

Urban Pathways K-5 College Charter School

Board of Trustees Policy

ACTIVE SHOOTER POLICY AND PROCEDURES

The Board of Trustees (“Board”) of Urban Pathways K-5 College Charter School (“Charter School”) recognizes that it is important that the faculty, staff, students, and visitors understand policies and procedures in situations in which there is an active shooter.

Purpose

The purpose of active shooter policies and procedures is to prepare building faculty, staff, students, and visitors for an organized evacuation in case of a fire or other emergency. Active shooter drills are also an opportunity to systematically identify various safety issues as to:

- Allow occupants to familiarize themselves with drill procedures, the location of fire exits, and safety features that may or may not exist in the building.
- Identify problems and potential safety features that may protect faculty, staff, students, and visitors in the event of an active shooter.
- Determine if additional equipment is necessary.
- Monitor evacuation of the building to assess effectiveness, efficiency and safety.
- Document the amount of time it takes to evacuate a building and compliance with drill procedures.
- Ensure Charter School compliance with state and local statutes, laws, and regulations.
- Faculty, staff, students, and visitors should be familiar with the acronym ALICE: Alert, Lockdown, Inform, Counter, Evacuate.

Active Shooter Drill Procedure:

The Chief Executive Officer is tasked with coordinating with either a local law enforcement agency, private security firm, or training program that specifically trains civilians and law enforcement on safety protocol in active shooter situations (the “experts”). These experts should visit and evaluate the school for potential safety hazards and help develop the safest procedures for all faculty, staff, students and visitors. Understanding that there is not always a right or wrong answer to how to handle an unpredictable assailant, these procedures should help faculty and staff identify the best situations to keep the students safe, and limit potential loss of life.

While assisting in developing policies, the experts should also recommend how many drills should be conducted per year and who should participate in those drills. Furthermore, these experts should be able to give training sessions and assemblies to faculty or the general student population, depending on the experts’ recommendations.

All policies and recommendations made by experts should become school policy. All trainings, drills, and assemblies recommended should be mandatory for all faculty, staff, and students. These policies and procedures must be shared with the Pittsburgh Bureau of Police.

Guidelines

When a drill is always held in the same way and at the same time, it loses much of its value. If there is an active shooter, and the students cannot follow the exact procedure they have practiced over and over, panic may ensue. Therefore, drills should be carefully planned to simulate actual conditions. Not only should they be held at varying times, but students should use different means of exit.

Active shooter drills should be designed to familiarize the faculty, staff, students, and visitors with all available means of exit, particularly emergency exits that are not habitually used during the normal occupancy of the building. Every active shooter drill shall be an exercise in school management for the principal and teachers.

Active Shooter drills should also be designed to familiarize the faculty, staff, students, and visitors with all potential hiding places when exit may not be available, and teach occupants to make the best choices to save their lives and others.

The chief purpose of every drill shows control of classes so that the teachers will form its ranks quickly and silently, halt, turn, or direct it as desired. Students should learn to take instruction from teachers, i.e., if a teacher asks a student to go out a window, the student should do so immediately. Great stress shall be laid upon the execution of each drill in a brisk, quiet, and orderly manner.

Many law enforcement agencies recommend practicing ALICE in active shooter situations. The Charter School should defer to experts as to which techniques to implement and practice. ALICE stands for:

Alert: Notice signs of danger right away, call 911.

Lockdown: If evacuation is not a safe option, barricade entry points into your room in an effort to create a semi-secure starting point.

Inform: Continue to communicate information in as real time as possible, if it is safe to do so. Armed intruder situations are unpredictable and evolve quickly, which means that ongoing, real time information is key to making effective survival decisions. Information should always be clear, direct and in plain language, not using codes. If the shooter is known to be in an isolated section of a building, occupants in other wards can safely evacuate while those in direct danger can perform enhanced lockdown and prepare to counter.

Counter: Create Noise, Movement, Distance and Distraction with the intent of reducing the shooter's ability to shoot accurately. Counter is NOT fighting.

Evacuate: Evacuating to a safe area takes people out of harm's way and hopefully prevents civilians from having to come into any contact with the shooter.

Source: <https://www.alicetraining.com/our-program/alice-training/>

The Charter School should defer to the hired experts on identifying if/when to implement ALICE and which step to employ given the situation the Charter School is facing.

If evacuation is possible, the same evacuation procedures used in fire drills should be used. However, all faculty and staff must be able to switch to a different safety plan, consistent with the school's adopted policies and procedures in the event that evacuation becomes impossible, or be able to choose a different evacuation plan if necessary.

If orderly evacuation is possible, the "Building Evacuation" plan should be followed:

- All visitors shall leave the building immediately
- Emergency Evacuation Route Maps are posted in each classroom, storage area, meeting room and office. Directions cover the primary evacuation route only. Should this route be blocked, teachers and/or administrators

- are to lead the children to the nearest safe exit.
- All windows must be closed prior to departing rooms. Once the class has departed the room, the door should be closed.
- During the evacuation, all students are to be in line and silent.
- All teachers, including specialists are to bring their roll book with them as they depart the school.
- Students, staff and visitors will re-enter the building promptly and in orderly fashion when instructed after the drill is completed.

Active Shooter Drills are:

- Unannounced;
- Held _____ a year (depending on recommendations from experts)
- Scheduled at various times, but when most occupants are in the building; and
- Well documented.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

ASBESTOS POLICY

The Urban Pathways K-5 College Charter School (“Charter School”) must comply with the requirements set forth in the Asbestos Hazard Emergency Response Act (AHERA) (15 U.S.C. sec.s 2641-2656) and the Asbestos-Containing Materials in Schools Regulations (40 C.F.R. Part 763). Compliance with AHERA and the Regulations is mandatory and enforceable by law. Schools that fail to comply with the regulations may be subject to civil or criminal liability, or an injunction. This includes the Annual Notification set forth below.

Employees and building occupants, or their parents, must be informed at least once per year of the inspections, response actions, and post-response action activities taking place in a Charter School building. In addition, parents, teachers and employee organizations must be notified in writing that the management plan is available for inspection in the administrative office of the Charter School. The management plan should contain a description of the steps taken to notify appropriate groups, as well as a copy of the written notice utilized to notify them.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

BONDING POLICY

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes the need for protecting its assets. Prudent trusteeship of the resources of the Charter School dictates that employees responsible for the safekeeping of school funds be bonded. Enumeration and valuations of such bonds shall be determined annually.

The Charter School shall be indemnified against loss of money by bonding of the Board Treasurer and Secretary in the amount of \$50,000.00.

All other employees, including the Chief Executive Officer, Business Manager and Finance Secretary, shall be covered under a blanket bond in the amount of \$250,000.00.

The Charter School shall bear the cost of bonding each employee required to be bonded by this policy or by statute.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

BREACH OF ELECTRONIC INFORMATION POLICY

The Board of Trustees ("Board") of the Urban Pathways K-5 College Charter School ("Charter School") recognizes the role that technology plays in its daily operations. As such, the security of the Charter School's electronic system and the prevention of a possible breach of electronic information is a priority of the Board. Therefore, the Board directs the CEO or his/her designee to create a data breach threat response team of qualified staff and/or authorized vendors to respond to incidences where the unencrypted and unredacted personal information was or is reasonably believed to have been accessed or acquired by unauthorized persons from the Charter School's computerized systems, networks or other storage.

Definitions - 73 P.S. § 2302

"Breach of the security of the system." The unauthorized access and acquisition of computerized data that materially compromises the security or confidentiality of personal information maintained by the entity as part of a database of personal information regarding multiple individuals and that causes or the entity reasonably believes has caused or will cause loss or injury to any resident of this Commonwealth. Good faith acquisition of personal information by an employee or agent of the entity for the purposes of the entity is not a breach of the security of the system if the personal information is not used for a purpose other than the lawful purpose of the entity and is not subject to further unauthorized disclosure.

"Business." A sole proprietorship, partnership, corporation, association or other group, however organized and whether or not organized to operate at a profit, including a financial institution organized, chartered or holding a license or authorization certificate under the laws of this Commonwealth, any other state, the United States or any other country, or the parent or the subsidiary of a financial institution. The term includes an entity that destroys records.

"Encryption." The use of an algorithmic process to transform data into a form in which there is a low probability of assigning meaning without use of a confidential process or key.

"Entity." A State agency, a political subdivision of the Commonwealth or an individual or a business doing business in this Commonwealth.

“Individual.” A natural person.

“Personal information.”

- (1) An individual's first name or first initial and last name in combination with and linked to any one or more of the following data elements when the data elements are not encrypted or redacted:
 - (i) Social Security number.
 - (ii) Driver's license number or a State identification card number issued in lieu of a driver's license.
 - (iii) Financial account number, credit or debit card number, in combination with any required security code, access code or password that would permit access to an individual's financial account.
- (2) The term does not include publicly available information that is lawfully made available to the general public from Federal, State or local government records.

“Records.” Any material, regardless of the physical form, on which information is recorded or preserved by any means, including in written or spoken words, graphically depicted, printed or electromagnetically transmitted. The term does not include publicly available directories containing information an individual has voluntarily consented to have publicly disseminated or listed, such as name, address or telephone number.

Notice

Following discovery of a breach of electronic information by the Charter School, the CEO or his/her designee shall ensure notice of the breach is provided to those whose information is reasonably believed to have been accessed and acquired by an unauthorized person. Unless advised by a law enforcement agency in writing, this notice of the breach shall be sent as soon as possible, and/or once the Charter School has assessed the breach in its entirety and taken necessary steps to prevent future breaches in this manner.

Notice may be provided by any of the following methods of notification:

- 1) Written notice to the last known home address for the individual.
- 2) Telephonic notice, if the individual can be reasonably expected to receive it and the notice is given in a clear and conspicuous manner, describes the incident in general terms and verifies personal information but does not require the

individual to provide personal information and the individual is provided with a telephone number to call or Internet website to visit for further information or assistance.

- 3) E-mail notice, if a prior business relationship exists and the Charter School has a valid e-mail address for the individual.
- 4) (i) Substitute notice, if the Charter School can demonstrate one of the following:
 - a) The cost of providing notice would exceed \$100,000.
 - b) The affected class of subject persons to be notified exceeds \$175,000.
 - c) The Charter School does not have sufficient contact information.
- (ii) Substitute notice shall consist of all of the following:
 - (1) E-mail notice when the Charter School has an e-mail address for the subject persons.
 - (2) Conspicuous posting of the notice on the Charter School's Internet website.
 - (3) Notification to major Statewide media.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

CRIMINAL HISTORY RECORD INFORMATION (CHRI) POLICY

Purpose

The Urban Pathways K-5 College Charter School (“Charter School”) Board of Trustees’ (“Board”) intent of this policy is to ensure the protection of the Criminal Justice Information (CJI) and its subset of Criminal History Record Information (CHRI) until the information is purged or destroyed in accordance with applicable record retention rules.

Scope

This policy applies to any electronic or physical media containing FBI CJI while being stored, accessed or physically moved from a secure location within the Charter School. This policy applies to any authorized person who accesses, stores, and/or transports electronic or physical media.

Criminal Justice Information (CJI) and Criminal History Record Information (CHRI)

CJI refers to all of the FBI CJIS provided data necessary for law enforcement and civil agencies to perform their missions including, but not limited to, biometric, identity history, biographic, property, and case/incident history data.

CHRI is a subset of CJI and for the purposes of this document is considered interchangeable. Due to its comparatively sensitive nature, additional controls are required for the access, use and dissemination of CHRI. In addition to the dissemination restrictions outlined below, Title 28, Part 20, Code of Federal Regulations (CFR) defines CHRI and provides the regulatory guidance for dissemination of CHRI.

Proper Access, Use, and Dissemination of CHRI

Information obtained from the Interstate Identification Index (III) is considered CHRI. Rules governing the access, use, and dissemination of CHRI are found in Title 28, Part 20, CFR. The III shall be accessed only for an authorized purpose. Further, CHRI shall only be used for an authorized purpose consistent with the purpose for which III was accessed. Dissemination to another agency (or entity) is authorized if (a) the other agency is an Authorized Recipient of such information and is being serviced by the accessing agency, or (b) the other agency is performing noncriminal justice

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Criminal History Record Information (CHRI) Policy

administrative functions on behalf of the authorized recipient and the outsourcing of said functions has been approved by appropriate CJIS Systems Agency (CSA) or State Identification Bureau (SIB) officials with applicable agreements in place.

Personnel Security Screening

Access to CJI and/or CHRI is restricted to authorized personnel. Authorized personnel is defined as an individual, or group of individuals, who have completed security awareness training and have been granted access to CJI data.

The Charter School will maintain a list of authorized users.

Security Awareness Training

Basic security awareness training is required within six months of initial assignment, and biennially thereafter, for all personnel with access to said confidential information.

Physical Security

All CJI and CHRI information shall be securely stored. The Charter School will maintain a current list of authorized personnel. Authorized personnel will take necessary steps to prevent and protect the Charter School from physical, logical and electronic breaches.

Media Protection

Controls shall be in place to protect electronic and physical media containing CJI while at rest, stored, or actively being accessed. "Electronic media" includes memory devices in laptops and computers (hard drives) and any removable, transportable digital memory media, such as magnetic tape or disk, backup medium, optical disk, flash drives, external hard drives, or digital memory card. "Physical media" includes printed documents and imagery that contain CJI.

The Charter School shall securely store electronic and physical media within physically secure locations. The Charter School restricts access to electronic and physical media to authorized individuals. If physical and personnel restrictions are not feasible, then the data shall be encrypted per Section 5.10.1.2. When no longer usable, information and related processing items shall be properly disposed of to ensure confidentiality.

Media Transport

Controls shall be in place to protect electronic and physical media containing CJI while in transport (physically moved from one location to another) to prevent inadvertent or inappropriate disclosure and use. The Charter School shall protect and control electronic

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Criminal History Record Information (CHRI) Policy

and physical media during transport outside controlled areas and restrict the activities associated with transport of such media to authorized personnel.

Media Sanitization and Disposal

When no longer usable, hard drives, diskettes, tape cartridges, CDs, ribbons, hard copies, print-outs, and other similar items used to process, store and/or transmit FBI CJI shall be properly disposed of in accordance with measures established by the Charter School.

Physical media (print-outs and other physical media) shall be disposed of by one of the following methods:

- 1) shredding using Charter School issued shredders. Shredding must be completed by authorized personnel.
- 2) placed in locked shredding bins for a private contractor to come on-site and shred, witnessed by authorized personnel during the entire process.

