Brookline School Board - Apr 22 2026 Agenda

Wednesday, April 22, 2026 at 6:00 PM

Richard Maghakian Memorial School

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A. 6:00pm Call to Order

1. Agenda Adjustments/Correspondence
2. Consent Agenda 3
   FY26 Consent Agenda - 4 2026.pdf
3. Approval of Minutes

B. 6:05pm Principal's Report

1. CSDA and RMMS reports 4
   Principal Report April 2026.pdf

C. 6:15pm Public Input

D. 6:45pm Discussion

1. Committee Appointments
2. General Assurances 8
   26_27 General Assurances FINAL.pdf
3. FY26 Revenue and Expense Report 29
   BSD Revenue Expense Report 4.13.2026.pdf
4. Business Office Memo 31
   BSD BO Memo 4.15.2026.pdf
5. Cooperative Study Committee Update 33
   Final Draft Brookline Expansion Study Committee Report.pdf

E. 7:15pm Deliberation

1. To see what action the Board will take regarding the Committee Appointments
2. To see what action the Board will take regarding the General Assurances

3. To see what action the Board will take regarding the Business Office Memo

4. To see what action the Board will take regarding the proposed policy memo 38

4.22.26 BSB Policy Memo.pdf

BEDB (BSB) Agenda Preparation and Dissemination (2).docx

IJND (BSD) Video and Audio Recording in School Classrooms (2).docx

EEAA (BSD) Video and Audio Recordings on School Property (2).docx

EEAA-R (BSD) Use of Video and Audio (2).docx

JCA (BSD) Change of Class or School Assignment- Best Interest and Manifest Hardships (2) (1).docx

JICK (BSB) Pupil Safety and Violence Prevention - Bullying (1) (AutoRecovered) (1).docx

GBEBB (BSD) Employee-Student Relations (3) (1).docx

EHB-R (BSB) Records Retention Schedule.docx

BEAA (BSD) Meeting Preparation

F. 7:45pm Non-Public

Motion to Enter RSA 91-A: 3II (a) Compensation and/or (c) reputation

G. 8:00pm Member Interest

H. 8:00pm Motion to Adjourn

School Administrative Unit #41
Hollis, Brookline & Hollis Brookline Cooperative School Districts
603 324 5999
4 Lund Lane, Hollis, NH 03049

April 2026

Nominations

Name	Position	Location	Lane/Step	Salary	Degree/Credentials

Resignations/Retirements

Name	Position	Location	Reason	Notes
Hanna Furbush	Grade 6	CSDA	Resignation	

Brookline School Administrator's Report
April 21, 2026

Enrollment History

Year	September Enrollment	June Enrollment
16-17	552	567
17-18	550	550
18-19	574	573
19-20	577	580
20-21	572	583
21-22	587	591
22-23	580	589
23-24	583	582
24-25	554	563

RMMS Enrollment - 310
CSDA Enrollment - 254
Brookline Total Enrollment - 564

	PreK 3/4	K	1	2	3	4	5	6
Enrollment Total	26	76	69	78	61	91	84	79
Ed 306.12 Class Size		25	25	25	30	30	30	30
Divisor according to Policy IIB		17	17	20	20	23	23	23
Sections according to Policy IIB	12	4.47	4.05	3.9	3.05	3.96	3.61	3.39
Teacher/Class Size according to Policy IIB	14,, 12	15, 15,15, 15, 16	13,13,14, 14,15,	15,15,16, 16, 16	15,15,15, 16	22,22,23 24	20,21,21 22	19,20,20 20

April

April 2nd-Springfest (PTO Event)
April 3rd & 10th -Kindergarten Music Information
April 8th– 6th Grade Step Up Day
April 14th– PTO Meeting
April 14th - Kindergarten Library Field Trip
April 15th– Early Release
April 16th-17th - 2nd Grade Beaver Brook Field Trip
April 21st - Kindergarten Library Field Trip
April 21st– 3rd Grade Concert
April 22nd– School Board Meeting
April 24th– Puberty Videos
April 27th-May 1st– Spring Break

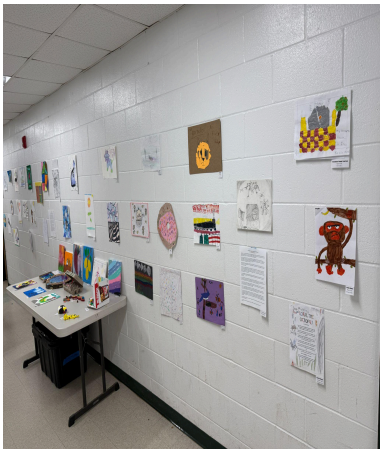
May

May 4th - NH SAS Parade @ 2:15 p.m.
May 5th-8th– NHSAS Testing
May 7th - Eyes on Owls visits First Grade
May 13th– Staff Meeting
May 19th– 5th grade math placement test
May 21st - First Grade Field Trip to Stone Zoo
May 22nd– Last Day of MTSS groups
May 22nd– Memorial Day Program
May 25th– No School, Memorial Day
May 26th - June 5th–aimsweb EOY
May 27th– School Board Meeting
May 28th - PreK Seacoast Science Program
May 29th - Leaping Lizards visits Second Grade

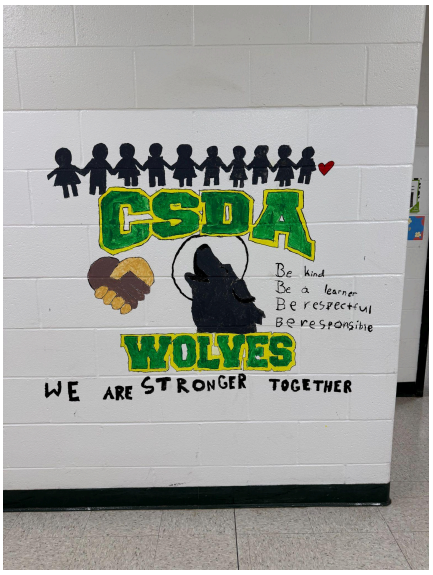
Brookline Staffing Needs:

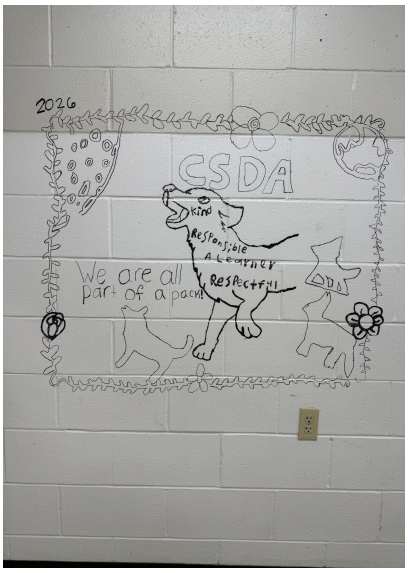
RMMS: 0.5 Paraeducators
CSDA: 5 Paraeducators
Brookline: School Psychologist

CSDA



Spring Festival





Classroom Murals (*student created, sketched, and painted)* for each classroom

RMMS

Kindergarten Informance

Legacy Project

Caitlin D. Davis
Commissioner

Richard K. Sala
Deputy Commissioner

STATE OF NEW HAMPSHIRE
DEPARTMENT OF EDUCATION
25 Hall Street
Concord, N.H. 03301
TEL. (603) 271-3495
FAX (603) 271-1953

March 27, 2026

TO: Federal Subrecipients

FROM: Jessica Lescarbeau, Bureau Administrator
Bureau of Instructional Support

SUBJECT: 2026-2027 General Assurances

The New Hampshire Department of Education (NHED) has developed the attached "General Assurances, Requirements and Definitions for Participation in Federal Programs" document that must be signed by all subrecipients of federal funds passed through the NHED. The federally funded programs require each applicant to file certain assurances. Some of these assurances apply to all programs and are therefore considered "general assurances."

The submission of general assurances is required in part by:

- Federal regulation 34 CFR §76.301 of the Education Department General Administrative Regulations (EDGAR), which requires a general application for subgrantees/subawardees for participation in federal programs funded by the U.S. Department of Education that meets the requirements of Section 442 of the General Education Provisions Act (GEPA).
- Applicable federal statutes.
- Applicable regulations of other federal agencies.

The NHED has consolidated the general assurances into one document which includes requirements and definitions in an effort to provide guidance relative to implementation of the underlying assurances.

Each subrecipient must fully execute these assurances by;

1. Initialing **each page** in the space provided (no initials required for the signature pages)
2. Execute the proper certification for your subrecipient type on the certification page. Your subrecipient type may require further certification by the local board.
3. **Local Educational Agency (LEA) subrecipients**: upload the document in its entirety to the LEA 2026-2027 homepage in the Grants Management System (GMS).
4. **Reporting Authority (RA) subrecipients**: if in GMS, upload the document in its entirety to the RA 2026-2027 homepage in GMS.
5. **Other subrecipients (not in GMS)**: return this document to the appropriate Federal Program Manager.

Please note, other program specific assurances will still be requested by individual NHED programs.

Compliance with these general assurances will be subject to review by NHED staff during federal compliance monitoring. Annual audits by CPAs in accordance with the Single Audit Act may also include compliance checks.

These assurances must be uploaded or returned (as described above) no later than **July 1, 2026**, in conjunction with federal program application deadlines. These general assurances are a requirement of all federal program applications.

Additionally, local educational agency subrecipients, please note that the practice of the School Board authorizing the Senior Educational Official to sign on behalf of the School Board Chair is not acceptable to the NHED in this case and will be considered non-responsive.

General assurances must be uploaded and/or submitted for each subrecipient applying for federal funds.

If you have any questions regarding these general assurances, please contact Jessica Lescarbeau, Bureau Administrator, Bureau of Instructional Support at Jessica.L.Lescarbeau@doe.nh.gov.

Thank you,

Jessica Lescarbeau

Jessica Lescarbeau
Bureau Administrator

New Hampshire Department of Education

2026-2027

GENERAL ASSURANCES, REQUIREMENTS AND DEFINITIONS FOR PARTICIPATION IN FEDERAL PROGRAMS

A. Definitions (2 CFR 200.1)

1) **Audit finding** – Deficiencies which the auditor is required by 2 CFR 200.516 (a) to report in the schedule of findings and questioned costs.

2) **Community based organization** – The term "community-based organization" means a public or private nonprofit organization of demonstrated effectiveness that— (A) is representative of a community or significant segments of a community; and (B) provides educational or related services to individuals in the community.

3) **Local educational agency** – A public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties as are recognized in a State as an administrative agency for its public elementary schools or secondary schools.

4) **Management decision** – The Federal awarding agency's or pass-through entity's written determination, provided to the auditee, of the adequacy of the auditee's proposed corrective actions to address the findings, based on its evaluation of the audit findings and proposed corrective actions.

5) **Pass-through entity** – A recipient or subrecipient that provides a subaward to a subrecipient (including lower tier subrecipients) to carry out of a Federal program. The authority of the pass-through entity under this part flows through the subaward agreement between the pass-through entity and subrecipient.

6) **Period of performance** – The total estimate time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the Period of Performance in the Federal award per 2 CFR 200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.

7) **Reporting authority** – An eligible entity for a subaward that does not meet the definition of local educational agency. Such as; public academies, non-public schools, child care centers, adult education centers, etc.

8) **Subaward** – An award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in with 2 CFR 200.331, including an agreement the pass-through entity considers a contract.

9) **Subrecipient** – An entity that receives a subaward from a pass-through entity to carry out part of a federal award.

10) **Senior Official** – The top executive in an organization who makes the key decisions on spending, staffing, and other education policies.

B. General Assurances

Assurance is hereby given by the subrecipient that, to the extent applicable:

1) The subrecipient has the legal authority to apply for the federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay non-federal share of project costs, as applicable) to ensure proper planning, management, and completion of the project described in all applications submitted.

2) The subrecipient will give the awarding agency, the NHED, the Comptroller General of the United States and, if appropriate, other State Agencies, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3) The subrecipient will comply with the requirements regarding construction and real property within 34 CFR Part 75.600-75.684. The non-Federal entity is required to comply with any reporting requirements on the status of real property in which the Federal Government retains an interest pursuant to 2 CFR 200.330.

4) The subrecipient will establish safeguards to prohibit employees from using their positions for purposes that constitute or appear to present a personal or organizational conflict of interest, or for personal gain.

5) The subrecipient will initiate and complete the work within the applicable time frame after receiving approval from the awarding agency.

6) The subrecipient will comply with all Federal statutes, administrative rules and executive orders including provisions protecting free speech, religious liberty, public welfare, the environment, and those prohibiting discrimination. These include, but are not limited to:
    a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin;
    b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex.
    c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps;
    d) The Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age;
    e) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;
    f) The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
    g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records;
    h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing;
    i) Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made;
    j) The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98); and
    k) The requirements of any other statute(s), administrative rule, executive order, dear colleague letter, or non-regulatory guidance which may apply to the application.

7) The subrecipient will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchases.

8) The subrecipient will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with federal funds. The subrecipient further assures that no federally appropriated funds have been paid or will be paid by or on behalf of the subrecipient to any person for influencing or attempting to influence an officer or employee

of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.

9) The subrecipient will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported in whole or in part with federal funds.

10) The subrecipient will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported in whole or in part with federal funds.

11) The subrecipient will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

12) The subrecipient will comply with all applicable requirements of all other federal laws, executive orders, regulations, dear colleague letter, non-regulatory guidance and policies governing all program(s).

13) The subrecipient will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and 2 CFR 200.501, Subpart F, "Audit Requirements," as applicable.

14) The subrecipient will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

15) The control of funds provided to a subrecipient that is a local educational agency, under each program, and title to property acquired with those funds, will be in a public agency, and a public agency will administer those funds and property.

16) Personnel funded by federal grants and their subcontractors will adhere to the prohibition from text messaging while driving an organization-owned vehicle, or while driving their own privately owned vehicle during official Grant business, or from using organization-supplied electronic equipment to text message or email while driving. Subrecipients must comply with these conditions under Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," October 1, 2009 (pursuant to provisions attached to federal grants funded by the

US Department of Education).

17) The subrecipient assures that it will adhere to the Pro-Children Act of 2001, which states that no person shall permit smoking within any indoor facility owned or leased or contracted and utilized for the provision of routine or regular kindergarten, elementary, or secondary education or library services to children (P.L. 107-110, section 4303(a)). In addition, no person shall permit smoking within any indoor facility (or portion of such a facility) owned or leased or contracted and utilized for the provision of regular or routine health care or day care or early childhood development (Head Start) services (P.L. 107-110, Section 4303(b)(1). Any failure to comply with a prohibition in this Act shall be considered to be a violation of this Act and any person subject to such prohibition who commits such violation may be liable to the United States for a civil penalty, as determined by the Secretary of Education (P.L. 107-110, section 4303(e)(1).

18) The subrecipient will comply with the Stevens Amendment.

19) The subrecipient will comply with the Buy America Preference for Infrastructure Projects as required by 2 CFR Part 184.

20) The subrecipient will submit such reports to the NHED and to U.S. governmental agencies as may reasonably be required to enable the NHED and U.S. governmental agencies to perform their duties. The subrecipient will maintain such fiscal and programmatic records, including those required under 20 U.S.C. 1234(f), and will provide access to those records, as necessary, for those Departments/agencies to perform their duties.

21) The subrecipient will ensure compliance with 2 CFR 200.415(a) and (b).

22) If an LEA, the subrecipient will provide reasonable opportunities for systematic consultation with and participation of teachers, parents, and other interested agencies, organizations, and individuals, including education-related community groups and non-profit organizations, in the planning for and operation of each program.

