per applicable state statutes, of the districts student records.
11. Notifying parents of secondary school students that it is required to release the student's name, address and telephone listing to military recruiters and institutions of higher learning upon request. Parents or eligible students may request that the District not release this information, and the District will comply with the request.
12. Notifying parents annually of the District's policy on the collection or use of personal information collected from students for the purpose of marketing or selling that information or otherwise providing that information to others for that purpose, including arrangements to protect student privacy that are provided by the agency in the event of such collection, disclosure or use.

Legal Reference: Connecticut General Statutes

- 1-19(b)(11) Access to public records. Exempt records.
- 7-109 Destruction of documents.
- 10-15b Access of parent or guardians to student's records.
- 10-154a Professional communications between teacher or nurse & student.
- 10-209 Records not to be public.
- 10-221b Boards of education to establish written uniform policy re: treatment of recruiters.
- 11-8a Retention, destruction and transfer of documents
- 11-8b Transfer or disposal of public records. State Library Board to adopt regulations.

#### 46b-56 (e) Access to Records of Minors.

Connecticut Public Records Administration Schedule V - Disposition of Education Records (Revised 1983).

Federal Family Educational Rights and Privacy Act of 1974 (section 438 of the General Education Provisions Act, as amended, added by section 513 of P.L. 93-568, codified at 20 U.S.C.1232g.).

Dept. of Educ. 34 C.F.R. Part 99 (May 9, 1980 45 FR 30802) regs. implementing FERPA enacted as part of 438 of General Educ. provisions act (20 U.S.C. 1232g)-parent and student privacy and other rights with respect to educational records, as amended 11/21/96, and Final Rule 34 CFR Part 99, December 9, 2008)

USA Patriot Act of 2001, PL 107-56, 115 Stat. 272, Sec 507, 18 U.S.C. §2332b(g)(5)(B) and 2331

PL 107-110 "No Child Left Behind Act of 2001" Sections 5208 and 9528

Owasso Independent Sch. Dist. No.1-011 v. Falvo, 534 U.S.426 (2002)

Policy adopted:

## Students

### Student Records; Confidentiality

#### Definitions

#### As used in this regulation:

1. "**Student**" means an individual who is or has been "in attendance" in person at an educational agency or institution for whom education records are maintained. It also includes those situations in which students "attend" classes but are not physically present, including attendance by videoconference, satellite, Internet, or other electronic information and telecommunication technologies.
2. "**Student Record**" means any item of information directly related to an identifiable student, other than directory information, which is maintained by the school district or required to be maintained by an employee in the performance of his/her duties whether recorded by handwriting, print, computer media, video or audio tape, film, microfilm and microfiche. Student records include information relative to an individual student gathered within or without the school system and maintained within the school district, regardless of the physical form in which it is maintained. Any information which is maintained for the purpose of review by a second party is considered a student record.

"**Student Record**" shall not include informal notes related to a student compiled by a school officer or employee which remain in the sole possession of the maker and are not accessible or revealed to any other person except a substitute for the maker of the record.

Employment records used only in relation to a student's employment by the district are not considered student records. In addition student records do not include alumni records that contain information about the student after the student is no longer in attendance, records maintained by a law enforcement unit of an educational agency or institution that were created by that unit for the purpose of law enforcement or records of an eligible student that are maintained by a physician, psychologist, professional or paraprofessional made in connection with the treatment of the student and disclosed only to individuals providing such treatment.

**“Substitute”** means a person who performs the duties of the individual who made the notes on a temporary basis, and does not refer to a person who permanently succeeds the maker of notes in his or her position. Medical records are not open to public inspection.

**“Post-enrollment Records”** means that records that pertain to an individual's previous attendance as a student are “education records” under FERPA regardless of when they were created or received by the institution.

3. **“Directory Information”** means one or more of the following items: parent's name and/or e-mail address, student's name, address, telephone number, date and place of birth, major field(s) of study, participation in officially recognized activities and sports, photographic, computer and/or video images, grade levels, electronic mail address, weight and height of members of athletic teams, dates of attendance, degrees and awards received, and the most recent previous public or private school attended by the student.

A student's Social Security Number or student ID number is prohibited from designation as directory information. However, student ID numbers and other electronic personal identifiers used to access or communicate in electronic systems may be disclosed only if the identifier is not used by itself to authenticate identity and cannot be used to gain access to education records.

4. **“Parent”** means a natural parent, an adopted parent, or legal guardian or an individual acting as a parent in the absence of a parent or guardian. If parents are divorced or legally separated, both the parent granted custody and the parent not granted custody have the legal right of access to the academic, medical, hospital or other health records of the child, unless a court order prohibits access.

Whenever a student has attained eighteen (18) years or is attending an institution of post-secondary education, the permission or consent required of, and the rights accorded to, the parents or guardian of the student shall thereafter only be required of, and accorded to, the student, unless parents of a student eighteen (18) years of age or older who is a dependent as defined in Section 152 of the Internal Revenue Code of 1956.

5. **“School Official”** means a person employed by the district as an administrator, supervisor, instructor or support staff member, including health or medical staff and law enforcement unit personnel, a person serving on the Board of Education, a person or company with whom the district has contracted to perform a special task (such as an attorney, auditor, medical consultant, or therapist), or a parent or student serving on an official committee such as a disciplinary or grievance committee, or assisting another school official in performing his/her tasks.

6. **“Disclosure”** means to permit access to or the release, transfer, or other communication of personally identifiable information contained in education records, to any party, by any means including oral, written, or electronic means. It is also permitted to return

an educational record to the provider or creator of the record, including the return of a questionable document to the purported sender for verification of information in the document.

7. **“Personally Identifiable Information”** includes but is not limited to the student’s name, the name of the student’s parent or other family member, the address of the student or student’s family, a personal identifier such as the student’s Social Security Number or student number, or “biometric records” (a record of one or more measurable biological or behavioral characteristics that can be used for automated recognition of an individual, including fingerprints, retina and iris patterns, voice prints, DNA sequence, facial characteristics and handwriting), a list of personal characteristics or indirect identifiers, such as the name of the student’s parent or other family members and the date and place of birth and mother’s maiden name, or other information that would allow a reasonable person in the school or community who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.
8. **“Record”** means any information recorded in any way, including, but not limited to, handwriting, print, computer media, video or audio tape, film, microfilm and microfiche.
9. **“Access”** means a personal inspection and review of a record or an accurate copy of a record, an oral description or communication of a record or an accurate copy of a record and a request to release a copy of any record.
10. **“Student”** means a person who is or was enrolled in a school.
11. **“Adult student”** means a person who is or was enrolled in school and who is at least eighteen (18) years of age.
12. **“Eligible Student”** means a student or former student who has reached eighteen years (18) of age or who is attending an institution of post-secondary education or is an emancipated minor.
13. **“Law Enforcement Unit”** means an individual office, department, division, or other component of an education agency or institution that is officially authorized or designated by that agency or institution to (1) enforce laws or refer matters of law enforcement to appropriate authorities, or (2) maintain the physical security and safety of the agency or institution.
14. **“Legitimate Education Interest”** means the need for a school official to review an educational record in order to fulfill his/her professional responsibilities.
15. **“Signed and Dated Waiver Consent”** means signed and dated written consent to disclose personally identifiable student information from a student’s records must specify the records to be disclosed, the purpose of disclosure and the party to whom such records should be provided. Consent may include a record and signature in electronic form provided that the consent identifies and authenticates a particular person as the source of consent.

## Types of Records



- B. Health information, including Child Health Developmental Disabilities Prevention Program verification or waiver. (Comprehensive Health Record)
- C. Participation in special education programs including required tests, case studies, authorizations, and actions necessary to establish eligibility for admission or discharge.
- D. Language training records.
- E. Progress slips and/or notices.
- F. Parental restrictions regarding access to directory information or related stipulations.
- G. Parent or adult student rejoinders to challenged records and to disciplinary action.
- H. Parental authorizations or prohibitions of student participation in specific programs.
- I. Results of standardized tests administered within the preceding three years.

*Note: Disciplinary records of suspension and expulsion are subject to being expunged according to state and federal statutes.*

3. **“Permitted Records”** are those records having clear importance only to the current educational process of the student. Such records may be destroyed after 6 years following the student’s graduation, or the graduation of the class to which he/she belonged, after appropriate notification to parents and/or eligible students via media and an opportunity provided to copy said records. Such records may include the following:

- A. Objective counselor and/or teacher ratings
- B. Standardized test results older than three years
- C. Routine discipline data
- D. Verified reports of relevant behavioral patterns
- E. All disciplinary notices

### **Maintenance and Security of Student Records**

#### **1. Custodian of Records**

A. (Name of certified person) is hereby designated as custodian of student records. The address of the custodian is *(please indicate the title of the appropriate person)*.

- (1) The custodian is charged with district-wide responsibility for implementing Board of Education policies and administrative regulations relating to student records.
  - (2) The custodian shall be responsible for security of student records and shall devise procedures for assuring that access to such records is limited to authorized persons.
  - (3) The custodian of records or a designated certified employee shall be responsible during the inspection for interpretation of the records where necessary and for prevention of their alteration, damage or loss.
- B. In each school, the principal, or a certified employee designated by the principal, is responsible for implementation of Board of Education policies and administrative regulations relating to student records maintained in that school.

## 2. Files

- A. A record for each individual student shall be maintained in a central file at the school attended by the student, or when records are maintained in different locations, a notation shall be placed in the central file indicating where such records may be found.
- B. Student records shall be stored in locked containers (files) or rooms.

## 3. Information

- A. All anecdotal information and assessment reports maintained as student records must be dated and signed by the individual who originated the record. Each school principal shall keep on file a record of enrollment and scholarship for each student currently enrolled in that school.

## Access to Student Records

### 1. School Officials

- A. School officials, as defined, have access to students' educational records without consent, if the official has been determined to have a legitimate educational interest in the records.
- B. Contractors, consultants, volunteers, and other parties to whom a school has outsourced services or functions are considered "school officials" who may have access to student records, without parental consent, if the following conditions are met:
  - The party is under the direct control of the school.

- The party is subject to the same conditions governing the use and redisclosure of education records applicable to other school officials.
  - The contractor must ensure that only individuals with legitimate educational interests, as determined by the district or school, obtain access to the education records. The contractor may not redisclose personally identifiable information without consent unless the district or school has authorized the redisclosure under a FERPA exception and the district or school records the subsequent disclosure.
- C. The district or school may not disclose education records to an outside service provider unless it has specified in its annual FERPA notification to parents/students that it uses contractors, consultants, volunteers, as “school officials” to provide certain institutional services and functions.
- D. In controlling access to education records by school officials and outside service providers, schools must:
- (1) Use “reasonable methods” to ensure an official is given access to only those education records, paper or electronic, in which the official has a legitimate educational interest.
  - (2) Schools may use such methods as:
    - Physical controls such as locked filing cabinets;
    - Technological controls such as role-based access controls for electronic records;
    - Administrative policies, in lieu of physical or technological controls. Such policies must be effective in controlling access.

(It is recommended that access to education records by school officials be tracked.)

## 2. Parents

- A. Parents of currently enrolled or former students shall have an absolute right during regular business hours to access to any and all student records related to their children which are maintained by the district. Neither the student record, nor any part thereof, shall be withheld or edited. If the student records contain information on more than one student, the parent may inspect and review or be informed of only the specific information which pertains to that student.
- B. A parent or guardian’s request for access to student records shall be made in writing to the custodian of student records. Access shall be granted no later than forty-five (45) days following the date of the request.
- C. A requesting parent shall be notified of the location of all student records, if not centrally located.
- D. When a parent’s dominant language is not English, the district shall make an effort to

- (1) provide interpretation of the student record in the dominant language of the parent, or
- (2) assist the parent in securing an interpreter.