Electronic media (hard-drives, tape cartridges, CDs, printer ribbons, flash drives, printer and copier Hard-drives, etc.) shall be disposed of by one of the Charter School's methods:

- 1) **Overwriting (at least 3 times)** - an effective method of clearing data from magnetic media. As the name implies, overwriting uses a program to write (1s, 0s, or a combination of both) onto the location of the media where the file to be sanitized is located.
- 2) **Degaussing** - a method to magnetically erase data from magnetic media. Two types of degaussing exist: strong magnets and electric degaussers. Note that common magnets (e.g., those used to hang a picture on a wall) are fairly weak and cannot effectively degauss magnetic media.
- 3) **Destruction** - a method of destroying magnetic media. As the name implies, destruction of magnetic media is to physically dismantle by methods of crushing, disassembling, etc., ensuring that the platters have been physically destroyed so that no data can be pulled.

IT systems that have been used to process, store, or transmit FBI CJI and/or sensitive and classified information shall not be released from the Charter School's control until the equipment has been sanitized and all stored information has been cleared using one of the above methods.

Account Management

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Criminal History Record Information (CHRI) Policy

The Charter School shall manage information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The Charter School shall validate information systems accounts at least annually and shall document the validation process.

All accounts shall be reviewed at least annually by the designated CJIS point of contact (POC), which is the CEO or designee to ensure that access and account privileges are commensurate with job functions, need-to-know, and employment status on systems that contain Criminal Justice Information. The POC may also conduct periodic reviews.

Remote Access

The Charter School shall authorize, monitor, and control all methods of remote access to the information systems that can access, process, transmit, and/or store FBI CJI. Remote access is any temporary access to the Charter School's information system by a user (or an information system) communicating temporarily through an external, non-agency controlled network (e.g., the Internet).

The Charter School may permit remote access for privileged functions only for compelling operational needs but shall document the rationale for such access in the security plan for the information system.

Utilizing publicly accessible computers to access, process, store or transmit CJI is prohibited. Publicly accessible computers include, but are not limited to: hotel business center computers, convention center computers, public library computers, public kiosk computers, etc.

Reporting Information Security Events

The Charter School shall promptly report incident information to appropriate authorities to include the state CSA or SIB's Information Security Officer (ISO). Information security events and weaknesses associated with information systems shall be communicated in a manner allowing timely corrective action to be taken.

Operational Records Division
Bureau of Records and Identification
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, PA 17110
(717) 783-5599

Formal event reporting and escalation procedures shall be in place. Wherever feasible, the Charter School shall employ automated mechanisms to assist in the reporting of security incidents. All employees, contractors and third party users shall be made aware of the procedures for reporting the different types of event and weakness that might have an impact on the security of Charter School assets and are required to report any information security events and weaknesses as quickly as possible to the designated point of contact, which is the CEO or designee.

Policy Violation/Misuse Notification

Violation of any of the requirements contained in the CJIS Security Policy or Title 28, Part 20, CFR, by any person can result in significant disciplinary action, up to and including loss of access privileges, civil and criminal prosecution, and/or termination.

Likewise, violation of any of the requirements contained in the CJIS Security Policy or Title 28, Part 20, CFR, by any visitor can result in similar disciplinary action against the sponsoring employee, and can also result in termination of services with any associated consulting organization or prosecution in the case of criminal activity.

Criminal History Record Information (CHRI) Proper Access, Use and Dissemination Policy & Procedure List

Upon adoption of this Policy, the Charter School will maintain a list of signatures of all authorized persons, including, but not limited to, such authorized persons who are employees, staff and contracted persons, for their signatures showing their certification that they were given a copy of the instant policy, along with the opportunity to discuss and ask questions on the above topics.

Any complaints with regard to a Board policy or any aspect of the Charter School's curriculum shall be brought in accordance with the Charter School's Complaint Policy.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE CHARTER SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

BY MY SIGNATURE BELOW, I CERTIFY THAT I HAVE BEEN GIVEN A COPY OF THE CRIMINAL HISTORY RECORD INFORMATION (CHRI) POLICY AND HAVE BEEN GIVEN THE OPPORTUNITY TO DISCUSS AND ASK QUESTIONS ON THE ABOVE TOPICS.

Employee Printed Name: _____

Employee Signature: _____

Employee Title: _____

Date: _____

Urban Pathways K-5 College Charter School

Board of Trustees Policy

CHILDREN'S INTERNET PROTECTION ACT (CIPA) POLICY

According to the Pennsylvania Department of Education ("PDE"), the Federal Children's Internet Protection Act ("CIPA"), Pub. L. No. 106-554 and 47 USC 254(h), mandates that schools that receive federal technology funds must develop and implement measures and policies to prevent access to "visual depictions" that are determined to be "obscene", "child pornography", or "harmful to minors" as defined herein.

PDE has further stated that schools receiving certain E-rate discounts are also mandated by the Neighborhood Children's Internet Protection Act (N-CIPA) to adopt and enforce an Internet Safety Policy (ISP) that addresses harmful or inappropriate online activities. N-CIPA was passed as part of CIPA.

The Board of Trustees of the Urban Pathways K-5 College Charter School ("Charter School") has adopted this Policy in order to establish specific standards to comply with CIPA and N-CIPA requirements.

This Policy is to be read in conjunction with the Charter School's Acceptable Use of Computer Resources Policy and shall supplement, not supplant, the Charter School's Acceptable Use of Computer Resources Policy.

The Chief Executive Officer ("CEO") or designee is directed to include this Policy in the Parent and Student Handbook and the Employee Handbook. Failure to comply with this Policy and/or Internet safety requirements of Charter School shall result in consequences as set forth in the school's Parent and Student Handbook, Code of Conduct or Employee Handbook and/or as allowed by applicable law. Consequences may include, but are not limited to: denial of or restriction to access to technology, suspension, expulsion, notification of authorities, termination, commencement of civil and/or criminal proceedings and/or other consequences available under school policy and/or applicable state and/or federal laws.

This Policy has been adopted after reasonable public notice and at a meeting held open to the public to address this Policy.

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Children's Internet Protection Act Policy

The Charter School uses computer resources to facilitate the education of students and to aid in matters related to the operations of Charter School. The Charter School further places student Internet safety as a primary concern.

It is every computer user's duty to use computer resources, including the Internet, responsibly, professionally, ethically and lawfully. Access to these resources shall be designated a privilege, not a right.

This policy applies to aspects of both adult and student compliance with Internet safety at the Charter School.

CIPA/N-CIPA Compliance/Internet Safety

It is the policy of the Charter School to:

(1) Prevent user access over its computer network to, or transmission of, inappropriate material via Internet, electronic mail, and all other forms of direct electronic communications;

(2) Prevent unauthorized access and other unlawful online activity;

(3) Prevent unauthorized online disclosure, use, or dissemination of personal identification information of minors; and

(4) Comply with the Children's Internet Protection Act, Pub. L. No. 106-554 and 47 USC 254(h).

To the extent consistent with applicable state and federal laws and reasonably practical, technology protection measures (or "Internet filters") shall be used at the Charter School to block or filter Internet, and other forms of electronic communications, and access to inappropriate information. The form and type of technology protection measures used during the 2023-2024 school **year include:**

The term "technology protection measure" means a specific technology that blocks or filters Internet access to visual depictions that are:

(1) Obscene, as that term is defined in section 1460 of title 18, United States Code;

(2) Child Pornography, as that term is defined in section 2256 of Title 18, United States Code; or

(3) Harmful to minors. The term "harmful to minors" means any picture, image, graphic image file, or other visual depiction that:

a. Taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion;

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Children's Internet Protection Act Policy

b. Depicts, describes, or represents, in a patently offensive way with respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals; and

c. Taken as a whole, lacks serious literary, artistic, political, or scientific value as to minors.

The terms “sexual act” and “sexual contact” have the meanings given such terms in section 2246 of title 18, United States Code.

As required by the Children’s Internet Protection Act (CIPA), blocking shall be applied to visual depictions of material deemed obscene or child pornography, or to any material deemed harmful to minors.

Technology protection measures shall only be disabled pursuant to the direction of the CEO or designee to the extent allowed by applicable law and regulation, for bona fide research or other lawful purposes of an adult as determined by the CEO or designee. The development of procedures for the disabling or otherwise modifying of any technology protection measures shall be the responsibility of the CEO of the Charter School or designee.

The CEO or designee shall take reasonable steps to promote the safety and security of users of the online computer network when using electronic mail, chat rooms, instant messaging, and other forms of direct electronic communications.

As required by the Children’s Internet Protection Act, prevention of inappropriate network usage at Charter School shall include:

- (1) Unauthorized access, including so-called ‘hacking,’ and other unlawful activities; and
- (2) Unauthorized disclosure, use, and dissemination of personal identification information regarding minors.

It shall be the responsibility of all members of the Charter School staff to supervise and monitor usage of the online computer network and access to the Internet in accordance with this policy and applicable laws, including the Children’s Internet Protection Act as well as in accordance with any administrative procedures developed by the CEO in furtherance of this Policy.

In accordance with the “Protecting Children in the 21st Century Act” and its requirement to certify to the Schools and Library Division (“SLD”) that the school’s Internet Safety Policy includes educating minors about appropriate online behavior, students shall be educated about appropriate online behavior, including cyber-bullying awareness and response and interacting with other individuals on social networking sites and in chat rooms.

With regard to educating minors about appropriate online behavior, the CEO or designee is directed to:

- (1) Make such educational opportunities available to students during the school year;
- (2) Notify students and their parents about these educational opportunities in advance; and
- (3) Maintain documentation of:
 - a. educational programs offered;
 - b. the dates and locations of such opportunities;
 - c. how online safety was taught and what was covered in the programs offered; and
 - d. those in attendance at the programs offered.

The CEO or designee is directed to file and/or provide the appropriate certifications evidencing compliance with CIPA and N-CIPA as required by applicable state and/or federal laws and regulations.

The CEO or designee is directed to maintain documentation of compliance with CIPA and N-CIPA certification requirements including the annual filing of FCC Form 486.

The CEO or designee is directed to ensure that the Charter School employs necessary technology protection measures in accordance with this Policy and shall report to the Board when modifications are needed to technology protection measures at the Charter School.

The online activities of students shall be monitored and minors’ access to harmful materials shall be restricted to the extent required by applicable laws and regulations.

To the extent not inconsistent with applicable laws and regulations, the following disclaimers apply:

- (1) There shall be no expectation of privacy by users of the Charter School’s Computer Resources;
- (2) The Charter School does not guarantee the effectiveness of technology protection measures or internet filtering; and

(3) The Charter School does not guarantee network functionality or accuracy of online information.

The CEO is directed to implement any procedures that may be necessary to implement this policy as well as to timely submit any forms and paperwork as required by CIPA and N-CIPA and/or applicable state and federal Internet safety laws and regulations.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

CONFLICT OF INTEREST POLICY

Board members, Officers and employees of the Urban Pathways K-5 College Charter School (“Charter School”) have a duty of loyalty to the Charter School and to the public whose interest they are sworn to serve. The purpose of this Conflict of Interest Policy, which provides guidance and a general standard of conduct with respect to actual or apparent conflicts, is in keeping with the Pennsylvania Public Official and Employee Ethics Law and the State Legislature's declaration that the people have the right to be assured that the financial interests of public officials and employees conflict with the public trust, and the principle which prohibits public officials and employees from entering into situations where private interests may conflict with official duties.

The appearance of conflict of interest undermines the public confidence in the integrity of the Charter School, its Board Members and/or employees, and should be scrupulously avoided.

Standards of Conduct

No Board Member or employee shall:

- A) Engage in conduct that constitutes a conflict of interest, which shall be defined as use by a Board Member or employee of authority of his office or employment of any confidential information received through his position for the private pecuniary benefit of himself, a member of his immediate family, or a business with which the Board Member or employee or a member of his immediate family is associated. “Immediate family,” for purposes of this policy, is defined to mean a parent, spouse, child, brother or sister.
- B) Engage, or have any interest, financial or otherwise, directly or indirectly, in any business, transaction or professional activity, which conflicts with or impairs the proper discharge of official duties or which could bring disfavor or disrespect upon the Charter School.
- C) Accept an honorarium, which represents a payment in recognition of published works, appearances, speeches, and presentations and which is

not intended as consideration of the value of such services that are non-public, occupational or professional in nature.

- D) Recommend or otherwise participate in the decision to make any contract of any value between the Charter School, any school or Student Activity Fund, and any business or entity in which the Board Member or employee or a member of his immediate family, has a personal or financial interest or act to implement or administer any such contract.
- E) No Board Member or employee may participate in the selection, award, or administration of the contract, regardless of the value of the contract, if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee or Board Member any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- F) A Board Member or employee shall report the nature of his or her interest in a potential Charter School contract to his or her superior. Where a Board Member or employee or a member of his or her immediate family has a personal or financial interest in a contract, he or she shall disclose it publicly and abstain from voting on the contract. Formal approval of the contract by a majority of all members of the Board of Trustees, other than the abstaining member, shall be required. The foregoing would apply to any business in which the Board Member's or employee's spouse or child is associated.
- G) Advertise business or professional activities on the Charter School property or use work hours, property or services to perform or promote personal or commercial enterprises or to campaign or raise money for any candidates for political office.
- H) Use confidential information, as defined by the Sunshine Act or the Board of Trustees, concerning property, personnel matters, or affairs of the Charter School or its employees to advance the financial or other private interests of the Board Member, employee or others; nor shall Board Members and employees disclose confidential information except as directed by the Board of Trustees or a court of law. Nothing in this provision shall be interpreted as prohibiting the practice of "whistle-blowing."

- I) Accept anything of value including, but not limited to, a gift, loan, political contribution, reward, promise of future employment, favor, gratuity, entertainment, transportation or lodging based on any implied or actual understanding that the judgment of the Board Member or public employee would be influenced thereby. The officers, employees, and agents of the Charter School may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. Example gifts of nominal value are t-shirts, calendars, pencils, branded inexpensive pens and other inexpensive promotional items. Examples of gifts of more than nominal value may include, but are not limited to, money, service, loan, travel, lodging, meals, refreshments, entertainment, discount, or promise to do or not do something having a monetary value.
- J) Solicit directly from other Board Members or employees, students or their parents, anything of value for the Board Member's or employee's personal benefit.
- K) Purchase property of any kind from the Charter School, either directly or indirectly, except in a manner approved by the Board for the particular sale involved, unless (1) there is an open and public bid process, including public notice and subsequent public disclosures of all bids considered and contracts awarded, and (2) the Board Member or employee did not act in an official capacity in connection with the sale, and (3) the Board Member or employee was not privy to non-public information received in the course of his office or employment.
- L) Participate in the review and approval of publications or materials for Charter School purchase if the Board Member or employee is the author/editor of or has any financial interest in the sale of such publications or materials.
- M) Tutor or counsel as a private enterprise, for compensation, pupils assigned to any class or course of the Charter School to which the employee is assigned. Employees may tutor or counsel pupils enrolled in other schools unless such private enterprise conflicts with or impairs the proper discharge of official duties for the Charter School.
- N) Refer a Charter School parent or student to a service, service provider or product in return for anything of value. Employees making referrals as part of their official duties shall make referrals to more than one provider of any non-unique service or product. For example, Charter School counselors shall refer parents or students to more than one counselor or

provider of medical services where comparably qualified persons are available.