23) If an LEA, the subrecipient shall assure that any application, evaluation, periodic program plan, or report relating to each program will be made readily available to parents and other members of the general public upon request.

24) If an LEA, the subrecipient has adopted effective procedures for acquiring and disseminating to teachers and administrators participating in each program, significant information from educational research, demonstrations, and similar projects, and for adopting, where appropriate, promising educational practices developed through such projects. Such procedures shall ensure compliance with applicable federal laws and requirements.

25) The subrecipient will comply with the requirements of the Gun-Free Schools Act of 1994.

26) The subrecipient will submit a fully executed and accurate FY26 Single-Audit Certification

(required) and the Federal Expenditures Worksheet (if applicable) to the NHED no later than December 31, 2026. The worksheet will be provided to each subrecipient by the NHED via email and is posted on the NHED website.

27) The subrecipient will comply with the requirements in 2 CFR Part 180, Government-wide Debarment and Suspension (non-procurement).

28) The subrecipient certifies that it will maintain a drug-free workplace and will comply with the requirements of the Drug-Free Workplace Act of 1988 and 34 CFR 84.200.

29) The subrecipient will adhere to the requirements of Title 20 USC 7197 relative to the Transfer of Disciplinary Records.

30) The subrecipient will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

31) The subrecipient will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally assisted construction sub-agreements.

32) The subrecipient will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

33) The subrecipient will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

34) The subrecipient will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

35) The subrecipient will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

36) As appropriate and to the extent consistent with law, the subrecipient should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award (2 CFR 200.322).

37) The subrecipient will comply with the Prohibition on Certain Telecommunications and Video Surveillance Equipment requirement per 2 CFR 200.216.

38) The subrecipient will comply with the Protection for Whistleblowers (41 U.S.C. §4712).

C. Explanation of Grants Management Requirements

The following section elaborates on certain requirements included in legislation or regulations referred to in section *B. General Assurances*. This section also explains the broad requirements that apply to federal program funds.

1. Financial Management Systems

Financial management systems, including records documenting compliance with federal statutes, regulations, and the terms and conditions of the federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions, and to trace funds to establish that such funds have been used in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award.

Specifically, the financial management system must be able to:

a) Identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and federal award identification must include, as applicable, the CFDA title and number, federal award identification number and year, name of the federal agency, and name of the pass-through entity, if any.
b) Provide accurate, current, and complete disclosure of the financial results of each federal award or program.
c) Produce records that identify adequately the source and application of funds for federally funded activities.
d) Maintain effective control over, and accountability for, all funds, property, and other assets.

The subrecipient must adequately safeguard all assets and assure that they are used solely for authorized purposes.

e) Generate comparisons of expenditures with budget amounts for each federal award.

2. Written Policies and Procedures

The subrecipient must have written policies and procedures for (this list is not all inclusive):

Policy/Procedure Name	In Accordance With	Policy	Procedure
Drug-Free Workplace Policy	34 CFR 84.200 and the Drug-Free Workplace Act of 1988	☑	N/A
Procurement Policy & Procedure	2 CFR 200.317-327	☑	☑
Conflict of Interest/Standard of Conduct Policy	2 CFR 318(c)(1)	☑	N/A
Inventory Management Policy & Procedure	2 CFR 200.313(d)	☑	☑
Travel Policy	2 CFR 200.475(b)	☑	N/A
Subrecipient Monitoring Policy & Procedure (if applicable)	2 CFR 200.332(d)	☑	☑
Time and Effort Policy & Procedure	2 CFR 200.430	☑	☑
Records Retention Policy & Procedure	2 CFR 200.334	☑	☑
Prohibiting the Aiding and Abetting of Sexual Abuse Policy	ESEA Section 8546	☑	N/A
Allowable Cost Determination Policy	2 CFR 200.302(b)(7)	☑	N/A
Gun Free School Act	Gun Free School Act of 1994	☑	N/A
Cash Management	2 CFR 200.302(b)(6) and 200.305	☑	☑
Nonsmoking Policy for Children's Services	ESEA Section 8573	☑	N/A

3. Internal Controls

The subrecipient must:

a) Establish, maintain, and document effective internal controls over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. These internal controls should comply with the guidance outlined in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework" issued by the Committee of

Sponsoring Organizations of the Treadway Commission (COSO).

b) Comply with the U.S. Constitution, federal statutes, regulations, applicable executive order, and non-regulatory guidance, as applicable, and the terms and conditions of the federal awards.
c) Take prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.
d) Take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the recipient or subrecipient considers sensitive and is consistent with applicable Federal, State, local and tribal laws regarding privacy and responsibility over confidentiality.
e) Retain all Federal award records and other supporting documentation in accordance with 2 CFR 200.334.

4. Allowable Costs

In accounting for and expending project/grant funds, the subrecipient may only charge expenditures to the project award if they are:

a) in payment of obligations incurred during the approved project period;
b) in conformance with the approved project;
c) in compliance with all applicable statutes and regulatory provisions;
d) costs that are allocable to a particular cost objective;
e) spent only for reasonable and necessary costs of the program; and
f) not used for general expenses required to carry out other responsibilities of the subrecipient.

5. Audits

This part is applicable for all non-federal entities as defined in 2 CFR 200, Subpart F.

a) In the event that the subrecipient expends $1,000,000 or more in federal awards in its fiscal year, the subrecipient must have a single or program-specific audit conducted in accordance with the provisions of 2 CFR 200, Subpart F. In determining the federal awards expended in its fiscal year, the subrecipient shall consider all sources of federal awards, including federal resources received from the NHED. The determination of amounts of federal awards expended should be in accordance with the guidelines established by 2 CFR 200, Subpart F.
b) In connection with the audit requirements, the subrecipient shall also fulfill the requirements relative to auditee responsibilities as provided in 2 CFR 200.508.
c) If the subrecipient expends less than $1,000,000 in federal awards in its fiscal year, an audit conducted in accordance with the provisions of 2 CFR 200, Subpart F, is not required. In the

event that the subrecipient expends less than $1,000,000 in federal awards in its fiscal year and elects to have an audit conducted in accordance with the provisions of 2 CFR 200, Subpart F, the cost of the audit must be paid from non-federal resources (i.e., the cost of such an audit must be paid from subrecipient resources obtained from non-federal entities).

The subrecipient assures it will implement the following audit responsibilities:

a) Procure or otherwise arrange for the audit required by this part in accordance with auditor selection regulations (2 CFR 200.509) and ensure it is properly performed and submitted no later than nine months after the close of the fiscal year in accordance with report submission regulations (2 CFR 200.512).
b) Provide the auditor access to personnel, accounts, books, records, supporting documentation, and other information as needed so that the auditor may perform the audit required by this part.
c) Prepare appropriate financial statements, including the schedule of expenditures of federal awards, in accordance with financial statements regulations (2 CFR 200.510).
d) Promptly follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan, in accordance with audit findings follow-up regulations (2 CFR 200.511(b-c)).
e) If an audit reveals the basis for a finding related to a federally funded program, upon request of the NHED, promptly submit a corrective action plan using the NHED template provided for audit findings related to the federally funded programs.
f) For repeat findings not resolved or only partially resolved, the subrecipient must provide an explanation for findings not resolved or only partially resolved to NHED for findings related to all federally funded programs. NHED will review the subrecipient's submission and issue an appropriate management decision adhering to the same framework as set forth in 2 CFR 200.521.

6. Reports to be Submitted

Audits/Management Decisions

Copies of reporting packages for audits conducted in accordance with 2 CFR 200, Subpart F shall be submitted, by or on behalf of the recipient directly to the following:

a) The Federal Audit Clearinghouse (FAC) in 2 CFR 200, Subpart F requires the auditee to electronically submit the data collection form described in 200.512(b) and the reporting package described in 200.512(c) to FAC at: The Federal Audit Clearinghouse

Copies of other reports or management decision letter(s) shall be submitted by or on behalf of the subrecipient directly to:

a) **New Hampshire Department of Education**
Bureau of Federal Compliance
25 Hall Street
Concord, NH 03301 Or via email to: federalcompliance@doe.nh.gov

b) In response to requests by a federal agency, auditees must submit a copy of any management letters issued by the auditor, 2 CFR 200.512(e).

Any other reports, management decision letters, or other information required to be submitted to the NHED pursuant to this agreement shall be submitted in a timely manner.

Single Audit Certifications and Federal Expenditures Worksheet

A fully executed and accurate FY26 Single-Audit Certification (required) and Federal Expenditures Worksheet (if applicable) shall be submitted to the NHED no later than **December 31, 2026**. A copy of the forms will be provided to each subrecipient by the NHED via email.

7. Debarment, Suspension, and Other Responsibility Matters

As required by Executive Orders (E.O.) 12549 and 12689, Debarment and Suspension, and implemented at 2 CFR Part 180, for prospective participants in primary covered transactions, as defined in 2 CFR 180.120, 180.125 and 180.200, no contract shall be made to parties identified on the General Services Administration's *Excluded Parties List System* as excluded from Federal Procurement or Non-procurement Programs in accordance with E.O.s 12549 and 12689, "Debarment and Suspension." This list contains the names of parties debarred, suspended, or otherwise excluded by agencies, and contractors declared ineligible under statutory or regulatory authority other than E.O. 12549. Contractors with awards that exceed the small purchase threshold shall provide the required certification regarding their exclusion status and that of their principal employees.

The federal government imposes this requirement in order to protect the public interest, and to ensure that only responsible organizations and individuals do business with the government and receive and spend government grant funds. Failure to adhere to these requirements may have serious consequences – for example, disallowance of cost, termination of project, or debarment.

To assure that this requirement is met, there are four options for obtaining satisfaction that subrecipients and contractors are not suspended, debarred, or disqualified.

The subrecipient certifies that it and its principals:

a) Are not presently debarred, suspended, proposed for debarment, and declared ineligible or voluntarily excluded from covered transactions by any federal Department or agency.
b) Have not within a three-year period preceding this application been convicted of or had a

civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes; commission of embezzlement; theft, forgery, bribery, falsification, or destruction of records; making false statements; or receiving stolen property.

c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in this certification.
d) Have not within a three-year period preceding this application had one or more public transactions (federal, state, or local) terminated for cause or default.

Where the subrecipient is unable to certify to any of the statements in this certification, they shall attach an explanation to this document.

8. Drug-Free Workplace (Grantees Other Than Individual)

As required by the Drug-Free Workplace Act of 1988 and implemented in 34 CFR 84.200 the subrecipient certifies that it will continue to provide a drug-free workplace by:

a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance (34 CFR 84.610) is prohibited in the subrecipient's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b) Establishing, as required by 34 CFR 84.215, an ongoing drug-free awareness program to inform employees about:

    - The dangers of drug abuse in the workplace;
    - The recipient's policy of maintaining a drug-free workplace;
    - Any available drug counseling, rehabilitation, and employee assistance programs; and
    - The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c) Requiring that each employee engaged in the performance of the project is given a copy of this statement.

d) Notifying the employee in the statement that, as a condition of employment under the project, the employee will:

    - Abide by the terms of the statement; and
    - Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.

e) Notifying the agency in writing within 5 calendar days after receiving notice of an employee's conviction of a violation of a criminal drug statute in the workplace, as required by 34 CFR 84.205(c)(2), from an employee or otherwise receiving actual notice of employee's conviction. Employers of convicted employees must provide notice, including position title to:

Director, Grants and Contracts Service
U.S. Department of Education
400 Maryland Avenue, S.W. [Room 3124, GSA – Regional Office Building No. 3]
Washington, D.C. 20202-4571

(Notice shall include the identification number[s] of each affected grant).

f) Taking one of the following actions, as stated in 34 CFR 84.225(b), within 30 calendar days of receiving the required notice with respect to any employee who is convicted of a violation of a criminal drug statute in the workplace.

- Taking appropriate personnel action against such an employee, up to and including termination consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- Requiring such employee to participate satisfactorily in drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.

g) Making a good-faith effort to maintain a drug-free workplace through implementation of the requirements stated above.

9. Gun Possession

As required by Title XIV, Part F, and Section 14601 (Gun-Free Schools Act of 1994) of the Improving America's Schools Act:

The subrecipient assures that it shall comply with the provisions of RSA 193:13, IV.

> Any pupil who brings or possesses a firearm as defined in section 921 of Title 18 of the United States Code in a safe school zone as defined in RSA 193-D:1 without written authorization from the superintendent or designee shall be expelled from school by the local school board for a period of not less than 12 months. Nothing in this section shall be construed to prevent the local school district or chartered public school that expelled the student from providing educational services to such student in an alternative setting.

The subrecipient assures that it shall timely file the report required by Ed 317.07.

The subrecipient assures that it has established policies on school discipline as required by RSA 193:13, XI and XII and Ed 317.03.

10. Lobbying

As required by Section 1352, Title 31, of the U.S. Code, and implemented in 34 CFR Part 82, for persons entering into a grant or cooperative agreement over $100,000, as defined in 34 CFR 82.105 and 82.110, the applicant certifies that:

a) No federally appropriated funds have been paid or will be paid by or on behalf of the subrecipient to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement.

b) If any funds other than federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with federal grants or cooperative agreements, the subrecipient shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

c) The subrecipient shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, contracts under federal awards, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

11. Subrecipient Monitoring

In addition to reviews of audits conducted in accordance with 2 CFR 200, Subpart F, subrecipient monitoring procedures may include, but not be limited to, on-site or remote visits by NHED staff, limited scope audits, and/or other procedures. By signing this document, the subrecipient agrees to comply and cooperate with any monitoring procedures/processes deemed appropriate by the NHED. In the event the NHED determines that a limited scope audit of the project recipient is appropriate, the subrecipient agrees to comply with any additional instructions provided by NHED staff to the subrecipient regarding such audit.

12. More Restrictive Conditions

Subrecipients found to be in noncompliance with program and/or fund source requirements or determined to be "high risk" shall be subject to the imposition of more restrictive conditions as determined by the NHED.

13. Obligations by Subrecipients

Obligations will be considered to have been incurred by subrecipients on the basis of documentary evidence of binding commitments for the acquisition of goods or property or for the performance of work, except that funds for personal services, services performed by public utilities, travel, or the rental of facilities shall be considered to have been obligated at the time such services were rendered, such travel occurred, and/or when facilities were used (see 34 CFR 76.707).

14. Personnel Costs – Time Distribution

Charges to federal projects for personnel costs, whether treated as direct or indirect costs, are allowable to the extent that they satisfy the specific requirements of 2 CFR 200.430 and will be based on payrolls documented in accordance with generally accepted practices of the subrecipient and approved by a responsible official(s) of the subrecipient.

When employees work solely on a single federal award or cost objective, charges for their salaries and wages must be supported by personnel activity reports (PARs), which are periodic certifications (at least semi-annually) that the employees worked solely on that program for the period covered by the certification. These certifications must be signed by the employee or a supervisory official having firsthand knowledge of the work performed by the employee.

When employees work on multiple activities or cost objectives (e.g., more than one federal project, a federal project and a non-federal project, an indirect cost activity and a direct cost activity, two or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity), the distribution of their salaries or wages will be supported by personnel activity reports or equivalent documents that meet the following standards:

a) Reflect an after-the-fact distribution of the actual activity of each employee;
b) Account for the total activity for which each employee is compensated;
c) Prepared at least monthly and must coincide with one or more pay period; and
d) Signed and dated by the employee.

15. Protected Prayer in Public Elementary and Secondary Schools

The subrecipient certifies that the LEA has no policy that prevents or otherwise denies participation in constitutionally protected prayer in public elementary and secondary schools. (Section 8524(a) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act and codified at 20 U.S.C. § 7904).