### 3. Parental Consent

- A. The custodian of student records may permit access to student records during regular school hours (a) to any person for whom a student's parent has executed written consent specifying the records to be released and identifying the party or class of parties to whom the records may be released; or (b) to the student if he/she is an eligible student, or has entered a post secondary educational institution.
- B. The recipient must be notified that the transmission of the information to others without the written consent of the parent is prohibited.
- C. The consent notices shall be kept permanently with the student record.
- D. Upon request, the district shall provide the parent/eligible student with a copy of the record which is disclosed. (34 CFR 9910, Rights of Inspection and Review)

### 4. Without Parental Consent

- A. No person or agent shall be permitted access to student records without written parental consent or under judicial order, except that access to those particular records relevant to the legitimate educational interests of the requester shall be permitted to the following:
  - (1) Officials and employees of other public schools or school districts, including local, county, or state correctional facilities where educational programs leading to high school graduation are provided, where the student intends to or is directed to enroll. The authority of the district or school to transfer education records to a student's new school continues after actual enrollment so long as the disclosure is in connection with the student's enrollment. This ensures that a school may supplement, update, or correct records sent during the student's application or transfer period. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

*Note: Section 504 and Title II of the ADA generally prohibits post-secondary institutions from making pre-admission inquiries about an applicant's disability status. However, after admission, such institutions may request such information concerning a current student.*

- (2) Authorized representatives of the Comptroller General of the United States, the Secretary of Education, an administrative head of an education agency, State Education Officials, or their respective designees, or the United States Office for Civil

Rights where such information is necessary to audit or evaluate a state or federally supported education program or pursuant to a federal or state law; provided that except when collection of personally identifiable information is specifically authorized by federal law, any data collected by such officials shall be protected in a manner which will not permit the personal identification of students or their parents by other than those officials, and such personally identifiable data shall be destroyed when no longer needed for such audit, evaluation, and enforcement of federal legal requirements.

- (3) The U.S. Attorney General or his/her designee in response to a court issued ex parte order, under the USA Patriot Act, in connection with the investigation or persecution of an offense listed in U.S.C. 2332b(g)5(B) or an act of domestic or international terrorism crimes. The District, in response to such an order, is not required to record a disclosure of information, nor acquire consent or notice to the parent or student.
  - (4) Other state and local officials to the extent that such information is specifically required to be reported pursuant to state law.
  - (5) Parents of a student eighteen (18) years of age or older who is a dependent as defined in Section 152 of the Internal Revenue Code of 1954.
  - (6) Schools may disclose information received under a community notification program concerning a student who is required to register as a sex offender in the State.
- B. Information from student records may be released to the following:
- (1) Appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health or safety of other persons. The factors to be considered in determining whether information may be disclosed include the seriousness of the threat to the health or safety of the student or other individuals, the need for the information to meet the emergency, whether the parties to whom the information is disclosed are in a position to deal with the emergency, and the extent to which time is of the essence in dealing with the emergency. 34 CFR 99.36, Conditions for disclosure of information in health and safety emergencies.
  - (2) Agencies or organizations in connection with a student's application form or receipt of financial aid, provided that information permitting the personal identification of students or their parents may be disclosed only as may be necessary for such purposes as to determine the amount of the financial aid, to determine the conditions which will be imposed regarding the financial aid, or to enforce the terms or conditions of the financial aid.
  - (3) Accrediting organizations in order to carry out their accrediting functions.
  - (4) Organizations conducting studies for or on behalf of state educational agencies and state higher education authorities, educational agencies or institutions for the purpose of developing, validating, or administering predictive tests, administering

student aid programs, and improving instruction, if such studies are conducted in such a manner as will not permit the personal identification of students or their parents by persons other than representatives of such organizations and such information will be destroyed when no longer needed for the purpose for which it is conducted.

Such disclosure is subject to the following FERPA requirements:

- The school does not have to initiate the research request or agree with or endorse the conclusion or results of the study.
- The school must agree with the purposes of the study and retain control over information from the education records it discloses.
- The school must have a written agreement with the receiving organization that:
  - Specifies the purpose, scope, and duration of the study or studies and the information to be disclosed.
  - Requires the organization to use the information from education records only to meet the purpose or purposes of the study stated in the agreement.
  - Requires the organization to conduct the study in a manner that does not permit personal identification of parents and students by anyone other than representatives of the organization with legitimate interests.
  - Requires the organization to destroy or return all personally identifiable information when no longer needed for purposes of the study.
  - Specifies the time period in which the information must be returned or destroyed.

*Note: It is recommended that whenever possible agencies and institutions either release de-identified information or remove student's names and Social Security Numbers to reduce the risk of unauthorized disclosure of personally identifiable information.*

(5) Officials and employees of private schools or school districts where the student is enrolled or intends to enroll subject to the rights of parents by law.

C. No person, persons, agency, or organization permitted access to student records pursuant to this regulation shall permit access to any information obtained from such records by any other person, persons, agency or organization without the written consent of the student's parent; provided, however, that this paragraph shall not be construed to require prior parental consent when information obtained pursuant to this regulation is shared with other persons within the district so long as such persons have an equal legitimate interest in the information.

D. Education records may be released without consent if all personally identifiable information has been removed. The district must reach a "reasonable determination" that a student's identity is not personally identifiable because of unique patterns of information about that student, whether through single or multiple releases, taking into account other reasonably available information. Also, de-identified student level data may be released for the purpose of educational research by attaching a code to each record. It may be necessary to look to local news, events, and media coverage in the "school community" in determining, in a highly publicized incident, whether other information would make a particular record personally identifiable even if all direct identifiers have been removed.

## **5. Court Order**

A. Information concerning a student shall be furnished in compliance with a court order.

(1) Unless otherwise judicially instructed, the custodian shall, prior to the disclosure of any student's records pursuant to a court order, give the parent and the student three days notice, if lawfully possible, within the requirements of the judicial order, of the name of the requesting agency and the specific records requested. Such notice shall be in writing if possible.

(2) Only those records related to the specific purpose of the court order shall be disclosed.

B. The service of a subpoena upon a district employee or official solely for the purpose of causing the employee to produce a school record pertaining to any student may be complied with by such employee, in lieu of personal appearance as witness in the proceeding, by submitting to the court, or other agency issuing the subpoena, at the time and place required by the subpoena, a copy of such record, accompanied by an affidavit certifying that such copy is a true copy of the original record on file in the school or school office. The copy of the record shall be in the form of a photograph, microfilm, micro card, or miniature photograph or other photographic copy or reproduction or an enlargement thereof.

Nothing in this regulation shall preclude the district from providing in its discretion statistical data from which no student may be identified to any public agency or entity or private nonprofit college, university, or educational research and development organization when such actions would be in the best educational interests of students.

If it is determined, per the federal regulations, that a third party improperly redisclosed personally identifiable information from education records in violation of 599.33(a), the district may not allow that third party access to personally identifiable information from education records for at least five years.

## **6. Disclosure to Parents of "Eligible Students" and Rights of Students**

A. Rights of parents under FERPA transfer to students once the student has reached 18 years of age or is attending a post secondary institution and thereby becomes an "eligible student."

B. Disclosure to parents without student consent after FERPA rights have transferred to students is permitted under the following circumstances:

- (1) The student is a dependent for Federal income tax purposes.
- (2) The disclosure is in connection with a health or safety emergency; i.e. knowledge of the information is necessary to protect the health or safety of other individuals.
- (3) The student has violated a law or the school's rules or policies governing alcohol or substance abuse.

#### **7. Disclosure of Information in Health and Safety Emergencies** (*Also see section above*)

- A. The district may include in the education records of a student appropriate information concerning disciplinary action taken against the student for conduct that posed a significant risk to the safety or well being of that student, other students, or other members of the school community.
- B. Such appropriate information concerning disciplinary action may be disclosed to teachers and school officials in the district who have been determined to have legitimate educational interests in the behavior of the student. This must be strictly construed.
- C. Such appropriate information, concerning disciplinary action, may be disclosed to teachers and school officials in other schools who have been determined to have legitimate educational interests in the behavior of the student.
- D. In making a determination, the district or school must take into account the totality of the circumstances pertaining to a threat to the safety or health of the student or other individuals. If a school determines that there is an articulable and significant threat to the safety or health of a student or other individuals, it may disclose information from education records to appropriate parties whose knowledge of the information is necessary to protect the health and safety of the student or other individuals.
- E. The district or school is required to record the articulable and significant threat that formed the basis for the disclosure and the parties to whom the information was disclosed. "Appropriate parties" include the parents of an eligible student.
- F. Pursuant to C.G.S. 19a-581 through 19a-585, confidential information concerning HIV status may not be released to anyone EXCEPT a health care provider with a written release from the parents.

#### **8. Redisclosure of Educational Records**

- A. Federal and State officials that receive education records for audits, evaluation, and compliance and enforcement purposes may redisclose such records under the same conditions that apply to other recipients of education records.
- B. A state educational agency that received records for audit, evaluation or compliance or enforcement purposes may redisclose records for other qualifying purposes, such as:

- (1) Forwarding records to a student's new school district;
- (2) Forwarding records to another listed official, including the Education Secretary or a post secondary authority;
- (3) Forwarding to an accrediting agency; or
- (4) In connection with a health or safety emergency.

**9. Criteria**

- A. "School officials and employees" as used in this regulation means district employees and elected district officers, and other parties as defined in this regulation.
- B. The following criteria shall be used in determining whether a "school official or employee" has a "legitimate educational interest".
  - (1) The employee has an instructional or supervisory responsibility toward the student that, in order to be fulfilled, requires knowledge of the contents of the student's records.
  - (2) The employee has an administrative duty that requires information contained in the student's records.
  - (3) The school official is engaged in a disciplinary proceeding that requires disclosure of all or part of the student's records in order to come to a just conclusion. (Or criteria can be defined by school district)
- C. The district and/or school shall use reasonable methods to identify and authenticate the identity of parents, students, school officials, and any other parties to whom they disclose education records. The district and its schools may use PINS, passwords, personal security questions, "smart cards" and tokens, biometric indicators, or other factors known or possessed only by the user, as appropriate. *Authentication* means determining who is the intended or authorized recipient of the information. *Authentication* means ensuring that the recipient is who he/she claims to be.

**Challenging Contents of Records**

- 1. Following an inspection and review of a student's records the parent or guardian of the student or former student may challenge the content of any student record.
  - A. The parent or eligible student may file a written request with the Superintendent of Schools to correct or remove any information recorded in the written records concerning the parent's child which the parent alleges to be:
    - (1) Inaccurate, misleading or in violation of the student's rights of privacy.

- (2) An unsubstantiated personal conclusion or inference.
  - (3) A conclusion or inference outside of the observer's area of competence.
  - (4) Not based on the personal observation of a named person with the time and place of the observation noted.
- B. Within 30 days of receipt of such request, the Superintendent or designee shall meet with the parent or guardian and the certified employee who recorded the information in question, if any, and if such employee is presently employed by the school district.
- C. The information shall be corrected or removed if the Superintendent sustains any or all of the allegations.
- D. If the Superintendent denies any or all of the allegations and refuses to order the correction or the removal of the information, the parent or guardian may, within 30 days of the refusal, appeal the decision in writing to the Board of Education.
- (1) Within 30 days of receipt of such an appeal, the Board of Education shall, in closed session with the parent or guardian and the certified employee who recorded the information in question, if any, and if such employee is presently employed by the district, determine whether or not to sustain or deny the allegations. The decision of the Board of Education shall be final.
  - (2) If the Board of Education sustains any or all of the allegations, it shall order the Superintendent to immediately correct or remove and destroy the information from the student's written records.
  - (3) Records of these administrative proceedings shall be maintained in a confidential manner and shall be destroyed one year after the decision of the Board of Education unless the parent or guardian initiates legal proceedings relative to the disputed information within the prescribed period.
- E. If the final decision of the Board of Education is unfavorable to the parent or guardian, or if the parent or guardian accepts an unfavorable decision by the Superintendent, the parent or guardian shall have the right to submit a written statement of his/her objections to the information. This statement shall become a part of the student's school record until such time as the information objected to is corrected or removed.

## 2. Hearing Panel

- A. Either the Superintendent of Schools or the Board of Education may convene a hearing panel composed of the following persons, provided the parent has given written consent to release information from the relevant student's records to the members of the panel so convened, to assist in making determinations;
- (1) The principal of a public school other than the one at which the record is on file.
  - (2) A certified employee appointed by the parent or guardian.

- (3) A parent appointed by the Superintendent or by the Board of Education, depending upon who convenes the panel.
- B. The persons appointed pursuant to the above paragraph, if possible, shall not be acquainted with the student, his/her parent or guardian, or the certified employee who recorded the information, except when the parent or guardian appoints the person pursuant to paragraph a (2) above.
- C. The Principal appointed to the hearing panel shall serve as Chairperson.
- D. The hearing panel shall, in closed session, hear the objections to the information of the parent and the testimony of the certified employee who recorded the information in question, if any, and if such employee is currently employed by the school system.
  - (1) The hearing panel shall be provided with verbatim copies of the information which is the subject of the controversy.
  - (2) Written findings shall be made setting forth the facts and decisions of the panel, and such findings shall be forwarded to the Superintendent or the Board of Education, depending upon who convened the panel.
  - E. The proceedings of the hearing shall not be disclosed or discussed by panel members except in their official capacities.
3. Whenever there is included in any student record information concerning any disciplinary action taken by school system personnel in connection with the student, the student's parent or guardian may include in such student's record a written statement or response concerning the disciplinary action.