- O) Upon separation from Charter School service or employment, represent any individual or business entity on any matter before the Charter School for a period of one year after such separation.

Administration

Statement of Financial Interest

In accordance with Pennsylvania's Public Official and Employee Ethics Law, the Charter School requires each Board Member and applicable employee to file a Statement of Financial Interest with the Secretary of the Board of Trustees by May 1st of each year for the immediate prior year. All Statements of Financial Interest are reviewed by the Board President.

The Board of Trustees may require any employee whose duties require the exercise of discretion or judgment to file a Statement of Financial Interest.

Conflict of Interest Resolution

In the event that a question of conflict of interest or the appearance of conflict of interest arises, a Board Member or employee must apprise his/her superior and the Board President who will investigate and report the fact of the inquiry and results of his investigation to the CEO and the Finance Committee of the Board of Trustees for resolution. A Board Member having a conflict question shall take it to the President of the Board of Trustees who, if he/she cannot resolve it, with counsel, will refer the question to the Finance Committee of the Board of Trustees for resolution.

All violations of the foregoing policy are subject to appropriate censure or disciplinary action, including termination of employment and any penalties as prescribed by law.

Any contract or subcontract made in violation of this policy shall be voidable by the Board of Trustees and subject to termination for the Board's convenience.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

COPYRIGHT MATERIAL POLICY

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes that applicable laws make it illegal for anyone to duplicate copyrighted materials without permission. The Board further acknowledges that severe penalties are provided for unauthorized copying of audio, visual, or printed materials unless the copying falls within the bounds of the “fair use” doctrine.

Under the “fair use” doctrine, unauthorized reproduction of copyrighted materials is permissible for such purposes as criticism, comment, news reporting, teaching, scholarship, or research. In determining whether the use of a work is a “fair use,” factors to be considered shall include, without limitation:

- a) The Purpose and Character of the Use. The use must be for such purposes as teaching or scholarship and must not be of a commercial nature.
- b) The Nature of the Copyrighted Work. Staff may make *single* copies of: book chapters for use in research, instruction or preparation for teaching; articles from periodicals or newspapers; short stories, essays or poems; and charts, graphs, diagrams, drawings, cartoons or pictures from books, periodicals or newspapers.
- c) The Amount and Substantiality of the Portion Used in Relation to the Copyrighted Work as a Whole. Copying the whole of a work cannot be considered fair use.
- d) The Effect of Use Upon The Potential Market For Or Value of The Copyrighted Work. If resulting economic loss to the copyright holder can be shown, even making a single copy of certain materials may be an infringement, and making multiple copies presents the danger of greater penalties.

Staff may make copies of copyrighted Charter School materials that fall within established administrative guidelines. Where there is reason to believe the material to be copied does not fall within the administrative guidelines, prior permission shall be obtained from the Chief Executive Officer.

Staff members who fail to follow this policy may be held personally liable for copyright infringement.

Administration and staff shall be responsible for instructing students in fair copyright practices and academic integrity, including guidance on citing resources appropriately.

It is the policy of the Charter School that all professional materials produced by employees, in execution of official duties, shall be protected by copyright. The copyright shall be in the name of Charter School.

All questions and requests regarding the implementation of this policy are to be referred to the President of the Board of Trustees.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

DISQUALIFICATION, SUSPENSION OR DEBARMENT OF BIDDERS POLICY

This policy sets forth standards to determine what bidders are not responsible and procedures to disqualify or suspend or debar non-responsible bidders from contracting or subcontracting with the Urban Pathways K-5 College Charter School (“Charter School”). It applies to all contracts that the Charter School is required by law to award to the lowest responsible bidder.

The Charter School shall solicit bids from and shall award contracts to or consent to subcontracting only with “responsible bidders” as that term is defined by law. Bidders, contractors, or affiliates may be disqualified, suspended or debarred if they are deemed “not responsible” in order to protect the Charter School and the public’s interest in accordance with the standards and procedures adopted by the Charter School and any other applicable law.

The Charter School adopts this policy and procedure under its powers to make rules and regulations to manage school affairs and competitive bidding provisions of the Public School Code applicable to the Charter School.

The Chief Executive Officer (“CEO”) is generally responsible to implement and enforce this policy and may designate subordinate officers or employees to perform any functions provided for in this policy.

Definitions

Adequate Evidence means evidence sufficient to support a reasonable belief in the truth of the fact or conclusion it is offered to support and does not require proof in accordance with technical rules of evidence.

Affiliates means persons having an overt or covert relationship such that any one of them directly or indirectly controls or have the power to control another.

Bidders means any person responding to an invitation for bids or otherwise seeking to contract with the Charter School or with its contractors.

Contractor means any person independent of the Charter School who does or seeks to do business with the Charter School pursuant to mutual agreement and includes persons who subcontract with the Charter School.

Conviction means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, including a plea of nolo contendere.

Disqualification means exclusion as a contractor from bidding on any particular contract with the Charter School; a contractor so excluded is “disqualified.”

Indictment means a formal accusation of a criminal offense and includes any information or other filing by a competent authority charging a criminal offense.

Legal Proceedings means any civil or criminal judicial proceeding, including appeals.

Person means an individual, company, firm, association, corporation, partnership, or other legal entity.

Public Prosecutor means an official having legal authority in any jurisdiction to file or to prosecute indictment.

Suspension means exclusion as a contractor in bidding for a contract or being awarded a contract for a period of time or until some stated future occurrence; a contractor so excluded is “suspended.”

Cause for Disqualification

A bidder or contractor may be disqualified with respect to any particular bid or contract award for any one or more of the following causes:

1. Any cause set forth in the above sections of this policy;
2. Inadequate financial resources to perform the contract;
3. Inadequate experience, organization, or technical resources to perform the contract;
4. Any other facts or circumstances showing a reasonable likelihood of inability to perform the contract;
5. Discrimination in the bidder’s or contractor’s employment or business practices on the basis of race, color, sex or national origin.

Period of Disqualification

Disqualification may be imposed for any particular bid or contract award and applies only to the bid or contract award.

Responsibility for Agents

Bidders, contractors, and affiliates are deemed responsible for the acts of persons acting for or on their behalf, such that:

1. The fraudulent, criminal or other improper conduct of any officer, director, shareholder, partner, employee or other associate may be imputed to the bidder, contractor or affiliate when the conduct occurred in connection with the individual's performance of duties for or on behalf of the bidder, contractor or affiliate, or with his/her knowledge, approval or acquiescence. Acceptance of the benefits derived from such conduct shall be evidence of such knowledge, approval or acquiescence;
2. The fraudulent, criminal or other improper conduct of bidder, contractor or affiliate may be imputed to any officer, director, shareholder, partner, employee, or other associate who participated in, knew of or had reason to know of the conduct; and
3. The fraudulent, criminal or other improper conduct of one bidder, contractor or affiliate participating in a joint venture or similar arrangement may be imputed to other participating bidders, contractors, or affiliates if the conduct occurred for or on behalf of the joint venture or similar arrangement or with the knowledge, approval or acquiescence of other participants. Acceptance of the benefits derived from the conduct shall be evidence of such knowledge, approval, or acquiescence.

Bids shall be opened by the Board Secretary and/or an appointed Board Member at the next regularly scheduled Board Meeting after the closing date of the bids. Copies of records of all persons disqualified shall be maintained pursuant to Board Meeting Minutes for the purpose of enforcing this policy.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

Educational Equity, Diversity and Inclusion

Purpose

In 2018, the Pennsylvania School Boards Association (“PSBA”), defined “Equity” as the just and fair distribution of resources based upon each individual student’s needs. Equitable resources included funding, programs, policies, initiatives and supports that target each student’s unique background and school context to guarantee that all students have equal access to a high-quality education. Such Equity is achieved by providing access and opportunity to all students regardless of race, ethnicity, color, age, religion, gender, gender identity, gender expression, sexual orientation, language, disability or socio-economic status.

In order to actualize its commitment to Equity, the Board of Trustees (“Board”) of Urban Pathways K-5 College Charter School (“Charter School”) adopts this policy to prioritize the principle of educational equity and the concept of Diversity, Equity and Inclusion (DEI) in Charter School programming, policies and actions.

To facilitate educational equity for all, Charter School will be committed to:

- Promptly identifying and addressing barriers that cultivate achievement and/or opportunity gaps for students or staff.
- Ensuring that a student’s educational achievement is neither predicted nor predetermined by explicit or implicit biases, and that staff is not denied professional opportunities due to explicit or implicit biases.
- The acknowledgement that potentially unequal learning needs among students require equitable, not equal, distribution of resources.

Definitions

Achievement gaps will mean the academic disparities and/or differences between groups of students, as indicated through variances in academic indicators such as test scores, grade point average and graduation rates.

Barriers will mean factors that block or hinder movement or progression. Barriers to educational equity may include, but are not limited to, policies, administrative guidelines and practices; explicit and implicit biases; facilities; budgeted funds; curriculum and instruction; personnel; class size; school calendar; Code of Student Conduct and school climate.

Cultural competency will mean an ability to interact effectively with individuals of other cultures.

Cultural proficiency will mean the level of knowledge-based skills and understanding that is required to successfully teach and interact with students and to work effectively with colleagues, families and communities from other cultures. It requires an ongoing examination and self-reflection to challenge one's own cultural biases and understand the cultural perspectives and experiences of others.

Culturally responsive will mean the inclusion of students' and of staffs' cultural references in all aspects of learning, school experiences, and student and staff engagement.

Diversity/Educational Equity Action plan will mean the steps education stakeholders in a school engage in to pursue equity.

Educational equity audit will mean a comprehensive equity and inclusion benchmarking instrument that assesses a school's barriers to opportunity and progress towards achieving the equity outcomes described in this policy and the district's Diversity/Educational Equity Action Plan.

Equity lens will mean an intentional focus on assessing any inequitable impact the execution of a program, practice, operation, decision or action may have on a student or group of students and/or on individual staff or a group of staff.

Explicit bias will mean the actions, attitudes and beliefs we have about a person or group on a conscious level.

Gender, for purposes of this policy, will mean the range of characteristics pertaining to, and differentiating between, masculinity and femininity, including a person's gender identity and gender expression which includes a person's internal sense of being male, female, some combination of male and female or neither male nor female.

Implicit bias will mean the actions, attitudes or stereotypes that affect our understanding, actions and decisions in a subconscious manner.

Inclusion will mean acknowledging, engaging, valuing, and respecting all groups (students, parents/guardians, community members, administrators, instructional and support personnel and other education stakeholders) and including all groups as essential partners in the education process.

Multi-tiered systems of support ("MTSS") will mean the standards-aligned, comprehensive school improvement framework used to provide targeted support for all learners. It is rooted in supporting the "whole child", whether an advanced or struggling learner, through academic, behavioral, social and emotional services.

Opportunity gaps will mean the disparities in the delivery of educational and extracurricular opportunities, funding and other resources between and among different student and/or staff groups, leading to different academic, extracurricular, social and economic outcomes for students.

School climate will mean the quality and character of school life based on patterns of students', parents'/guardians' and school personnel's experience; it also reflects norms, goals, values, interpersonal relationships, teaching and learning practices and organizational structures.

Authority

The Board is committed to the provision of an equitable education system that reflects the principles of fairness and justice for all students and staff regardless of gender, race, ethnicity, socio-economic status, English learner status, disability, and other characteristics, as well as the intersection of those characteristics. An established Diversity, Equity, and Inclusion (DEI) Director will carry out the initiatives and goals of the policy.

Delegation of Responsibility

The CEO and/or designee(s) will use an equity lens and quantitative and qualitative data to assess systematically which students and/or student groups are experiencing the least achievement, determine why, and target resources and efforts to address identified needs and improve overall outcomes.

Each school employee will be expected to conduct themselves in a manner consistent with the principles of this policy and for fostering a school climate that is equity focused and culturally responsive. Employees will receive supports in the form of training regarding cultural competency, cultural proficiency, cultural responsiveness, implicit bias, explicit bias, diversity and inclusion.

Educational Equity Audit

The CEO or designee(s) will periodically conduct an audit to benchmark educational equity in school-wide achievement and opportunities. The Charter School's Educational Equity Audit will help identify clear accountability goals and metrics to address inequities. The Educational Equity Audit will be reflective of the voices of administrators, teachers, staff, students, families, and members of the community.

The Educational Equity Audit will ensure performance observations encompass consideration of the expectations and goals of this policy.

Educational Equity Action Plan:

1. Will embed equity practices throughout the Charter School's educational system.
2. Will include equity goals and practices embedded in the Charter School's comprehensive planning strategies.
3. Ensure personnel performance observations encompass consideration of the expectations and goals of this policy.
4. Include action steps and accountability measures to raise the achievement of all students while minimizing the gaps for historically disadvantaged student groups.

Guidelines

Educational equity will serve as the foundational structure upon which all aspects of the Charter School's educational system are built and maintained. An equity-focused structure is essential to grow knowledge and skills, provide necessary resources, include diverse voices, promote accountability, implement effective practices, produce partnerships and address barriers to learning and participation. In the pursuit of educational equity for all students and staff, school programs, operations and functions will be structured to prioritize the following guiding principles:

Multiple Pathways to Success/High Expectations

Charter School will provide multiple pathways to success in order to meet the needs of the diverse student body and will actively encourage, support and expect high academic achievement and excellence from each student. All students will be encouraged and provided opportunities to pursue their goals and interests without regard to biases and other barriers.

- Enroll in challenging programs.
- Participate in school activities and interscholastic athletics.
- Access to equitable resources.
- Linguistic diversity.

Each student will be provided equitable access to instructional materials, assessments, curriculum, support, facilities, teaching practices and other educational resources and services that reflect an appreciation for the diverse cultural perspectives, identities and needs of students and their families by strategically differentiating allocations as necessary to remove barriers and improve outcomes.

Welcoming and Inclusive Environment

Charter School will strive to create a welcoming, inclusive and bias-free culture and environment that values, reflects and is responsive to the diversity of the students, of their families, of the staff, and of the community.

Respectful and civil discourse and interactions among all school leaders, staff, students, families and community members will be expected at all times.

Partnerships and Inclusion

Charter School will welcome and empower students and families, including families of color, low-income families, individuals with disabilities, individuals whose first language may not be English and other underrepresented groups, as essential partners in their student's educational experiences, school planning and decision-making. Charter School will provide multiple and flexible opportunities for dialogue and engagement with families and communities.