16. Purchasing/Procurement

The non-Federal entity must have and use documented procurement procedures, consistent with

the standards of this section and 2 CFR 200.317 - 2 CFR 200.327 for any of the following methods of procurement used for the acquisition of property or services required under a Federal award or sub-award.

1. Informal procurement methods
    a. Micro-purchases
    b. Simplified Acquisition
2. Formal procurement methods
    a. Sealed bids
    b. Proposals
3. Noncompetitive procurement

17. Retention and Access to Records

The subrecipient certifies that it will comply with all federal regulations, including but not limited to, 2 CFR 200.334 – 2 CRF 200.338.

18. The Stevens Amendment

All federally funded projects must comply with the Stevens Amendment of the Department of Defense Appropriation Act, found in Section 8136, which provides:

> *When issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with federal money, all grantees receiving federal funds, including but not limited to state and local governments, shall clearly state (1) the percentage of the total cost of the program or project which will be financed with federal money, (2) the dollar amount of federal funds for the project or program, and (3) the percentage and dollar amount of the total costs of the project or program that will be funded by non-governmental sources.*

19. Transfer of Disciplinary Records

Title 20 USC 7197 requires that the State have a procedure (RSA 193-D:8) to assure that a student's disciplinary records, with respect to suspensions and expulsions, are transferred by the project recipient to any public or private elementary or secondary school where the student is required or chooses to enroll.

The relevant portions of the federal and state law appear below.

a) **Disciplinary Records** - In accordance with the Family Educational Rights and Privacy Act of 1974 (20 U.S.C. 1232g), not later than 2 years after the date of enactment of this part, each State receiving Federal funds under this Act shall provide an assurance to the Secretary that the State has a procedure in place to facilitate the transfer of disciplinary records, with respect to a suspension or expulsion, by local educational agencies to any private or public

elementary school or secondary school for any student who is enrolled or seeks, intends, or is instructed to enroll, on a full- or part-time basis, in the school.

b) **193-D:8 Transfer Records; Notice –** All elementary and secondary educational institutions, including academies, private schools, and public schools, shall upon request of the parent, pupil, or former pupil, furnish a complete school record for the pupil transferring into a new school system. Such record shall include, but not be limited to, records relating to any incidents involving suspension or expulsion, or delinquent or criminal acts, or any incident reports in which the pupil was charged with any act of theft, destruction, or violence in a safe school zone.

20. Compliance with FERPA and PPRA

The subrecipient certifies that it complies with Family Educational Rights and Privacy Act (FERPA) (20 U.S.C.§ 1232g; 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98) by ensuring the following:

a) The subrecipient has established and implemented effective internal processes to ensure that student's complete education records are maintained;
b) The subrecipient has established and implemented effective internal processes to ensure that parents are provided with the opportunity to review their student's education records;
c) The subrecipient has established policies and procedures that permit disclosure of personally identifiable information from a student's education records in order to address safety issues in a manner that complies with FERPA;
d) The subrecipient provides parents and eligible students annual notification of their rights under FERPA consistent with 34 CFR § 99.7; and
e) The subrecipient, if applicable, has established procedures to provide military recruiters the same access to secondary students as provided to postsecondary institutions or to prospective employers and require that schools provide student information to military recruiters, when requested, unless the parent has opted out of providing such information (schools are required to provide to military recruiters include student names, addresses, electronic mailing addresses, and telephone listings. *See* Section 8528 of the ESEA, as amended, 20 U.S.C. § 7908 and 10 U.S.C. § 503(c)).

CERTIFICATION

Instructions: The Senior Official **must** consult with the Board (School Board, Board of Trustees, Board of Directors, etc.) of the subrecipient by informing said Board about the subrecipients participation in Federal Programs and the terms and conditions of the General Assurances, Requirements and Definitions for Participation in Federal Programs. The Senior Official and the Chair/President of the Board **must** sign this certification page (and initial all other pages) as described below and return it to the NHED. **No subawards will be made by the NHED without a fully executed copy of this General Assurances, Requirements and Definitions for Participation in Federal Programs on file.**

Senior Official Certification:

We the undersigned acknowledge that a person is guilty of a violation of R.S.A. § 641:3 if: (a) He or she makes a written or electronic false statement which he or she does not believe to be true, on or pursuant to a form bearing a notification authorized by law to the effect that false statements made therein are punishable; or (b) With a purpose to deceive a public servant in the performance of his or her official function, he or she: (1) Makes any written or electronic false statement which he or she does not believe to be true; or (2) Knowingly creates a false impression in a written application for any pecuniary or other benefit by omitting information necessary to prevent statements therein from being misleading; or (3) Submits or invites reliance on any writing which he or she knows to be lacking in authenticity; or (4) Submits or invites reliance on any sample, specimen, map, boundary mark, or other object which he or she knows to be false.

Accordingly, I, the undersigned official legally authorized to bind the named subrecipient hereby apply for participation in federally funded education programs on behalf of the subrecipient named below. I certify, to the best of my knowledge, that the below subrecipient will adhere to and comply with these General Assurances, Requirements and Definitions for Participation in Federal Programs (pages 1 through 19 inclusive). I further certify, as is evidenced by the Minutes of the Board Meeting held on _____ __, ____, that I have informed the members of the Board of the federal funds the subrecipient will be receiving and of these General Assurances, Requirements and Definitions for the Participation in Federal Programs for the subrecipients participation in said programs.

Subrecipient Name (must match applicant name): _____

_____	_____	_____
Typed Name of Senior Official	Signature	Date

Board Certification:

I, the undersigned official representing the Board, acknowledge that the Senior Official, as identified above, has consulted with all members of the Board, in furtherance of the Board's obligations (including those enumerated in RSA 189:1-a for local educational agencies), and pursuant to the Board's oversight of federal funds the subrecipient will be receiving and of the General Assurances, Requirements and Definitions for Participation in Federal Programs in said programs.

_____	_____	_____
Typed Name of Board Chair/ President (on behalf of the Board)	Signature	Date

Brookline School District
FY26
as of 4/13/2026

Expenses

Description	Budget	YTD Expense	Encumbered	Balance
Regular Education	$ 3,342,765	$ 2,086,848	$ 1,034,830	$ 221,088
Special Education	$ 2,387,909	$ 1,992,520	$ 803,617	$ (408,227)
Student Support Services	$ 996,805	$ 638,670	$ 301,071	$ 57,065
Instructional Staff Support	$ 353,093	$ 277,962	$ 86,222	$ (11,092)
School Board/SAU Assessment	$ 570,507	$ 409,988	$ 137,670	$ 22,848
School Administration	$ 729,718	$ 617,731	$ 127,212	$ (15,225)
Facilities	$ 938,804	$ 702,834	$ 169,109	$ 66,860
Transportation	$ 723,684	$ 442,875	$ 274,128	$ 6,681
Benefits	$ 2,868,593	$ 1,938,494	$ 910,064	$ 20,036
Site Development	$ 2	$ -	$ -	$ 2
Debt Service	$ 218,945	$ 211,365	$ -	$ 7,580
Transfers	$ 655,000	$ -	$ 655,000	$ -
TOTAL	**$ 13,785,825**	**$ 9,319,287**	**$ 4,498,922**	**$ (32,384)**
Plus FY25 Expense Carryover	$ 10,267	$ 9,696	$ 571	$ (0)
TOTAL FY25 + FY26	**$ 13,796,092**	**$ 9,328,983**	**$ 4,499,493**	**$ (32,384)**

Revenue

	Budget	YTD Revenue	Expected	IN EXCESS OF BUDGET
Local Property Tax	$ 10,174,585	$ 7,350,000	$ 2,824,585	$ (0)
Adequacy & SWEPT Grant	$ 2,834,440	$ 2,172,810	$ 661,630	$ 0
State				
Special Education Aid	$ 286,623	$ 326,542		$ 39,919
Other - State Aid	$ 3,225		$ 3,225	$ -
State Funding	$ -			$ -
Food Service	$ 2,500		$ 2,500	$ -
Federal				
Grants	$ 190,000	$ 67,625	$ 122,375	$ 0
Food Service	$ 38,500	$ 25,680	$ 12,820	$ 0
Medicaid	$ 8,000	$ 30,015		$ 22,015
Local				
Tuition	$24,000	$ 45,402		$ 21,402
Impact Fees		$ 6,652		$ 6,652
Earnings on Investment	$ 20,000	$ 12,039	$ 7,961	$ 0
Other	$ 1,000	$ 14,796		$ 13,796
Food Service Sales	$ 150,000	$ 146,011	$ 3,989	$ 0
FY25 Expense Carryover	$ 10,267	$ 9,696	$ 571	$ 0
Less: Facilities Maint. Fund				$ -
Less: Special Education Fund	$ -			$ -
Fund Balance Adjustments	$ 248,144		$ 248,144	$ -
Less Retained Fund Balance	$ (185,192)		$ (185,192)	$ -
TOTAL REVENUE	**$ 13,806,092**	**$ 10,207,269**	**$ 3,702,608**	**$ 103,785**

Total Expense Balance	**$ (32,384)**
To Food Service Unreserved Fund Balance	**$ -**
Total Revenue Balance	**$ 103,785**
Unreserved Fund Balance	**$ 71,401**

Anticipated Reductions to Unreserved Fund Balance

	Anticipated Needs for FY26
Maintenance Trust	
Retained Fund Balance	
Total Reductions	**$ -**

Projected Fund Balance	**$ 71,401**

* A negative balance here at year-end would require a special meeting with taxpayers

Explanation of budget balances on current expense report			
4/13/2026			
Function	**Description**	**Current Balance**	**Notes**
1100	**Regular Education**	$ 221,088	Unfilled positions
1200	**Special Education**	$ (408,227)	Contracted staffing
2100	**Student Support Services**	$ 57,065	Unfilled Psych position
2200	**Instructional Staff Support**	$ (11,092)	Several small expected overages
2300	**School Board/SAU Assessment**	$ 22,848	Less legal services
2400	**School Administration**	$ (15,225)	New Admin hired/increased salaries/IT services
2600	**Facilities**	$ 66,860	Savings with oil and propane, offset snow removal overages
2700	**Transportation**	$ 6,681	small savings in transportation
2900	**Benefits**	$ 20,036	Unfilled positions and choice changes
4000	**Site development**	$ 2	
5100	**Debt Service**	$ 7,580	Estimated higher Interest for new lease
5200	**Transfers**	$ -	
		$ (32,384)	

General explanation of what is included in each account category		
Function	**Description**	**Includes**
1100	Regular Education	Teacher salaries and teaching materials
1200	Special Education	Teacher salaries, teaching materials, ESY, out-of-district tuition
2100	Student Support Services	Guidance, nurse, psychologist, OT, teaching/testing supplies, contracted services
2200	Instructional Staff Support	Professional development, librarian, library supplies, computer equipment
2300	School Board/Assessment	Assessment, school board expense, annual meeting expense, legal expense
2400	School Administration	Administrator & secretarial salaries, copiers, telephone, hardware/software support contracts, site licensing, consulting, network services, office supplies
2600	Facilities	Custodial/maintenance salaries, snow plowing, mowing, building repairs, heating oil, electric, janitorial supplies, property/liability insurance
2700	Transportation	Bus transportation, fuel
2900	Benefits	Health and dental insurance, taxes, NHRS, Life/LTD, workers comp & unemployment
4000	Site Improvement	Site improvements including architectural fees
5100	Bonds	Principal and interest payments on bonds
5200	Transfers	service expense

School Administrative Unit #41
Hollis, Brookline & Hollis Brookline Cooperative School Districts
603 324 5999
4 Lund Lane, Hollis, NH 03049

Business Office Memo

To: Superintendent Bergskaug

From: Lance Flamino

Date: 4/15/2026

Subject: Year-End Recommendations

April 13th Estimated Year-End Fund Balance

As noted in the most recent revenue and expense report, the anticipated year-end fund balance is estimated to be **$71,401**. This figure is subject to change as we approach the end of the fiscal year and finalize encumbrances and expenditures.

In addition to the current year estimate, there is a retained fund balance of **$185,192** from fiscal year 2025, as previously voted by the board.

Recommendations

It is recommended that available funds be utilized to address deferred maintenance projects and other high priority items that were removed from the FY27 budget in order to achieve the default budget.

We respectfully request board approval to expend up to **$280,000** from the combined FY26 fund balance and FY25 retained fund balance for the following:

1. RMMS Milford Street Roof & Trim Repair	$100,000
2. RMMS Parking Lot Repairs, Paving & Sealcoating	$150,000
3. Nurses Office Privacy Curtain	$2,500
4. IFP Purchase (4 RMMS / 3 CSDA)	$27,300
	$279,800

If the board approves the use of retained fund balance a public hearing will be held at the May meeting.

School Administrative Unit #41
Hollis, Brookline & Hollis Brookline Cooperative School Districts
603 324 5999
4 Lund Lane, Hollis, NH 03049

Gina Bergskaug
Superintendent
of Schools

Dorothy Flaherty
Asst. Superintendent
of Curriculum

Lauren DiGennaro
Asst. Superintendent
of Student Services

Lance Flamino
Business
Ad

Brookline Expansion Study Committee Report

Executive Summary

The Brookline Expansion Study Committee was charged with studying the potential impact of Brookline independently dissolving and joining the Hollis-Brookline Cooperative School District.

After reviewing enrollment trends, financial obligations, collective bargaining agreements, capital needs, governance structures, and SAU operations, the Committee determined that Brookline-only expansion would not provide meaningful cost savings, substantial structural efficiencies, or significant student programming benefits.

While limited operational adjustments may be possible, the core administrative framework within SAU 41 would remain largely unchanged. As a result, the Committee does not recommend that Brookline independently dissolve and join the Cooperative at this time.

During its review, the Committee identified that the greatest opportunity for long-term efficiency and structural improvement appears to lie in reducing the number of independent districts within SAU 41. A joint consolidation effort involving both Brookline and Hollis could potentially achieve those efficiencies. RSA194-C addresses reorganization of an SAU and that scenario exceeds the scope of this Committee's charge and was not formally analyzed.

Accordingly, the Committee recommends that the Brookline School Board initiate discussions with the Hollis School Board to determine whether there is mutual interest in studying a joint consolidation into the Hollis-Brookline Cooperative School District.

Scope of Work

The Committee consisted of two Brookline School Board members and three community members and met six times.

The Committee's charge was limited to evaluating the potential impacts of Brookline independently joining the Hollis-Brookline Cooperative School District.

The Committee reviewed the following materials:

- Article 8 of the 2025 Brookline School District Warrant
- Hollis-Brookline Cooperative School District Articles of Agreement

- Collective bargaining agreements for Hollis, Brookline, and Cooperative teachers and support staff
- Relevant New Hampshire statutes, including RSA 195:6, RSA 195:16, RSA 195:18, and RSA 195:25
- Statutory debt limitations under RSA 195:6 III
- Current and projected student enrollment data
- Cohort performance data across SAU schools
- Long-term debt obligations across the three districts
- Town growth and demographic data
- Curriculum alignment between Brookline and Hollis elementary schools
- Staff tenure and mobility data
- Operational differences among districts
- The 2016 report on dissolving the Hollis-Brookline Cooperative School District
- FY27 budget planning documents and the Brookline FY25 Budget Summary
- The 2025 state report on reducing the number of School Administrative Units (SB 57, Chapter 220:1)

The Committee did not conduct a full feasibility study of joint dissolution by both towns.

Findings

1. Financial Impact
   - Brookline-only expansion would result in minimal direct cost savings.
   - Certain spending categories could be realigned, but significant structural savings would not be realized.
   - Debt obligations and capital needs vary across the districts and would require careful legal and financial review if expansion were pursued.

2. Student Programming
   - Short-term impacts on students would likely be minimal.

- No significant immediate academic or programmatic enhancements were identified under a Brookline-only model.

3. Governance and Legal Considerations

Under RSA 195:16, changes to cooperative school districts require:

- Detailed study and analysis
- School board action
- Revision of Articles of Agreement
- Development of warrant articles
- Voter approval in affected communities

Revising the Articles of Agreement to accommodate Brookline-only expansion would require substantial legal and governance work.

4. SAU-Level Impacts

The Committee determined that the most significant opportunity for efficiency lies at the SAU level.

Currently, SAU 41 comprises four separate entities: The Brookline School District, The Hollis School District, and the Hollis-Brookline School District and the SAU 41, SAU 41 must treat each of these entities as separate for all legal organizational and operational elements such as :

- Supporting separate School and SAU Boards,
- Budget development, finances, grants, and monitoring,
- Facilities,
- Human Resources and Collective Bargaining Agreements
- Technology,
- Contracts,
- Curriculum and Student Support

Brookline-only expansion would not materially reduce the number of independent districts within SAU 41. As a result, core administrative structures and associated costs would largely remain intact.

In reviewing SAU operations, the Committee observed that greater efficiencies might be achieved if the number of independent districts were reduced more broadly. A joint consolidation of both Brookline and Hollis into one district, e.g. The Hollis-Brookline Cooperative and would potentially produce:

- Increased administrative alignment
- Greater staffing flexibility
- Reduced duplication of governance structures
- Improved long-term structural sustainability

However, this broader scenario was not within the Committee's formal scope and would require a separate, dedicated feasibility study per RSA 194-C or RSA 195.

Committee Conclusion

Based on the work conducted within its defined scope, the Committee concludes that Brookline independently dissolving and joining the Hollis-Brookline Cooperative School District would not provide sufficient financial, structural, or student benefit to warrant pursuing that course of action at this time.

While expansion could produce limited efficiencies, it would not meaningfully address underlying structural duplication within SAU 41.

The Committee further concludes that the most promising opportunity for meaningful efficiency appears to involve broader consolidation, a matter that extends beyond the charge of this Committee.

Study Committee Recommendation

1. The Committee does not recommend that Brookline independently dissolve and join the Hollis-Brookline Cooperative School District.

2. The Committee recommends that the Brookline School Board initiate discussions with the Hollis School Board to determine whether there is mutual interest in conducting a joint feasibility study of both towns dissolving their individual districts and joining the Cooperative together per RSA 195.

Future Action and Process Considerations

If the Brookline School Board accepts this recommendation:

1. The Brookline School Board could formally initiate discussions with the Hollis School Board and the Hollis-Brookline Cooperative School Board.

2. The Hollis School Board and the Hollis-Brookline Cooperative School Board could independently determine whether they wish to participate in a joint feasibility study.

3. If all boards agree, a structured joint study could be undertaken RSA 195 to evaluate:

- Financial modeling and debt implications
- Collective bargaining impacts
- Governance structure
- SAU staffing and operational efficiencies
- Student programming implications
- Legal requirements

Any consolidation would ultimately require:

- Revision of the Articles of Agreement
- Development of warrant articles
- Approval by voters in both communities pursuant to RSA 195:16

School Administrative Unit #41
Hollis, Brookline & Hollis Brookline Cooperative School Districts
603 324 5999
4 Lund Lane, Hollis, NH 03049

To: Superintendent Bergskaug
From: BSB Policy Committee
RE: Policy Recommendations
Date: April 22, 2026

The Brookline Policy Committee makes the following policy recommendations for the April 22nd, 2026 Brookline School Board meeting:

Present for a 2nd read and adopt with no changes:

1. BEDB: Agenda Preparation and Dissemination
2. IJND: Video and Audio Recording in School Classrooms
3. EEAA: Video and Audio Recordings on School Property
4. EEAA-R: Use of Video and Audio Regulations
5. JCA: Change of Class or School Assignment,

Present for a 2nd read with major changes:

1. JICK: Pupil Safety and Violence Prevention

Present for a 2nd read with minor changes:

1. GBEBB: Employee- Student Relations

Present for a 1st read and adopt:

1. EHB-R: Local Records Retention Schedule

Present to be rescinded:

1. BEAA: Meeting Preparation

BEDB: Agenda Preparation and Dissemination

Category: Recommended

The Superintendent shall prepare all agendas for meetings of the Board. In doing so, the Superintendent (or designee) shall consult with the Board Chair.

Items to be placed on the agenda should be received by the Superintendent at least ten days prior to the meeting. Every Board member has the right to place items on the agenda. Matters not included in the agenda may be presented during the meeting provided the Board agrees to discuss the matter. The Board may choose not to deal with every agenda item.

Consistent with RSA 91-A:3 and the laws pertaining to student and family privacy rights, the Board will not place any matter on the public meeting agenda that is to be properly discussed in a non-public session. This shall not preclude the Board from giving notice of its intent to hold or enter into a non-public session and the statutory reason for doing such.

Any Board member, staff member, student, or citizen of the District may suggest items of business. The inclusion of items suggested by staff members, students, or citizens shall be at the discretion of the Board Chairperson.

The Board shall follow the order of business set up by the agenda unless the order is altered by a majority vote of the members present. Items of business not on the agenda may be discussed and acted upon if a majority of the Board agrees to consider them. The Board, however, may not revise Board policies, or adopt new ones, unless such action has been scheduled, or unless there is an emergency.

The agenda and supporting materials should be posted online at least three days prior to the Board meeting. Board Members shall be expected to read the information provided them and to contact the Superintendent to request additional information that may be deemed necessary to assist them in their decision-making responsibilities.

When the final agenda has been established, it will be made available to the public online. Members of the public who wish to speak at Board meetings regarding an agenda item are encouraged to contact the Superintendent prior to the Board meeting. Additionally, the Board reserves the right to limit public discussion at Board meetings to agenda items only.

A consent agenda may be used at School Board meetings to cover the following actions: accepting resignations and/or nominations for professional staff persons when supported by written documentation.

NH Statutes	**Description**
RSA 91-A:3	Non-Public Sessions
RSA 91-A:5	Exemptions (Access to Governmental Records)

Cross References

Code	**Description**
BEDA	Public Notification of School Board Meetings

BEDDA Board Meeting - Rules of Procedure & Order

BEDH Public Comment and Participation at Board Meetings

1st Reading: November 26, 2013 (Amended)
2nd Reading: December 10, 2013
3rd Reading: January 28, 2014
Adopted: January 28, 2014

1st Reading: March 25, 2026 (as amended)

2nd Reading: April 22, 2026

IJND

VIDEO AND AUDIO RECORDING IN SCHOOL CLASSROOMS

The Board recognizes that video and/or audio records (recordings) can serve many valuable purposes that align with our school's education mission and programming. The Board approves the use of these recordings for education purposes including, but not limited to, recording student performances for instructional purposes; creating classroom instruction materials; and providing tools for teacher instruction and development.

A. Purposes for Which Written Consent Is Required

Unless otherwise permitted by law, the following conditions apply to recordings in classrooms. Classroom is defined as any area on school grounds where instruction is taking place.

1. If classroom activities planned for recording include one or more students, prior written consent must be obtained from the parents/legal guardians of each affected student in the class. Prior consent must be obtained on an annual basis.

2. If the school-related activities are planned for recording include one or more staff members, prior written consent must be obtained from each of those staff members.

B. Circumstances Under Which Written Consent Is Not Required

1. Video and/or audio recordings made pursuant to a student's IEP or 504 Plan, when the IEP of 504 Team determines that such recording is necessary for the delivery of a free appropriate public education (FAPE), do not require consent under this policy.

   In such cases, the IEP and 504 Team is expected to establish reasonable conditions and limitations reasonably necessary for the student to receive a FAPE.

2. Written consent is not required for recordings of non-classroom activities including, but not limited to, extracurricular/co-curricular activities, club events, competitions, ceremonies, musical performances, presentations, orientations, training, assemblies, activities such as student government, yearbook, and other school sponsored events that occur outside of classrooms, or any recording of hallways, open or general areas for school security purposes.

3. Recordings made consistent with the District's FERPA Annual notice or as provided in the Student Handbook.

Legal Reference:

RSA 189:68, IV

1st Reading: March 25, 2026

2nd Reading: April 22, 2026

EEAA

VIDEO AND AUDIO RECORDINGS ON SCHOOL PROPERTY

Category: Recommended

See also IJND, JICD, JICL

Video Surveillance

The Board authorizes the use of video surveillance devices on District property to ensure the health, welfare, and safety of all students, staff and visitors to District property and to safeguard District buildings, grounds, and equipment. The Superintendent will approve appropriate locations for surveillance devices. Placement of the video cameras will be based on the presumption and belief that students, staff and visitors have no reasonable expectation of privacy in areas or at events that occur in plain view. However, such devices are not to be placed in bathrooms or locker rooms.

Signs will be posted on school buildings to notify students, staff and visitors that video recording devices may be in use. At the Superintendent's discretion, parents and students may also be notified through the student handbook.

All persons will be responsible for any violations of school rules caught on tape by cameras.

The district will retain copies of video recordings until they are erased, which may be accomplished by either deletion or copying over with a new recording. The Superintendent will consult with the necessary personnel to determine how and when such recordings should be deleted.

Video Recordings Used for Student Discipline Matters

Videos containing evidence of a violation of student conduct rules, school board policy, and/or state or federal law will be retained until the issue of the misconduct is no longer subject to review or appeal, as determined by board policy or applicable law. Any release or viewing of the video will be in accordance with the law.

In the event a video recording is used as part of a student discipline proceeding, such video may become part of a student's education record. If a video recording does become part of a student's education record, the provisions of Policy JRA shall apply.

The Superintendent is authorized to contact the District's attorney for a full legal opinion relative in the event of such an occurrence.

Video and Audio Recordings Used for Special Education Purposes

Video and audio recordings may be used for special education or Section 504 purposes, when a student's individualized education program or accommodation plan includes audio or video recording as part of the child's education. All such recordings will be maintained in accordance with the Family Education Rights and Privacy Act, 20 U.S.C. section 1232g, and other applicable law(s).

Other Purposes for Which Video and Audio Recordings May Be Used

The school board authorizes the superintendent to use video and/or audio recordings to the extent either required or prohibited by law.

Video and Audio Recordings Authorized

The school board permits the video and audio recording of the following school-related activities by the school district. The following purposes are not intended to be exhaustive and may be expanded or contracted by either administrative determination or school board action.

Extracurricular/co-curricular activities

Musical performances, band, concert band, ensemble, orchestra, choir

Drama activities

Club events

Sporting events

Other activities such as yearbook, school pride

Ceremonies, orientation, presentations, school assemblies or meetings, or any school events which occur outside of the physical classroom.

See the Acceptable Use Agreement ("AUA") on the SAU 41 website for the most current procedures governing personally owned internet devices at school.

Legal References:

RSA 189:65, Definitions
RSA 189:68, Student Privacy
RSA 570-A:2
20 U.S.C. §1232g, Family Educational Rights and Privacy Act (FERPA)
34 C.F.R. Part 99, Family Educational Rights and Privacy Act Regulations

1st Reading: March 25, 2026
2nd Reading: April 22, 2026

EEAA-R

Category: *Recommended*

USE OF VIDEO AND AUDIO SYSTEMS ADMINISTRATIVE PROCEDURE

Video and Audio Systems include but are not limited to security cameras and live streaming video and audio systems.

A. Security Camera Placement

1. Security cameras may be placed outside and inside school facilities as described in Policy EEAA and as approved by the Superintendent. The Superintendent shall consult with the building administrator and others as appropriate prior to approving placement of security cameras.
2. The use of security cameras or video devices may also be approved in particular locations by the Superintendent on a short-term basis in connection with investigations of possible misconduct and/or illegal activity.
3. Security cameras will not be placed in bathrooms, locker rooms, private offices or other locations where the Superintendent determines that users have a reasonable expectation of privacy, except as otherwise permitted by law.

B. Viewing/Monitoring of Live Images from Security Cameras and/or Other Recording Devices

1. In order to maintain building security, a monitor will be placed to enable office staff to observe points of access to the building.
2. The Superintendent, building administrators and others designated by the Superintendent may monitor security camera images on a periodic or random basis for school-related purposes.
3. In situations when the School Department's Comprehensive Emergency Plan is implemented and/or there is an immediate security risk, law enforcement officials may directly view images from school security cameras at the school on their own monitors at other locations.

C. Viewing of Recordings

1. The Superintendent, building administrators and others designated by the Superintendent may review recordings for school-related purposes. Other school employees may be authorized by the Superintendent or a building administrator to view recordings if there is a legitimate educational or operational reason to do so.
2. Any recording used for student disciplinary purposes will only be disclosed as authorized by the Family Educational Rights and Privacy Act (FERPA) and in accordance with Board policy.
3. The parents/guardians of a student or an eligible student under FERPA may request to view portions of a recording used as a basis for disciplinary action against that student. Viewing of the recording shall be conducted in the presence of a building administrator and shall be conducted in a manner that does not violate the confidentiality rights of other students.
4. Law enforcement personnel may review recordings, when available, to investigate possible criminal conduct.

D. Storage and Security of Security Camera Recordings

1. All security camera recordings will be stored in a secure location to ensure confidentiality.
2. Security camera recordings will be stored no longer than 60 days, except in cases where there is a request from the police or a court or when recordings are needed for a disciplinary matter.
3. Recordings related to a disciplinary matter will be maintained in their original form until the matter is resolved.

1st Reading: March 25, 2026
2nd Reading: April 22, 2026

CHANGE OF CLASS OR SCHOOL ASSIGNMENT – BEST INTERESTS AND MANIFEST HARDSHIP

Category: Required by Law

The Superintendent is charged with assigning students of the District to schools and classes consistent with Board policies and procedures. New Hampshire RSA 193:3 recognizes that there are limited instances when the class or school to which a student might be assigned under a district's ordinary assignment policies and procedures, might not be in that student's best interests, or other factors might exist under which create a manifest educational hardship upon the student such that a change (referred to in this policy as "reassignment") in the student's class or school assignment is warranted. The Board has adopted this policy consistent with RSA 193:3 and to provide procedures for parents/guardians to follow when they believe a reassignment is appropriate. Under specified conditions and procedures as set forth below, reassignment may be made to another public school, public academy or "approved private school" within or outside the District.

As used in this policy, "**approved private school**" means a school that has been approved and contracted by the school board to provide a student or students with the opportunity to acquire an adequate education (see RSA 193:3, VII). The term also includes schools that the Board has "approved as a school tuition program." (See NH Dept. of Education Rule Ed 307.01(a).

A. <u>Best Interest Re-Assignment – Determination by Superintendent</u>.

Consistent with RSA 193:3, I, and subject to the provisions below, the Superintendent is authorized to reassign a student residing in the District to another class within the school, to another public school, public academy, or approved private school in another district.

Authorization granted to the Superintendent to make reassignments under this policy applies only after application is made by the parent/guardian of the student or with the parent/guardian's consent, and upon a finding by the Superintendent that reassignment is in the student's best interests, after taking into consideration the student's academic, physical, personal, or social needs.

This policy, however, does not limit the Superintendent's discretion to make other in-District assignments consistent with applicable Board policies and administrative rules.

1. **<u>Procedure for Best Interest Assignments to a School/ Academy Within the District</u>:**

    a. <u>Request for Change of Assignment Within District:</u> In order to initiate consideration of a reassignment within the current school district based upon the child's best interests, the parent/guardian shall submit to the Superintendent or their designee a written request stating why and/or how the child's best interests warrant reassignment. The parent/guardian is encouraged, but not required, to provide information as to how the child's interests are served by the change in assignment.

    NOTE: The request by the parent should be delivered to the Superintendent no later than July 1. Requests following that date will require a meeting with the Superintendent and may require the parent/guardian to provide relevant evidence supporting the parent/guardian's belief that it is

in the best interest of the student to change the current assignment.

b. Reassignment Determination*:* In determining whether to grant a request to change a student's current assignment within the current school or to another public school/academy or approved private school within the District, the Superintendent will only consider whether the school has the ability to accommodate the student based upon "existing school capacity." For purposes of determining existing school capacity, the Superintendent will consider the District's Board policy IIB, the Enrollment Projections for that school year, and shall consult with the Assistant Superintendent of Student Services for special considerations relating to the student's educational program.

If the Superintendent determines that the requested school within the District **does not** have the ability/capacity to accommodate the student and therefore denies the request, the Superintendent will give written notice to the parent/guardian with the reason the request was denied. The parent/guardian is encouraged to provide a supplemental written statement to the Superintendent with any additional information that the parent/guardian believes is relevant to the initial request. The Superintendent will review the additional information and inform the parent/guardian of the decision within 5 school days.

If the ***Superintendent grants the request*** to change the student's school or assignment, the Superintendent shall initiate the student's transfer within the current school, or to the other school/academy within the District.

If the Superintendent ***does not find that it is in the best interest and does not approve the request*** to change the student's school or assignment, the parent/guardian may request a hearing before the School Board to determine if the student is experiencing a manifest educational hardship as provided in Section B of this policy.

2. **Procedures for Best Interest Assignments to a School Outside the Distric.**

A change in assignment to a school/academy outside of the District under this section requires a finding by the Superintendent that reassignment is in the student's best interests, after taking into consideration the student's academic, physical, personal, or social needs.

a. Change of Assignment Request. In order to initiate consideration of a reassignment to a public school, a public academy or approved private school outside of the District ("school outside the district") based upon the child's best interests, the parent/guardian shall submit to the Superintendent a written request stating why and/or how the child's best interests warrant the change. To facilitate a determination, such application should also include any additional information described in paragraph A.1iii below. The written request should be mailed or hand-delivered to the SAU office or emailed to the Superintendent at the email address provided on the District's website.

b. Reassignment Meeting and Review of Request.

i. Upon receiving a request to change assignment to a school outside the District, the Superintendent will schedule a meeting (the "reassignment meeting") with the parent/guardian, to be held within 10 days of receiving the written request.

ii. Prior to or at the reassignment meeting, the parent/guardian shall make a specific request that the student be re-assigned to a specific school outside the District.

iii. At the reassignment meeting, the parent/guardian may present documents, witnesses, or other relevant evidence supporting the parent/guardian's belief that reassignment is in the best interest of the student.

iv. The Superintendent may present such information as he or she deems appropriate.

v. In determining whether reassignment is in the student's best interest, the Superintendent shall consider the student's academic, physical, personal, or social needs.

c. Determination Whether Reassignment is in Best Interest

Within five school days of the reassignment meeting, the Superintendent shall deliver to the parent/guardian a written determination whether or not reassignment is in the child's best interest. Delivery of the written determination should be done in a manner to produce evidence of the delivery (e.g., courier, email, fax).

i. *Finding that Change is in Student's Best Interest*: If the Superintendent finds it is in the best of the interest of the student to change the student's school or assignment, the Superintendent shall initiate the process to implement the student's transfer to a school outside the district (requires agreement of the other school/district).

ii. *No Finding that Change is in Student's Best Interest*: If the Superintendent does not find that it is in the best interest of the student to change the student's school or assignment, the parent/guardian may request a hearing before the School Board to determine if the student is experiencing a manifest educational hardship as provided in Section B of this policy. The Superintendent shall assure that the reassignment approval is placed on the agenda for the next regularly scheduled Board meeting.

3. Tuition Determination

a. *Public School or Academy Outside the District*: If a student is to be reassigned to a public school or academy in another school district following a best interest determination, the Superintendent shall work with the Superintendent or senior education official of the receiving school district/academy to establish a tuition rate for such student. Pursuant to RSA 193:3, I(g), if the Superintendent has made a finding that it is in the best interest of the student to be reassigned, then the School Board shall approve the tuition payment; such approval shall be consistent with the Board's ordinary manifest approval procedures.

b. *Approved Private School Either Outside of the District*: If the student is reassigned to an approved private school under this policy, that school may charge tuition to the parent/guardian or may enter into an agreement for payment of tuition District in which the student resides. The Superintendent shall consult with counsel regarding tuition obligations in such an instance. Any such Agreement shall be subject to approval by the school board on behalf of the School District and shall be at the sole discretion of the School Board with due consideration given to the fiscal impact of such approval of the District, and shall not be granted if, in the opinion of the School Board, there are other viable public school options for reassignment.

c. *Tuition for Students Reassigned by Other Districts Pursuant to RSA 193:3, I*. It is the general policy of the Board that the tuition amount to be charged to another district for any student reassigned by that district to a school within this District under the best interest standard of 193:3, I, shall be the lesser of the tuition charged for non-residential students under Board policy JFAB or as computed under the formula set out in RSA 193:4. The Superintendent, however, is authorized to reduce the tuition amount below those thresholds or for other good cause shown (e.g., reciprocal assignments between the two districts).

4. **Transportation**: Transportation for a student reassigned to a school in another district under this Section A (best interest) shall be the responsibility of the parent/guardian. Transportation within the District will be consistent with the transportation policies of the District for the public, charter, and private schools located within the District.

5. **Annual Review of Decision:** A reassignment on the basis of best interest of the student shall be limited to no longer than the end of the ensuing school year, and shall be subject to review by the Superintendent prior to any subsequent school year to determine that the reassignment remains in the best interest of the student, with the understanding that the Superintendent may, at their discretion waive the review when they deem such to be appropriate.

6. **Review/Appeal of Decision**: The decision of the Superintendent relative to best interest reassignments shall be final and any appeal shall be limited to the process set forth in Section B, below.

B. Manifest Educational Hardship – Determination by School Board and Appeal to State Board.

If, after following the procedure outlined in Section A of this policy, the Superintendent did not find that it was in the best interest of the student to reassign the student as requested by the student's parent/guardian, then the parent/guardian may request a hearing before the School Board to determine if the student is experiencing a manifest educational hardship.

1. "Manifest Educational Hardship" Defined. As provided in RSA 193:3, II (a), "manifest educational hardship" means that a student has a documented hardship in his or her current educational placement; and that such hardship has a detrimental or negative impact on the student's academic achievement or growth, physical safety, or social and emotional well-being. Such hardship must be so severe, pervasive, or persistent that it interferes with or limits the ability of the student to receive an education.

2. Procedure for Determination of Manifest Educational Hardship.
    a. Within thirty (30) days after receipt of the Superintendent's written determination describing that reassignment is not in the student's best interest as described in Section A, the parent/guardian requesting a manifest educational hardship hearing shall submit a written application to the Superintendent detailing the specific reasons why they believe that the current assignment constitutes a manifest educational hardship.

    b. The Superintendent shall duly notify the school board that the parent/guardian has requested a manifest educational hardship hearing, upon which the school board shall schedule a hearing to be held no more than 15 days after the request has been received by the Superintendent. The Board shall provide at least two full days' notice of the hearing. The Board will conduct the hearing in non-public session, unless the parent/guardian requests the hearing be held in public session, subject to RSA 91-A:3, II(c). The hearing will be held following the procedures set forth under NH Dept. of Education rules Ed 204.01 and Ed 307.01(f).

    c. Prior to or at such hearing, the parent/guardian shall provide to the Superintendent a specific request in writing that the student attend another public academy or approved private school in the District or attend a public school, public academy, or approved private school in another school district. The Superintendent shall provide such request to the School Board at the hearing. Although not required, the parent/guardian may include this request as part of the original hearing request.

    d. At such hearing, the parent/guardian may present documents, witnesses, or other relevant evidence supporting their belief that the student is experiencing a manifest educational hardship. The Superintendent may present such information as he or she may deem appropriate to assist the School Board in reaching its decision. The parties (or their appointed designee) shall have the right to examine all evidence and witnesses. The formal rules of evidence shall not apply. The Superintendent will assure the means for the Board to establish

an adequate record of the hearing.

e. The parent/guardian shall have the burden of establishing the presence of a manifest educational hardship by clear and convincing evidence, which means that the evidence is highly and substantially more likely to be true than untrue, and the Board must be convinced that the contention is highly probable.[4]

f. The Board will render its decision in writing within seven days after the hearing and will forward its written decision to the parent/guardian via means producing proof of delivery (e.g., courier, email, etc.). The decision will conform to the requirements of NH Dept. of Education rule Ed 204.01(d) and (e).

3. **Finding of Manifest Educational Hardship**: If the School Board finds that the student has a manifest educational hardship, the School Board shall grant the parent's or guardian's request to reassign the student another public academy or to a public school, public academy, or approved private school in another district.

4. **Finding that Manifest Educational Hardship Was Not Established – Appeal to the New Hampshire State Board of Education:** If the School Board finds that the parent/guardian has not met their burden of proof, the parent/guardian may appeal the local Board decision to the New Hampshire State Board of Education ("SBOE"), within thirty (30) days of receipt of the Board's written decision in accordance with NH Dept. of Ed. Rule Ed 204.01(g). If a parent/guardian believes that denial of a re-assignment under this policy is based upon the child's disability, the parent/guardian may appeal to the SBOE or file a complaint with the N.H. Human Rights Commission under RSA 354-A:28.

5. **Tuition for Students Reassigned Upon Finding of Manifest Educational Hardship:** If, after a finding of a manifest educational hardship - by either the School Board or the State Board - a student of the District is assigned to attend a public school or a public academy in another district, or a student from another district is assigned to a school in this District, the district in which the student resides shall pay tuition to the district to which the child is reassigned.

   Such tuition shall be computed according to RSA 193:4. The school board of the district in which the student resides shall approve the tuition payment consistent with its ordinary manifest approval process.

6. **Transportation:** Transportation for a student reassigned to a school in another district under this Section B (manifest educational hardship) shall not be the responsibility of the District unless otherwise ordered by the SBOE.

7. **Annual Review of Manifest Hardship Determination:** A reassignment on the basis of manifest educational hardship shall be limited to no longer than the end of the ensuing school year and shall be subject to review by the School Board prior to any subsequent school year to determine that the manifest educational hardship still exists, with the understanding that the Board may, at its discretion, waive the review when it deems such to be appropriate.

C. Admission Requirements. Students reassigned under this Policy shall meet the admission requirements of the school to which the student is to be reassigned.

D. Statutory Reassignment Limit. Pursuant to RSA 193:3, III-a(d), the total reassignments or transfer made under this policy in any one school year will not exceed one (1) percent of the average daily membership in residence of a school district, or five (5) percent of the average daily membership in residence of any single school, whichever is greater, unless the School Board votes to exceed this limit.

E. Count of Reassigned Pupils, Tuition Payment and Rate, and Transportation. Pupils reassigned under this policy will be counted in the average daily membership in residence ("ADMR") of a given pupil's resident school district. Said pupil's resident district will forward any tuition payment due to the District to which the

pupil was assigned.

F. Notice to the Department of Education. The Superintendent of the pupil's resident SAU will notify the Department of Education within thirty (30) days of any reassignment made under this policy.

G. Special Education Placements. A placement made relative to a student's special education needs and services shall not be deemed a change of school assignment for purposes of this section.

Legal References:

NH Statutes	Description
RSA 193:14-a	Change of School Assignment; Duties of State Board of Education
RSA 193:3, III	Change of School Assignment

NH Dept of Ed Regulation	Description
Ed 307	Manifest Educational Hardship
N.H. Dept. of Education Admin. Rule Ed. 320	N.H. Dept. of Education Administrative Rule Ed. 320 [Pending revision]

1st Reading: January 24, 2024 (as amended)
2nd Reading: March 27, 2024
3rd Reading: Waived
Adopted: March 27, 2024

1st Reading: December 17, 2025 (as amended)
2nd Reading: April 22, 2026

PUPIL SAFETY AND VIOLENCE PREVENTION - BULLYING

Category: Priority/Required by Law *See also JBAA, JIC, JICD, IHBA*

A. **Purpose and Intent:** The Brookline School District is committed to providing a safe and respectful learning environment for all students. Through education, prevention, and consistent enforcement, we aim to eliminate bullying and promote positive peer relationships for all of our students.

1. Prohibition of Bullying or Cyberbullying of a Student - RSA 193-F:4, II(a): This policy is intended to comply with and implement RSA 193-F. Bullying, in any form—whether physical, verbal, social, or cyber—is strictly prohibited and will not be tolerated. This policy defines bullying and related conduct, and establishes clear procedures for reporting, investigating, and responding to incidents.

2. Protection of all School Aged Children - RSA 193-F:4, II(c): This policy shall apply to all students and school-aged persons on school district grounds and participating in school district functions, whether or not such school-aged person is a student within the District and regardless of their status under the law. District staff will coordinate with staff from other districts, if an allegation of bullying involves a student who is not a resident of the District.

3. Prohibition of Retaliation and False Accusations - RSA 193-F:4, II(b): This policy prohibits retaliation or false ~~threats~~ accusations against a victim, witness, or anyone else who, in good faith, provides information about an act of bullying or cyberbullying. An unsubstantiated allegation of bullying, without more, will not constitute a false accusation against an alleged perpetrator.

~~I.~~ B. Definitions (RSA 193-F:3)

1. Bullying: Bullying is hereby defined as a single significant incident or a pattern of incidents involving a written, verbal, or electronic communication, or a physical act or gesture, or any combination thereof, directed at another pupil which:

a. Physically harms a pupil or damages the pupil's property;

b. Causes emotional distress to a pupil;

c. Interferes with a pupil's educational opportunities;

d. Creates a hostile educational environment; or

e. Substantially disrupts the orderly operation of the school. ~~: or~~and

f. Either ~~Occurs~~ occurs on, is delivered to, school property or a school-sponsored activity or event on or off school property; or

~~g. Occurs~~ occurs off of school property or outside a school-sponsored activity or event, if the conduct interferes with a student's educational opportunities or substantially disrupts the orderly

operations of the school or any school-sponsored activity or event.

Bullying shall ~~also~~ include actions motivated by an imbalance of power based on a pupil's actual or perceived personal characteristics, behaviors, or beliefs, or motivated by the pupil's association with another person and based on the other person's characteristics, behaviors, or beliefs.

As used throughout this or other Board policies, and unless the context indicates otherwise, the term "bullying" as used in this policy will include cyberbullying.

2. "Cyberbullying." ~~Cyberbullying~~ is defined as any conduct defined as "bullying" in this policy that is undertaken through the use of electronic devices. For purposes of this policy, any references to the term bullying shall include cyberbullying.

3. "Electronic devices." ~~Electronic devices include, but are not limited to, telephones, cellular phones, computers, pagers, electronic mail, instant messaging, text messaging, and websites.~~ includes, but is not limited to, telephones, cellular or smartphones, computers, pagers, or any other device which is used for or can transmit: voice calls or messages; electronic mail; text/instant or other verbal messaging; images or videos; and websites.

~~4. School property. School property means all real property and all physical plant and equipment used for school purposes, including public or private school buses or vans and any school sponsored activity.~~

~~Any reference in this policy to "parent" shall include parents or legal guardians.~~

~~Any reference in this policy to "Superintendent" or "Principal" shall include their designee.~~

4. "Parent" means a person who has legal custody of a minor child as a natural or adoptive parent, as a legal guardian, or who is functioning in a parental role if the actual parent or guardian is absent from the child's daily life. Additionally, "parent" may include students who have been emancipated, either by age or legal process. The term "parent", shall not, however, include a parent as to whom the parent-child relationship has been terminated by judicial decree or voluntary relinquishment.

5. "Perpetrator" means a student who engages in bullying or cyberbullying.

6. "Principal" shall mean and include the building Principal or other senior building administrator of a school, as well as any qualified person appointed by the Principal to carry out all or some Principal functions as described in this policy. References to "Principal" throughout this policy refer to the Principal or designee.

7. "Retaliation" means and includes such conduct as intimidation, threats, coercion, harassment, or discrimination in response to (or in an effort to prevent) a victim, alleged victim, witness or other person, who in good faith provides information about an act or conduct that the person providing the information believes is bullying or cyberbullying.

8. "School property" means all real property and all physical plant and equipment used for school purposes, including public or private school buses or vans.

9. "Staff" means and includes all district, school or SAU employees, designated volunteers (as defined in Board policy GBCD), or other volunteers who are regularly on school property, or who have significant contact with students, and any employees of a company under contract to the District or SAU and who have significant contact with students.

10. "Student" shall have the same meaning as "pupil" as used in RSA 193-F and this or any other Board policy.

11. "Superintendent" means the Superintendent (Senior Education Official) or other person designated by the Superintendent to carry out all or some Superintendent functions as described in this policy. References to "Superintendent" throughout this policy refer to the Superintendent or designee.

12. "Victim" means a student against whom bullying or cyberbullying has been perpetrated.

II. Statement Prohibiting Bullying or Cyberbullying of a Pupil (RSA 193-F:4, II(a))

The Board is committed to providing all pupils a safe and secure school environment. This policy is intended to comply with RSA 193-F. Conduct constituting bullying and/or cyberbullying will not be tolerated and is hereby prohibited.

Further, in accordance with RSA 193-F:4, the District reserves the right to address bullying and, if necessary, impose discipline for bullying that:

(1) Occurs on, or is delivered to, school property or a school-sponsored activity or event on or off school property; or

(2) Occurs off of school property or outside of a school-sponsored activity or event, if the conduct interferes with a pupil's educational opportunities or substantially disrupts the orderly operations of the school or school-sponsored activity or event.

The Superintendent of Schools is responsible for ensuring that this policy is implemented.

III. Statement prohibiting retaliation or false accusations (RSA 193-F:4, II(b))

False Reporting

A student found to have wrongfully and intentionally accused another of bullying may face discipline or other consequences, ranging from positive behavioral interventions up to and including suspension or expulsion.

A school employee found to have wrongfully and intentionally accused a student of bullying shall face discipline or other consequences to be determined in accordance with applicable law, District policies, procedures and collective bargaining agreements.

Reprisal or Retaliation

The District will discipline and take appropriate action against any student, teacher, administrator, volunteer, or other employee who retaliates against any person who makes a good faith report of alleged bullying or against any person who testifies, assists, or participates in a proceeding or hearing relating to such bullying.

1. The consequences and appropriate remedial action for a student, teacher, administrator, volunteer, or other employee who engages in reprisal or retaliation shall be determined by the Principal after consideration of the nature, severity and circumstances of the act, in accordance with law, Board policies and any applicable collective bargaining agreements.

2. Any student found to have engaged in reprisal or retaliation in violation of this policy shall be subject to measures up to, and including, suspension and expulsion.

3. Any teacher, administrator, volunteer, or other employee found to have engaged in reprisal or retaliation in violation of this policy shall be subject to discipline up to, and including, termination of employment.

4. Any school volunteer found to have engaged in reprisal or retaliation in violation of this policy shall be subject to measures up to, and including, exclusion from school grounds.

Process to Protect Pupils from Retaliation

If the alleged victim or any witness expresses to the Principal or other staff member that they believe they may be retaliated against, the Principal shall develop a process or plan to protect that student from possible retaliation.

Each process or plan may be developed on a case-by-case basis. Suggestions include, but are not limited to, re-arranging student class schedules to minimize their contact, stern warnings to alleged perpetrators, temporary removal of privileges, or other means necessary to protected against possible retaliation.

IV. Protection of all Pupils (RSA 193-F:4, II(c))

This policy shall apply to all pupils and school-aged persons on school district grounds and participating in school district functions, regardless of whether or not such pupil or school-aged person is a student within the District.

V. Disciplinary Consequences for Violations of This Policy (RSA 193-F:4, II(d))

The district reserves the right to impose disciplinary measures against any student who commits an act of bullying, falsely accuses another student of bullying, or who retaliates against any student or witness who provides information about an act of bullying.

In addition to imposing discipline under such circumstances, the board encourages the administration and school district staff to seek alternatives to traditional discipline, including but not limited to early intervention measures, alternative dispute resolution, conflict resolution and other similar measures.

VI. Distribution and Notice of This Policy (RSA 193-F:4, II(e))

Staff and Volunteers

All staff will be made aware and provided access to a copy of this policy annually. The Superintendent may determine the method of providing the policy (employee handbook, hard copy, electronically, etc.)

The Superintendent will ensure that all school employees and volunteers receive annual training on bullying and related district's policies.

Students

All students will be made aware and provided access to a copy of this policy annually. The Superintendent may determine the method of providing the policy (student handbook, mailing, hard copy, electronically etc.)

Students will participate in an annual education program which sets out expectations for student behavior and emphasizes an understanding of harassment, intimidation, and bullying of students, the District's prohibition of such conduct and the reasons why the conduct is destructive, unacceptable, and will lead to discipline. Students shall also be informed of the consequences of bullying conduct toward their peers.

The Superintendent, in consultation with staff, may incorporate student anti-bullying training and education into the district's curriculum, but shall not be required to do so.

Parents

All parents will be made aware and provided access to a copy of this policy annually. The Superintendent may determine the method of providing the policy (parent handbook, mailing, hard copy, electronically, etc.). Parents will be informed of the process and the means for students to report bullying acts toward them or other students. They will also be told that to help prevent bullying at school they should:

1. Encourage their children to report bullying when it occurs and to cooperate fully with school personnel in identifying and resolving incidents

2. Take advantage of opportunities to talk to their children about bullying;

3. Inform a member of the school staff immediately if they think their child is being bullied or is bullying other students;

Additional Notice and School District Programs

The Board may, from time to time, host or schedule public forums in which it will address the anti-bullying policy, discuss bullying in the schools, and consult with a variety of individuals including teachers, administrators, guidance counselors, school psychologists and other interested persons.

VII. Procedure for Reporting Bullying (RSA 193-F:4, II(f))

At each school, the Principal shall be responsible for receiving complaints of alleged violations of this policy.

Student Reporting

1. Any student who believes they have been the victim of bullying should report the alleged acts immediately to the Principal or if the student is more comfortable reporting the alleged act to a person other than the Principal, the student may tell any school district employee or volunteer about the alleged bullying.

2. Any school employee or volunteers who witnesses, receives a report of, or has knowledge or belief that bullying may have occurred shall inform the Principal as soon as possible, but no later than the end of that school day.

3. The Principal may develop a system or method for receiving anonymous reports of bullying. Although students, parents, volunteers and visitors may report anonymously, formal disciplinary action may not be based solely on an anonymous report. Independent verification of the anonymous report shall be necessary in order for any disciplinary action to be applied.

4. The administration may develop student reporting forms to assist students and staff in filing such reports. An investigation shall still proceed even if a student is reluctant to fill out the designated form and chooses not to do so.

5. Upon receipt of a report of bullying, the Principal shall commence an investigation consistent with the provisions of Section XI of this policy.

Staff Reporting

1. An important duty of the staff is to report acts or behavior that they witness that appears to constitute bullying.

2. All district employees and volunteers shall encourage students to tell them about acts that may constitute bullying.

3. Any school employee or volunteer who witnesses, receives a report of, or has knowledge or belief that bullying may have occurred shall inform the Principal as soon as possible and within 48 hours.

4. Upon receipt of a report of bullying, the Principal shall commence an investigation consistent with the provisions of Section XI of this policy.

VIII. Procedure for Internal Reporting Requirements (RSA 193-F:4, II(g))

In order to satisfy the reporting requirements of RSA 193-F:6, the Principal shall be responsible for completing all New Hampshire Department of Education forms and reporting documents of substantiated incidents of bullying. Said forms shall be completed within 10 school days of any substantiated incident. Upon completion of such forms, the Principal shall retain a copy for themselves and shall forward one copy to the Superintendent and may forward one copy to the local authority. The Superintendent shall maintain said forms in a safe and secure location.

IX. Notifying Parents of Alleged Bullying (RSA 193-F:4, II(h))

The Principal shall report to the parents of a student who has been reported as a victim of bullying and to the parents of a student who has been reported as a perpetrator of bullying within 48 hours of receiving the report. Such notification may be made by telephone, writing or personal conference. The date, time, method, and location (if applicable) of such notification and communication shall be noted in the report. All notifications shall be consistent with the student privacy rights under the applicable provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA).

X. Waiver of Notification Requirement (RSA 193-F:4, II(i))

The Superintendent may, within a 48 hour time period, grant the Principal a waiver from the requirement that the parents of the alleged victim and the alleged perpetrator be notified of the filing of a report. A waiver may only be granted if the Superintendent deems such a waiver to be in the best interest of the victim or perpetrator. Any waiver granted shall be in writing.

XI. Investigative Procedures (RSA 193-F:4, II(j))

1. Upon receipt of a report of bullying, the Principal shall, within 5 school days, initiate an investigation into the alleged act. If the Principal is directly and personally involved with a complaint or is closely related to a party to the complaint, then the Superintendent shall direct another district employee to conduct the investigation.

2. The investigation may include documented interviews with the alleged victim, alleged perpetrator and any witnesses. All interviews shall be conducted consistent with the developmental needs of the students in mind and shall be confidential.

3. If the alleged bullying was in whole or in part cyberbullying, the Principal may ask students and/or parents to provide the District with printed or electronic copies of e-mails, text messages, website pages, or other similar electronic communications.

4. Consistent with applicable law, the District will not require or request that a student disclose or provide to the District the student's user name, password, or other authenticating information to a student's personal social media account. However, the District may request to a student or a student's parent/guardian that the student voluntarily shared printed or electronic copies of specific information from a student's personal social media account if such information is relevant to an ongoing District investigation.

5. A maximum of 10 school days shall be the limit for the initial filing of incidents and completion of the investigative procedural steps.

6. Factors the Principal or other investigator may consider during the course of the investigation, including but not limited to:

- Description of incident, including the nature of the behavior;
- How often the conduct occurred;
- Whether there were past incidents or past continuing patterns of behavior;
- The characteristics of parties involved, (name, grade, age, etc.);
- The identity and number of individuals who participated in bullying behavior;
- Where the alleged incident(s) occurred;
- Whether the conduct adversely affected the student's education or educational environment;
- Whether the alleged victim felt or perceived an imbalance of power as a result of the reported incident; and
- The date, time and method in which parents or legal guardians of all parties involved were contacted.

7. The Principal shall complete the investigation within 10 school days of receiving the initial report. If the Principal needs more than 10 school days to complete the investigation, the Superintendent may grant an extension of up to 7 school days. In the event such extension is granted, the Principal shall notify in writing all parties involved of the granting of the extension.

8. 7. A determination of whether a particular action or incident constitutes a violation of this policy shall be based on all facts and surrounding circumstances. If the determination is that there has been a substantiated incidence of bullying, the Principal shall include recommended remedial steps necessary to stop the bullying within in a written final report submitted to the Superintendent.

9. 8. Students who are found to have violated this policy may face discipline in accordance with other applicable board policies, up to and including suspension. Students facing discipline will be afforded all due process required by law.

XII. Response to Remediate Substantiated Instances of Bullying (RSA 193-F:4, II(k))

Consequences and appropriate remedial actions for a student or staff member who commits one or more acts of bullying or retaliation may range from positive behavioral interventions up to and including suspension or expulsion of students and dismissal from employment for staff members.

Consequences for a student who commits an act of bullying or retaliation shall be varied and graded according to the nature of the behavior, the developmental age of the student, and the student's history of problem behaviors and performance. Remedial measures shall be designed to correct the problem behavior, prevent another occurrence of the problem, protect and provide support for the victim, and take corrective action for documented systematic problems related to bullying.

Examples of consequences may include, but are not limited to:

- Admonishment
- Temporary removal from classroom
- Deprivation of privileges
- Classroom or administrative detention
- Referral to disciplinarian
- In-school suspension
- Out-of-school suspension
- Expulsion

Examples of remedial measures may include, but are not limited to:

- Restitution
- Mediation
- Peer support group
- Corrective instruction or other relevant learning experience
- Behavior assessment
- Student counseling
- Parent conferences

In support of this policy, the Board promotes preventative educational measures to create greater awareness of aggressive behavior, including bullying. The Board encourages the Superintendent to work collaboratively with

all staff members to develop responses other than traditional discipline as a way to remediate substantiated instances of bullying.

XIII. Reporting of Substantiated Incidents to the Superintendent (RSA 193-F:4, II(l)

The Principal shall forward all substantiated reports of bullying to the Superintendent upon completion of the Principal's investigation.

XIV. Communication with Parents upon Completion of Investigation (RSA 193-F:4, II(m)

1. Within two school days of completing an investigation, the Principal will notify the students involved in person of their findings and the result of the investigation.

2. The Principal will notify via telephone the parents of the alleged victim and alleged perpetrator of the results of the investigation. The Principal will also send a letter to the parents within 24 hours again notifying them of the results of the investigation.

3. If the parents request, the Principal shall schedule a meeting with them to further explain their findings and reasons for their actions.

4. In accordance with the Family Educational Rights and Privacy Act and other law concerning student privacy, the District will not disclose educational records of students including the discipline and remedial action assigned to those students to the parents of other students involved in a bullying incident.

XV. Appeal

1. For non-disciplinary remedial actions where no other review procedures govern, the parents of the pupils involved in the bullying shall have the right to appeal the Principal's decision to the Superintendent in writing within ten (10) calendar days. Upon receipt of the appeal, the Superintendent shall review the Principal's decision and issue a written decision within ten (10) school days. If the aggrieved party is still not satisfied with the outcome, the aggrieved party may file a written request for review by the School Board within ten (10) calendar days of the Superintendent's decision. The School Board will adhere to all applicable New Hampshire Department of Education administrative rules.

An aggrieved parent/guardian has the right to appeal the final decision of the local School Board to the State Board within thirty (30) calendar days of receipt of the written decision of the local School Board in accordance with RSA 541-A and State of New Hampshire Department of Education Regulations set forth in ED 200. The State Board may waive the thirty-day requirement for good cause shown, including, but not limited to, illness, accident, or death of a family member.

2. The procedures under RSA 193:13, Ed 317, and District policies establish the due process and appeal rights for students disciplined for acts of bullying.

3. The School Board or its designee will inform parents of any appeal rights they may have to the New Hampshire State Board of Education.

XVI. School Officials (RSA 193-F:4, II(n)

The Superintendent of schools is responsible for ensuring that this policy is implemented. In order to facilitate the implementation of this policy, the Superintendent may establish further administrative rules or regulations.

XVII. Capture of Audio Recordings on School Buses

Pursuant to RSA 570-A:2, notice is hereby given that the Board authorizes audio recordings to be made in conjunction with video recordings of the interior of school buses while students are being transported to and from school or school activities. The Superintendent shall ensure that there is a sign informing the occupants of school buses that such recordings are occurring.

XIII. Use of Video or Audio Recordings in Student Discipline Matters

~~The District reserves the right to use audio and/or video recording devices on District property (including school buses) to ensure the health, safety and welfare of all staff, students and visitors. Placement and location of such devices will be established in accordance with the provisions of Policies EEAA, EEAE and ECAF.~~

~~In the event an audio or video recording is used as part of a student discipline proceeding, such video may become part of a student's education record. If an audio or video recording does become part of a student's education record, the provisions of Policy JRA shall apply.~~

~~The Superintendent is authorized to contact the District's attorney for a full legal opinion relative in the event of such an occurrence.~~

C. **Retaliation** - RSA 193-F:4, II(b). Retaliation or false accusations related to bullying or cyberbullying shall be deemed a violation of this policy, and students engaging in retaliation or making false accusations may be subject to disciplinary action. Upon receiving any report of bullying or cyberbullying, the Principal will immediately assess the need to develop a plan or take steps to protect the alleged victim or any witnesses against retaliation. The same assessment shall be made at any point upon a report of retaliation or false accusations made during or after a bullying/cyberbullying investigation.

Reports of retaliation or false accusations relating to a bullying/cyberbullying report may be made in the same manner as for reports of bullying/cyberbullying as provided in this policy.

Investigations, and responses (i.e., interventions, supportive measures, disciplinary consequences) to reports of retaliation or false accusations may be made as provided in the same manner as provided in the applicable sections below for reports or incidents of bullying/cyberbullying, or in accordance with procedures and provisions set forth in the student handbook

D. **Procedures for Reporting Bullying, Cyberbullying, Retaliation or False Accusations** - RSA 193-F:4, II(f). At each school, the Principal is responsible for receiving reports or complaints of bullying or cyberbullying.

1. Student Reporting: Any student who believes he or she has been the victim of bullying/cyberbullying, retaliation, or false accusations should report the alleged acts immediately to the Principal, or to a school district employee or volunteer that the student feels more comfortable making the report.

2. Staff Reporting: Any school employee or volunteer who receives a report of, witnesses, or has knowledge or belief that bullying/cyberbullying or retaliation may have occurred, shall inform the Principal as soon as possible, but no later than the end of that school day.

3. Parent Reporting: Parents and other adults are also encouraged to report any concerns about possible bullying/cyberbullying or retaliation of students to the Principal.

4. Report Forms: The administration may develop student reporting forms to assist students and staff in filing such reports. An investigation shall still proceed even if a student is reluctant to fill out the designated form and chooses not to do so.

5. Anonymous Reports: The Principal may develop a system or method for receiving anonymous reports of bullying within the building. Although students, parents, volunteers and visitors may report anonymously, an investigation based upon such reports may by necessity be incomplete. More significantly, formal disciplinary action may not be based solely on an anonymous report, and, likewise, other remedial or supportive measures may require some form of evidentiary

verification.

E. Actions Upon Receipt of Report of Bullying or Cyberbullying

1. Receipt of Report: Upon receipt of a report of bullying, the Principal shall commence an investigation consistent with the provisions of Section F of this policy and ~~,~~ shall assess:

   a. the need for a plan to protect students against retaliation,

   b. whether the conduct may be construed as illegal discrimination or harassment related to a protected class as set forth in Board policy AC (if so, the Principal shall confer with the District staff member(s) charged with handling such discrimination or harassment to determine how to proceed (e.g., parallel or combined investigations)); and

   c. whether such conduct constitutes a safe schools violation requiring a report pursuant to RSA 193-D:4 and Ed 317.05.

2. Parental Notice of Bullying Report — RSA 193-F:4, II(h). Within 48 hours of receiving a report of bullying, the Principal will notify the parents of any student reported as a victim of bullying, as well as the parents of any student who has been reported as a perpetrator of bullying. Such notification may be made by telephone, writing or personal conference. The date, time, method, and location (if applicable) of such notification and communication shall be included in the investigative report. Notifications shall be consistent with the applicable provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA) relative to the student privacy rights of each student indicated in the report.

   The Principal may request of the Superintendent ~~designee~~ a waiver of the parental notification requirement, which may be granted only if the Superintendent deems such a waiver to be in the best interest of either the alleged victim or alleged perpetrator. If the waiver is granted, it shall be documented in writing. ~~Details of any request for a waiver and any grant of such request will be included in the investigative report.~~

~~2.~~3. Bullying Across School Districts — RSA 193-F:4, I(j). In cases of bullying and/or cyberbullying across multiple school districts, the Principal shall commence an investigation and contact the other involved school district(s) to collaborate investigation efforts. In cases of bullying and/or cyberbullying across multiple states, the Principal shall also inform the New Hampshire attorney general's office.

F. Investigative Procedures - RSA 193-F:4, II(j)

1. Upon receipt of a report of bullying, the Principal shall, within 5 school days, initiate an investigation into the alleged act. ~~-~~If the Principal is directly and personally involved with a complaint or is closely related to a party to the complaint, then the Superintendent shall direct another district employee to conduct the investigation.

2. The investigation should include documented interviews with the alleged victim, alleged perpetrator and any witnesses. All interviews shall be conducted privately, and shall be confidential to the extent permitted by law. Each individual will be interviewed separately and at no time will the alleged victim and perpetrator be interviewed together during the investigation.

3. The investigation should include review of any available surveillance recordings subject to the provisions of applicable Board policies.

4. If the alleged bullying was in whole or in part cyberbullying, the Principal may ask students and/or parents to provide the District with printed copies of the e-mails, text messages, website pages, or other similar electronic communications, consistent with Board policy JIH and RSA 189:706. RSA 189:70, II(d). The Principal may not, however, ~~require or request a student~~take any of the following actions:

   i. Require or request a student or prospective student to disclose or to provide access to a personal social media account through the student's or prospective student's user name, password, or other means of authentication that provides access;
   ii. Require or request a student or prospective student to access a personal social media account in the presence of any employee of the educational institution in a manner that enables the employee to observe the contents of the personal social media account;
   iii. Compel a student or prospective student to add anyone to his or her list of contacts associated with a personal social media account or require, request, suggest, or cause a student or prospective student to change the privacy settings associated with a personal social media account;
   iv. Take or threaten to take any action against a student or prospective student to discipline or prohibit such student or prospective student from participation in curricular or co-curricular activities for refusal to disclose information or to take the above actions. ~~to disclose or to provide access to a personal social media account through the student's user credentials.~~

RSA 189:70, I(a)-(d). The Principal may, however, monitor the usage of the District's computer network. In addition, the Principal may take any of the above listed actions if the social media account was created or provided by the District, if the student was provided advance notice that the account may be monitored at any time by District employees. RSA 189:70, III.

4.5. ~~Factors the~~The Principal or other investigator ~~may~~ shall consider all relevant facts and circumstances during the course of the investigation, including but not limited to:

   a. Description of incident, including the nature of the behavior;

   b. How often the conduct occurred;

   c. Whether there were past incidents or past continuing patterns of behavior;

   d. The characteristics of parties involved, (name, grade, age, etc.);

   e. The identity and number of individuals who participated in bullying behavior;

   f. Where the alleged incident(s) occurred;

   g. Whether the conduct adversely affected any student's education or educational environment;
   h. Whether the conduct physically harmed the alleged victim;
   i. Whether the conduct damaged the alleged victim's property;

~~g.~~j. Whether the conducted caused emotional distress to a pupil;

~~h.~~k. Whether the ~~alleged victim felt or perceived an~~ conduct was motivated by an imbalance of power based on the pupil's actual or perceived personal characteristics, behaviors, or beliefs, and/or motivated by the pupil's association with another person and based on the other person's characteristics, behaviors, or beliefs. ~~imbalance or power as a result of the reported incident~~;

~~i.~~l. Whether the conduct violated any District or school policies or rules; and

~~j.~~m. The date, time and method by which parents or legal guardians of all parties involved were first contacted.

~~5.~~6. The Principal shall complete the investigation within 10 school days of receiving the initial report. If the Principal needs more than 10 school days to complete the investigation, the Superintendent may grant an extension of up to 7 school days. ~~-~~ In the event such extension is granted, the Principal shall notify in writing all parties involved of the granting of the extension.

Without limiting what might constitute sufficient cause for an extension under this paragraph, the Superintendent may consider the interests of the victim or alleged perpetrator related to any investigation into some or all of the same alleged conduct which other investigation includes procedures and timelines mandated by a regulation or statute other than RSA 193-F (e.g., Title IX, criminal investigations, etc.). Before waiving the time requirement on account of such other investigation, the Superintendent should confer with counsel and or the District's Title IX Officer.

G. Completion of Investigation and Report

1. Investigative Determination and Report: Whether a particular action or incident constitutes bullying/cyberbullying, retaliation or other violation of this policy – requires review and consideration of available evidence of all facts and surrounding circumstances. The investigative determination along with a summary of the investigation, shall be included in a comprehensive report. If the determination is that the bullying allegation is substantiated, the report shall include provisions describing any disciplinary consequences, interventions, supportive measures or other assistance for the victim or perpetrator, and, when indicated, any steps appropriate to protect all students from retaliation of any kind. The report may also include policy, training or other recommendations for preventing future bullying conduct within the school. ~~-~~

2. Communication with Students and Parents Upon Completion of Investigation - RSA 193-F:4, II(m).

   a. The Principal will meet promptly with each student (alleged victim and alleged perpetrator) ~~directly~~ involved in the incident(s) and communicate the general investigative determination as to whether the allegations of bullying/cyberbullying were substantiated, and any initial consequences or interventions appropriate to the determination.

   b. Within 10 school days of the completion of the investigation, the Principal will notify the parents of the alleged victim and of the alleged perpetrator of the outcome of the

investigation and ~~regarding~~ the school's remedies and assistance, within the boundaries of applicable state and federal law. The initial communication may be in writing, in person or by telephone, but if verbally, the Principal will also send a letter confirming earlier determination to the parents within 2 school days confirming the earlier notification.

c. If the parents request, the Principal shall schedule a meeting with them to further explain the investigative determination.

d. In accordance with the Family Educational Rights and Privacy Act and other laws concerning student privacy, the District will not disclose educational records of students, including the discipline and remedial action assigned to those students and the parents of other students involved in a bullying incident.

3. Appeals: A parent aggrieved by the investigative determination of the Principal may appeal the determination in accordance with the standards and procedures set forth for Level II and Level III appeals in Board policy ACA.

4. Additional Reporting Requirements.

a. Reporting Substantiated Incidents - RSA 193-F:4, II(l): The Principal shall forward all substantiated reports of bullying to the Superintendent upon completion of the Principal's investigation.

b. Department of Education Reports - RSA 193-F:4, II(g): The Principal shall be responsible for completing such reports/forms as required by the New Hampshire Department of Education (NHED) for all substantiated incidents of bullying. Irrespective of the time/date a form/report is due to be filed with NHED, the report/form or the information required for the report/form shall be completed/compiled within 10 school days following an investigative finding of a substantiated bullying/cyberbullying report. The Principal or designee shall retain a copy and shall forward one copy to the Superintendent. Hard copies are not necessary if the digital form/data is retained and accessible to both the building administration and SAU.

c. Reporting to NH Department of Education - RSA 193-F:6, I. The Superintendent shall annually report the District's substantiated incidents of bullying to the New Hampshire Department of Education. Pursuant to FERPA, such reports shall not contain any personally identifiable information pertaining to any student.

H. Substantiated Instances of Bullying/Cyberbullying, ~~or~~ Retaliation or False Accusations: Interventions, Remedial Measures and Disciplinary Consequences — RSA 193-F:4, II(k).

While students who have been found to have committed an act of bullying/cyberbullying, or engaged in retaliation or made a false accusation, can face disciplinary consequences, the Board encourages the administration and school district staff to explore alternative or additional measures and interventions to address the substantiated instances of bullying/cyberbullying, and prevent their reoccurrence.

1. Interventions and Other Remedial Measures: Examples of interventions and remedial measures include, but are not limited to:

a. Restitution,

b. Parent conferences,

c. Student counseling,

d. Behavior assessment,

e. Corrective instruction or other relevant learning experience,

f. Peer support group, and

g. Mediation (but only after the investigation has been completed).

Interventions and other remedial measures shall be designed to correct the problem behavior, prevent another occurrence of the problem, protect and provide support for the victim, and take corrective action for documented systematic problems related to bullying.

A finding that an allegation of bullying/cyberbullying ~~or~~, retaliation, or a false accusation is unsubstantiated *does not* preclude the District from implementing interventions and other remedial measures, when appropriate to do so.

~~2.~~ Disciplinary Consequences - RSA 193-F:4, II(d)- Disciplinary consequences for students shall be consistent with District policies and the student handbook for the conduct that ~~constituted bullying/cyberbullying~~violated this policy. Disciplinary consequences should be varied according to specific circumstances such as: the nature of the behavior, the developmental age of the student, the student's prior disciplinary history, performance. Students will be afforded any due process applicable to the level of consequences as provided in Board policy JICD, RSA 193:13 and Ed 317.

~~Consequences and appropriate remedial actions for a staff member who commits one or more acts of bullying/cyberbullying or retaliation may range from up to and including dismissal from employment for staff members, with additional reports, if appropriate, in accordance with the Code of Conduct for New Hampshire Educators.~~

2.

I. Dissemination of Policy and Bullying Prevention Education - RSA 193-F:4, II(e) and 193-F:5.

1. Staff and Volunteers: All staff will be provided with a copy of this policy annually. The Superintendent may determine the method of providing the policy (employee handbook, hard copy, website, workshops, etc.). The Superintendent will ensure that all school employees and volunteers receive **annual** training on bullying and related Board policies, consistent with RSA 193-F:5.

2. Students: All students will be provided with a copy of this policy annually. The Superintendent may determine the method of providing the policy (student handbook, mailing, hard copy, website, etc.).

   Each year, all students will participate in programming that includes anti-bullying/cyberbullying materials presented in age-appropriate language. The materials and information should, among other things, describe expectations for student behavior, emphasize an understanding of what bullying/cyberbullying, harassment and intimidation is and looks like, the District's prohibition of such conduct and the reasons why the conduct is destructive, unacceptable, and how and when

the conduct can lead to disciplinary consequences.

The Superintendent, in consultation with staff, will, to the extent reasonably possible, integrate student anti-bullying training and education into the district's curriculum, behavior programs and other violence prevention efforts.

3. Parents: The Superintendent will ensure that all parents are annually provided with a copy of this policy or informed in writing where a copy of the policy may be located on the District and/or school's website. Student/family handbooks will include information of the District/school's anti-bullying program, as well as the means for students to report bullying acts either experienced or witnessed, and how parents, themselves, may inform/report to the school when they believe their child is being bullied or is bullying other students and encourage their children to report bullying when it occurs.

4. Additional Notice and School District Programs: The Board may, from time to time, host or schedule public forums in which it will address this anti-bullying policy, discuss bullying in the schools, and consult with a variety of individuals, including teachers, administrators, guidance counselors, school psychologists and other interested persons.

J. Summary of School Officials' Duties to Implement Policy - RSA 193-F:4, II(n)

The Superintendent, as the person charged with supervision of all employees of the District, is responsible for the implementation of this policy and the provisions of RSA 193-F. The School Principal(s) are expected and required by statute to implement this policy within their respective school buildings and ensure the procedures are followed.

Consistent with this Policy, the Principal(s) shall receive reports of alleged bullying or retaliation, investigate the alleged conduct, and communicate with the parties involved (including their parents) consistent with privacy laws, and communicate/report to the Superintendent. The Superintendent shall oversee the Principal(s) in their duties relative to this policy and shall ensure each school is compliant with this policy. Additionally, the Superintendent, will receive reports of substantiated incidents, review waivers and time extension requests, and communicate with the Principal(s), the School Board, and the NH Department of Education, all as provided in this policy.

K. Immunity and Liability – RSA 193-F:7 & 9

Under 193-F:7, employees, volunteers, students, parents and any other person covered by this policy will be immune from civil liability for **good faith** conduct arising from or pertaining to the reporting, investigation, findings, recommended response, or implementation of a recommended response under this policy or RSA 193-F. (Note – civil liability could arise, (including for attorney fees) in the event of gross negligence or willful misconduct for violations of this policy.)

Legal References:

~~*RSA 187:70, Educational Institution Policies on Social Media*~~

RSA 193-F~~:3~~, Pupil Safety and Violence Prevention Act

RSA 187:70, Educational Institution Policies on Social Media

RSA 570-A:2, Capture of Audio Recordings on School Buses Allowed

NH Code of Administrative Rules, Section Ed 306.04(~~a~~b)(~~8~~7), Student Harassment

1st Reading: September 15, 2010
2nd Reading: November 17, 2010
Adopted: November 17, 2010

1st Reading: December 11, 2019
2nd Reading: January 22, 2020
Adopted: February 12, 2020

1st Reading: December 17, 2025
2nd Reading: April 22, 2026

GBEBB

Category: Recommended
See also: GBEBD, JICDAA

EMPLOYEE-STUDENT RELATIONS

Staff members are expected to maintain courteous and professional relationships with students, maintain an atmosphere conducive to learning, through consistently and fairly applied discipline and established professional boundaries.

For purposes of this policy, "staff member" and "staff" includes every person identified as a "covered individual" under relevant Board policies.~~y GBCD~~, ~~i.e.,~~ When any of the following individuals are providing services directly to students of the District, this policy applies: ~~e~~mployee, stipend position (e.g., coach, trainer, drama coach, etc.), designated volunteer (whether direct or through a volunteer organization), or any contractor or person working on behalf of a contractor.

A. Prohibited Interactions

The Board understands that Staff may interact with and have activities, friendships or natural relationships with students or the families of students outside of school. This Policy is not intended to prohibit such interactions, provided that appropriate limits are maintained.

The below types of interactions with District students are prohibited unless necessary to serve an educational or health-related purpose. Note that many of the interactions listed are also prohibited under other policies or laws (harassment, abuse/neglect, Code of Conduct for NH Educators, etc.), and this policy in no way limits the application of those policies or laws, including any reporting requirements.

1. Staff members shall not make derogatory comments to students regarding the school and/or its staff.

2. The exchange of purchased gifts between staff members and students is discouraged and prohibited when the gift is of more than de minimis value

or is directed to an individual student.

3. Staff members shall not fraternize, written or verbally, with students except on matters that pertain to school-related issues.

4. Staff members shall not associate with students in any situation or activity which could be considered sexually suggestive or involve the presence or use of tobacco, alcohol or drugs.

5. Dating between staff members and students is prohibited.

6. Staff members shall not use insults or sarcasm against students as a method of forcing compliance with requirements or expectations.

7. Staff members shall maintain a reasonable standard of care for the supervision, control and protection of students commensurate with their assigned duties and responsibilities.

8. Staff members shall not send students on personal errands.

9. Staff members shall, pursuant to law, immediately report any suspected signs of child abuse or neglect.

10. Staff members shall not attempt to guide ~~counsel~~, assess, diagnose or treat a student's personal problem relating to sexual behavior, substance abuse, mental or physical health and/or family relationships but, instead, should refer the student to the appropriate individual or agency for assistance.

11. Staff members shall not disclose information concerning a student to any person not authorized to receive such information. This includes, but is not limited to, information concerning assessments, ability scores, grades, behavior, mental or physical health and/or family background. Any request for this information shall come through the school office.

12. Staff members shall not be alone in a room with an individual student with a door closed, a locked door, or with the lights off.

13. Staff members are strongly discouraged from socializing with students outside of school on social networking websites, consistent with the provisions of Policy GBEBD.

14. Unless following a published District emergency health or medical emergency protocol or policy, staff shall not accompany or transport a minor to any medical appointment, mental health appointment or visit that includes any type of mental health evaluation, treatment, or counseling, or any other

health-related appointment or visit, without the knowledge and approval of the minor's parent or guardian. In the case where a parent or guardian cannot be reached and in consultation with emergency services, two adults will accompany the child at all times until the arrival of a parent or guardian.

B. Violations and Reporting Violations

Staff members who violate this policy may face disciplinary measures, up to and including termination, consistent with state law and applicable provisions of a collective bargaining agreement.

Any employee who witnesses or learns of any of the above behaviors shall report it to the building principal or Superintendent immediately.

Additionally, if the alleged violation of the above would also constitute a violation of the Code of Conduct for New Hampshire Educators, and the reporting employee is also a Credential Holder, then the Credential Holder must also make such reports as are required by the Code of Conduct and related Board policies.

Additional reporting is required if the conduct constitutes abuse or neglect prohibited by RSA 169-C (see Board policy JLF), or is required under some other Board policy, statute or regulation.

C. Dissemination of Policy

The Superintendent shall ensure that all staff members are provided a copy of this policy each year by way of handbooks, or other appropriate means.

Revised: September 2009
Reviewed: June 2004
Revised: July 1998, August 2006

1st Reading: November 27, 2012
2nd Reading: December 18, 2012
3rd Reading: January 22, 2013
Adopted: January 22, 2013

1st Reading: December 17, 2025 (as amended)
2nd Reading: April 22, 2026

EHB-R LOCAL RECORDS RETENTION SCHEDULE

See Board Policy: EHB
Related Policies: EH, EHAB, JRA, and GBJ

Type of Record	Statute, Rule, or other legal authority – if none listed the retention period is a recommendation	Retention Period
Business Records		
Accident Reports:		
• Employee		Term of employment, plus ~~6~~ 20 years
• Student		Age of majority, plus 6 years
Accounts Receivable	RSA 33-A:3-a	Until audited, plus 1 year
Annual Audit	RSA 33-A:3-a (10 years)	Permanent
Annual Report (District), Warrants, Annual Meeting Minutes, Budgets (District & SAU)	RSA 33-A:3-a	Permanent
Application for Federal Grants	20 U.S.C. 1232f., (three years after the completion of the activity for which the funds are used) other authorities may apply	5 years
Architectural Plans		Permanent
Asbestos Removal		Permanent
Bank Deposit Slips	RSA 33-A:3-a	6 years
Bonds and continuation certificates	RSA 33-A:3-a (expiration plus 2 years)	Permanent
Budget Worksheets		End of budget year, plus 1 year
Cash receipts, disbursement records, checks	RSA 33-A:3-a	Until Audited and at least 6 years after last entry
Child Labor Permits		1 year
Work-study	29 C.F.R. §570.37	3 years from date of enrollment
• Construction Contracts, Capital projects, fixed assets that require accountability after acquired*	RSA 33-A:3-a (Life of project/asset)	Life of contract, building, asset plus 20 years

• Engineering Surveys		Permanent
• Unsuccessful bids	RSA 33-A:3-a (Completion of project, plus one year)	Life of contract plus 3 years
Certified Educator		Permanent
COBRA Notices	42 U.S.C. 300bb-1, et. seq.(3 years) ERISA 29 U.S.C. §1027 (6 years)	6 years from date of issue
Collective Bargaining Agreements		Permanent
Correspondence for Business transactions*		Life of subject matter plus 4 years
Correspondence - General		3 years or longer when historic/useful
Correspondence Transitory	RSA 33-A:3-a	As needed for reference
Deeds		Permanent
District Meeting Minutes & Warrant		Permanent
Insurance policies	RSA 33-A:3-a	Permanent
Notes (loan documents)	RSA 33-A:3-a	Until paid, Audited, plus 3 years
Student Activities Records/Accounts	RSA 33-A:3-a (bank deposit slips and statements 6 years)	Until Audited, plus 6 years
Enrollment Reports:		
• Fall Reports A12A (RSA 189:28)		Permanent
• Pupil Registers	RSA 189:27-b	Permanent
• Resident Pupil Membership Forms		14 years
• School Opening Reports		3 years
• Statistical Report A-3 (RSA 189:28)		Permanent
Federal Projects Documents	Review specific project/grant program requirements. 20 U.S.C. 1232f, (three years after the completion of the activity for which the funds are used), other authorities may apply	5 years after submission of final audit report and documentation for expenditures, unless there is an ongoing audit
FICA Reports – monthly		7 years

Fixed Trip Requests/Confirmation		1 year
Fixed Assets Schedule		Permanent/as updated
Form C-2 Unemployment		6 years
Wage Report (DES 100)		6 years
Invoices*	Until Audited, plus 1 year	3 years*
MS-22 Budget Form		6 years
MS-23 Budget Form		6 years
MS-25 Budget Form		Permanent
Minutes of Board Meetings, Board Committees	RSA 91-A:2, II, RSA 33-A:3-a	Permanent
Purchase Orders*		Until Audited, plus 1 year
Request for Payment Vouchers*		Until Audited, plus 1 year
Requisitions*		Until Audited, plus 1 year
Retirement Reports – Monthly		1 year
Time Cards:		
• Bus Drivers	Lab 803.03. Notification and Records no less than 4 years	5 years
• Custodial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Secretarial	Lab 803.03. Notification and Records no less than 4 years	5 years
• Substitute Teachers pay slips	Lab 803.03. Notification and Records no less than 4 years	5 years
Payroll Records	RSA 33-A:3-a Audited, plus 2 year 29 C.F.R. §1627.3 (3 years) ADEA: 29 U.S.C. §626, 29 CFR Part 1602 (2 years from job action); 29 C.F.R § 825.500 FMLA, 29 U.S.C.§2616, 3 years	6 years
Travel Reimbursements*	Until Audit, plus 1 year	3 years*
Treasurer's Receipts – canceled checks		6 years
Treasurer's Report		6 years
Vocational Education:		
• AVI Forms		1 year
• Vocational Center Regional Contracts		20 years
• Federal Vocational Forms*		6 years

Vouchers Manifests*		Until Audit, plus 1 year
Tax Forms:		
• W-2's, 1099 *	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2)(tax advisors say 7 years)	7 years
• W-4 Withholding Exemption Certificate	RSA 33-A:3-a. Retirement or termination, plus 20 years	Term of Employment, plus 20 years ~~3 years~~
• W-9	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
• 941-E Quarterly Taxes	Keep all records of employment taxes for at least four years after filing the 4th quarter for the year. – 26 C.F.R § 31.6001-1 (e)(2) (tax advisors say 7 years)	7 years
Personnel Records	RSA 33-A:3-a. Retirement or termination, plus ~~50~~ 20 years	Term of Employment, plus ~~50~~ 20 years
Application for employment - Successful	RSA 33-A:3-a Unsuccessful applicants: current year, plus 3 years.	Term of Employment, plus ~~50~~ 20 years
Attendance Records:		
• Leaves	Family Medical Leave Act – ~~3 years~~ RSA 33-A:3-a. Retirement or termination, plus 20 years	~~3 years~~ Term of Employment, plus 20 years
• Request for Leaves		1 year
Class Observation Forms		1 year
Criminal Record Check:		
• No criminal record	RSA 189:13-a (Superintendent only)	Destroy immediately after review
• Criminal record	RSA 189:13-a (Superintendent only)	Destroy within 30 days of receipt

Civil Rights Forms, Discrimination claims, accommodation under ADA, information used for EEO-5 report, EEO-5 report	29 C.F.R. §1602.40; 42 U.S.C. 12117; 42 U.S.C. § §§ 2000e-8-2000e-12; 42 U.S.C. § 2000ff-6; (final disposition, 2 years, 3 years)	6 years
Deferred Compensation plans	RSA 33-A:3-a	7 years

Dues Authorization	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
Employment test papers with results	29 C.F.R. §1627.3	~~One year from date of personnel action~~ Term of Employment, plus 20 years
Evaluations	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
HIPPA Documentation	RSA 33-A:3-a. – Personnel record HIPPA: 45 C.F.R. §164,316(b) & .530(j) – 6 years. HITECH 42 U.S.C. §17938	Term of Employment, plus ~~50~~ 20 years
Labor-PELRB actions	RSA 33-A:3-a	Permanent
Labor Negotiations	RSA 33-A:3-a	Permanent
Legal Actions - lawsuits	RSA 33-A:3-a	Permanent
Medical Benefits Application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
Medical exams, Physical examinations used for personnel action	29 C.F.R. §1627.3(One year from date of personnel action) RSA 33-A:3-a. – Personnel record 29 C.F.R. §1910.1020 (term of employment plus 30 years)	Term of Employment, plus ~~50~~ 20 years
Oaths of Office	RSA 33-A:3-a Term, plus 3 years	Permanent
Promotion, demotion, transfer, selection for training, layoff, recall, or discharge	29 C.F.R. §1627.3 (1 year from date of action) RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
Recruitment Documents	29 C.F.R. §1627.3	~~One year from date of personnel action~~ Term of Employment, plus 20 years
Re-employment Letter of Assurance	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
Retirement application	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years

School Bus Driver Drug Tests – positive results &	49 C.F.R. §382.401; 49 C.F.R. § 40.333	5 years

records of administration of test		
School Bus Driver Drug tests – negative & cancelled	49 C.F.R. §382.401	1 year
Separation from Employment Form/Letter	RSA 33-A:3-a. – Personnel record	Term of Employment, plus ~~50~~ 20 years
Settlement agreements, even if in anticipation of a lawsuit	RSA 91-A:4, VI (10 years)	Permanent
Staff Development Plan	Term of Employment, plus ~~50~~ 20 years	Term of Employment, plus ~~50~~ 20 years
Substitute Teacher Lists		7 years
Student Records:		
Applications for Free/Reduced Lunch		6 years
Assessment Results	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Attendance	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Disciplinary Records		Term of Enrollment, plus 3 years
Early Dismissal		1 year
Emergency Information Form		1 year/as updated
Grades	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Health and Physical Records		Term of Enrollment, plus 3 years
Immunization Record		Term of Enrollment, plus 3 years
Log of requests for access to education records	FERPA 20 U.S.C. §1232g (b)(4)(A)	As long as the education record is retained

Medical Reports		Term of Enrollment, plus 3 years
Registration Form		Term of Enrollment, plus 3 years
Student Handbook		1 copy of each edition, Permanent
Transcripts	Ed 306.04 Policy Development, (h) complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe.	Permanent
Internal Records:		
Child Abuse Reports/Allegations		Permanent
Criminal Investigation		Permanent
Personnel Investigations		Permanent
Sexual Harassment		Permanent
Records Management, transfer to storage or disposal	RSA 33-A:3-a (summary report of what category of records, for what range of dates, was put in storage or destroyed)	Permanent
Vehicle maintenance	RSA 33-A:3-a	Life of vehicle, plus 3 years

Items marked with an asterisk (*) are indicative of having implications with federal grant funding that must be considered.

1st Reading: September 27, 2023
2nd Reading: November 29, 2023
3rd Reading: Waived
Adopted: November 29, 2023

1st Reading: April 22, 2026

Policy: BEAA

Section: Section B - School Board Governance and Operations

(BSD) Meeting Preparation

BEAA

MEETING PREPARATION

The agenda should be developed by the Board Chairperson in cooperation with the Superintendent and distributed to the Board members at least forty-eight hours prior to regular meetings. Members wishing to place items on the agenda shall notify the Superintendent and/or Chairperson. A written notice of the time and place of each meeting, including Non-Public Sessions, shall be posted in two appropriate places at least 24 hours, excluding Sundays and legal holidays, prior to such meetings.

Adopted: May 25, 2004