

POLICY

New

FRANKLIN TOWNSHIP BOARD OF EDUCATION

File Code: 3501

SUSTAINABILITY

The Franklin Township Board of Education recognizes the importance of minimizing the District's use of natural resources, providing a high quality environment that promotes health and productivity and the effective management of our fiscal resources.

The Board of Education agrees that the Superintendent and designated administrative staff will be responsible for developing a resource management program that includes strategies for implementing effective and sustainable resource practices, exploring renewable and clean energy technologies, reducing energy and water consumption, minimizing utility costs, reducing the amount of waste of consumable materials, encouraging recycling and green procurement practices, and promoting conservation principles by implementation of the following actions:

1. **Energy and Energy Conservation Curriculum:** The Franklin Township School will seek to integrate the concepts of resources conservation, including waste reduction and recycling, into our District's environmental curriculum at all grade levels.
2. **Consumable Waste Reduction:** Wherever possible and economically practical, the Franklin Township School will seek to reduce the consumption of consumable materials, fully utilize all materials before disposal, and minimize the use of non-biodegradable products.
3. **Recycling and Environmental Operations:** The Franklin Township School will explore collaboration with local, state, and federal entities to promote recycling efforts.
4. **Facility Operations, Maintenance, Construction and Renovations:** The Franklin Township School will strive to develop and implement an operations and maintenance program for its buildings and facilities that embraces practices for energy conservation, energy cost containment, and revenue enhancements. In addition, it will be the administration's goal to develop construction or renovation projects that adhere to LEED Silver standards. Furthermore, when economically viable and practical, the Franklin Township School will develop site improvements that will attempt to reduce greenhouse gases while promoting environmentally-friendly lifestyles. Potential steps could include increased utilization of landscaping plantings, school gardens/learning centers, and greening of selected locales.

A committee set by the Franklin Township Board of Education will be responsible for overseeing the development and implementation of this Sustainability Policy, as well as an annual Sustainability Plan and reports (as needed) in concert with the Superintendent and designated staff.

Date adopted:

POLICY

New

**FRANKLIN TOWNSHIP
BOARD OF EDUCATION**

**File Code: 4142.1/
4242.1**

DIRECT DEPOSIT

The Board of Education may determine to have the net pay of all school district employees directly deposited in a specific banking institution in a checking account, savings account, or share account designated in writing by the employee in accordance with the provisions of N.J.S.A. 52:14-15h.

If the Board approves a direct deposit program, compliance by an employee shall be mandatory. However, the Board may grant an exemption from the mandatory requirements of N.J.S.A. 52:14-15h on such terms and conditions as the Board deems necessary. The Board may grant an exemption for seasonal and temporary employees as the Board deems necessary.

The Board shall make available for those employees required to have their net pay direct deposited in accordance with the provisions of N.J.S.A. 52:14-15h, all information concerning net pay, any accompanying information approved for distribution with net pay, and W-2 forms in accordance with applicable Federal law, only on the internet with restricted access and policies and procedures to protect the integrity and confidentiality of the information. The Board will continue to complete the payroll check distribution verification process as required in N.J.A.C. 6A:23A-5.7 and Policy 4142/4242.

In the event the Board of Education determines to implement a mandatory direct deposit program in accordance with N.J.S.A. 52:14-15h, the Board shall annually adopt a resolution to implement the direct requirements of N.J.S.A. 52-15h. The Board approved resolution shall designate the school district's banking institution that shall be used to implement the direct deposit program and shall indicate any employee group or category that are exempt from the Boards direct deposit requirements.

Date adopted

POLICY

New

FRANKLIN TOWNSHIP BOARD OF EDUCATION

File Code: 5125.1

STUDENT DATA PRIVACY

I. Identifying Data:

A. Philosophy

In order to safeguard student privacy, the District complies with the Family Educational Rights and Privacy Act (FERPA) of 1974, the Protection of Pupil Rights Amendment (PRPA) of 1974, the Health Insurance Portability and Accountability Act (HIPPA) of 1996, the Children's Internet Protection Act (CIPA), the Privacy Act of 1974 and the Elementary and Secondary Educational Act of 1965 as amended by the No Child Left Behind Act of 2001.

B. Policy Statement

The policy of the Board of Education is that the District protects confidential student information and will not improperly collect, use or disclose student information in violation of any applicable law or regulation governing student privacy. All vendors, contractors and/or service providers with access to personally identifiable information (PII) are expected to adhere to of District policies and procedures including acknowledgement of their responsibilities related to student data and PII.

C. Exceptions to the Policy

- i. Pupil Records, Board Policy #5125, outlines the District's use, protection, and dissemination of information contained in a student's educational records.
- ii. Student Health Records, Board Policy #5141.3, governs the District's administration of physical examinations or screenings to students.

D. Amplifying Instructions and Guidelines

- i. For the purposes of this regulations the term "parent" means parent or legal guardian or other person standing in loco parentis to a student.
- ii. The District's Students Records Officer is the Vice Principal.
- iii. The District's Student Data Privacy Officer is the Computer Technician.