Data Focused

To make informed decisions in the pursuit of educational equity, Charter School will systematically use quantitative and qualitative school-level data. Such data may include anecdotal information from teachers and staff, as well as formally collected and reported data. Data will be disaggregated and intersected, where feasible, based on available demographics such as gender, race, ethnicity, socio-economic status, English Learner status and disability as to:

- Enrollment;
- Achievement indicators;
- Attendance and behavior indicators;
- Opportunity indicators such as attending advanced placement classes, honors classes, career and technical education and participation in extracurricular activities;
- Experience and sense of belonging indicators which may include school climate and culture surveys.

Equity Lens

Charter School will, as a continuous practice, review current and newly developed policies, administrative guidelines, practices, programs, procedures, professional development and locally controlled budget allocations with an equity lens.

Cultural Competency & Proficiency

Charter School will provide instructional materials and assessments and promote teaching practices that reflect and are responsive to the diverse cultural perspectives and identities of students and their families. Every student should have access to the

educational resources and rigor they need at the right moment in their education across race, gender, ethnicity, language, disability, religion, sexual orientation, gender identity, family background and/or family income.

Charter School's curriculum will:

- Promote equity and respect.
- Reflect the distinctive contributions of a diverse society.
- Embed culturally responsive teaching and practices.

Workforce Diversity

Charter School recognizes the benefits of a highly effective workforce that reflects racial, gender, and linguistic diversity.

In the promotion of workplace diversity, the Charter School will strive to:

- Maintain an employment process that is free of discrimination and bias.
- Identify and address barriers to the recruitment, hiring, retention, development and promotion of district employees from diverse backgrounds.
- Actively recruit and/or promote highly qualified candidates who are committed to educational equity.

Professional Development

Charter School will ensure the provision of professional development opportunities for advancement of employees' understanding and skill sets relative to addressing barriers to students' opportunities. An equity lens will be embedded in all professional development. The timing of professional development will be respectful of and will recognize the diverse needs of staff and will not be scheduled on days or at times that require staff to choose between participating and pursuing their religious or cultural beliefs.

Professional development will foster the skills, knowledge and beliefs to cultivate equity, including social-emotional learning and mental health/wellness to create a learning environment that is student-centered and meets the individual and diverse needs of students.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

ELECTRONIC RECORDS AND SIGNATURES POLICY

Purpose: The Board of Trustees of Urban Pathways K-5 College Charter School (“Board”) recognizes its responsibility for utilizing emerging technology for the compilation, retention, disposition, and security of files necessary for efficient management of the educational setting.

Quality educational programming requires the collection, retention, and use of data and information through a variety of means and purposes. The Urban Pathways K-5 College Charter School (“Charter School”) maintains educationally relevant records for legitimate educational purposes, while ensuring an individual's student's right to privacy.

This Board policy establishes the usage and disclosure of electronic records and signatures stored or sent via electronic means by administration, employees and other users of Charter School computers and networks for the purposes of educationally relevant records, required for the operation of the educational setting.

Authority: Under certain conditions, electronic records and signatures satisfy the requirements of a written signature when transacting business including educational programming purposes. The Charter School wishes to promote effective and efficient use of electronic communications. Although all electronic signatures are represented digitally, they can take many forms and can be created using many different types of technology. The authenticity and reliability of electronic records and signatures relating to transactions are dependent on the accompanying processes, supplemental records, and the overall context in which records are created, transferred, signed, and stored. The Charter School adopts the following policy with respect to the use of electronic records and signatures in connection with the transaction of Charter School business. This includes the records maintained pursuant to Individuals with Disabilities Education Act (IDEA), The Family Education Rights Privacy Act (FERPA), and the School-Based ACCESS Program (SBAP) and other applicable federal and state laws.

Definitions: Attribution - An electronic record or electronic signature is attributable to a person if it was the act of the person. The act of the person may be shown in any manner, including a showing of the efficacy of any security procedure applied to

determine the person to which the electronic record or electronic signature was attributable.

Electronic Signature - An electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record.

Electronic Record - Any record created, generated, sent, communicated, received, or stored by electronic means.

Policy:

Electronic Records: Electronic records created or received by the Charter School shall be appropriately attributed to the individual(s) responsible for their creation and/or authorization or approval. The Charter School shall utilize available technology to implement reliable methods for generating and managing electronic records. Any electronic record filed with or issued by the Charter School shall be given full force and effect of a paper communication if the following conditions are satisfied:

1. The communication is an electronic filing or recording and the Charter School agrees to accept or send such communication electronically.
2. If a signature is required on the record or communication by any statute, rule, or other applicable law or Charter School policy, the electronic signature must conform to the requirements set forth in this policy governing the use of electronic signatures. Signatures cannot be altered by ordinary means, thus ensuring security.

Individuals with Disabilities Education Act (IDEA) - Pursuant to the US DOE, IDEA requires public agencies to obtain informed consent from the parent of the child, consistent with pursuant to 34 C.F.R. §300.9, before conducting an initial evaluation and a reevaluation of a child, subject to certain exceptions, and before the initial provision of special education and related services to the child. 34 C.F.R. §300.300. Under 34 C.F.R. §300.9, consent, which must be voluntary on the part of the parent, means the parent has been fully informed of, and agrees in writing to the activity for which his or her consent has been requested. Under some circumstances it may not be possible or preferable to obtain a parent's signed, written consent in-person.

In developing appropriate safeguards for using electronic or digital signatures consistent with the protections under FERPA, the Charter School has determined that a "signed and dated written consent" may include a record and signature in electronic form that identifies and authenticates a particular person as the source of the consent and indicates such person's approval of the information contained in the electronic consent. See 34 C.F.R. § 99.30(d) (consent for disclosure of personally identifiable information (PII) from education records).

These safeguards also should include a statement that indicates that the parent has been fully informed of the relevant activity and that the consent is voluntary on the part of the parent consistent with the IDEA definition of “consent” in 34 C.F.R. § 300.9. The Charter School shall obtain a signed consent and authorization (see Attached Consent/Authorization) from the parent or student 18 years old or older regarding such voluntary consent for the use of electronic documents and electronic signatures.

IDEA Part B also requires that prior to accessing a child’s or parent’s public benefits or insurance for the first time and after providing the annual notification to parents consistent with 34 C.F.R. § 300.154(d)(2)(v), the public agency must obtain written consent from the parent that meets the requirements of 34 C.F.R. §§99.30 and 300.622, for disclosure of PII from education records to a State’s public benefits or insurance program (e.g., Medicaid) in order for the public agency to bill that State’s program for services provided under 34 C.F.R. Part 300. 34 C.F.R. §300.154(d)(2)(iv).

FERPA - Disclosure of PII from student’s educational records - If safeguards are applied and met, pursuant to the IDEA section of this policy, electronic signatures for consent may be accepted for disclosure of PII from education records. If consent is required, because no specific exception exists pursuant to IDEA or FERPA, consent must be voluntary, on part of the parent or student who is 18 years old or older, fully informed and agreed to in writing to the activity for which consent has been requested. 34 C.F.R. §300.9.

School-Based ACCESS Program - a program that allows Local Education Agencies (LEAs) to receive Medicaid reimbursement for IEP medically necessary health-related services provided to students who are eligible for Medical Assistance (MA).

As permitted under the SBAP, electronic signatures may satisfy the requirements of a written signature of SBAP provider logs. The Board recognizes that the authenticity and reliability of electronic signatures are dependent on the processes accompanying the use of such signatures.

Electronic Signature

An electronic signature may be used if the law requires a signature unless there is a specific statute, regulation, or rule of law that requires records to be signed in non-electronic form. The issuance and/or acceptance of an electronic signature by the Charter School shall be permitted in accordance with the provisions of this policy and all applicable state and federal law. Such electronic signature shall have the full force and effect of a manual signature only if the electronic signature satisfies all of the following requirements:

1. The electronic signature identifies the individual signing the document by his/her name and title.
2. The identity of the individual signing with an electronic signature is capable of being validated through the use of an audit trail.
3. The electronic signature and the document to which it is affixed cannot be altered once the electronic signature has been affixed.
4. The electronic signature conforms to all other provisions of this policy.

Acceptance, Use and Issuance of Electronic Records and Signatures

1. The Charter School shall develop and maintain an electronic recordkeeping system that can receive, store, and reproduce electronic records and signatures relating to transactions in their original form. Such system shall include security procedures whereby the Charter School can (a) verify the attribution of a signature to a specific individual, (b) detect changes or errors in the information contained in a record submitted electronically, (c) protect and prevent access, alteration, manipulation or use by an unauthorized person, and (d) provide for nonrepudiation through strong and substantial evidence that will make it difficult for the signer to claim that the electronic representation is not valid.
2. The Charter School shall ensure that all electronic records and signatures are capable of being accurately reproduced for later reference and retained until such time as all legally mandated retention requirements are satisfied.
3. The Charter School shall designate individuals who are authorized to utilize an electronic signature in connection with Charter School business and shall require each designated individual to sign a statement of exclusive use.
4. The Charter School shall maintain a secure hard copy log of the PIN/password or actual signature of any individual authorized to provide an electronic signature in connection with Charter School business.
5. The Charter School will receive and accept as original, electronic records and signatures so long as the communication, on its face, appears to be authentic.
6. The Charter School will retain in its records this policy and all statements of exclusive use, until such time as all legally mandated retention requirements are satisfied.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR

**FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR
CHARTER CONTROL.**

ADOPTED this _____ day of _____, 2023

President

Secretary

Parent/Guardian and/or Student Consent and Authorization for Use of Electronic Signatures and Electronic Records

2023-2024 School Year

As Parent/Guardian of _____, (Name of Minor Student), or as Student 18 years old or older, _____, (Name of Student), I hereby consent to the use of my electronic signature by Urban Pathways K-5 College Charter School, which electronic signature shall be given full force and effect of a paper communication on any form related to the educational programming for my minor Student/me, pursuant to the Individuals with Disabilities Education Act, (IDEA), Section 504 of the Rehabilitation Act of 1973, 22 Pa Code §711 and other applicable state and federal laws which require consent or disagreement with the proposed action/refusal to act by the Charter School.

I hereby authorize the use and acceptance of my electronic signature by the Charter School which electronic signature shall be given the full force and effect of a paper communication on any form required by The Family Education Rights Privacy Act (FERPA) for disclosure of personally identifiable information (PII).

Further, any electronic record filed with or issued by the Charter School regarding my minor Student/me shall be given full force and effect of a paper communication.

This consent and acknowledgement shall not replace the need for consent for any particular action or disclosure of PII by the Charter School. However, this consent and acknowledgement shall serve as consent for the use of an electronic signature and electronic record each of which shall have the full force and effect of a paper communication.

I understand that I may at any time request to have the record at issue provided on paper and that I may withdraw consent to the use of electronic records or signatures by providing notice to _____ at _____;

I understand that this consent to use of electronic records or signatures applies to the 2023-2024 school year and applies to any consent required under the IDEA and any consent related to the release of education records and/or PII protected under FERPA.

The granting of this consent to the use of electronic records and signatures is voluntary and may be revoked at any time.

I understand that should I revoke the use of electronic records or signatures such revocation is not retroactive (i.e., it does not negate an action that has occurred after the consent was given and before the consent was revoked).

Date

Name of Parent/Guardian of Minor Student

Date

Signature of Parent/Guardian of Minor Student

Urban Pathways K-5 College Charter School

Board of Trustees Policy

EMERGENCY PREPAREDNESS POLICY

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes its responsibility to safeguard the health and welfare of Charter School students and employees. Therefore, the Board shall provide the facilities, equipment, and training necessary to minimize the effects of all hazards and emergencies, including but not limited to natural disasters, hazardous chemicals, fires, weapons, bomb threats, terrorism, communicable diseases, and pandemics. Advance planning and comprehensive implementation are key components in ensuring the protection of the Charter School community.

The Charter School must have a comprehensive emergency preparedness plan as required by 35 Pa. C.S.A. § 7701, which includes:

- a. The plan must be developed in cooperation with the local emergency management agency and Pennsylvania Emergency Management Agency (PEMA).
- b. The plan must be reviewed annually by the school safety and security coordinator and/or school administrator and filed with or submitted to the local emergency management agency.
- c. The plan must be submitted to each police department that has jurisdiction over the Charter School, county communications or dispatch and each local fire department having jurisdiction over the Charter School.

The Board shall instruct the CEO to utilize the resources of and comply with the requirements of the Pennsylvania Department of Health and the Pennsylvania Department of Education for emergency preparedness.

The Charter School’s system of emergency preparedness shall ensure that the health and safety of students and staff are protected, the time necessary for instructional purposes is not unduly diverted, minimum disruption to the educational program occurs, and students are helped to learn self-reliance and trained to respond sensibly to emergency situations.

School Safety and Security Coordinator

Per 24 P.S. § 13-1309-B, the CEO shall appoint a school administrator as the School Safety and Security Coordinator for the Charter School. The school safety and security coordinator shall oversee all Charter School police officers, resource officers, security guards and Charter School policies and procedures, and report directly to the CEO.

The Charter School Safety and Security Coordinator shall:

- (1) Review the Charter School's policies and procedures relative to safety and security and compliance with Federal and State laws regarding safety and security.
- (2) Coordinate training and resources for Charter School students and staff in matters relating to situational awareness, trauma-informed education awareness, behavioral health awareness, suicide and bullying awareness, substance abuse awareness and emergency procedures and training drills, including fire, natural disaster, active shooter, hostage situation and bomb threat.
- (3) Coordinate safety and security assessments as necessary.
- (4) Serve as the Charter School liaison with committees, the Pennsylvania Department of Education, law enforcement and other relevant organizations on matters of Charter School safety and security.
- (5) Make a report no later than June 30th of the regular school year, to the Charter School's Board of Trustees ("Board") on the Charter School's current safety and security practices that identify strategies to improve safety and security. The report shall be presented to the Board at an executive session of the Board. The report shall not be subject to the act of February 14, 2008 (P.L. 6, No. 3), known as the Right-to-Know Law.
- (6) Coordinate a tour of the Charter School's buildings and grounds biennially or when a building is first occupied or reconfigured with the law enforcement agencies and first responders that are primarily responsible for protecting and securing the Charter School to discuss and coordinate safety and security matters.

The CEO and other administrators in charge of Charter School are required to develop plans to be used when the Charter School is closed for an emergency during the school day. A copy of each emergency plan is to be forwarded to the Board of Trustees and a

copy is to be retained in the Charter School administrative office. The CEO shall consult with relevant stakeholders, such as the local police and fire departments, regarding the development and implementation of the emergency preparedness plan.

The CEO shall develop procedures for the handling of Charter School emergencies which include: a plan for the prompt and safe evacuation of Charter School and safe dispersal of students from Charter School property which shall be practiced monthly in fire drills conducted in accordance with law, the conduct of bus evacuation drills twice a year in accordance with law, a plan for the sequestration of students in a safe place other than the Charter School, design of a communications system to alert the whole Charter School community when necessary and to notify parents of the evacuation of students, instruction in emergency preparedness and survival techniques as a part of the regular curriculum of the Charter School, the immediate notification of appropriate administrative personnel whenever any employee becomes aware of an emergency or impending emergency, cooperation with local agencies such as police department or fire department or civil defense, instruction of staff members in the techniques of handling emergencies, the continual evaluation of the effectiveness of emergency planning in preparing the Charter School to cope with disaster, and the arrangement for an annual inspection by fire police officials.

If a developing storm leads to a decision by the CEO to close the Charter School at noon, every attempt shall be made to have that information on radio and television by 11:00 a.m. If the decision is to close the Charter School during the afternoon but before regular dismissal time, every attempt will be made to have that information broadcast by 1:00 p.m.

Prompt relays will be sent to all Board members.

On-Site Supervision:

- Pupils must not be left alone or unsupervised during emergency closings.
- Areas of the building to be used shall be easily accessible to entrances and to the office.
- All staff members must remain in the building until all pupils are dismissed. If the pupils are still in the building beyond one (1) hour after the official closing time, the procedures described below are to be followed. All other staff members may leave the building one hour after the official closing time.
- The CEO is to remain in the Charter School to supervise the pupils. Additional personnel shall be retained only if there is a need

beyond the CEO. The CEO does not receive extra compensation during this time.

- The number and positions of persons needed during an emergency shall be determined by the CEO and listed in the Emergency Preparedness Manual.

The CEO shall list a minimum of ten (10) staff members in priority order who will assist with the supervision of pupils who may still be in the building one (1) hour after the official closing time.

The CEO shall be the last person to leave the building after all pupils are dismissed and no other emergencies exist. Just prior to leaving, the CEO shall notify the Board President that everyone has been dismissed.

Special Situations -- School closings because of problems relating to heating, air conditioning, plumbing, vandalism, etc. will be made by the CEO as determined necessary with notice to the Board President.

Effective infection control and prevention procedures, such as frequent hand washing and cough/sneeze etiquette, shall be encouraged throughout the school year to help limit the spread of germs at the Charter School in an effort to prevent any possible communicable disease emergency.

Emergency Preparedness Drill - At least annually, the Charter School shall conduct a disaster response or emergency preparedness plan drill.

Fire Drills -- The drill shall include the actual use thereof, and the complete removal of the pupils and teachers, in an expeditious and orderly manner, by means of fire-escapes and exits, from the building to a place of safety on the ground outside. Fire drills shall be held not less than once a month throughout the school year. A record of the dates and times of fire drills shall be maintained at Charter School. These drills shall be held at irregular intervals and at different times during the school day.

Advance notice of fire drill shall be given to persons in charge of the cafeteria, medical, and science area, administrative offices in the building, and to the custodian. This advance notice shall not be given more than one (1) hour prior to calling the drill. In the absence of an advance notice, it shall be assumed an emergency exists.

Fire drill procedures pertaining to each room and all other Charter School areas must be posted conspicuously.

The status of all fire drill plans shall be reported annually in September.

All guests in a facility must participate in a scheduled fire drill and may be requested by the CEO to assist, if necessary.

In the event of a fire near the Charter School, the CEO or designee shall consult with the local fire department to determine the action to be taken to ensure the safety of Charter School personnel.

Bus Drills – If the Charter School uses or contracts for school buses for the transportation of its students, the Charter School shall conduct on Charter School grounds two emergency evacuation drills on buses during each school year, the first to be conducted during the first week of the first school term and the second during the month of March, and at such other times as the CEO may require. Each such drill shall include the practice and instruction concerning the location, use and operation of emergency exit doors and fire extinguishers and the proper evacuation of buses in the event of fires or accidents.

24 P.S. § 13-1303-B requires the School Safety and Security Committee (Committee) within the Pennsylvania Commission on Crime and Delinquency (PCCD) to annually review the Charter School's physical site, as well as its policies and training regarding the Charter School's safety and security. The committee has established that this requires discussions with Charter School employees in order to conduct the assessment. Please see the Committee's Safety and Security Assessment Criteria, available here: <https://www.pccd.pa.gov/schoolsafety/Documents/School%20Safety%20and%20Security%20Assessment%20Criteria%20-%20adopted%20Sept%2026%202018.pdf>

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

EVALUATION OF EDUCATIONAL PROGRAM POLICY

The Board of Trustees of the Urban Pathways K-5 College Charter School (“Charter School”) directs the Chief Executive Officer (“CEO”) to develop and implement a systematic short-range and long-range plan for the continuing qualitative assessment of the progress of the educational program toward the goals established by the Board. To this end, s/he shall recommend such tests and methods as may be indicated by generally accepted professional practice and best professional judgment.

The Board reserves the right to review tests and to approve those which serve a legitimate purpose without infringing upon the personal rights of the students or their parents. The results of any evaluation may be released by the CEO employing school data, but such data may not be traceable to individuals.

The CEO shall be responsible for a plan and procedure for an evaluation of the educational program.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL’S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

FIRE DRILL POLICY AND PROCEDURES

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes that it is important that the students understand fire safety and evacuation procedures.

The purpose of fire drills is to prepare building staff, students, and visitors for an organized evacuation in case of a fire or other emergency. Fire drills are also an opportunity to systematically identify various fire safety issues as to:

- Allow occupants to familiarize themselves with drill procedures, the location of fire exits, and the sound of the fire alarm.
- Identify problems with the fire alarm system and its components.
- Determine if additional equipment is necessary.
- Monitor evacuation of the building to assess effectiveness, efficiency and safety.
- Document the amount of time it takes to evacuate a building and compliance with drill procedures.
- Ensure Charter School compliance with state and local statutes, laws, and regulations.

When a fire drill is always held in the same way and at the same time, it loses much of its value. When an actual fire happens, and the students cannot follow the exact procedure they have practiced repeatedly, panic may ensue. Therefore, drills should be carefully planned to simulate actual fire conditions. Not only should they be held at varying times, but also students should use different means of exit.

Fire exit drills should be designed to familiarize the occupants with all available means of exit, particularly emergency exits that are not habitually used during the normal

occupancy of the building. Every fire exit drill shall be an exercise in school management for the principal and teachers.

The chief purpose of every drill shows control of classes so that the teachers will form its ranks quickly and silently, halt, turn, or direct it as desired. Great stress shall be laid upon the execution of each drill in a brisk, quiet, and orderly manner.

Running shall be prohibited.

If for any reason a line becomes blocked, some of the students should be taken to another exit in order to prevent panic conditions arising because of inactivity.

In exiting the building, the "Building Evacuation" plan should be followed.

- All visitors shall leave the building immediately following a fire alarm signal.
- Emergency Evacuation Route Maps are posted in each classroom, storage area, meeting room and office. Directions cover the primary evacuation route only. Should this route be blocked, teachers and/or administrators are to lead the children to the nearest safe exit.
- All windows must be closed prior to departing rooms. Once the class has departed the room, the door should be closed.
- During the evacuation, all students are to be in line and silent.
- All teachers, including specialists are to bring their roll book with them as they depart the school.
- Students, staff and visitors will re-enter the building promptly and in orderly fashion when instructed after the drill is completed.

Fire Drills are:

- Unannounced;
- Held monthly per PA Public School Code 24 P.S. § 15-1517;
- Scheduled at various times, but when most occupants are in the building; and
- Well documented.

Charter School Fire Drill Procedure:

1. All directions are to be posted in every classroom.
2. During evacuation, all students are to be in line and silent.

3. All teachers, including specialists, are to bring roll book with them as they depart the school.
4. Directions cover the primary evacuation route only. Should this route be blocked, teachers are to lead children to the nearest safe exit.
5. In an actual evacuation of the school, not a drill, classes will be taken to the (need to designate a facility) after directed to do so by an Administrator.
6. Close windows.
7. Close doors after departing rooms.
8. Once the class is out of the building and in their designated area, the teacher should take roll making sure all students are present.
9. Once a complete search of the building has determined that no students are in the building and the Chief Executive Officer (“CEO”) gives the all clear signal, the teachers and students may return to their classrooms.

Specific Duties (to be modified according to Charter School’s procedures)

CEO/Principal	Checking front area Internal supervision
Vice Principal:	Collect attendance from classes and report to the CEO/Principal
Designated Teacher:	Check special education
Designated Teacher:	Check bathrooms
Designated Teacher:	Check classrooms
Facilities Manager	Proper maintenance of all appliances for extinguishment of fires and free use of fire exits.

Charter School Fire Drill Maps

Everyone should know closed location of fire alarm boxes and how to operate them.

Should be posted in a highly visible area in every classroom, storage area, meeting room and office.

- Copy of full school floor plan with the following:
 - identified hazards--for potential explosion;
 - fire alarms; and
 - fire extinguishers;

- Set of “You’re Here” and evacuation route for all classrooms;
- Assigned evacuation designations for Charter School rooms;
- Set of “You’re Here” and evacuation route for all classrooms;
- Assigned evacuation designations for the Charter School classroom line organization;
- Fire Safety Training for the Charter School Staff;
- Everyone should know how to operate the fire extinguisher and fire hoses.
- Everyone should have a clear understanding of his or her roles and responsibilities.

Fire Safety Training for Charter School Staff:

- Staff should know how to operate the fire extinguisher and fire hoses.
- Staff should have a clear understanding of their roles and responsibilities.
- Staff should know the location of fire alarm boxes and how to operate them.

Duties of Fire Discoverer - RACE

- | | |
|--------------------|--|
| <u>R</u> escue | Remove all people from immediate danger. |
| <u>A</u> larm | Pull the nearest fire alarm. |
| <u>C</u> ontain | Contain the fire by closing any doors that will isolate it. Analyze the situation and determine if the fire is controllable. |
| <u>E</u> xtinguish | If fire is controllable; attempt to extinguish it with a fire extinguisher. |
| <u>E</u> vacuate | Orderly remove all students and staff from the area. |

Person on Fire

1. Yell to the victim to STOP, DROP and ROLL.
2. Do not allow victim to run.
3. Roll victim to put out fire or throw a blanket to smother flames.
4. Inform other occupants to leave the immediate area:
 - Designate someone to inform office and nurse of the situation
 - The office should immediately call 9-1-1 for medical backup
5. Perform necessary immediate first-aid on the victim:
 - Smother fire by rolling the victim on the ground
 - Deluge with water
 - As a last resort, spray with dry chemical fire extinguisher
6. After the fire is extinguished, remove hot and smoldering clothing careful not to remove skin along with clothing from the victim.
7. Cool the victim with water or ice packs. Go to emergency shower if close by.
8. Submit an incident report to the main office.

Bus Drills

If the Charter School is or will be using or contracting for school buses for the transportation of children, two emergency evacuation drills on buses during each school year are to be conducted on Charter School grounds. The first is to be conducted during the first week of the first school term and the second during the month of March, and at such other times as the CEO may require. Each bus drill shall include the practice and instruction concerning the location, use and operation of emergency exit doors and fire extinguishers and the proper evacuation of buses in the event of fires or accidents.

Reporting

As required by law, on or before the tenth day of April of each year, the CEO shall certify to the Department of Public Instruction that the required emergency evacuation drills have been held.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

LESSON PLANS POLICY

To ensure continuity of instruction, the Board of Trustees of Urban Pathways K-5 College Charter School ("Charter School") requires lesson plans.

To facilitate more effective instruction, lesson plans must be prepared in advance. Plan books will be inspected and must conform to the guidelines established by the Chief Executive Officer or his/her designee.

Plans shall include specific curricular objectives, pertinent information to the effective implementation of the lesson, assessment procedures, and evidence of the application of staff development strategies.

Teachers must clearly state the lesson's objective(s), the standards taught, the instructional strategies and activities that will accomplish those objectives, and the formal or informal assessment that will conclude the lesson and inform the teacher's preparation for the next day.

Additionally, teachers will create a weekly overview of the lessons' connections to state standards and how the lessons are reinforcing test readiness strategies, skills and content.

All plans should provide adequate direction for a substitute to continue ongoing programs and the plans must remain in the teacher's desk at all times to be available to substitute teachers.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

LOCKDOWN AND SHELTER-IN-PLACE POLICY

The purpose of this Lockdown and Shelter-in-Place Policy is to act as a guide for the Urban Pathways K-5 College Charter School (“Charter School”), Charter School employees, students, Board members, and community members to address a wide range of potential crisis situations in the Charter School or surrounding area. This Policy will provide guidance prior to, during, and after any emergency or potential crisis situation.

Decision Making

1. When a volatile incident exists at the Charter School Facility or surrounding area, prior to police arrival, any decision to evacuate, Lockdown, or shelter-in-place will be made by the Chief Executive Officer or their designee.
2. When the Pittsburgh Police arrive at the scene, they will be the lead agency. The Pittsburgh Police will coordinate and direct all actions. Charter School will comply with all Pittsburgh Police Department instructions.

Lockdown

At the order of the Chief Executive Officer or their designee or the Pittsburgh Police Department, Lockdown procedures may be issued in situations involving dangerous intruders, severe weather, other incidents in or around the Charter School, or other crisis situations that may result in harm to persons inside the school building.

- The Chief Executive Officer or their designee will issue the Lockdown order by announcing a warning over the public address system, sending a messenger to each classroom or other alternate method.
- Direct all students, staff and visitors into classrooms or secure rooms.
- Lock all external and internal doors.
- Cover windows of classrooms.

- Everyone is to remain in their assigned room.
- The Pittsburgh Police Department and/or the Chief Executive Officer or their designee shall determine whether the Lockdown shall be internal or external.
 - External Lockdown: If the threat to students is outside the school, the Chief Executive Officer may order an External Lockdown. Under the External Lockdown, the external doors to the school are locked, and no person may enter or leave the school. However, students, staff, and visitors are free to move within the confines of the school.
 - Internal Lockdown: If the threat to students is within the school or unknown, the Chief Executive Officer may order an Internal Lockdown. Under the Internal Lockdown, all doors are locked. No person may leave their assigned room. No one will be permitted to enter or leave the Charter School.
- The Lockdown shall not be lifted until the Pittsburgh Police Department states that the danger is over or has been removed.
- When the Pittsburgh Police Department consents to lifting the Lockdown, the Chief Executive Officer or their designee shall notify the Charter School by making an announcement over the Public address system, sending a messenger to each classroom or other alternate method.
- No person may enter or leave the school until the Pittsburgh Police Department consents to lifting the Lockdown.