**Directory Information**

1. The following student information is declared to be directory information:

- A. Name
- B. Address
- C. Telephone number
- D. Date and place of birth
- E. Major field of study
- F. Participation in officially recognized activities and sports
- G. Weight and height of members of athletic teams



- A. The school shall allow a reasonable period of time after such notice has been given for a parent or guardian to inform the custodian of student records that any or all of the information designated should not be released without the parent's or guardian's prior consent.
  - B. No directory information shall be released regarding any student when a parent or guardian has notified the school that such information shall not be released.
8. Disclosure of directory information on former students is permitted without providing notice or additional opt-out opportunities. A former student's opt-out provided while he/she was a student in the district must continue to be honored unless specifically rescinded by the former student.
  9. Opt-out from directory information does not prevent a school from identifying a student by name or from disclosing an electronic identifier or instructional e-mail address in the classroom. A student does not have the right to remain anonymous in class and an opt-out may not be used to impede routine classroom communications and interactions, whether the class is held in a specified physical location or online through electronic communications.

#### Access Log

1. A log or record shall be maintained for each student's record which lists all persons, agencies, or organizations requesting or receiving information from the record and the legitimate educational interests.
2. Such listing need not include the following:
  - A. Parents or students to whom access is granted.
  - B. Parties to whom directory information is released.
  - C. Parties for whom written consent has been executed by the parent or guardian.
  - D. School officials or employees having a legitimate educational interest.
3. The log or record shall be open to inspection only by a parent or guardian and the custodian of student records, or the custodian's designee, and to other school officials with legitimate interests in the records, and to the Comptroller General of the United States, the Secretary of the Office of Education, an administrative head of an education agency as defined in 20 U.S.C. 1232g., and state educational authorities as a means of auditing the school system's operations.

#### Fee for Reproducing Records

1. A fee based upon the actual cost of reproduction, handling and postage (if any) shall be charged for furnishing copies of any student record.
2. The custodian of student records annually shall recommend a fee schedule for approval by the Board of Education.
3. No fee shall
  - A. effectively prevent the parents or guardians from exercising their right to inspect and review student records.
  - B. be charged for searching or retrieving a student's record.
  - C. be made for furnishing
    - (1) up to two transcripts of former student's records.
    - (2) up to two verifications of various records of former students.

#### **Transfer of Student Records**

1. Whenever a student transfers to another Connecticut public school district or to a charter school, the following student records shall be forwarded upon written notification of the student's enrollment from the other district:
  - A. The student's Mandatory Permanent Student Record or a copy thereof. The original or a copy shall be retained by this district.
  - B. The student's entire Mandatory Interim Student Record.
2. The student's records shall be transferred to the new school district or charter school no later than 10 days after receipt of such notification.
3. Whenever a student transfers to a school district in another state or to a private school, the district shall transfer the student's Mandatory Permanent Student Record upon receipt of a written request.
4. Permitted student records may be forwarded.
5. Student records shall not be withheld from the requesting district because of any charges or fees owed by the student or the student's parents or guardian.
6. All student records shall be updated prior to transfer.
7. Parent Notification

- A. If a student's parent or guardian did not give authorization for the transfer of such records, the district shall send notification of the transfer to the parent/guardian at the same time it transfers the records.
- B. If the transfer is a within-state transfer, the receiving school shall notify the parents of the record transfer.
- C. If the student transfers out of state, the custodian of student records shall notify the parents or guardian at their last known address of the rights accorded them. (34 C.F.R. 99.34 disclosure to other agencies or institutions)
- D. The notification shall include a statement of the parent's or guardian's right to review, challenge, and receive a copy of the student record, if desired.

### **Retention and Destruction of Student Records**

1. No additions, except routine updating, shall be made to a student's record after high school graduation or permanent departure without the parent's or guardian's prior consent for those students who have not reached the age of eighteen years. Adult students may give consent for themselves.
2. The guide to disposal of municipal records in Connecticut is found in Connecticut General Statutes Section 7-109. For disposal of education records, see Schedule V of "Records Retention Schedules 1982" (Revised 1983) published by the Public Records Administration, Connecticut State Library, Hartford, Connecticut.
3. The method of destruction shall assure that records are not available to possible public inspection during the destruction process.

### **Subpoenaed Records**

If the school is served with a subpoena issued by competent authority directing the production of school or student records in connection with any court proceeding, the school upon which such subpoena is served may deliver such record, or at its option a copy thereof, to the clerk of such court. Such clerk shall give a receipt for the same and shall be responsible for the safekeeping of such records, not permitting the removal of such records from the premises of the court. The clerk shall notify the school to call for the subpoenaed record when it is no longer needed for use in court. Any such record so delivered to the clerk of the court shall be sealed in an envelope which shall indicate the name of the school or student, the name of the attorney subpoenaing the same and the title of the case referred to in the subpoena.

No such record or copy shall be open to inspection by any person except upon the order of a judge of the court concerned, and any such record or copy shall at all times be subject to the order of such judge.

Any and all parts of any such record or copy, if not otherwise inadmissible, shall be admitted in evidence without any preliminary testimony, if there is attached thereto the certification in affidavit form of the person in charge of such record indicating that such record or copy is the original record or copy thereof, made in the regular course of such business to make such record and that it was the regular course of such business to make such record at the time of the transactions, occurrences or events recorded therein or within a reasonable time thereafter.

A subpoena directing production of such school or student records shall be served not less than eighteen (18) hours before the time for production, provided such subpoena shall be valid if served less than eighteen (18) hours before the time of production if written notice of intent to serve such subpoena has been delivered to the person in charge of such records not less than eighteen hours (18) nor more than two weeks before such time for production.

**Notification of Parents**

1. Parents shall be notified in writing of their rights under this regulation upon the date of the student's initial enrollment, and annually thereafter of students current attendance at the same time as notice is issued. The notice shall be in a form which reasonably notifies parents of the availability of the following specific information:

*Postcard to  
Woburn  
parents of the  
Student's*

- A. The type of student records and information contained therein which are directly related to students and maintained by the school system.
- B. The position of the person responsible for the maintenance of each type of record.
- C. The location of the log or record required to be maintained.
- D. The criteria to be used by the school district in defining "school officials and employees" and in determining "legitimate educational interest."
- E. The policies of the school district for reviewing and expunging student records, including the right to inspect and review the student's education records within 45 days of the day the school district receives a request. If circumstances effectively present the parent or eligible student from exercising the right to inspect and review the student's education records, the district shall provide a copy of the records requested or make other arrangements for the inspection or review of the requested records.
- F. The right of the parent or guardian to access (inspect and review) to student records.
- G. The right to request the amendment of student education records that the parent or eligible student believes are inaccurate or misleading.
- H. The procedures for challenging the content of student records.
- I. The policy that no fee will be charged for up to two copies of a record.
- J. The categories of information which the school district has designated as directory information and that pursuant to federal law, military recruiters and institutions of higher learning may request and receive names, addresses and telephone numbers of all high school students, unless their parents/guardians notify the school, in writing, not to release this information.

- K. The right of the parent to file a complaint with the United States Department of Education concerning an alleged failure by the school system to comply with the provisions of Section 438 of the Federal Education Provisions Act (20 U.S.C.A. 1232g).
- L. The right of a parent or eligible student to a hearing regarding the request for amendment of the record if denied by the district.
- M. The right to consent to disclosures of personally identifiable information contained in the student education record, except to the extent that FERPA authorizes disclosure without consent.

### **Issue/Practice of Peer Grading**

The definition of "education records" excludes grades on peer-graded papers before they are collected and recorded by a teacher. Peer-grading does not violate FERPA.

#### **Legal Reference: Connecticut General Statutes**

- 1-19(b)(11) Access to public records. Exempt records.
  - 7-109 Destruction of documents.
  - 10-15b Access of parent or guardian to student's records.
  - 10-94i Rights and liabilities of surrogate parents.
  - 10-154a Professional communications between teacher or nurse and student.
  - 10-209 Records not to be public.
  - 10-221b Boards of education to establish written uniform policy re treatment of recruiters.
  - 11-8a Retention, destruction and transfer of documents
  - 11-8b Transfer or disposal of public records. State Library Board to adopt regulations.
  - 46b-56(e) Access to records of minors.
- Federal Family Educational Rights and Privacy Act of 1974 (section 438 of the General Education Act, as amended, added by section 513 of P.L. 93-568, codified at 20 U.S.C. 1232g and Final Rule 34 CFR Part 99, December 9, 2008)  
 Connecticut Public Records Administration Schedule V -- Disposition of Education Records (Revised 1983).  
 USA Patriot Act of 2001, PL 107-56, 115 Stat. 272, Sec 507, 18 U.S.C. §2332b(g)(5)(B) and 2331  
 PL 107-110 "No Child Left Behind Act of 2001," Sections 4155, 5208, and 9528  
 Owasso Independent Sch. Dist. No.1-011 v. Falvo, 534 U.S.426 (2002)

Regulation approved:

# Preston Board of Education

## Policies, Regulations, and Bylaws

9321(a)

### **Bylaws of the Board**

#### **Time, Place, Notification of Meetings**

##### **Regular Board Meetings**

There shall be a regular meeting of the Board each month unless canceled by special action of the Board. At its regular December meeting, the Board of Education shall set the schedule of regular meetings for the subsequent calendar year; such schedule to be filed with the Town Clerk no later than 30 days prior to the first scheduled meeting of the following January. The schedule will include the date, time, and location of each meeting.

All regular meetings shall be open to the public and the press. *All regular meetings shall not exceed \_\_\_ hours in length unless a majority of the Board votes to increase the meeting in half hour intervals with the exception of executive sessions held after regular Board meetings.* Changes of regular meetings from normal dates shall be filed with the Town Clerk and publicized in accordance with requirements of the Freedom of Information Commission. Only items on the regular meeting agenda may be taken up by the Board unless a two-thirds vote of the Board approves additions to a regular meeting agenda.

##### **Special Board Meetings**

The Chairperson of the Board may call a special meeting whenever he/she deems it necessary and must call a special meeting when requested to do so by three members of the Board. The Secretary shall in the absence of the Chairperson, or in his or her inability to act, have the powers of the Chairperson to call special meetings as outlined herein.

# Preston Board of Education

## Policies, Regulations, and Bylaws

9321(b)

### **Bylaws of the Board**

#### **Time, Place, Notification of Meetings** (continued)

Notice of special meetings of the Board of Education shall be given at least 24 hours prior to the meeting by filing a notice of the time and place and the business to be conducted in the office of the Town Clerk; however, in case of emergency, any such special meeting may be held without complying with the foregoing requirement for the filing of notice, but a copy of the minutes of any such special meeting adequately setting forth the nature of the emergency and the proceedings occurring at such meeting shall be filed with the Town Clerk not later than 72 hours following the holding of such meeting. In addition, such written notice delivered to the Town Clerk less than 24 hours in advance of the meeting must also be delivered to the residence of each Board member, unless at, or prior to, the time the special meeting convenes a Board member files with the Town Clerk or Secretary of the Board of Education a written waiver of such notice.

**In determining the time within which or by when a notice is required to be given, made available, posted or filed, Saturdays, Sundays, legal holidays, and any other day when the Town Clerk's office is closed shall be excluded.**

Only business identified on the call of a special meeting shall be discussed or transacted by the Board at such special meeting.

- (cf. 1331 Smoke Free Environment)
- (cf. 9121 Board of Education Officers)
- (cf. 9323 Agenda Construction)
- (cf. 9324 Meeting Conduct & Parliamentary Procedures)
- (cf. 9325.1 Quorum)
- (cf. 9325.2 Order of Business)
- (cf. 9326 Minutes)

#### **Legal Reference:**

##### **Connecticut General Statutes**

1-200 Definitions. ("Public Agency")

1-225 Meetings of government agencies to be public. Recording of votes. Schedule and agenda of meetings to be filed. Notice of special meetings. Executive sessions (as amended by P.A. 83-148 requiring "filing" of notice instead of "posting" with clerk; Saturdays, Sundays, holidays or days when office is closed are excluded from time element)

**Bylaw adopted by the Board: 4/10/06**

# **Preston Board of Education**

## **Policies, Regulations, and Bylaws**

**4118.4, 4218.4**

### **Personnel — Certified and Non-Certified**

#### **Electronic Mail--Rights, Responsibilities and Duties**

Electronic mail is communication between two or more persons by computers or electronic terminals whether or not the message is converted to hard copy format after receipt and whether or not the message is viewed upon transmission or stored for later retrieval. Electronic mail includes all electronic messages that are transmitted through a local, regional, or global computer network.

All district electronic mail systems are owned by the district and intended for the conduct of official district business only. District electronic mail systems are not intended for personal use by employees of the district, and employees have no right to privacy in electronic mail systems.

Users of district E-mail systems are responsible for their appropriate use. All illegal and improper uses of the electronic mail system, including but not limited to pornography, obscenity, harassment, solicitation, gambling and violating copyright or intellectual property rights are prohibited. Use of the electronic mail system for which the district will incur an expense without expressed permission of an administrator is prohibited.

Electronic messages are not for private or confidential matters. Because there is no guarantee of privacy or confidentiality, other avenues of communication should be used for such matters. Except for directory information, student records will not be transmitted by electronic mail. If the sender of an electronic mail message does not intend for the mail to be forwarded, the sender should clearly mark the message, "Do Not Forward".

To keep district electronic mail systems secure, users may not leave the terminal "signed on" when unattended and may not leave passwords in an obvious place near the terminal or share passwords with anyone except the electronic mail system administrator. The district reserves the right to bypass individual passwords at any time and to monitor the use of such systems by employees.

The district retains the right to review, store and disclose all information sent over the district electronic mail systems for any legally permissible reason, including but not limited to determining whether the information is a public record, whether it contains information discoverable in litigation and to access district information in the employee's absence.

# **Preston Board of Education**

Policies, Regulations, and Bylaws

**4118.4(b)**

**4218.4(b)**

## **Personnel — Certified and Non-Certified**

### **Electronic Mail--Rights, Responsibilities and Duties (continued)**

Except as provided herein, district employees are prohibited from accessing another employee's electronic mail. All district employees should be aware that electronic mail messages can be retrieved even if deleted and that statements made in electronic mail communications can form the basis of various legal claims against the individual author or the district.

Electronic mail sent or received by the Board, the district, or the district's employees are public records subject to public disclosure or inspection. All Board and district electronic mail communications may be monitored.

District employees will be subject to disciplinary action for violation of this policy.

The Superintendent will ensure that all district employees are provided with a copy of this policy. In addition, each district employee will be provided with an acknowledgement form to sign stating that they have received and read the policy. A copy of the form will be maintained in the employee's personnel file.

(cf. 5125 - Student Records)

**Legal Reference:**

**Connecticut General Statutes**

The Freedom of Information Act.

PA 98-142 An Act Requiring Notice to Employees of Electronic Monitoring by employees

**Policy adopted:**

# Preston Board of Education

## Policies, Regulations, and Bylaws

4118.5

4218.5

### **Personnel - Certified-Non-Certified**

#### **Rights, Responsibilities and Duties**

##### **Employee Use of Computers and Computer Networks**

The Board of Education provides computers, networks and Internet access to support the educational mission of the schools and to enhance the curriculum and learning opportunities for students and school staff.

Employees shall use the school unit's computers, networks and Internet services for school-related purposes and performance of job duties. Incidental personal use of school computers is permitted as long as such use does not interfere with the employee's job duties and performance, with system operations or other system users. Incidental personal use is defined as use by an individual employee for occasional personal communications. Personal use of computers must comply with this policy and all other applicable policies, procedures and rules.

District computers remain under the control, custody and supervision of the district which reserves the right to monitor all employee computer and Internet activity. Each employee authorized to access the school unit's computers, networks and Internet services is required to sign an acknowledgment form stating that they have read this policy. A copy of the acknowledgment form will be retained in the employee's personnel file.

The Superintendent shall oversee implementation of this policy and any accompanying rules. The Superintendent may develop additional administrative procedures/rules governing the day-to-day management and operations of district computer systems consistent with the Board's policy/rules and may delegate responsibilities to building principals and others as appropriate.

Any employee who violates this policy and/or any rules governing use of the school unit's computers will be subject to disciplinary action, up to and including discharge. Illegal uses of the school unit's computers could also result in referral to law enforcement authorities. Employees have no expectation of privacy in their use of school computers.

(cf. 6141.321 - Student Use of the Internet)

(cf. 6141.322 - Web Sites/Pages)

#### **Legal References:**

##### **Connecticut General Statutes**

The Freedom of Information Act

53A-182B Harassment in the first degree.

P.A. 98-142 An Act Requiring Notice to Employees of Electronic Monitoring by Employers.

#### **Policy adopted:**

# Preston Board of Education Policies, Regulations, and Bylaws

4126

## **Personnel — Certified**

### **Consultants**

The Board of Education supports the use of consultants who may be retained periodically to provide valuable and necessary specialized services that cannot be provided by district personnel due to limitations of time, experience, or knowledge.

Funds for consultant help will be budgeted appropriately when planning specific projects or programs.

### **Policy adopted:**

# Preston Board of Education

## Policies, Regulations, and Bylaws

3160

### **Business and Non-Instructional Operations**

#### **Transfer of Funds between Categories**

The Board of Education may transfer any unexpended or unencumbered portion of any appropriation for school purposes to any other item, but expenditures shall not exceed the appropriation made by the fiscal authority combined with such money as may be received from other sources for school purposes.

The Superintendent shall not exceed in encumbrances or expenditures any individual line item budgeted amount. Based on recommendations from the Superintendent, the Board may, if necessary, make adjustments in the form of transfers between line items to cover projected shortfalls from items which are projected to be under expended but may not normally transfer already encumbered funds. Line items are defined on the attached list. The line item list may be altered from time to time to suit changing circumstances.

The Board shall explicitly authorize by vote the expenditure of any amount, or series of related amounts, exceeding \$2500 prior to expenditure or encumbrance except in the area of payroll, wages and salaries, and special education costs, which the Superintendent may authorize. The Superintendent shall present to the Board such items requiring its approval.

The Superintendent is authorized to transfer funds from any line item in an amount less than \$10,000, under emergency conditions if the urgent need for the transfer prevents the Board from meeting in a timely fashion to consider such transfer. All transfers made in such instances shall be announced at the next regularly scheduled meeting of the Board, and such announcements shall be accompanied by a report from the Superintendent explaining the emergency and measures taken to obtain an emergency meeting of the Board.

Legal Reference:       **Connecticut General Statutes**  
                              10-222 Appropriations and budget (as amended by PA 98-141).

**Policy adopted:**

PRESTON BOARD OF EDUCATION  
325 Shetucket Turnpike  
Preston, Connecticut 06365

**BOARD OF EDUCATION MEETING DATES**  
**Calendar Year 2010**

<b>Month</b>	<b>Date</b>	<b>Day</b>	<b>Type of Meeting</b>
January	11	M	Regular Meeting
February	08	M	Regular Meeting
March	08	M	Regular Meeting
April	12	M	Regular Meeting
May	10	M	Regular Meeting
June	14	M	Regular Meeting
July	12	M	Regular Meeting
August	09	M	Regular Meeting
September	13	M	Regular Meeting
<b>September</b>	<b>27</b>	<b>M</b>	<b>Additional Meeting</b>
October	18	M	Regular Meeting
<b>October</b>	<b>25</b>	<b>M</b>	<b>Additional Meeting</b>
November	08	M	Regular Meeting
<b>November</b>	<b>22</b>	<b>M</b>	<b>Additional Meeting</b>

December 13 M Regular Meeting

**December 27 M Additional Meeting**

All meetings (unless otherwise noted) start at **7:00** p.m. in Preston Veterans' Memorial School Library located at 325 Route 165/Shetucket Tpke.

Approved  
Preston Board of Education

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Chairperson

## **Business and Non-Instructional Operations**

### **Audit Sub-Committee**

The Board of Education recognizes that it must be responsive to weaknesses and non-compliance issues that may be uncovered in its financial system and its internal control system following the annual audit. It also must have assurances that applicable policies and procedures are being followed by the school system's administrators. One of the principal methods for receiving this assurance is through the annual town audit.

Therefore, the Board has decided to establish an audit sub-committee. The sub-committee will be comprised of three members appointed by the Chairperson pursuant to Policy 9132.

The sub-committee will meet with the auditors prior to the beginning of each audit period to discuss major concerns of the Board relative to the audit and areas to be examined as well as to determine the auditor's main concerns. Perceived weaknesses should also be discussed at this time. The sub-committee will also meet with the auditors at the conclusion of the audit to determine its effectiveness, system problems and areas where better coordination and cooperation could improve effectiveness. The sub-committee may also meet with the auditors on other occasions, if deemed necessary.

In addition to improving communication between the auditors and the Board, the sub-committee should through discussions with other Board members and the Superintendent, seek out areas of potential concern. The committee would then propose questions for the town auditors which could lead to alleviation of these concerns.

**Policy adopted:**

# Preston Board of Education

## Policies, Regulations, and Bylaws

3161

### **Business and Non-Instructional Operations**

#### **Audit Sub-Committee**

The Board of Education acknowledges that one of the principal ways it receives assurances regarding the integrity of its financial management system is through the annual town audit. Toward that end, it shall be the board's policy to invite the town's auditor to a regularly scheduled meeting of the Preston Board of Education to present his/her findings and recommendations relative to the annual town audit.

In the event that the auditor issues a management letter noting exceptions or non-compliance issues to generally accepted accounting procedures or law relative to the management of the board's budget, it shall be incumbent upon the Chairperson pursuant to Policy 9132 to appoint a three member Ad Hoc Committee to address any said deficiencies in conjunction with the Director of Finance and School Business Operations (and other staff as appropriate), and report back to the board as soon as practicable.

**Policy adopted:**

## **MANAGEMENT LETTER**

To the Board of Finance  
Town of Preston, Connecticut  
Preston, Connecticut

In planning and performing our audit of the financial statements of the Town of Preston, Connecticut for the year ended June 30, 2005, we considered its internal control in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control. However, we noted certain matters involving internal control and its operation that we consider to be reportable conditions under standards established by the American Institute of Certified Public Accountants. Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control that, in our judgment, could adversely affect Town of Preston, Connecticut's ability to initiate, record, process, and report financial data consistent with the assertions of management in the financial statements.

Our consideration of internal control would not necessarily disclose all matters in internal control that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered to be material weaknesses as defined below. However, we noted the following reportable conditions that we believe to be material weaknesses.

### **I. Internal Control Review- Material Weaknesses:**

A material weakness is a reportable condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that errors or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions.

#### **MW-96-1 - Segregation of Duties**

**Condition:** The Town of Preston does not maintain an adequate segregation of duties for proper internal control over the financial transactions in certain areas. Proper internal control relies on the following three aspects of processing

transactions being performed by separate individuals: authorizing transactions, custody of assets, and record keeping. This weakness in internal controls could lead to funds being expended in a manner not consistent with the intentions of management. These weaknesses were noted in the following cash receipts areas:

**Treasurer** - The Town Treasurer handles cash receipts, prepares and makes deposits, posts cash receipt transactions, and reconciles bank statements. The Treasurer also authorizes, makes, records and reconciles all investment activities.

**Tax Collector** - The Tax Collector prepares and sends bills, handles tax collections, prepares and makes deposits, posts tax receipt transactions, and reconciles bank statements.

**Parks and Recreation** - The Program Coordinator handles cash receipts, prepares and makes deposits, and posts cash receipt transactions and reconciles the accounts.

**Student Activity Funds** - The same individual handles all the processing, recording and reconciling activities for these monies.

**Recommendation:** The Town should review the segregation of duties involved in all the cash receipts functions. The duties of the individuals involved should be analyzed and restructured as necessary to provide for a better system of checks and balances. Once a better system has been devised, it should be written, approved by the Board of Finance and distributed to the individuals involved.

## **II. Internal Control Review - Reportable Conditions:**

Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control structure that, in our judgment, could adversely affect the Town of Preston, Connecticut's ability to record, process, summarize, and report financial data consistent with the assertions of management in the financial statements.

### **RC-96-1 - Accounting Policy and Procedures Manual**

**Condition:** The Town does not have an accounting policies and procedures manual outlining reporting responsibilities and describing the steps involved in processing transactions, including usage of the Town's computer system. A written manual would improve the Town's ability to maintain continuity of operations during any absences of personnel responsible for accounting and financial administration. It would also be useful in the training of new personnel. In addition, a manual would help to document the internal control structure and would assist in identifying opportunities to enhance segregation of duties.

**Recommendation:** We recommend the Town develop a manual to document all accounting policies, administrative and internal control procedures and all financial reporting requirements. This will provide a basis for maintaining continuity of operations should any of the key employees of the Town be absent for any extended period.

**Follow Up Required of Town of Preston, Connecticut on This Management Letter**

Management is required to prepare and submit a corrective action plan to the State of Connecticut Office of Policy and Management to address any of the following if they are present:

Material Weaknesses in Internal Control  
Reportable Conditions in Internal Control

Material Non-compliance  
Questioned Costs

Other matters noted, if any, do not need to be addressed. The Town of Preston, Connecticut's corrective action plan should include:

An identification of each finding as reported above  
Comments on findings and recommendations  
Actions taken or planned (or an explanation why corrective action is unnecessary)  
Status of Corrective Actions on prior findings

Our consideration of internal control would not necessarily disclose all matters in internal control that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered to be material weaknesses as defined above.

This report is intended solely for the information and use of Board of Finance, management, and others within the administration and is not intended to be and should not be used by anyone other than these specified parties.

*Marien + Company*

October 21, 2005

## **MANAGEMENT LETTER**

To the Board of Finance  
Town of Preston, Connecticut  
Preston, Connecticut

In planning and performing our audit of the financial statements of the Town of Preston, Connecticut for the year ended June 30, 2006, we considered its internal control in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control. However, we noted certain matters involving internal control and its operation that we consider to be reportable conditions under standards established by the American Institute of Certified Public Accountants. Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control that, in our judgment, could adversely affect Town of Preston, Connecticut's ability to initiate, record, process, and report financial data consistent with the assertions of management in the financial statements.

Our consideration of internal control would not necessarily disclose all matters in internal control that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered to be material weaknesses as defined below. However, we noted the following reportable conditions that we believe to be material weaknesses.

### **I. Internal Control Review- Material Weaknesses:**

A material weakness is a reportable condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that errors or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions.

**MW-96-1 - Segregation of Duties**

**Condition:** The Town of Preston does not maintain an adequate segregation of duties for proper internal control over the financial transactions in certain areas. Proper internal control relies on the following three aspects of processing transactions being performed by separate individuals: authorizing transactions, custody of assets, and record keeping. This weakness in internal controls could lead to funds being expended in a manner not consistent with the intentions of management. These weaknesses were noted in the following cash receipts areas:

**Treasurer** - The Town Treasurer handles cash receipts, prepares and makes deposits, posts cash receipt transactions, and reconciles bank statements. The Treasurer also authorizes, makes, records and reconciles all investment activities.

**Tax Collector** - The Tax Collector prepares and sends bills, handles tax collections, prepares and makes deposits, posts tax receipt transactions, and reconciles bank statements.

**Parks and Recreation** - The Program Coordinator handles cash receipts, prepares and makes deposits, and posts cash receipt transactions and reconciles the accounts.

**Student Activity Funds** - The same individual handles all the processing, recording and reconciling activities for these monies.

**Recommendation:** The Town should review the segregation of duties involved in all the cash receipts functions. The duties of the individuals involved should be analyzed and restructured as necessary to provide for a better system of checks and balances. Once a better system has been devised, it should be written, approved by the Board of Finance and distributed to the individuals involved.

**II. Internal Control Review - Reportable Conditions:**

Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control structure that, in our judgment, could adversely affect the Town of Preston, Connecticut's ability to record, process, summarize, and report financial data consistent with the assertions of management in the financial statements.

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**Recommendation:** We recommend the Town develop a manual to document all accounting policies, administrative and internal control procedures and all financial reporting requirements. This will provide a basis for maintaining continuity of operations should any of the key employees of the Town be absent for any extended period.

**Follow Up Required of Town of Preston, Connecticut on This Management Letter**

Management is required to prepare and submit a corrective action plan to the State of Connecticut Office of Policy and Management to address any of the following if they are present:

Material Weaknesses in Internal Control  
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Material Non-compliance  
Questioned Costs

Other matters noted, if any, do not need to be addressed. The Town of Preston, Connecticut's corrective action plan should include:

An identification of each finding as reported above  
Comments on findings and recommendations  
Actions taken or planned (or an explanation why corrective action is unnecessary)  
Status of Corrective Actions on prior findings

Our consideration of internal control would not necessarily disclose all matters in internal control that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered to be material weaknesses as defined above.

This report is intended solely for the information and use of Board of Finance, management, and others within the administration and is not intended to be and should not be used by anyone other than these specified parties.

*Marion + Company*

October 23, 2006

## MANAGEMENT LETTER

To the Board of Finance  
Town of Preston, Connecticut  
Preston, Connecticut

In planning and performing our audit of the financial statements of the Town of Preston, Connecticut as of and for the year ended June 30, 2007 in accordance with auditing standards generally accepted in the United States of America, we considered the Town of Preston, Connecticut's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Town of Preston, Connecticut's internal control. Accordingly, we do not express an opinion on the effectiveness of their internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. However, as discussed below, we identified certain deficiencies in internal control that we consider to be significant deficiencies and other deficiencies that we consider to be material weaknesses.

### **I. Internal Control Review - Significant Deficiencies:**

A **control deficiency** exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A **significant deficiency** is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process or report financial data reliably in accordance with Generally Accepted Accounting Principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control. We consider the following deficiencies to be significant deficiencies in internal control:

#### **SD-07-1 – Internal Control over Financial Reporting**

**Condition:** The Town of Preston, Connecticut presents financial statements in accordance with Generally Accepted Accounting Principles (GAAP). The Town of Preston, Connecticut does not collectively possess the resources, skills and knowledge to prepare their own financial statements including footnote disclosures in accordance with GAAP.

**Recommendation:** The Town of Preston, Connecticut should consider increasing the continuing education for financial personnel or reviewing the qualifications of others in management (i.e. Board Members, etc.) to see if there is someone who can prepare or take responsibility for the financial statements.

**Management's Response:** The Town of Preston, Connecticut will look into possible training opportunities for their staff to prepare the financial report.

**SD-07-2 – Controls over Nonroutine and Nonsystematic Transactions**

**Condition:** On occasion, the Town of Preston, Connecticut must make adjusting journal entries to add, delete, correct, adjust or reclassify transactions. These adjusting journal entries are generally prepared and posted by the same individual. There are no review, authorization and documentation procedures required for an adjusting journal entry.

**Recommendation:** We recommend that the review of internal control procedures include the adjusting journal entry process.

**Management's Response:** The Town of Preston, Connecticut will review this as part of preparing a comprehensive accounting policies and procedures manual.

**II. Internal Control Review – Material Weaknesses:**

A **material weakness** is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control. We believe that the following deficiencies constitute material weaknesses.

**MW-07-1 – Documentation of the Components of Internal Control**

**Condition:** The Town of Preston, Connecticut has numerous internal controls in place over significant processes and accounts. Not all of these controls are formally documented. It is possible for controls to change over time or not be completely understood by the individuals involved in the processes.

**Recommendation:** We recommend that the Town of Preston, Connecticut make a listing of its significant processes and accounts. Controls in each area should be documented in a procedures manual. Each of the procedures should be reviewed to determine if controls are adequate.

**Management's Response:** The Town of Preston, Connecticut has a number of accounting policies in place already. These will be reviewed and incorporated into a manual. The Town of Preston, Connecticut will determine the significant processes for all income and expense transactions and make sure each is addressed in the manual. The manual will be reviewed and distributed to all individuals involved.

**MW-07-2 – Controls over the Period-End Financial Reporting Process**

**Condition:** The audit identified material adjustments to the Town of Preston, Connecticut's internally prepared financial reporting. Although these have been subsequently corrected by management, the internal reports presented and used for management decisions were materially misstated.

**Recommendation:** We recommend that the management of the Town of Preston, Connecticut review the adjustments that have been proposed by the auditor. This should be a good indication of where controls need to be improved. Additionally, the Town of Preston, Connecticut should consider developing specific preparation and review procedures, required documentation and checklists to review their internally prepared financial reports prior to their release.

**Management's Response:** The Town of Preston, Connecticut will include internal controls and checklists over financial reporting to their accounting manual. In addition, the Town of Preston, Connecticut will review additional training opportunities for the accounting personnel to help them understand why the material adjustments were made to the internally prepared financial statements.

**MW-96-1 - Segregation of Duties**

**Condition:** The Town of Preston does not maintain an adequate segregation of duties for proper internal control over the financial transactions in certain areas. Proper internal control relies on the following three aspects of processing transactions being performed by separate individuals: authorizing transactions, custody of assets, and record keeping. This weakness in internal controls could lead to funds being expended in a manner not consistent with the intentions of management. These weaknesses were noted in the following cash receipts areas:

**Treasurer** - The Town Treasurer handles cash receipts, prepares and makes deposits, posts cash receipt transactions, and reconciles bank statements. The Treasurer also authorizes, makes, records and reconciles all investment activities

**Tax Collector** - The Tax Collector or her assistants prepare and send bills, handle tax collections, prepare and make deposits, post tax receipt transactions, and reconcile bank statements. In addition, the tax levies are not reconciled by Town personnel to the Grand Rate Book.

**Parks and Recreation** - The Program Coordinator handles cash receipts, prepares and makes deposits, and posts cash receipt transactions and reconciles the accounts.

**Recommendation:** The Town should review the segregation of duties involved in all the cash receipts functions. The duties of the individuals involved should be analyzed and restructured as necessary to provide for a better system of checks and balances. Once a better system has been devised, it should be written, approved by the Board of Finance and distributed to the individuals involved.

**Follow Up Required of the Town of Preston, Connecticut on this Management Letter**

Management is required to prepare and submit a corrective action plan to the State of Connecticut Office of Policy and Management to address any of the following if they are present:

Significant Deficiencies in Internal Control  
Material Weaknesses in Internal Control

Material Non-compliance  
Questioned Costs

Other matters noted, if any, do not need to be addressed. The Town of Preston, Connecticut's corrective action plan should include:

An identification of each finding as reported above  
Comments on findings and recommendations  
Actions taken or planned (or an explanation why corrective action is unnecessary)  
Status of Corrective Actions on prior findings

Our consideration of internal control would not necessarily disclose all matters in internal control that might be significant deficiencies and, accordingly, would not necessarily disclose all significant deficiencies that are also considered to be material weaknesses as defined above.

This report is intended solely for the information and use of Board of Finance, management, and others within the administration and is not intended to be and should not be used by anyone other than these specified parties.

*Marion + Company*



# Marien + Company LLC

124 New London Turnpike  
Norwich, Connecticut 06360

Tel: 860.886.1750  
Fax: 860.886.0280

[www.MarienCPAs.com](http://www.MarienCPAs.com)

CERTIFIED PUBLIC ACCOUNTANTS + ADVISORS

## MANAGEMENT LETTER

To the Board of Finance  
Town of Preston, Connecticut  
Preston, Connecticut

In planning and performing our audit of the financial statements of the Town of Preston, Connecticut as of and for the year ended June 30, 2008 in accordance with auditing standards generally accepted in the United States of America, we considered the Town of Preston, Connecticut's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Town of Preston, Connecticut's internal control. Accordingly, we do not express an opinion on the effectiveness of their internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. However, as discussed below, we identified certain deficiencies in internal control that we consider to be significant deficiencies and other deficiencies that we consider to be material weaknesses.

### **I. Internal Control Review - Significant Deficiencies:**

A **control deficiency** exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A **significant deficiency** is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process or report financial data reliably in accordance with Generally Accepted Accounting Principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control. We consider the following deficiencies to be significant deficiencies in internal control:

#### **SD-07-1 – Internal Control over Financial Reporting**

**Condition:** The Town of Preston, Connecticut presents financial statements in accordance with Generally Accepted Accounting Principles (GAAP). The Town of Preston, Connecticut does not collectively possess the resources, skills and knowledge to prepare their own financial statements including footnote disclosures in accordance with GAAP.

**Recommendation:** The Town of Preston, Connecticut should consider increasing the continuing education for financial personnel or reviewing the qualifications of others in management (i.e. Board Members, etc.) to see if there is someone who can prepare or take responsibility for the financial statements.

**Management's Response:** The Town will continue to solicit accounting expertise from sources other than Town personnel to complete financial statements.

**SD-07-2 – Controls over Nonroutine and Nonsystematic Transactions**

**Condition:** On occasion, the Town of Preston, Connecticut must make adjusting journal entries to add, delete, correct, adjust or reclassify transactions. These adjusting journal entries are generally prepared and posted by the same individual. There are no review, authorization and documentation procedures required for an adjusting journal entry.

**Recommendation:** We recommend that the review of internal control procedures include the adjusting journal entry process.

**Management's Response:** This weakness will be addressed in the Town's Accounting Policy and Procedures Manual.

**II. Internal Control Review – Material Weaknesses:**

A **material weakness** is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control. We believe that the following deficiencies constitute material weaknesses.

**MW-96-1 - Segregation of Duties**

**Condition:** The Town of Preston, Connecticut does not maintain an adequate segregation of duties for proper internal control over the financial transactions in certain areas. Proper internal control relies on the following three aspects of processing transactions being performed by separate individuals: authorizing transactions, custody of assets, and record keeping. This weakness in internal controls could lead to funds being expended in a manner not consistent with the intentions of management. These weaknesses were noted in the following cash receipts areas:

**Treasurer** - The Town Treasurer handles cash receipts, prepares and makes deposits, posts cash receipt transactions, and reconciles bank statements. The Treasurer also authorizes, makes, records and reconciles all investment activities.

**Tax Collector** - The Tax Collector or her assistants prepare and send bills, handle tax collections, prepare and make deposits, post tax receipt transactions, and reconcile bank statements. In addition, the tax levies are not reconciled by Town personnel to the Grand Rate Book.

**Parks and Recreation** - The Program Coordinator handles cash receipts, prepares and makes deposits, and posts cash receipt transactions and reconciles the accounts.

**Recommendation:** The Town should review the segregation of duties involved in all the cash receipts functions. The duties of the individuals involved should be analyzed and restructured as necessary to provide for a better system of checks and balances. Once a better system has been devised, it should be written, approved by the Board of Finance and distributed to the individuals involved.

**Management's Response:** The Tax Collector has implemented an accounting policy that addresses this issue to the best of our ability taking into consideration our limited staffing. Parks and Recreation segregates cash management duties whenever possible. The limited size of the program and the small dollar amounts involved makes total segregation of duties financially unfeasible. The Treasurer and Tax Collector work together to maintain as much segregation of cash transactions as fiscally possible. We are working on policy to further address this area of concern.

#### **MW-07-1 – Documentation of the Components of Internal Control**

**Condition:** The Town of Preston, Connecticut has numerous internal controls in place over significant processes and accounts. Not all of these controls are formally documented. It is possible for controls to change over time or not be completely understood by the individuals involved in the processes.

**Recommendation:** We recommend that the Town of Preston, Connecticut make a listing of its significant processes and accounts. Controls in each area should be documented in a procedures manual. Each of the procedures should be reviewed to determine if controls are adequate.

**Management's Response:** The Board of Finance has established a Policy and Procedures Sub-committee to review and implement financial policies and procedures. The adoption and implementation should be completed during fiscal year 2008-2009.

#### **MW-08-1 – Entity Level Controls**

**Condition:** Internal controls are a coordinated set of policies and procedures that management uses achieve their objectives and meet their fundamental responsibilities for effectiveness, efficiency, compliance and financial reporting. The literature recognizes five sections of internal control published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO Report) in Internal Control – Integrated Framework. These five interrelated components include:

- *Control Environment* – A favorable control environment exists when management is knowledgeable about controls (entity wide and specific), is committed to establishing controls and communicates its support for internal controls to all individuals involved.
- *Risk Assessment* – This involves management’s continual identification and assessment of the potential risks that might prevent management from fulfilling its responsibilities and achieving its objectives.
- *Information and Communication Systems* – These are the systems used to assure that appropriate individuals have timely and accurate information to carry out their responsibilities.
- *Control Activities* – These are management’s response to the risks identified. These are the specific policies and procedures that are put in place to alert management of undesired actions in a timely manner.
- *Monitoring* – There is a responsibility of management to follow up on the controls that have been put in place to assure that they continue to function and function properly, effectively and efficiently.

The Town of Preston, Connecticut does not have a framework established to deal with each of the interrelated entity level controls over and above the specific control policies and procedures that have been developed.

**Recommendation:** We recommend that as part of developing an accounting manual, the Town of Preston, Connecticut consider the entity wide controls as discussed above.

**Management’s Response:** The Town of Preston, Connecticut will assign this to the policy committee to work on while they are developing the other controls.

**Follow Up Required of the Town of Preston, Connecticut on this Letter**

Management is required to prepare and submit a corrective action plan to the State of Connecticut Office of Policy and Management to address any of the following if they are present:

- |  |                         |
|--|-------------------------|
| Significant Deficiencies in Internal Control | Material Non-compliance |
| Material Weaknesses in Internal Control      | Questioned Costs        |

Other matters noted, if any, do not need to be addressed. The Town of Preston, Connecticut’s corrective action plan should include:

- An identification of each finding as reported above
- Comments on findings and recommendations
- Actions taken or planned (or an explanation why corrective action is unnecessary)
- Status of Corrective Actions on prior findings

Our consideration of internal control would not necessarily disclose all matters in internal control that might be significant deficiencies and, accordingly, would not necessarily disclose all significant deficiencies that are also considered to be material weaknesses as defined above.

This report is intended solely for the information and use of the Board of Finance, management, and others within the administration and is not intended to be and should not be used by anyone other than these specified parties.

*Maier + Company*

October 3, 2008

**Town of Preston, Connecticut  
Schedule of Findings and Questioned Costs  
For the Year Ended June 30, 2009**

**I. Summary of Audit Results**

**A. Financial Statements:**

Type of auditors' report issued: Unqualified  
 Internal control over financial reporting:  
     • Material weakness(es) identified? Yes No  
     • Significant deficiency(ies) identified that are not considered to be material weaknesses? Yes None reported  
 Noncompliance material to the financial statements noted? Yes No

**B. State Financial Assistance:**

Internal control over major programs:  
     • Material weakness(es) identified? Yes No  
     • Significant deficiency(ies) identified that are not considered to be material weaknesses? Yes None reported  
 Type of auditors' report issued on compliance for major programs: Unqualified  
 Any audit findings disclosed that are required to be reported in accordance with Section 4-236-24 of the Regulations to the State Single Audit Act? Yes No

The following schedule reflects the major programs included in the audit:

State Grantor and Program	State Core-CT Number	Expenditures
Department of Education: School Readiness in Priority School Districts	11000-SDE64370-12113	\$107,000
Department of Transportation: Town Aid Road	12001-DOT57131-17036	\$100,964
Office of the State Comptroller: Payment in Lieu of Taxes – State Property	11000-OSC15910-17004	\$265,210
Mashantucket Pequot Grant	12009-OSC15910-17005	\$1,433,586

**II. Findings and Questioned Costs Related to Financial Statements:**

- A.** We issued reports, dated December 04, 2009, on compliance and on internal control over financial reporting based on an audit of financial statements performed in accordance with Government Auditing Standards.
- B. Compliance** - Our report on compliance indicated no reportable instances of noncompliance.
- C. Internal control** - Our report on internal control indicated the following:

**Town of Preston, Connecticut  
Schedule of Findings and Questioned Costs  
For the Year Ended June 30, 2009**

**Material Weakness(es)** – A deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Town of Preston, Connecticut's financial statements will not be prevented, or detected and corrected in a timely basis.

**MW-96-1 - Segregation of Duties**

**Condition:** The Town of Preston does not maintain an adequate segregation of duties for proper internal control over the financial transactions in certain areas. Proper internal control relies on the following three aspects of processing transactions being performed by separate individuals: authorizing transactions, custody of assets, and record keeping. This weakness in internal controls could lead to funds being expended in a manner not consistent with the intentions of management. These weaknesses were noted in the following cash receipts areas:

**Treasurer** - The Town Treasurer handles cash receipts, prepares and makes deposits, posts cash receipt transactions, and reconciles bank statements. The Treasurer also authorizes, makes, records and reconciles all investment activities.

**Tax Collector** - The Tax Collector or her assistants prepare and send bills, handle tax collections, prepare and make deposits, post tax receipt transactions, and reconcile bank statements.

**Parks and Recreation** - The Program Coordinator handles cash receipts, prepares and makes deposits, and posts cash receipt transactions and reconciles the accounts.

**Recommendation:** The Town should review the segregation of duties involved in all the cash receipts functions. The duties of the individuals involved should be analyzed and restructured as necessary to provide for a better system of checks and balances. Once a better system has been devised, it should be written, approved by the Board of Finance and distributed to the individuals involved.

**Management's Response:** The Tax Collector has implemented an accounting policy that addresses this issue to the best of our ability taking into consideration our limited staffing. Parks and Recreation segregates cash management duties whenever possible. The limited size of the program and the small dollar amounts involved makes total segregation of duties financially unfeasible. The Treasurer and Tax Collector work together to maintain as much segregation of cash transactions as fiscally possible. We are working on policy to further address this area of concern.

**MW-07-1 – Documentation of the Components of Internal Control over Processes**

**Condition:** The Town of Preston, Connecticut has numerous internal controls in place over significant processes and accounts. Not all of these controls are formally documented. It is possible for controls to change over time or not be completely understood by the individuals involved in the processes.

**Town of Preston, Connecticut  
Schedule of Findings and Questioned Costs  
For the Year Ended June 30, 2009**

**Recommendation:** We recommend that the Town of Preston, Connecticut make a listing of its significant processes and accounts. Controls in each area should be documented in a procedures manual. Each of the procedures should be reviewed to determine if controls are adequate.

**Management's Response:** The Town of Preston, Connecticut has a number of accounting policies in place already. These will be reviewed and incorporated into a manual. The Town of Preston, Connecticut will determine the significant processes for all income and expense transactions and make sure each is addressed in the manual. The manual will be reviewed and distributed to all individuals involved.

**MW-07-2 – Controls over the Period-End Financial Reporting Process**

**Condition:** The audit identified material adjustments to the Town of Preston, Connecticut's internally prepared financial reporting. Although these have been subsequently corrected by management, the internal reports presented and used for management decisions were materially misstated.

**Recommendation:** We recommend that the management of the Town of Preston, Connecticut review the adjustments that have been proposed by the auditor. This should be a good indication of where controls need to be improved. Additionally, the Town of Preston, Connecticut should consider developing specific preparation and review procedures, required documentation and checklists to review their internally prepared financial reports prior to their release.

**Management's Response:** The Town of Preston, Connecticut will include internal controls and checklists over financial reporting to their accounting manual. In addition, the Town of Preston, Connecticut will review additional training opportunities for the accounting personnel to help them understand why the material adjustments were made to the internally prepared financial statements.

**MW-08-1 – Entity Level Controls**

**Condition:** Internal controls are a coordinated set of policies and procedures that management uses to achieve their objectives and meet their fundamental responsibilities for effectiveness, efficiency, compliance and financial reporting. The literature recognizes five sections of internal control published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO Report) in Internal Control – Integrated Framework. These five interrelated components include:

- *Control Environment* – A favorable control environment exists when management is knowledgeable about controls (entity wide and specific), is committed to establishing controls and communicates its support for internal controls to all individuals involved.

**Town of Preston, Connecticut  
Schedule of Findings and Questioned Costs  
For the Year Ended June 30, 2009**

- *Risk Assessment* – This involves management’s continual identification and assessment of the potential risks that might prevent management from fulfilling its responsibilities and achieving its objectives.
- *Information and Communication Systems* – These are the systems used to assure that appropriate individuals have timely and accurate information to carry out their responsibilities.
- *Control Activities* – These are management’s response to the risks identified. These are the specific policies and procedures that are put in place to alert management of undesired actions in a timely manner.
- *Monitoring* – There is a responsibility of management to follow up on the controls that have been put in place to assure that they continue to function and function properly, effectively and efficiently.

The Town of Preston, Connecticut does not have a framework established to deal with each of the interrelated entity level controls over and above the specific control policies and procedures that have been developed.

**Recommendation:** We recommend that as part of developing an accounting manual, the Town of Preston, Connecticut consider the entity wide controls as discussed above.

**Management’s Response:** The Town of Preston, Connecticut will assign a committee to work on developing the necessary entity wide controls.

**Significant Deficiency(ies)** – A deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

**SD-07-1 – Internal Control over Financial Reporting**

**Condition:** The Town of Preston, Connecticut presents financial statements in accordance with Generally Accepted Accounting Principles (GAAP). The Town of Preston, Connecticut does not collectively possess the resources, skills and knowledge to prepare their own financial statements including footnote disclosures in accordance with GAAP.

**Recommendation:** The Town of Preston, Connecticut should consider increasing the continuing education for financial personnel or reviewing the qualifications of others in management (i.e. Board Members, etc.) to see if there is someone who can prepare or take responsibility for the financial statements.

**Management’s Response:** The Town of Preston, Connecticut will look into possible training opportunities for their staff to prepare the financial report.

**Town of Preston, Connecticut  
Schedule of Findings and Questioned Costs  
For the Year Ended June 30, 2009**

**SD-07-2 – Controls over Nonroutine and Nonsystematic Transactions**

**Condition:** On occasion, the Town of Preston, Connecticut must make adjusting journal entries to add, delete, correct, adjust or reclassify transactions. These adjusting journal entries are generally prepared and posted by the same individual. There are no review, authorization and documentation procedures required for an adjusting journal entry.

**Recommendation:** We recommend that the review of internal control procedures include the adjusting journal entry process.

**Management's Response:** The Town of Preston, Connecticut will review this as part of preparing a comprehensive accounting policies and procedures manual.

**III. Findings And Questioned Costs Related to State Financial Assistance**

No findings or questioned cost are reported relating to State financial assistance programs.

# Preston Board of Education

## Policies, Regulations, and Bylaws

**4118.11(a)**

**4218.11(a)**

### **Personnel — Certified and Non-Certified**

#### **Nondiscrimination**

The Preston Board of Education is an equal opportunity employer. The board does not discriminate on the basis of race, color, religious creed, age, marital status, national origin, ancestry, sex, sexual orientation, past or present history of mental disorder, mental retardation, learning disability, physical disability (including blindness), or other disability (except in the case of a bona fide occupational qualification or need) among applicants for employment, provided that the individual can perform the essential functions of the job with or without reasonable accommodations.

#### **Equal Education Opportunity**

Pursuant to the IDEA, Americans With Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, no otherwise qualified individual with handicaps shall, solely by reason of such handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program of the Board of Education.

Every student has the right to participate fully in classroom instruction and extracurricular activities which shall not be abridged or impaired because of age, sex, sexual orientation, race, religion, national origin, pregnancy, parenthood, marriage, or for any reason not related to his/her individual capabilities.

The Superintendent of Schools or designated Civil Rights Coordinator shall monitor compliance with this policy. Further compliance with policy is a responsibility of all district administrators in accordance with the procedures set forth in attached regulations.

Students shall not be discriminated against, including but not limited to, in:

- A. Admission
- B. Use of school facilities
- C. Vocational education
- D. Equal Education Opportunity
- E. Competitive athletics
- F. Student rules, regulations and benefits
- G. Financial assistance
- H. School sponsored extracurricular activities
- I. Course enrollments
- J. Counseling and guidance
- K. Physical education
- L. Graduation requirements
- M. Treatment of married and/or pregnant students

**Preston Board of Education**  
**Policies, Regulations, and Bylaws**

**4118.11(b)**  
**4218.11(b)**

**Personnel — Certified and Non-Certified**

**Equal Education Opportunity (Continued)**

- N. Health services
- O. Other aid, benefits, or services

Employees/applicants shall not be discriminated against, including but not limited to, in:

- P. Hiring and promotion
- Q. Compensation
- R. Job assignments
- S. Leaves of absence
- T. Fringe benefits
- U. Labor organization
- V. Contracts or professional agreements

Sexual harassment has been established as a form of sexual discrimination and is defined as follows: "Any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, when (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment or participation in an educational function (2) submission or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting the individual or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work or educational performance or creating an intimidating, hostile or offensive working environment."

Examples of specific behaviors (that are unwanted and sexual in nature) that could constitute sexual harassment include, but are not limited to:

- A. Attempted rape/rape
- B. Inappropriate touching
- C. Sexual name calling Sexual rumors
- D. Display of unwanted affections
- E. Overly personal conversation
- F. Corner/blocking
- G. Harassing telephone calls
- H. Inappropriate gestures
- I. Leers
- J. Sexually explicit jokes/cartoons/pictures
- K. Sexually explicit comments

If an employee believes that he or she has been discriminated against in regard to either of the preceding policies, a grievance may be filed charging that the employee's personal rights have been denied or violated.

**Preston Board of Education**  
**Policies, Regulations, and Bylaws**

**4118.11(c)**  
**4218.11(c)**

**Personnel — Certified and Non-Certified**

Employees wishing to discuss these regulations or rights under this policy, or wish to discuss or file a grievance, should contact the district's Civil Rights Coordinator/s or any administrator.

Forms are available in guidance offices or from the Civil Rights Coordinator/s. Contact with the Civil Rights Coordinator/s should take place within forty (40) calendar days of the alleged occurrence.

**Legal Reference:** Civil Rights Act of 1964, Title VII, 42 U.S.C. 2000-e2(a).  
Equal Employment Opportunity Commission Policy Guidance (N-915.035) on Current Issues of Sexual Harassment, effective 10/15/88.  
Title IX of the Education Amendments of 1972, 34 CFR Section 106.  
Meritor Savings Bank. FSB v. Vinson, 477 U.S. 57 (1986)  
**Connecticut General Statutes**  
46a-60 Discriminatory employment practices prohibited.  
Constitution of the State of Connecticut, Article I, Section 20.

**Policy adopted:**

# Preston Board of Education

## Policies, Regulations, and Bylaws

4118.113(a)  
4218.113  
5145.52

### **Personnel — Certified and Non-Certified**

#### **Harassment**

The Board strives to provide a safe, positive working and learning climate for its students and employees. Therefore, harassment, in any form, will not be tolerated in Preston Public Schools. This policy applies to all students, staff members, board members, parents, vendors, contracted individuals, volunteers, other employees and other visitors – who are on district grounds or property or on property within the jurisdiction of the district; on buses operated by or for the district; while attending or engaged in district activities; and while away from district grounds if the misconduct directly affects the good order, efficient management, and welfare of the district.

Employees, students, and others are expected to adhere to a standard of conduct that is respectful and courteous to all. The principle of freedom of expression that might otherwise protect the most offensive public speech does not protect or encompass a right to threaten the dignity and privacy of an individual. Such personally directed behavior will not be tolerated. It is contrary to academic values, debilitates its victims, compromises the offenders, and undermines the district's fundamental commitment to individual freedom and respect for all its members. Furthermore, acts of intolerance may destroy the very atmosphere in which freedom of expression is otherwise tolerated and cherished.

For purposes of this policy, harassment consists of verbal, written, graphic, or physical conduct relating to an individual's race, color, religion, sex, national origin/ethnicity, physical attributes or disability, parental or marital status, sexual orientation, or age when such conduct/harassment:

1. is sufficiently severe, persistent or pervasive that it affects an individual's ability to participate in or benefit from an educational program or activity or creates an intimidating, threatening or abusive educational environment;
2. has the purpose or effect of substantially or unreasonably interfering with an individual's academic or work performance;
3. otherwise adversely affects an individual's learning or work opportunities;
4. is made either explicitly or implicitly a term or condition of an individual's education, employment, or participation in district programs or activities; and
5. exposure to or rejection of such conduct by an individual is used as the basis for decisions affecting the individual.

Harassment as set forth above may include, but is not limited to:

- verbal, physical, or written intimidation or abuse;
- repeated remarks of a demeaning or condescending nature;
- repeated demeaning jokes, stories, or activities directed at the individual.

For purposes of this policy, sexual harassment shall consist of unwelcome sexual advances; requests for sexual favors; and other inappropriate verbal, written, graphic or physical conduct of a sexual nature when:

1. acceptance of such conduct is made, either explicitly or implicitly, a term or condition of an individual's continued employment; or participation in district programs or activities; and
2. submission to or rejection of such conduct by an individual is used as the basis for decisions affecting the individual; and
3. such conduct is sufficiently severe, persistent or pervasive that it has the purpose or effect of substantially interfering with the employee's job performance or creating an intimidating, hostile or offensive working environment.

Examples of conduct that may constitute sexual harassment include, but are not limited to sexual flirtations, advances, touching or propositions; verbal abuse of a sexual nature; graphic or suggestive comments about an individual's dress or body; sexually degrading words to describe an individual; jokes; pin-ups; calendars; objects; graffiti; vulgar statements; abusive language; innuendos; references to sexual activities; overt sexual conduct; or any conduct that has the effect of unreasonably interfering with an employees' ability to work or creates an intimidating, hostile or offensive working environment.

Each staff member shall be responsible to maintain an educational environment free from all forms of unlawful harassment. Each student shall be responsible to respect the rights of all students and to ensure an environment free from all forms of unlawful harassment.

Should harassment be alleged, it is the policy of this Board that it shall be thoroughly investigated, that there shall be no retaliation against the victim of the alleged harassment, and that the problem/concern shall be appropriately addressed.

In order to maintain a work environment that discourages and prohibits unlawful harassment, the Board designates the

- Superintendent
- Assistant Superintendent
- Business Manager
- Personnel Director
- Director of Special Education/Services

as the District's Compliance Officer.

The Compliance Officer shall publish and disseminate this policy and the complaint procedure annually to students, parents, employees, independent contractors, vendors and the public. The publication shall include the position, office address and telephone number of the District's Compliance Officer.

The District shall annually inform students, staff, parents, independent contractors and volunteers that unlawful harassment will not be tolerated with the school system.

Legal Reference: Title VII, Civil Rights Act, 42 U.S.C. 2000e, et seq.

29 CFR 1604.11, EEOC Guidelines on Sex Discrimination.

Title IX of the Educational Amendments of 1972, 20 U.S.C. 1681 Et seq.

34 CFR Section 106.8 (b), OCR Guidelines for Title IX.

Definitions, OCR Guidelines on Sexual Harassment, FED. Reg. Vol 62, #49, 29CFR Sec. 1606.8 (a) 62 Fed. Reg. 12033 (March 13, 1997) and 66 Fed. Reg. 5512(1/19/01)

Meritor Savings Bank FSB v. Vinson, 477 U.S. 57 (1986)

Faragher v. City of Boca Raton, No. 97-282 (U.S. Supreme Court, June 26, 1998)

Burlington Industries, Inc. v. Ellerth, No. 97-569, (U.S. Supreme Court, June 26, 1998)

Gebbs v. Lago Vista Indiana School District, No. 99-1866, (U.S. Supreme Court, June 26, 1998)

Davis v. Monroe County Board of Education, No. 97-843, (U.S. Supreme Court, May 24, 1999)

Connecticut General Statutes

46a-60 Discriminatory employment practices prohibited.

10-15c Discrimination in public schools prohibited. School Attendance by five-year olds. (amended by P.A. 97-247 to include Sexual orientation)

10-153 Discrimination on account of marital status.

**17a-101 Protection of children from abuse.**

**Policy adopted: 9/12/05**

# PRESTON PUBLIC SCHOOLS

## SUPERINTENDENT'S GOALS 2010-2011

1. To develop a new curriculum guide for Board approval in social studies.

Completed     Progress     Planned for Future  
 No Action     Rejected

2. To complement the implementation of the standards based student report card in K-7 by piloting a comparable system in grade 8.

Completed     Progress     Planned for Future  
 No Action     Rejected

3. To improve student performances on the CMT's (i.e., 80% at Goal/Advanced) in mathematics, reading and writing in grades three through eight.

Completed     Progress     Planned for Future  
 No Action     Rejected

4. To develop and implement Student Improvement Plans for every student who performed below Goal/Advanced in writing in 2010, grades three through eight.

Completed     Progress     Planned for Future  
 No Action     Rejected

5. To identify a standardized assessment tool to assess the performance of grades 1-2 students in mathematics and reading.

Completed     Progress     Planned for Future  
 No Action     Rejected

6. To expand implementation of Response to Intervention at PVMS (mathematics) and PPMS (grade 6, mathematics; grades 7-8, mathematics and reading).

Completed     Progress     Planned for Future  
 No Action     Rejected

7. To continue to monitor the special education pre-referral process as well as staffing requirements to ensure that eligible students receive the services that they require in the most cost effective manner possible.

Completed     Progress     Planned for Future  
 No Action     Rejected

8. To offer a multi-week public outreach program for members of the community, especially seniors, who are interested in learning how to navigate the internet and use e-mail.

Completed     Progress     Planned for Future  
 No Action     Rejected

9. To achieve a 50% (plus) participation level by students/staff in the district's food services program and implement a point-of-sale program.

Completed     Progress     Planned for Future  
 No Action     Rejected

10. To reduce our reliance on independent livery service providers for the transportation of special education services by 50K in comparison to FY10.

Completed     Progress     Planned for Future  
 No Action     Rejected

11. To assist the Board of Education in finalizing its review of series 6000 and 7000 of the board's Policy Manual.

Completed     Progress     Planned for Future  
 No Action     Rejected

12. To ensure the complete implementation of the new financial software system.

Completed     Progress     Planned for Future  
 No Action     Rejected

13. To develop the Fiscal Year 2012 operating and capital budgets.

Completed     Progress     Planned for Future  
 No Action     Rejected

14. To ensure the inclusion of monthly financial reports with the board packets on the Friday before each regularly scheduled Monday meeting.

Completed     Progress     Planned for Future  
 No Action     Rejected



**PRESTON PUBLIC SCHOOLS**  
Office of the Superintendent of Schools  
325 Shetucket Turnpike  
Preston, Connecticut 06365-8631

**John J. Welch, Ed.D.**  
*Superintendent of Schools*  
[welchj@prestonschools.org](mailto:welchj@prestonschools.org)

**(860) 889-6098**  
**FAX (860) 889-8685**

September 20, 2010

Mr. William Geer  
Chairman  
Ledyard Regional Advisory Committee  
Ledyard High School  
24 Gallup Hill Road  
Ledyard, CT 06339

Dear Mr. Geer,

At their regularly scheduled meeting on September 13, 2010, the Board of Education unanimously voted to appoint Gerald Grabarek as the Preston Representative to the Ledyard VoAg Advisory Committee.

If you have any questions, do not hesitate to contact me.

For the Preston Board of Education,

A handwritten signature in cursive script that reads "John J. Welch".

John J. Welch, Ed. D.

Cc: Mr. Gerald Grabarek  
**Preston BOE**

**Preston Public Schools  
Administration and Unaffiliated Staff  
2010-11**

<b>Name</b>	<b>Position</b>	<b>FTE</b>	<b>Salary</b>
Jack Welch	Superintendent	1.00	115,257
Ivy Davis	Dir. Curriculum & Spec Ed	1.00	84,460
Ray Bernier	Principal - PPMS	1.00	94,093
Kathryn Walsh	Principal - PVMS	1.00	101,920
Gary Miller - Interim	Business Manager	0.60	88,000
Gloria Homiski	Exec Admin Asst	1.00	45,651
Margie LePage	SpEd Admin Asst	1.00	37,616
Cheryl Derosier	Fiscal Assistant	0.50	14,060
Mike House	B & G Supervisor	1.00	68,407
Patricia Hibbard	Transportation Coord	1.00	47,740
Emile Levasseur	Technology Coord	0.80	48,067
Susan Strader - New	Reading Tutor - PVMS	1.00	23,920
Linda Congdon	Nurse - PVMS	1.00	52,411
Sue Porter	Nurse - PPMS	1.00	40,775

**Preston Public Schools  
Teacher Salaries  
2010-2011**

School	Teachers	Assignment	Step	FTE	Salary 10-11
	<b>REGULAR EDUCATION</b>				
PVMS	Berek, Gloria	Gr 1	MA+00 - 14	1.00	73,828
PVMS	Bosko, Sandra	Gr 4	MA+30 - 14	1.00	81,552
PPMS	Braunhardt, Glenn	Phys Ed	MA+00 - 14	0.60	44,297
PVMS	Capunitan, Cathleen	Gr 2	MA+15 - 14	1.00	78,817
PVMS	Clark, Lisa	Gr 4	BA+15 - 05	1.00	50,173
PVMS	Cormier, Michelle **	Pre-K	MA+00 - 08	1.00	62,938
PPMS	Dekiert, Evelina	Tech	MA+30 - 04	1.00	64,234
PPMS	Deremiah, Jane	Gr 7-8	MA+15 - 14	1.00	78,817
PPMS	Durkee, Melissa **	Gr 7-8	MA+15 - 08	1.00	66,538
PVMS	Fecteau, Alycia	Pre-K/K	BA+00 - 04	1.00	46,829
PVMS	Felker, Maureen	Gr 5	MA+00 - 14	1.00	73,828
Both	Feltes, Lisa	Music	MA+30 - 14	1.00	81,552
PPMS	Fitzgerald, Paul	Music	MA+30 - 14	0.80	65,242
PVMS	Frechette, Marianne	Gr 5	MA+30 - 14	1.00	81,552
PVMS	Freiss, Ruth	Gr 2	MA+00 - 11	1.00	67,800
PPMS	Ghattas, Judith *	Gr 6	MA+00 - 14	1.00	73,828
Both	Hansen, Diane	Art	MA+00 - 14	1.00	73,828
PVMS	Kilpatrick, Katrina	Gr 5	MA+00 - 13	1.00	71,743
Library	Letterie, Elaine	Library	MA+00 - 14	1.00	73,828
PVMS	Mattern, Nancy	Gr 3	MA+00 - 14	1.00	73,828
PVMS	McCullen, Arline	Gr 1	MA+00 - 14	1.00	73,828
PPMS	McNeil, Christine	Gr 8	MA+00 - 13	1.00	71,743
PPMS	Pickett, Christopher	Gr 8	MA+00 - 04	1.00	56,933
PVMS	<i>Rearick, Daniel - New</i>	Gr 4	MA+00 - 05	1.00	58,437
PPMS	Riley, Dawn	Gr 6	MA+30 - 14	1.00	81,552
PPMS	Robbins, Sharon	Gr 7-8	MA+15 - 14	1.00	78,817
PVMS	Rogers, Erika	Gr K	MA+00 - 02	1.00	53,935
PVMS	Rudyk, Natalie	Gr K	MA+00 - 09	1.00	64,440
PPMS	<i>Seigny, Jan - New</i>	Gr 7-8	MA+00 - 01	1.00	52,436
PVMS	Shabunia, Kristine	Gr 3	MA+15 - 14	1.00	78,817
PVMS	Smithers, Bonnie	World Lang	BA+00 - 06	1.00	47,972
PVMS	Stadler, Robin	Reading Spec	MA+30 - 13	1.00	79,307
PPMS	<i>Stefanowicz, Stanley - New</i>	World Lang	MA+00 - 07	1.00	61,436
PVMS	Thom, Jennifer	Gr 3	MA+00 - 05	1.00	58,437
PVMS	Tubbs, Corinne	Phys Ed	MA+00 - 14	0.50	36,914
				<b>33.90</b>	
	<b>SPECIAL EDUCATION</b>				
Both	Anderson, Heather	Speech/Lang	MA+00 - 09	1.00	64,440
PVMS	Clark, Amy	ABA	MA+00 - 11	1.00	67,800
PVMS	Deshefy, Nicole	Resource	MA+00 - 10	1.00	65,943
Both	Doyle, Karen	Speech/Lang	MA+00 - 14	0.80	59,062
PVMS	Flannagan, Toby	Resource	MA+00 - 13	1.00	71,743
PPMS	Foltz, Jennifer	Resource	MA+00 - 14	1.00	73,828
PVMS	<i>Lauteri, Megan - New</i>	Psych	MA+30 - 02	1.00	61,270
PPMS	Miller, Kim	Resource	MA+00 - 14	1.00	73,828
PPMS	Sigmarsdottir, Gudmunda	Psych	MA+30 - 08	0.60	42,103
				<b>8.40</b>	

**Preston Public Schools  
MEUI Employees  
2010-11**

Bldg	NAME		STEP	Wages
<b>INSTRUCTIONAL ASSISTANTS</b>				
PVMS	Allard, Linda	ABA	11	18,926
PVMS	Barile, Lisa	PK	9	16,668
PVMS	Bearden, Cindy	1:1	MAX	21,338
PVMS	Bonosconi, Bethany	PK	10	16,740
PPMS	Brown, Debra	1:1	MAX	20,484
PVMS	Burton, Marie	PK	MAX	20,484
PVMS	Curtis, Kerry	1:1	MAX	21,167
PVMS	Davison, Lana	1:1	10	17,855
PPMS	Guiher, Mary		MAX	20,484
PVMS	Harris, Lisa	ABA	MAX	21,338
NFA	Jancewicz, Linda		MAX	20,484
NFA	Joly, Karen		12	21,307
PVMS	Keenan, Jenny		MAX	20,484
PVMS	Loughery, Teresa		MAX	20,484
PVMS	Palmer, Nancy		MAX	20,484
PPMS	Popinchalk, Lori		12	18,939
PPMS	Serra, Louise		MAX	23,045
NFA	Wolinski, Linda		12	20,517
<b>SCHOOL SECRETARIES</b>				
PVMS	Smith, Gail		MAX	26,060
PPMS	Winchester, Frances		MAX	24,567
<b>CUSTODIANS</b>				
PPMS	Donais, Mark		MAX	33,654
PVMS	Jakubowski, Peter		MAX	33,654
PVMS	Pope, George		MAX	33,654
PPMS	Russ, David		MAX	33,654
<b>COOKS &amp; ASST COOKS</b>				
PVMS	Cote, Lana		10	10,378
PPMS	Craig, Jeanne		MAX	20,180
PVMS	Potter, Katerina		12	19,745

**Preston Public Schools  
CSEA Employees  
2010-2011**

<b>Name</b>	<b>Position</b>	<b>Step</b>	<b>Average Wkly Hrs</b>	<b>Annual Wages</b>
Bender, W	Driver	3	31.25	21,779
Benjamin, N	Driver	2	30.00	18,837
Boenig, R	Driver	0	30.00	17,375
Claudio, E	Driver	1	31.25	18,098
Clements, R	Driver	1	30.00	17,375
Daniels, P	Driver	3	31.25	21,779
Dio, J	Driver - Sub	0	25.00	13,933
Elton, J	Mechanic	M	40.00	47,050
Guertin, S.	Driver	3	31.25	21,779
Moran, K	Driver - Sub	0	30.00	16,719
Ninteau, D.	Driver	3	31.25	21,779
Pank, S	Driver	1	23.75	13,755
Potter, P.	Driver	3	31.25	21,779
Sabrowski, A.	Driver	3	25.00	17,423
Tonan, M	Driver	2	32.50	20,407
<b>Notes:</b>				
(1) Driver wages based on average weekly hours for 39 weeks				
(2) CSEA contract expired on June 30, 2010				
No step or wage increases included				

TOWN OF PRESTON

NOTICE OF SPECIAL TOWN MEETING

Thursday, October 21, 2010

The electors and those persons eligible to vote in town meetings of the Town of Preston, Connecticut, are hereby warned and notified that a Special Town Meeting will be held at Preston Veterans Memorial School, 325 Route 165, Preston, Connecticut, on Thursday, October 21<sup>st</sup>, 2010 @ at 7:30 p.m. for the following purposes:

ITEM 1. To approve the Board of Selectmen's recommended appointments to the Preston Redevelopment Agency as established by ordinance adopted at a Special Town Meeting held on April 30<sup>th</sup>, 2009 and amended on February 25<sup>th</sup>, 2010.

ITEM 2. To adopt an ordinance entitled "An Ordinance to Define the Annual Town Budget Meeting and Board of Finance Public Hearing." A copy of the full text of the ordinance is available for inspection at the Preston Town Clerk's office during regular office hours and on the Town's website at [www.preston-ct.org](http://www.preston-ct.org).

ITEM 3. If the ordinance in Item 2 above is adopted, to authorize a summary of the ordinance to be published in lieu of the entire ordinance.

Dated at Preston, Connecticut this 14<sup>th</sup> Day of October, 2010.

BOARD OF SELECTMEN

*Robert Congdon*  
First Selectman

*Michael Sinko*  
Selectman

*Timothy Bowles*  
Selectman

**PRESTON PLAINS SCHOOL**

**HIGH SCHOOL INFORMATION EVENING**

**WEDNESDAY, OCTOBER 13, 2010**

**7:00 PM**

**AGENDA**

- A. Preston's High School Selection Policy and Procedures: Mr. Bernier/ Dr. Welch
- B. Introduction of high school counselors: Mrs. Robbins
- C. High School representatives' presentation
  - 1. Ledyard High School - Agri-science
  - 2. Saint Bernard
  - 3. Norwich Regional Vocational Technical School
  - 4. Marine Science High School
  - 5. Science and Technology Magnet High School of Southeastern Connecticut
  - 6. Norwich Free Academy
- E. An opportunity to meet with individual representative for specific questions.