II. Student Data Privacy and Security

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

Student information is compiled and used to evaluate and improve New Jersey's and this District's educational system and improve transitions from high school to postsecondary education or the workforce.

In order to ensure the proper protection of confidential student information, the District shall adopt, implement and electronically post this Policy to its' website. It is intended to provide guidance regarding the collection, access, security, and use of education data to protect student privacy.

The School Business Administrator or designee shall have in place Administrative Security, Physical Security, and Logical Security controls to protect from a Data Breach or Unauthorized Data Disclosure. The District shall immediately notify the County Executive Superintendent in case of a breach or suspected breach of student data. The District shall also notify in a timely manner affected individuals, students, and families if there is a confirmed Data Breach or confirmed Unauthorized Data Disclosure. Notification will also be given to any applicable law enforcement agency.

III. Student Data

- A. "Personally identifiable information" includes, with respect to a student:
- the student's first and last name;
 - the first and last name of the student's parent or guardian or another family member;
 - the home or physical address of the student or student's family;
 - online contact information for the student; a personal identifier, such as the student's social security number, student number, or biometric record; - a persistent identifier that can be used to recognize a user over time and across different Internet Web sites, online services, online applications, or mobile applications, including a customer number held in a cookie, an Internet Protocol address, a processor or device serial number, or another unique identifier;
 - a photograph, video, or audio recording that contains the student's image or voice;
 - geolocation information sufficient to identify a street name and the name of a city or town;
 - other indirect identifiers, such as the student's date of birth, place of birth, or mother's maiden name; other

information that, alone or in combination, would allow an District or a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify a specific student with reasonable certainty; and information requested by a person who the public or nonpublic school reasonably believes knows the identity of the student to whom the information relates.

B. Instructional Materials

The Board of Education shall provide resource materials per Board Policy #6160/6160R, to implement District and school educational goals and objectives as student needs dictate and District resources permit. Such materials include reference books, other supplementary titles, maps, library print and non-print materials, and other sources of information for use by pupils that are not designated as textbooks.

C. Third Party Survey

The term "third party" means any survey created by a third party and administered or distributed by the District.

The District will notify parent(s)/guardian(s) of its intent to administer or distribute a third party survey before it is administered or distributed to students. A parent/guardian who submits a timely request will be granted a reasonable opportunity to inspect the third party survey before the District administers it or distributes it to students. All surveys will be conducted as per Board Policy #6162.5/6162.5R.

D. Targeted Advertising

"Targeted advertising" means presenting advertisements to a student or the student's parent or guardian, where the advertisements are selected based on information obtained or inferred from the student's online behavior or use of online applications or mobile applications or from covered information about the student maintained by the District of a school service. "Targeted advertising" shall not include presenting advertisements to a student or the student's parent or guardian at an online location or through an online application or mobile application, if: the advertisements are contextually relevant; the advertisements are selected based on a single visit or session of use during which the advertisements are presented; and information about the student's online behavior or use of online applications or mobile applications is not collected or retained over time.

The term "targeted advertising" does not include any instrument used to disclose or collect such information for the exclusive purposes of developing, evaluating, or providing educational products or services for, or to students or institutions such as:

- Colleges, or other postsecondary educational recruiters or military recruiters;

- Book clubs, magazines or programs providing access to low-cost literary products;
- Curriculum and instructional materials used by elementary and secondary schools;
- Tests and assessments used by elementary and secondary schools to provide cognitive, evaluative, diagnostic, clinical, adaptive or achievement information about students (or to generate other useful statistical data for the purpose of securing such tests and assessments) and the subsequent analysis and public release of the aggregate data from such tests and assessments;
- The sale by students of products or services to raise funds for school-related or education-related activities;
- Student recognition programs.

The District will notify parent(s)/guardian(s) of its intent to distribute a targeted advertising before it is administered or distributed to students. A parent/guardian who submits a timely request will be granted a reasonable opportunity to inspect the targeted advertising before the District administers it or distributes it to students.

- E. The provisions of this Policy shall continue to apply, after a student is no longer enrolled in the District, to covered information relating to the student that was collected or generated while the student was enrolled per Board Policy # 5125.
- F. Nothing in this Policy shall be construed to: limit the authority of a law enforcement agency to obtain content or information from an District as authorized by law or pursuant to an order of a court of competent jurisdiction; limit the ability of an District to use information, including covered information, for adaptive or personalized student learning purposes; limit a public or nonpublic school from providing Internet access service for its own use, to other public or nonpublic schools, or to students and their families; prohibit an District's use of covered information for maintaining, developing, supporting, improving, or diagnosing the District's school service; prohibit an District of a school service from marketing educational products directly to parents or guardians, provided that the marketing does not result from the use of covered information; impose a duty upon a provider of an electronic store, gateway, marketplace, or other means of purchasing or downloading software or applications to review or enforce compliance with this act by professional service providers of school services; impede the ability of a student or the student's parent or guardian to download, export, create, or otherwise save or maintain data or documents created by or about the student or noncommercial applications created by the student, except to the extent that this activity would result in disclosures prohibited by this act of covered information of other students or users of a school service.
- G. Any provision of this Policy that refers to the consent of the student's parent or guardian shall in the case of

covered information about a student who is 18 years or older, be considered to refer to the consent or right of the student and not the student's parent or guardian.