Shelter-in-Place

Shelter-in-Place provides refuge for students, staff, and public within school buildings during an emergency. Shelters are located in areas that maximize the safety of inhabitants. Safe areas may change depending on the emergency. Be prepared to go into Lockdown once inside.

At the order of the Chief Executive Officer or their designee or the Pittsburgh Police Department, Shelter-in-Place procedures may be issued in situations involving severe weather or other incidents in or around the Charter School that may result in harm to persons inside the school building.

- The Chief Executive Officer or their designee will issue the Shelter-in-Place order by announcing a warning over the Public address system, sending a messenger to each classroom or other alternate method.
- All students, employees, and visitors will be moved to their designated safe area.
- Teachers will take class roster. The Chief Executive Officer or their designee will contact each teacher for a headcount
- All exterior doors and windows shall be closed.
- If necessary, any ventilation or other system that pulls in air from outside shall be turned off.
- Begin Lockdown, if needed.
- All persons must remain in safe areas until the Pittsburgh Police Department states that the danger is over or has been removed.
- No person may enter or leave the school until the Pittsburgh Police Department consents to lifting the Shelter-in-Place order.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

OPENING EXERCISES POLICY

The Charter School’s Board of Trustees recognizes that it is the responsibility of each citizen to show proper respect for his/her country and the flag and may direct that procedures be instituted to uphold the laws of the Commonwealth and the United States.

However, students may decline to recite the Pledge of Allegiance and may refrain from saluting the Flag on the basis of personal belief or religious convictions. Students who choose to refrain from such participation shall respect the rights and interests of classmates who do wish to participate.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

OTHER INSURANCE POLICY

Proper school operation requires that adequate basic insurance programs be provided for the protection of the Urban Pathways K-5 College Charter School (“Charter School”), its employees and Board of Trustees (“Board”).

The Board has the authority and responsibility to provide adequate insurance coverage to protect the Charter School’s interests. Such coverage shall be in accordance with the guidelines listed within this policy.

Liability Insurance for the Charter School, including but not limited to policies of General Liability, Educators’ Legal Liability, Directors and Officers and Workers Compensation, shall include coverage for liability, but not limited to claims as a result of general liability, acts of employees within the scope of their employment, including sexual abuse, educator’s liability, corporal punishment, disputes with contractors, landlord and tenant difficulties, problems concerning garage helpers, and errors and omissions of the Board and administrators.

Travel Accident Insurance shall include coverage for Board Members while in the performance of their duties.

Health Care Insurance shall include coverage for hospital care for administrators and regularly employed persons, medical-surgical treatment for administrators and regularly employed persons, and major medical expenses for administrators and regularly employed persons.

Group Life Insurance shall include coverage for administrators and regularly employed persons.

In placing insurance, the Board shall be guided by the service of the insurance agent and carrier, scope of coverage provided by policy, price of desired coverage, recommendations by PSBA Insurance Trust, or similar organization and assurance of coverage.

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ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

RECORD MANAGEMENT, RETENTION AND DESTRUCTION POLICY

This Policy pertains to all records and documents, regardless of physical form or characteristics, which have been created or received by the Urban Pathways K-5 College Charter School ("Charter School") in connection with the transaction of school business. For purposes of this policy, "records" are defined as recorded information that is generated internally or received from external sources that is utilized in the transaction of school business, related to the school's legal obligations, documenting a transaction or verifying a receipt. Recorded information can be comprised of various characteristics and can be found on different media including, but not limited to: paper, audio or video recordings, electronic messages, computer hard drives, tapes and discs microfilm and microfiche.

This policy pertains to records which are specifically defined herein. **This policy does not pertain to student records.**

Definitions

"Electronic Mail (E-mail) System" - a system that enables users to compose, transmit, receive and manage text and/or graphic electronic messages and images across local area networks and through gateways connecting other networks. This information consists primarily of messages but may include attachments such as calendars, directories, distribution lists, word processing documents, spreadsheets, and other electronic documents.

"Litigation Hold" - a communication ordering that all records and data relating to an issue being addressed by current or potential litigation or investigation be preserved for possible production during the litigation or investigation.

"Records" - regardless of physical form or characteristics, information that documents a transaction or activity of the Charter School and that is created, received, or retained pursuant to law or in connection with a transaction, business, or activity of the Charter School. The term includes a document, paper, letter, map, book, tape, photograph, film or sound recording, information stored or maintained electronically and a data-processed or image-processed document.

“Records Management Plan” - the system implemented by the Charter School for the retention, retrieval, and disposition of all records generated by Charter School operations.

“Records Retention Schedule” - a comprehensive listing stating retention periods and proper disposition of records.

Delegation of Responsibility

Records Coordinator - In order to maintain a Records Management Plan that complies with federal and state laws and regulations and Board policy, the Charter School shall designate a person who shall be responsible for implementing this policy and for ensuring compliance with it. Any questions regarding document retention and/or destruction shall be directed to the person designated.

The Records Coordinator shall be responsible to:

1. Ensure that training appropriate to the user’s position and level of responsibility is provided. Such training may include:
 - a. Operation, care and handling of the equipment and software.
 - b. Requirements of the Records Retention Schedule.
 - c. Protocols for preserving and categorizing Charter School records.
 - d. Procedures and responsibilities of Charter School staff in the event of a litigation hold.
 - e. Identification of what is and what is not a record.
 - f. Disposal of records.
2. Review the Records Management Plan periodically to ensure that record descriptions and retention periods are updated as necessary.
3. Identify, when the retention period expires, the specific records to be disposed of and ensure that all identified records are properly disposed of annually.

Records Management Committee - A committee responsible for the development and recommendation of the Charter School’s Records Management Plan may be established by the Board. The Records Management Committee shall give primary consideration to the most efficient and economical means of implementing the recommended Plan. Members of the Committee shall include the:

1. Open Records Officer.
2. CEO or designee.

3. Board Secretary.
4. Information Technology Director or designee.
5. Director of Administrative Services or designee.
6. Board member(s).

The Records Management Committee shall meet periodically to evaluate the effectiveness and implementation of the Records Management Plan and recommend changes as needed.

Guidelines

Records Management Plan

The Charter School's Records Management Plan shall be the principal means for the retention, retrieval, and disposition of manual and electronic records, including e-mails. The Plan shall not rely primarily on backup systems to manage the retention and disposition of records. The Records Management Plan shall include:

1. Comprehensive listing of records and data of the Charter School.
2. Criteria to distinguish records of the Charter School from the supplemental personal records of individual employees.
3. System(s) of records storage and retrieval to be used, including in what form the records will be stored, maintained, reproduced, and disposed.
4. Preservation measures to protect the integrity of records and data.
5. Data map or flow chart detailing the sources, routes, and destinations of electronic records.
6. Procedures and employee designated for determining whether an item is a record.
7. Procedures for adding, revising, or deleting records and data, and any other details necessary to implement the Records Management Plan.
8. Records Retention Schedule.
9. Provisions for the storage and retrieval of records in the event of an emergency or disaster.
10. Staff positions authorized to access Charter School records.
11. Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all records relevant to the current or potential claim. Such procedures shall specify: a. Who can initiate a litigation hold. b. How and to whom a litigation hold is communicated. c. Who will determine which records are subject to the litigation hold. d. Who will be responsible for collecting and preserving such records

and data. e. Who will be responsible for monitoring and ensuring the Charter School's compliance with the litigation hold. f. In what format the records will be collected.

When possible, records and data shall be stored in their original form, including metadata, such as creation date, author, type of file, etc. For any record not covered by the Records Retention Schedule, the Records Management Committee shall determine how long the record shall be kept and recommend any necessary revisions to the retention schedule.

The Charter School shall maintain and dispose of records in a manner that protects any sensitive, proprietary, or confidential information or individual privacy rights, and helps conserve natural resources.

Manual Records

Manual records, which include all records not stored electronically, shall be retained, and disposed of in accordance with the Records Management Plan.

Manual records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

The Charter School shall develop and maintain adequate and up-to-date documentation about each manual record system. Documentation may:

1. List system title and responsible employee(s) or office.
2. Define the contents of the system, including record formats.
3. Identify vital records and information.
4. Determine restrictions on access and use.

Electronic Records

Electronic records shall be retained and disposed of in the same manner as records in other formats and in accordance with the Records Management Plan.

Electronic records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

The Charter School shall develop and maintain adequate and up-to-date documentation about each electronic record system. Documentation may:

1. List system title and responsible employee(s) or office.

2. Specify all technical characteristics necessary for reading or processing the records stored on the system.
3. Identify all defined inputs and outputs of the system.
4. Define the contents of the system, including records formats and database tables.
5. Identify vital records and information.
6. Determine restrictions on access and use.
7. Describe update cycles or conditions.

E-mail Records

E-mail messages, in and of themselves, do not constitute records. Retention and disposition of e-mail messages depend on the function and content of the individual message. Records on an e-mail system, including messages and attachments, shall be retained and disposed of in accordance with the Charter School's Records Management Plan.

E-mail messages and attachments that do not meet the definition of records shall be deleted as required by the Records Management Plan.

E-mail records may be maintained as an electronic record or be printed and maintained as a manual record. For each e-mail considered a record, the following information shall be retained:

1. Message content.
2. Name of sender.
3. Name of recipient.
4. Date and time of transmission and/or receipt.

Contractor Records created or maintained by contractors employed by the Charter School shall be retained and disposed of in accordance with the Records Management Plan.

Property of the Charter School

All records are the property of the Charter School and no employee or contractor has any personal or property right to such records regardless of his or her position or the fact that he or she may have developed or compiled them.

Document Retention Schedule

Trustees, employees, independent contractors, volunteers and members of the public should refer to the Document Retention Schedule attached to this policy for information concerning the period for specific types of records. Records shall not be destroyed before the required retention period has expired. Additionally, records shall not be retained for longer than the required retention period without first contacting the person designated by the school to implement and ensure compliance with this policy. Duplicates of original documents should generally be discarded after use unless necessary to support current operations. If duplicates are so retained, they should be discarded after they have served their purpose. In no event should duplicates be retained for a period longer than the retention period for the original document.

Electronic documents shall be retained as if they were paper documents. Any electronic files that fall into one of the document types on the above-schedule shall be maintained for the appropriate amount of time. Electronic and voice mail and other electronic data that are not official records should be destroyed unless subject to a Litigation Hold for legal purposes.

Litigation Hold

Upon any indication of an official investigation of the school or litigation involving the school, document destruction shall be suspended immediately. Destruction shall be reinstated upon the conclusion of the investigation or litigation. Employees are prohibited from discarding documents that would normally be retained for a longer period of time because they believe that the records might be harmful to any employee or the school. The unauthorized destruction, removal, use, falsification or inappropriate alteration of any record is prohibited.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this _____ day of _____, 2023

President

Secretary

Charter School Records Retention Schedule

All documents will be eligible for destruction January 1st of the year after. For example, if ten years for a document runs from June 1, 2023 until June 1, 2033, the document will be destroyed after January 1, 2034.

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
Accident reports (after settlement)	E & P	May Contain Exempt Information	6
Accounts payable and receivable ledgers and schedules	E & P	Public	6
All correspondence	E & P	May Contain Exempt Information	3
Annual Budget, Reports, Financial and Audit reports	E & P	Public	Permanent Records (never destroyed)
Articles of Incorporation	E & P	Public	Permanent Records (never destroyed)
Audit reports of accountants	E & P	Public	7
Authorization for change or deduction in payroll	E & P	May Contain Exempt Information	3
Bank statements and reconciliation	E & P	Public	6

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
Board and Committee minutes	E & P	Public	Permanent Records (never destroyed)
Board and Committee Policies	E & P	Public	Permanent Records (never destroyed)
Bylaws	E & P	Public	Permanent Records (never destroyed)
Certified financial statements	E & P	Public	Permanent Records (never destroyed)
Check register	E & P	Public	7
Checks used for important payments (e.g., taxes, property, etc.)	E & P	Public	Permanent Records (never destroyed)
Contracts and agreements -	E & P	Public	6 after contract termination
Contracts and leases (expired)	E & P	Public	6 after termination
Curriculum Records (not including textbooks)	E & P	Public	3 after last activity
Deeds and titles	E & P	Public	Permanent Records (never destroyed)
Deposit Slips	E & P	Public	6
Depreciation schedules	E & P	Public	7

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
Donor contributions	E & P	May Contain Exempt Information	7
Employee contracts	E & P	Public	7 after employment termination
Employee evaluations, job descriptions and insurance records	E & P	May Contain Exempt Information	Permanent Records (never destroyed)
Employee wage and tax statements (W2)	E & P	May Contain Exempt Information	6 after employment termination
Employee withholding statements	E & P	May Contain Exempt Information	7 after employment termination
Employment applications and related documents for individuals hired	E & P	Public	7 after employment termination
Employment applications for individuals not hired	E & P	Public	3
Employment tax records	E & P	May Contain Exempt Information	7
Ethics Statements of Financial Interest	E & P	May Contain Exempt Information	7

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
End-of-year financial statement	E & P	Public	7
Federal Programs Records (Title I, Title II, Title III, and IDEA)	E & P	May Contain Exempt Information	7
Fixed assets records	E & P	Public	Permanent Records (never destroyed)
Free & Reduced Lunch Program Records	E & P	Public	5
General ledger	E & P	Public	Permanent Records (never destroyed)
Insurance matters: policies, accident reports, fire inspection reports, claims	E & P	May Contain Exempt Information	6 after settlement
Insurance policies/contracts	E & P	May Contain Exempt Information	6 after expiration
Invoices (after payment)	E & P	Public	6
IRS examinations, rulings and comments	E & P	Public	Permanent Records (never destroyed)

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
IRS exemption application and determination letter	E & P	Public	Permanent Records (never destroyed)
Journals	E & P	May Contain Exempt Information	7
Labor agreements or contracts	E & P	Public	Permanent Records (never destroyed)
Leases - Real Estate	E & P	Public	Permanent
Monthly financial reports and statements	E & P	Public	7
Payroll journal sheets	E & P	May Contain Exempt Information	7
Payroll tax report	E & P	May Contain Exempt Information	6
Employee payroll tax reports	E & P	May Contain Exempt Information	7 after employment termination
Pension plan documents	E & P	May Contain Exempt Information	Permanent Records (never destroyed)

Record Description	Record Format ("E & P" - Electronic & Physically kept)	Record Classification	Retention Period (in years)
Petty cash records	E & P	Public	7
Public Record Requests	E & P	Public	1
Receivable ledger	E & P	Public	7
Records of lawsuits and other claims	E & P	May Contain Exempt Information	Permanent Records (never destroyed)
Sales invoices	E & P	Public	7
Services contracts (after termination)	E & P	Public	3
State tax exemptions	E & P	Public	Permanent Records (never destroyed)
Tax and information returns and supporting documents (State and Federal)	E & P	Public	Permanent Records (never destroyed)
Time cards	E & P	May Contain Exempt Information	7
Trial balances - general ledger	E & P	Public	Permanent Records (never destroyed)
Worker's compensation claims - from date of employee termination	E & P	May Contain Exempt Information	10
Working papers: accounting and financial reports	E & P	Public	7

Urban Pathways K-5 College Charter School

Board of Trustees Policy

RIGHT TO KNOW POLICY

In accordance with the Right-to-Know Law, Act 3 of 2008, be it resolved that the Board of Trustees of the Urban Pathways K-5 College Charter School (“Charter School”) hereby establishes the following:

- (1) Right-to-Know Law Policy,
- (2) Right-to-Know Law Request for Access to Records Form, and
- (3) Right-to-Know Law Request Fee Structure.

The Board of Trustees hereby directs that the Right-to-Know Law Policy, Right-to-Know Request for Access to Records Form and Right-to-Know Law Request Fee Structure be posted at Charter School’s main administrative office and, if Charter School maintains an Internet website, on Charter School’s Internet website together with the following:

- (1) Contact information for the Open Records Officer (may be included in the Right-to-Know Law Policy);
- (2) Contact information for the Office of Open Records or other applicable appeals officer (may be included in the Right-to-Know Law Policy); and
- (3) Any additional Administrative Procedures or regulations that may be developed consistent with this Policy and the Right to Know Law.

The Board further appoints the Charter School’s **CEO as the Open Records Officer.**

This Policy, Form and Fee Structure included herein, hereby replace and supersede all prior Policies, Forms and/or Fee Structures related to the Right-to-Know Law in effect at the Charter School.

In accordance with the Right-to-Know Law, Requesters may elect to access the Official Records Request Form available through the Office of Open Records.

The Board of Trustees of the Charter School directs the appointed Open Records Officer to implement procedures necessary to effectuate this Policy and to adhere to the requirements of the Right-to-Know Law. This policy supersedes and replaces all previously adopted Right-to-Know Law Policies at the Charter School and any and all

procedures related to the Right-to-Know Law at the Charter School shall be modified as consistent with this Policy.

Language in this Policy has been drafted taking into consideration the Right-to-Know Law and information available from and through the Office of Open Records and Pennsylvania Department of Education. Nothing in this policy shall be construed to conflict with applicable state and/or federal laws, including but not limited to the Right-to-Know Law and any and all applicable common law and cases developing from the Right-to-Know Law and/or interpreting the Right-to-Know Law. In the event the Right-to-Know Law is amended or otherwise revised, this Policy shall be interpreted to incorporate any revisions or changes to the Right-to-Know Law without the need for Board action.

The Open Records Officer is the individual designated by the Board to receive, review and respond to all requests directed to the Charter School pursuant to this Policy and applicable law.

A record of the Charter School is public provided the record is not:

- (1) Exempt under the Right-to-Know Law;
- (2) Exempt from being disclosed under any other Federal or State law or regulation or judicial order or decree; or
- (3) Protected by a privilege.

This Policy shall not be interpreted to require or allow access to any record that is not a Public Record under the Right-to-Know Law.

This Policy shall be interpreted to allow access to or duplication of Public Records to the extent required by the Right-to-Know Law.

For purposes of this Policy, a Requester is a person that is a legal resident of the United States and requests a record pursuant to the Right-to-Know Law. The term includes an agency.

Access to a record or written notice to a Requester granting, denying or partially granting and partially denying access to a record.

The Open Records Officer shall receive requests submitted to the Charter School under the Right-to-Know Law, direct requests to other appropriate persons in accordance with the Right-to-Know Law, track the Charter School's progress in responding to requests and issue interim and final Responses under the Right-to Know Law and this Policy.

The Charter School may designate a Public Records Access Room. The function of a Public Records Access Room is to provide a specific, established site where Requesters may have physical access to some or all of the Charter School's Public Records. If the Board elects not to establish such a room, the Open Records Officer shall determine on an ad hoc basis and in accordance with the Right-to-Know Law the building and room where Public Records will be made available to a Requester and the hours of availability.

In either instance the Open Records Officer has the discretion to establish procedures governing the use of the room including, but not limited to, the hours of access, the need and adequacy of proof of identification, restrictions or prohibitions on the removal of Records, the use of written requests and the ability of a Requester to bring the Requestor's own equipment into the room.

Procedure for Requesting Records:

Oral requests. The Right-to-Know Law does not require the Charter School to respond to oral requests. The Open Records Officer shall refuse to accept any oral request.

Anonymous requests. The Right-to-Know Law does not require the Charter School to respond to Anonymous requests. The Open Records Officer shall refuse to accept any written request that does not identify the Requester.

Written requests. The Right-to-Know Law requires that the Open Records Officer act upon each non-anonymous written request when such request is submitted in person, by mail, by facsimile or email.

Contents of a request. The Right-to-Know Law sets forth various specifications for the contents of a written request. A Requester must submit a request in writing to the Open Records Officer on a form to be provided by the Open Records Officer or on the Official form issued by the Office of Open Records. The request must be addressed to the Open Records Officer and must set forth the name and address where the Charter School should address its Response. The request should identify or describe the Record or Records sought with sufficient specificity to enable the Charter School to ascertain which Records are being requested. The written request may be submitted in person, by mail, facsimile or email. Any Charter School Employee or Board Member who receives a request directed to the Open Records Officer shall immediately forward that request to the Open Records Officer.

The Right-to-Know Law provides that the Requester need not include the reason for the request or the intended use of the Records. Therefore, the Open Records Officer shall not insist that such a statement be provided, nor shall the Charter School reject or refuse a request on the grounds that no such reason was given.

Forms. The Charter School may create or adopt forms for use by Requesters in preparing written requests. In the absence of a form created by the Charter School, the Open Records Office's official Form must be used.

Identification. As the Right-to-Know Law states that the Charter School provide a Requester with access to a Public Record if the Requester is a legal resident of the United States, the Charter School may require the Requester to produce photographic identification to the extent allowed by the Right-to-Know Law.

Address all Open Records Requests to:

Right to Know Officer

INSERT

The Charter School shall post this information to its website and shall post it at a location that is publicly accessible.

The Right-to-Know Law provides that, upon receipt of a written Open Records Request, the Charter School must make a good faith effort to determine if the requested Record is a Public Record, financial record, or legislative record and to respond as promptly as possible under the circumstances existing at the time of the request, and that this time shall not exceed five (5) business days from the date the written request is received by the Charter School's Open Records Officer.

The five (5) business day period does not begin to run until the Charter School's designated Open Records Officer has received a written request in accordance with the Right-to-Know Law and this Policy. If an Open Records Request is submitted to the Charter School or to some Officer or employee of the Charter School other than the Open Records Officer, the five (5) business day period has not yet begun.

Either a final or an interim written Response must be made within five (5) business days from the date that the Open Records Officer received the request. If the Open Records Officer fails to respond within that time period, the Open Records Request is deemed denied.

The Right-to-Know Law and this Policy contemplate that Requesters will receive a Response within the five (5) business day period. However, the Right-to-Know Law and this Policy also provide the Charter School with certain specific exceptions to invoke a single extension of time, which may not exceed thirty (30) calendar days. If an extension is invoked and then there is no timely Response, the Open Records Request is

deemed denied. Likewise, if the Open Records Officer notifies the Requester that it needs more than the maximum of thirty (30) days, the request is deemed denied.

Processing of Open Records Requests by the Open Records Officer:

Upon receiving an Open Records Request, the Open Records Officer shall, at a minimum, promptly complete the following tasks to the extent required by the Right-to-Know Law:

- (i) Date-stamp or otherwise note the date of receipt on the Open Records Request.
- (ii) Compute the day on which the five (5) business day period will expire and make a notation of that date.
- (iii) Maintain a paper or electronic copy of the Open Records Request, including all documents submitted with it and the envelope (if any) in which it was received.
- (iv) Create an official file for the retention of the original Open Records Request.
- (v) Make a good faith effort to determine if the record requested is a Public Record and if the Charter School has possession, custody or control of the record.
- (vi) Maintain a copy of the Charter School's Response to the request.

For purposes of determining the five (5) business-day period:

- (i) A business day shall be from 8:00 a.m. until 4:00 p.m. on any Monday, Tuesday, Wednesday, Thursday, or Friday, except those days when the offices of the Charter School are closed for all or part of a day due to a holiday; due to severe weather (such as a blizzard or ice storm); due to natural or other disaster; or due to the request or direction of local, state, or federal law enforcement officers.
- (ii) Any Open Records Request received by the Open Records Officer after the close of its regular business hours shall be deemed received by that office on the following business day.
- (iii) For purposes of determining the end of the five (5) business day period, the day that an Open Records Request is received (or deemed received) is not

counted. The first day of the five (5) business day period is the Charter School's next business day.

The act of providing a Requester with physical access to a document or a copy of the requested Record, in the Open Records Office, is a "Response" for purposes of this Open Records Policy. Unless the Charter School issues written policies to the contrary, only the Open Records Officer possesses the authority to permit this access.

Where timely access is not provided in accordance with above, the Act requires that the Charter School's Response be in writing. The Open Records Officer has the duty to prepare and send written Responses. In preparing a written Response, the Open Records Officer should consult, as necessary, with the Solicitor.

The Charter School is not required to create a Public Record that does not already exist, nor is the Charter School required to compile, maintain, format, or organize a Public Record in a manner in which the Charter School does not currently do so.

The Open Records Office shall send written Responses to Requesters by one of the following, in its discretion: United States mail, facsimile transmission; electronic transmission; overnight or parcel delivery service; or, courier delivery.

Access to Public Records:

Unless otherwise provided by law, a Public Record, legislative record or financial record shall be accessible for inspection and duplication in accordance with the Right-to-Know Law and this Policy. A Public Record, legislative record or financial record being provided to a Requester shall be provided in the medium requested if it exists in that medium; otherwise, it shall be provided in the medium in which it exists. Public Records, legislative records or financial records shall be available for access during the regular business hours of the Charter School.

The Charter School shall not be required to create a record which does not currently exist or to compile, maintain, format or organize a record in a manner in which the Charter School does not currently compile, maintain, format or organize the record.

The Open Records Officer may respond to a records request by notifying the Requester that the record is available through publicly accessible electronic means or that the Charter School will provide access to inspect the record electronically. If the Requester is unwilling or unable to access the record electronically, the Requester may, within thirty days following receipt of the notification, submit a written request to the Open Records Officer to have the record converted to paper. The Charter School shall provide access to the record in printed form within five days of the receipt of the written request for conversion to paper.

The Act requires that, unless otherwise provided by law, the Public Records of the Charter School must be accessible for inspection by any Requester during the regular business hours of the Charter School. Unless the Charter School adopts written policies to the contrary, the regular business hours of the Charter School for purposes of the Act are from 8:00 a.m. until 4:00 p.m. on any business day.

Access shall be provided by the Open Records Officer either in the Open Records Office or the Public Records Access Room, at the discretion of the Open Records Officer, depending on the size, complexity or other circumstances of the request.

Notice of Review:

Upon receipt of a written request for access, the Open Records Officer shall determine if one of the following applies:

- (A) The request for access requires redaction of a record in accordance with the Right-to-Know Law;
- (B) The request for access requires the retrieval of a record stored in a remote location;
- (C) A timely Response to the request for access cannot be accomplished due to bona fide and specified staffing limitations;
- (D) A legal review is necessary to determine whether the record is a record subject to access under this act;
- (E) The Requester has not complied with the agency's policies regarding access to records;
- (F) The Requester refuses to pay applicable fees authorized by this act; or
- (G) The extent or nature of the request precludes a Response within the required time period.

Upon a determination that one of the above factors applies, the Open Records Officer shall send written notice to the Requester within five (5) business days of receipt of the request for access. The notice shall include a statement notifying the Requester that the request for access is being reviewed, the reason for the review, a reasonable date that a Response is expected to be provided and an estimate of applicable fees owed when the record becomes available. If the date that a Response is expected to be provided is in excess of thirty (30) days, following the five (5) business days allowed for in the Right-

to-Know Law, the request for access shall be deemed denied unless the Requester has agreed in writing to an extension to the date specified in the notice.

If the Requester agrees to the extension, the request shall be deemed denied on the day following the date specified in the notice if the Charter School has not provided a Response by that date.

Written Final Responses:

Types of final Responses. The Act provides for three (3) types of written final Responses:

- (i) The Charter School grants the entire Open Records Request;
- (ii) The Charter School refuses the entire Open Records Request;
- (iii) The Charter School grants part of the Open Records Request and refuses the remainder.

The failure of the Charter School to make a timely final Response is a Deemed Denial under the terms of the Act. Final Responses that deny Open Records Requests, both in whole or in part, shall be in writing by the Open Records Officer and include all of the following:

- (i) A description of the record requested;
- (ii) The specific reasons for the denial, including a citation of supporting legal authority;
- (iii) The typed or printed name, title, business address, business telephone number and signature of the Open Records Officer on whose authority the denial is issued;
- (iv) Date of the Response; and
- (v) The procedure to appeal the denial of access under the Right-to-Know Law.

If the Open Records Officer grants the request, the Response shall so inform the Requester and include any necessary information for access.

Redaction:

If the Charter School determines that a Public Record, legislative record or financial record contains information which is subject to access as well as information which is not subject to access, the Charter School's Response shall grant access to the information which is subject to access and deny access to the information which is not subject to access. If the information which is not subject to access is an integral part of the Public Record, legislative record or financial record and cannot be separated, the Charter School shall redact from the record the information which is not subject to access, and the Response shall grant access to the information which is subject to access. The Charter School may not deny access to the record if the information which is not subject to access is able to be redacted. Information which the Charter School redacts in accordance with the Right-to-Know Law shall be deemed a denial under the Right-to-Know Law.

Appeals:

If a written request for access to a record is denied or deemed denied, the Requester may file an appeal with the Office of Open Records or judicial, legislative or other appeals officer designated under the Right-to-Know Law within fifteen (fifteen (15)) business days of the mailing date of the Charter School's Response or within fifteen (fifteen (15)) business days of a deemed denial. The appeal shall state the grounds upon which the Requester asserts that the record is a Public Record, legislative record or financial record and shall address any grounds stated by the Charter School for delaying or denying the request. Unless otherwise provided by applicable law, the Office of Open Records shall assign an appeals officer to review the denial.

A person other than the Charter School or Requester with a direct interest in the record subject to an appeal under this section may, within fifteen (15) days following receipt of actual knowledge of the appeal but no later than the date the appeals officer issues an order, file a written request to provide information or to appear before the appeals officer or to file information in support of the Requester's position. Copies of the written request shall be sent to the agency and the Requester.

Posting:

The following information shall be posted at the Charter School and, if the Charter School maintains an Internet website, on the Internet website:

- (A) Contact information for the Open Records Officer.
- (B) Contact information for the Office of Open Records or other applicable appeals officer.
- (C) A form which may be used to file a request.
- (D) Regulations, policies and procedures of the Charter School relating to the Right-to-Know Law.

Current Information for the Office of Open Records:

Mailing Address:

Commonwealth of Pennsylvania
Office of Open Records
Commonwealth Keystone Building
333 Market Street, 16th Floor
Harrisburg, PA 17101-2234

Phone: 717-346-9903

Fax: 717-425-5343

Email: openrecords@pa.gov

The Charter School may deny a Requester access to a record if the Requester has made repeated requests for that same record and the repeated requests have placed an unreasonable burden on the Charter School. Such denial shall not restrict the ability to request a different record.

The Charter School may deny a Requester access:

- (i) When timely access is not possible due to fire, flood or other disaster; or
- (ii) To historical, ancient or rare documents, records, archives and manuscripts when access may, in the professional judgment of the curator or custodian of records, cause physical damage or irreparable harm to the record. To the extent possible, the contents of such a record shall be made accessible to a Requester even when the record is physically unavailable.

If, in Response to a request, the Charter School produces a record that is not a Public Record, legislative record or financial record, the Charter School shall notify any third party that provided the record to the agency, the person that is the subject of the record and the Requester. the Charter School shall notify a third party of a request for a record if the third party provided the record and included a written statement signed by a representative of the third party that the record contains a trade secret or confidential proprietary information. Notification shall be provided within five (5) business days of receipt of the request for the record. The third party shall have five business days from receipt of notification from the agency to provide input on the release of the record. The Charter School shall deny the request for the record or release the record within ten (10) business days of the provision of notice to the third party and shall notify the third party of the decision.

A Public Record shall be accessible for duplication by a Requester. The Charter School does not make duplication equipment available to a Requester but shall provide other means by which a Requester may obtain copies.

The Charter School will assign its own staff to make the duplications requested by the Requester; or it may contract for duplication services and require that the Requester pay the contractor for those services. The Charter School shall charge the Requester a reasonable fee(s) that is consistent with the prevailing charges in the geographic location where the duplication occurs.

Retention and Disposal of Public Records:

There are statutes, regulations and other laws that regulate the Charter School's retention and disposition of Records. The Charter School shall follow the mandates of these laws and regulations. Neither the Act nor this policy modifies, rescinds or supersedes any retention or disposition schedule established pursuant to law or other regulation.

Reasonable fees and charges as permitted by the Right-to-Know Law shall be established by the Board via Resolution and Established Fee Structure. The Board-approved list of fees shall be available for review by Requesters.

Such a fee structure may be amended from time to time as appropriate, using the standards provided in the Right-to-Know Law and shall not exceed the fee structure recommended by the Office of Open Records.

If the fee is for copying only and the anticipated cost exceeds \$100.00, the Charter School may allow access to the Records but shall refuse to make copies until the fee is paid. If the fee is for redacted copies or some other allowable service that is necessary

in order for access to be provided, the Charter School may deny access until the fee is paid. At no time will the Charter School accept cash as a method of payment.

The Charter School shall not charge a fee for review of a record to determine whether the record is subject to access.

All copies must be retrieved within ninety (90) days of the Charter School Response or the Charter School may, in the discretion of the Open Records Officer and to the extent allowed by law, dispose of copies made. The Requester remains responsible for fees incurred to the extent allowed by the Right-to-Know Law.

The Open Records Officer may waive fees set by the Board on a case-by-case basis consistent with applicable state and federal law.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School
Right-to-Know Law Request Fee Structure

The Right-to-Know law requires the establishment of a fee structure. The Urban Pathways K-5 College Charter School (“Charter School”) establishes the following fee structure in accordance with the Law and has derived this structure upon review of the Open Records Office’s Recommended Structure. The Law requires that the Office of Open Records review the fee structure biannually. For more information, please visit the Office of Open Records’ Official Fee Schedule: <https://www.openrecords.pa.gov/RTKL/FeeStructure.cfm> .

Record Type / Delivery Method	Fee Structure
Black & White Copies (first 1,000)	Up to \$0.25 per copy.
Black & White Copies (beyond 1,000)	Up to \$0.20 per copy.
Color Copies	Up to \$0.50 per copy.
Specialized Documents (3)	Up to actual cost.
Records Delivered via Email or Other Electronic Method	No additional fee may be imposed.
CD / DVD	Up to actual cost, not to exceed \$1.00 per disc.
Flash Drive	Up to actual cost.
Facsimile	Up to actual cost.
Other Media	Up to actual cost.
Redaction	No additional fee may be imposed.
Conversion to Paper	Up to \$0.25 per page.
Photographing a Record	No additional fee may be imposed.
Postage	Up to actual cost of USPS first-class postage.
Certification	Up to \$5.00 per record.

Please Also Be Advised in regard to the Right-to-Know Law Fee Structure:

Statutory Fees: If a separate statute authorizes the Charter School to charge a set amount for a certain type of record, the Charter School may charge no more than that statutory amount.

Inspection of Redacted Records: If a Requester wishes to inspect rather than receive a copy of a record and the record contains both public and non-public information, the Charter School shall redact the non-public information. The Charter School may not charge the Requester for the redaction. However, the Charter School may charge for the copies it must make of the redacted material in order for the Requester to view the public record. The fee structure outlined above will apply. If, after inspecting the records, the Requester chooses to obtain the copies, no additional fee may be charged.

Enhanced Electronic Access: If the Charter School offers enhanced electronic access to records in addition to making the records accessible for inspection and duplication by a Requester, the Charter School may establish user fees specifically for the **provision** of the enhanced electronic access, but only to the extent that the enhanced electronic access is in addition to making the records accessible for inspection and duplication by a Requester as required by the Right-to-Know Law. The user fees for enhanced electronic access may be a flat rate, a subscription fee for a period of time, a per-transaction fee, a fee based on the cumulative time of system access or any other reasonable method and any combination thereof. The user fees for enhanced electronic access must be reasonable, must be pre-approved by the Office of Open Records and shall not be established with the intent or effect of excluding persons from access to records or duplicates thereof or of creating profit for the agency. Any request is to be submitted to the Office of Open Records, 333 Market Street, 16th Floor, Harrisburg, PA 17101-2234.

Fee Limitations: Except as otherwise provided by statute, the law states that **no other fees may be imposed** unless the Charter School necessarily incurs costs for complying with the request, and such fees must be reasonable. No fee may be imposed for a review of a record to determine whether the record is a Public Record, legislative record or financial record subject to access. No fee may be charged for searching **for** or retrieval of documents. The Charter School may not charge staff time or salary for complying with a Right-to-Know request.

Prepayment: Prior to granting a request for access, the Charter School may require a Requester to **prepay** an estimate of the fees authorized under this section if the fees required to fulfill the request are expected to exceed \$100.

Once the request is fulfilled and prepared for release, the Office of Open Records recommends **that** the Charter School obtain the cost of the records prior to releasing the records. This recommendation is designed to avoid situations in which the Charter School provides the records and the Requester fails to submit payment.

Urban Pathways K-5 College Charter School

Board of Trustees Policy

SCHOOL CALENDAR POLICY

The Board of Trustees (“Board”) of the Urban Pathways K-5 College Charter School (“Charter School”) recognizes that the preparation of a calendar is necessary for the efficient operation of the Charter School.

The Board shall determine annually the days and the hours when the Charter School shall be in session for instructional purposes in accordance with State law. Such school calendar shall normally consist of 180 days for students unless the Charter School’s Charter provides for more than the minimum 180 days.

The Chief Executive Officer shall prepare a school calendar for Board consideration, annually.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

SCHOOL DAY POLICY

The normal school day for the instruction of the pupils of the Urban Pathways K-5 College Charter School ("Charter School") shall be in accordance with law and with the following guidelines.

The regular school session may be temporarily altered when such alteration is in the best interests of the Charter School by the Chief Executive Officer ("CEO") with the approval of the Board of Trustees President.

The CEO, with the approval of the Board President, may close the Charter School, delay the opening of the Charter School, or dismiss school early for emergency reasons and to protect the health and safety of students and staff members, and shall prepare rules for the proper and timely notification of concerned persons in the event of such emergency closing. Every attempt shall be made to have information regarding school closing on the air by 6:00 a.m. Such provisions shall be included in the Parent/Student Handbook with procedures.

Day School Programs:

- The broadcast number for Charter School is (#), although most radio and television stations will refer to the Charter School by name. If school cannot open at the regular time, it will remain closed for the day.

The CEO shall develop guidelines which allow students to enter and leave Charter School, under exceptional conditions so that variances with the normal school schedule may be accommodated. Such guidelines shall consider such things as inclement weather, family illness, and other similar circumstances.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS CONTROL. THIS POLICY IS NOT INTENDED TO CONFLICT WITH CHARTER REQUIREMENTS.

ADOPTED this day _____ of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

SCHOOL VISITORS POLICY

1. Purpose
 - 1.1 The term Visitor shall include all who are not employees, volunteers, students or contractors of Urban Pathways K-5 College Charter School (“Charter School”). The Charter School welcomes parents and others who have legitimate purpose and do not interfere with instruction.
 - 1.2 The Chief Executive Officer has the right to refuse admission to the Charter School for any excessive number or disruptive visitors, those who fail to make advance arrangements or whose presence conflicts with other Charter School activities.
 - 1.3 Visitors shall not go directly to classrooms or interrupt staff members in the performance of duties. All visitors must sign-in and out of the building and carry a visitor's pass or identification badge. If such visitors do not have current state and federal criminal and state child abuse clearances on file at the Charter School, visitors must be accompanied by a staff member at all times if during Charter School hours or if students are in the Charter School facility. Charter School staff who observe visitors without proper identification or without a Charter School staff escort shall report it immediately to the Charter School office.
 - 1.4 Visitors are prohibited from carrying weapons into the Charter School building. Only on duty law enforcement officers are permitted to carry their weapon in the building.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

SOLICITATION POLICY

Solicitation, distribution of literature/printed materials and the sale of merchandise by an employee of the Urban Pathways K-5 College Charter School (“Charter School”) for any purpose is prohibited while an employee is on his/her work time (“work time” does not include meal periods, authorized rest breaks or any period when employees are properly not engaged in the performance of their work tasks). Employees who are not on work time may not solicit employees who are on work time or distribute literature/printed materials of any kind in working areas.

Solicitation of employees or distribution of advertising materials, handbills or printed or written literature of any kind to employees on the premises of the Charter School by persons who are not school employees is prohibited at any time. This policy does not include school-authorized vendors.

The Charter School bulletin boards and other areas where information is posted are provided for advertising of school functions or information. Posting of any literature/printed materials unrelated to such functions or information is strictly prohibited.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.

ADOPTED this _____ day of _____, 2023

President

Secretary

Urban Pathways K-5 College Charter School

Board of Trustees Policy

Video Surveillance Policy

The Board of Trustees of Urban Pathways K-5 College Charter School (“Charter School”) ensures that all students have the right to a safe school environment and therefore, endorse this policy with regard to video surveillance within the Charter School’s classrooms, hallways, lunchrooms, assembly halls or other public areas of the School building in which Students do not have an expectation of privacy. There will not be any audio recording of students or others in the School building as part of the video surveillance approved through this policy.

In order to prevent any foreseeable FERPA violations, this Policy sets forth:

- a clear statement of appropriate reasons for using surveillance cameras;
- the role and responsibilities of individuals with access to the cameras;
- individuals who will have access to any footage;
- how long will any footage be kept and how will it be destroyed; and
- the need for a consent provision to be signed by Parents/Guardians.

Such surveillance is permitted primarily for the purpose of monitoring and improving student safety. This video footage may also be used as part of a Student or Students’ educational programming if Student is IDEA eligible and as a result has behavioral needs or has behavioral accommodations in the Student’s Section 504 Service Plan. This footage may provide valuable information as to behavioral triggers, both individually and environmentally, that are critical to the successful completion of Functional Behavioral Assessments, Positive Behavior Support Plans, and informal behavioral interventions. In both cases, images from the video surveillance cameras are subject to the Family Education Rights and Privacy Act, (“FERPA”), if being maintained as educational records for use in educational programming and/or disciplinary actions.

The CEO, Technology Director, and other designated Administrators, as necessary in a situation, will have access to the camera footage in order to determine if same will be

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Video Surveillance Policy

maintained as an educational record based on the content of the video footage. A Charter School employee, contractor, volunteer, Parent or Student should notify either the CEO, Technology Director, or other designated Administrator if there is a belief that some or all of the video footage from one or more dates requires review with regard to a behavioral or disciplinary incident or involves educational programming for one or more students.

In addition to Charter School personnel listed above, and in accordance with FERPA, these videotaped educational records may only be shared with the Parents/Guardians of the students whose images are on the video and with outside law enforcement authorities, as appropriate. Images of students captured on security videotapes that are maintained by a School's law enforcement unit may not be initially considered education records under FERPA but may be seen as FERPA protected if later used by School Administration in a disciplinary proceeding. In order to view footage containing students' images other than of a Parent/Guardian's own child, permission must be requested by the Charter School and granted by the other students' Parents/Guardians before the Charter School may permit a Parents/Guardians' review of another student on the video footage for purposes of FERPA confidentiality.

Video footage will be maintained only **period of time** unless Administration is notified that there is a request for review by a Parent or Student based on a safety, behavioral or programming concern. If it is determined by Administration, after such a review, that any/all of the footage is to be maintained as an educational record, it will be maintained in accordance with the Charter School's Board Approved Record Retention and Destruction Policy.

Notice to the Charter School community of the use of surveillance cameras in areas of the School building in which Students do not have an expectation of privacy will be placed in the Parent/Student Handbooks which is distributed to all Charter School families annually. Such notice will also be posted on the School's website and by posting actual signs in the School building that surveillance cameras are located throughout public areas of the school building and therefore, that anyone on Charter School property may be videotaped. The notices shall contain language that no audio taping will occur with the videotaping. A contact person from the Charter School staff will be included in the Handbook for parents and students to make any inquiries regarding this policy and any related Charter School procedures.

With regard to any Open Records obligations of the Charter School, typically, FERPA-protected education records are excepted from the disclosure requirements of open-

records laws. So if the recording is maintained by Charter School officials as an education record because, for instance, it contains images of a student in an altercation, the Charter School's obligations under FERPA to protect the confidentiality of the recording will, in most cases, override its open-records obligations.

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ADOPTED this day _____ of _____, 2023

President

Secretary