H. Parental Notification

The District will notify the parent(s)/guardian(s) of the adoption or continued use of this Policy at least annually, at the beginning of the school year, and within a reasonable period of time after any substantive change in this Policy.

N.J.S.A. 18A:18A-1 et seq.; 18A:18A-4; 18A:18A-4.1;
18A:18A-4.2; 18A:18A-4.3; 18A:18A-4.4

N.J.A.C. 6A:27-10; 6A:27-11; 6A:27-12

Date Adopted:

POLICY

New

FRANKLIN TOWNSHIP BOARD OF EDUCATION

File Code: 6142.11

DATA BREACH

It is the policy of the Franklin Township School District ("School District") that employees comply with the New Jersey Identity Theft Protection Act. Employees are required to protect the sensitive personal about employees from inadvertent, negligent and willful disclosure or breach of such information, data or records.

Definition

Data Breach - Disclosure of personally identifiable information (PII) pertaining to students or staff is accessed by any unauthorized person.

Personally Identifiable Information - The first name or first initial and last name of any student or staff in combination with and linked to any one or more of the following: (a) social security number; (b) driver's license number or State identification card number; and (c) financial account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account. Personal information does not include publicly available information that is lawfully made available to the general public from federal, state or local government records.

Guidelines Data Breach Notification

All employees must protect and secure all electronic resources and information, data and records of the School District from an inadvertent disclosure when they are under the supervision and control of the School District, and when they are not under the supervision or control of the School District, for example, but not limited to, working at home, on vacation, or elsewhere.

If any employee becomes aware of the release of School District information, data or records the release must be reported to the School Business Administrator immediately.

If there is a breach of security of the information, data, or records of the School District, the School District must disclose any breach of security of personal records after discovery or notification of the breach to any New Jersey resident whose personal information was or is reasonably believed to have been accessed by an unauthorized person.

Before disclosing a breach of security, the School District must report the breach of security and any information pertaining to the breach to the local or state law enforcement agency for investigation or handling in advance of the disclosure to the customer or others. The School District may be required to delay notification if a law enforcement agency determines that the notification will impede a criminal or civil investigation.

The School Business Administrator must then determine whether a data breach notification will be issued. Notifications may be made through a written notice, telephone notice, electronic notice, or a substitute notice (only if the requirements of the New Jersey Identity Theft Protection Act are met).

A notice of the security breach must be provided to New Jersey residents whose unencrypted and unredacted computerized personal information was or is reasonably believed to have been accessed and acquired by an unauthorized person and that the School District believes has or could cause loss or injury.

All records of the School District must be destroyed pursuant to the School District document retention and destruction policy, schedule and procedures. Destruction means shredding, erasing, or modifying the personal information in the records to make them unreadable, undecipherable or non-reconstructionable through generally available means.

Social Security Number Requirement

Unless otherwise permitted by law, School District employees must protect the privacy of Social Security numbers.

A. The School District may not do any of the following:

- i. Publicly post or publicly display in any manner an individual's Social Security number. "Publicly post" or "publicly display" means to intentionally communicate or otherwise make available the Social Security number to the general public.
- ii. Print an individual's Social Security number on any card required for the individual to access products or services provided by School District.
- iii. Require an individual to transmit his or her Social Security number over the Internet unless the connection is secure or the Social Security number is encrypted.
- iv. Require an individual to use his or her Social Security number to access an Internet website unless a password or unique personal identification number or other authentication device is also required to access the website.
- v. Print an individual's Social Security number on any materials that are mailed to the individual unless Federal or State law requires the Social Security number to be on the document to be mailed. However, Social Security numbers may be included in applications and forms sent by mail, including documents sent as part of an application or enrollment process or to establish, amend or terminate an account, contract or policy or to confirm the accuracy of the Social Security number. A Social Security number that is permitted to be mailed under this section may not be printed, in whole or in part, on a postcard or other mailer

not requiring an envelope, or visible on the envelope or without the envelope having been opened.

- B. The School District may collect, use, or release a Social Security number as required by federal or state law, or may use the Social Security number for internal verification, administrative purposes or for law enforcement investigations.
- C. This requirement does not apply to a document that is required by law to be open to the public, and originates with, or is filed, recorded or maintained by any governmental agency, instrumentality or taxing authority.

The Board of Education recognizes that data security and data management are becoming increasingly prominent concerns as technology becomes more integral to the management of education records and education data systems.

The District shall provide ongoing staff training in accordance with the New Jersey Identity Theft Act. Any breach of the District's computerized data which compromises the security, confidentiality, or integrity of personal information will be handled in accordance with state law.

Date adopted: