

School Committee Policy Review Subcommittee
Monday, April 22, 2019
6:00 PM – 7:50 PM
5th Floor Conference Room, Town Hall

Policy Review Subcommittee members present: Mr. Glover (Chairman), Ms. Monopoli, and Ms. Schreiner-Oldham.

School Staff present: Mr. Bott, Ms. Dunn, Dr. Gittens, Ms. Ngo-Miller, Dr. Brown, and Ms. Coyne.

Others present: Special Education Parent Advisory Council Co-Chair Craig Haller.

1) Approval of Minutes

On a motion of Mr. Glover and seconded by Ms. Monopoli, the Policy Review Subcommittee voted unanimously to approve the minutes of the April 2, 2019 Policy Review Subcommittee meeting.

2) Review of Proposed New Public Schools of Brookline (PSB) Policy to Support Students who are Transgender and/or Gender Non-Conforming

The Subcommittee reviewed proposed changes (Attachment A) to the draft PSB Policy to Support Students who are Transgender and/or Gender Non-Conforming. Subcommittee members and staff liked the reorganization and edits. Discussion focused on the balance between 1) the desire of parents/guardians to be informed and involved and 2) student privacy and safety. Members discussed the following: whether procedures should vary depending on the student's age/grade; when and how to make changes to student records; how to ensure that parents/guardians still receive student notifications and reports (it was pointed out that Brookline High School has already dealt with this issue); whether the policy should include detailed procedures/expectations or be a more general statement of the district's commitment to support students regardless of their gender identity; and what constitutes a plan (is it always in writing, who can initiate a plan). Members suggested that we consider how the proposed policy/procedures might apply under different scenarios.

Mr. Bott offered to share the draft policy with local experts Valerie Frias (Greater Boston PFLAG Executive Director) and Jeff Perrotti (Senior Consultant to the Safe Schools Program for LGBTQ Students) and ask for their thoughts on the overall direction and how they would approach the above questions. Members suggested that Mr. Bott consult with Town Counsel's Office regarding applicable law and regulations.

3) Update on Proposed Changes to PSB Student Field Trip Policy

The Subcommittee discussed proposed changes to the PSB Student Field Trip Policy, including a list of questions that should be addressed (Attachment B). Subcommittee discussion focused on the following: whether/when it is appropriate to exclude students from trips for behavioral issues; chaperone ratios and background checks; different requirements/approvals for local day trips, out-of-state trips, and out-of-country trips; availability of financial assistance; use of private vehicles to transport students; purpose of trips and connection to curriculum; compliance with PSB Wellness Policy; who can initiate and organize trips; and the need to be clear that trips must be fully accessible to students with disabilities.

Mr. Glover will revise the draft policy based on today's discussion and will add headings. The Subcommittee will continue discussion at the next meeting.

4) Update on Proposed Changes to PSB Student Activities Fund Policy

Ms. Dunn stated that the proposed PSB Student Activities Fund Policy (Attachment C) does not apply to PTOs. The Subcommittee will continue discussion at the next meeting.

5) New Business

The Subcommittee may be asked to provide guidance on the basis for designating school holidays and whether the first day of Lunar New Year should be a Category One School Holiday. The Superintendent will be asked to provide additional information, including what is done in other districts.

The meeting adjourned at 7:50 PM.

Public Schools of Brookline (MG edits for 4.22 Policy subcommittee meeting Revised 12.20.18)

Policy to Support Students who are Transgender and/or Gender Nonconforming

Through the core value, “Respect for Human Differences,” the Public Schools of Brookline affirm the district’s responsibility “...to create an atmosphere of safety in which to acknowledge and express difference while advancing true acceptance and respect.” This Policy to Support Transgender and Gender Nonconforming Students further clarifies and articulates the district’s commitment to ensure that all students are safe, included and respected in school, regardless of their gender identity or expression.

The Public Schools of Brookline is committed to supporting any student who asserts a gender identity or expression different from the gender assigned at birth. In most cases, such an assertion involves more than a casual declaration of gender identity or expression, but it does not require a medical diagnosis.

The Public Schools of Brookline recognizes that students of any age may be transgender and that the circumstances around each student’s sexual identity and expression are unique. School staff shall work with students whenever possible to establish healthy communication and ensure the needs of transgender students are met.

Some students who are transgender face family rejection, which can result in negative outcomes such as abuse or ejection from the home. The Public Schools of Brookline is responsible for ensuring a safe and affirming environment with equal opportunity for all students. Staff should take guidance from, and work collaboratively with, each student to ensure that the student remains safe both at school and at home.

Schools may be the only safe space where students feel comfortable fully expressing their gender. Therefore, it is critical that parent approval is never a prerequisite for respecting a student’s chosen name, gender identity, and chosen pronouns.

A.I. Purpose

The purpose of this ~~policy~~procedure is to:

1. Establish, maintain and foster an educational environment that is safe, welcoming and free from stigma and discrimination for all students, regardless of sex, sexual orientation, gender identity, or gender expression;
2. Maximize students’ social integration to ensure safety and comfort, while providing equal opportunity and access in school admission, admissions to course content, guidance, and extracurricular and athletic activities for which they are eligible;
3. Ensure that all students have the opportunity to express themselves and live authentically; and

4. Facilitate compliance with local, state and federal laws concerning privacy and discrimination-

This ~~Policy~~~~procedure~~ is intended to be interpreted in light of applicable state and federal laws and regulations, as well as ~~School Committee~~ other Public Schools of Brookline policies, procedures and school rules including, without limitation, the Statement on Diversity, the Policy Against Discrimination, Sexual Harassment and Retaliation, the Bullying Prevention Policy, and the Student Code of Conduct.

This ~~Policy~~~~procedure~~ is not intended to anticipate every possible situation that may occur, since the needs of particular students and families differ depending on the student's age and other factors. In addition, the programs, facilities and resources of each school building also differ. Administrators and school staff are expected to consider the needs of students on a case-by-case basis and to utilize those procedures and other available resources as appropriate.

For the purpose of this ~~p~~Policy, the word "parent" will signify parent, guardian, or caregiver. The pronoun "they" (in the singular form) will be used in place of the pronouns she or he.

B.II. Definitions

The following definitions are not intended to provide rigid labels for students, but to assist in discussing and addressing the needs of students. The terminology in this area is constantly evolving, and preferences for particular terminology vary widely. Administrators, school staff, volunteers, coaches, students and others who interact with students are expected to be sensitive to the ways in which_

individual students who are transgender may wish to be identified, and to recognize that -sStudents may or may not use the terms below to describe themselves or their experiences. The best way to find out is to ask.

- **Gender identity** - a person's deeply held knowledge of being male, female, some combination of male and female, or no gender.
- **Gender expression** - the physical and behavioral manifestations of one's gender identity.
- **Gender nonconforming** - a person whose gender expression differs from stereotypical expectations (also called "gender variant" and "gender atypical").
- **Nonbinary/Genderqueer** - a person who identifies with or expresses a gender identity that is neither entirely male nor entirely female.
- **Transgender** - an adjective describing a person whose gender identity or expression is different from that traditionally associated with an assigned sex at birth. The definition of Transgender may include, but is not limited to, individuals who are gender nonconforming and/or nonbinary/genderqueer.
- **Transition** - The process in which a person begins to live according to their deeply held identity rather than the gender they were thought to be at birth. This process may or may not involve social, legal, or physical changes.
- **Sexual orientation** - A person's romantic and/or physical attraction to people of the same and/or another gender, such as being straight, gay, bisexual, or asexual. Transgender and gender nonconforming people may have any sexual orientation.
- **Cisgender** - a person whose gender identity aligns with the sex assigned to them at birth.

C. Addressing the Needs of Students who are Transgender

A student will be considered transgender if, at school, they consistently assert a gender identity or expression different from the gender assigned at birth. This involves more than a casual declaration of gender identity or expression, but it does not require a medical diagnosis.

Students of all ages can often be the driving force behind a gender transition, and students are transitioning at younger ages. School staff should work with parents whenever possible to establish healthy communication and ensure the student's needs are met.

Each student will follow a unique process for transitioning. Students ready to socially transition often initiate a process to change their name, pronoun, and attire. In situations when students are leading the process, it will be important for school staff to speak with the student prior to involving parents or other family members to determine whether doing so would be safe and support the student's health and well-being.

Some students who are transgender face family rejection, which can result in negative outcomes such as

~~abuse or ejection from the home. Schools are responsible for ensuring a safe and affirming environment with equal opportunity for all students. Staff should take guidance from, and work collaboratively with, each student to ensure that the student remains safe both at school and at home.~~

~~Schools may be the only safe space where students feel comfortable fully expressing their gender. Therefore, it is critical that parent approval is never a prerequisite for respecting a student's chosen name, gender identity, and chosen pronouns.~~

D.III. Creating A Plan for Students who are Transgender/Transitioning

~~Upon the request of any transgender student, the PSB will work with the student and, if requested by the student, the student's parent(s) to The following procedure will be used to create a pPlan to address the needs meet the needs of such student with respect to their participation in school-based activities as a transgender student (a "Plan"). s who are transgender:~~

~~In clarification of the foregoing, PSB staff may only contact a student's parent(s) with regard to a student's gender identity, gender expression or Plan with the consent of the student except in the case of an emergency in which disclosure of such information is reasonably necessary to appropriately respond to the emergency. [is this "emergency" language necessary or too vague?]~~

~~1. ——— A student who is transgender and/or their parent should contact the building administrator or the student's counselor. In the case of students who have not yet enrolled in school, they should contact the Office of Student Affairs as part of the registration process. The Office of Student Affairs will ~~then~~ coordinate with the student's assigned school principal/administrator to develop a Plan.~~

~~2. The building administrator or designee should schedule a meeting to discuss the student's particular circumstances and needs. The student should help determine who should be at this meeting. In addition to the student and building administrator or designee, other participants may include the parent, school counselor, school nurse, teachers and/or other school staff, and possibly outside providers who can assist in developing a Plan for that student.~~

~~3. In consultation with the student and parent/others as appropriate, the school should develop a Plan to address the student's particular needs. While the Public Schools of Brookline do not conflate gender identity and disabilities, if a student has an IEP and/or a 504 plan, the team should consider the provisions of these plans as they develop a Plan. The Plan should:~~

~~a.i. In consultation with the student, determine what, if any, information to share with the student's parents.~~

~~b.ii. Identify resources that could assist parents to better understand how to support their child, if necessary.~~

~~e.iii. Describe how staff will communicate with building staff, other students, and coaches/trainers.~~

~~d.iv. Outline how the school will meet the student's specific needs around facilities (i.e. restrooms, locker rooms, overnight accommodations, etc).~~

~~e.v. Students who are transgender may dress in accordance with their consistently asserted gender identity.~~

~~f.vi. The school may request consultation from outside service providers as necessary in an effort to assist staff in developing a Plan appropriate for the~~

student. Such consultation would require a signed release.

If a student is transitioning or intends to transition, the Plan should address the student's unique process for transitioning. Students ready to socially transition often initiate a process to change their name, pronoun, and attire. PSB staff shall speak with the student to understand the student's school and family dynamics to determine whether doing so would be safe and support the student's health and well-being.

While the Public Schools of Brookline do not conflate gender identity and disabilities, if a student has an IEP and/or a 504 plan, the team should consider the provisions of these plans as they develop a Plan.

4. As in all cases regarding student matters, if agreement about the elements to be included in a Plan cannot be reached, the building administrator and/or a district-level administrator shall be consulted as appropriate.

Teachers and other staff who have responsibilities for a student who is transgender will receive support in implementing the student's Plan.

5.

6. The Plan(s) shall be kept in the Counselor’s office, with a notification added to the district’s data management system informing educators to consult with the School Counselor for further information. For privacy reasons, the actual Plan will not be uploaded to a student’s data profile.

IV. Continued Guidance: Privacy, Records, and

Access, Inclusion and Support

E.

Privacy:

The District shall ensure that all personally identifiable and medical information relating to transgender and gender nonconforming students shall be kept confidential in accordance with state law. School staff shall not disclose any information that may reveal a student’s transgender status to others, including parents and other school staff, *unless legally required to do so or unless the student has authorized such disclosure.*

The student’s Plan shall address how and under what conditions to disclose that the student is transgender. In some cases, a student may want school staff and students to know, and in other cases the student may not want this information to be widely known. School staff should take care to follow the student’s Plan and not inadvertently disclose information that is intended to be private or that is protected from disclosure.

Official Records:

Under state law, information about a student’s assigned birth sex, name change for gender identity purposes, gender transition, medical or mental health treatment related to gender identity, or any other information of a similar nature, regardless of its form, is part of the individual’s student record (see Massachusetts Student Records Regulations, (603 CMR 23.00), is confidential, and must be kept private and secure, except in limited circumstances. (603 CMR 23.04.)

Schools are required to maintain a permanent record for each student that includes legal name and gender. This information is also required for standardized tests and official school unit reports. On school records or other documents, the school should use the name and gender identified in the student’s Plan, not the name or gender assigned at birth.

Under Massachusetts law, an individual may adopt a name that is different from the name that appears on the birth certificate, “provided the change is done for an honest reason, with no fraudulent intent. Nothing more formal than usage is required.”¹ (~~MA DESE’s Creating a Safe and Supportive School Environment Nondiscrimination on the basis of Gender Identity~~). The Massachusetts Department of Elementary and Secondary Education ~~ESE~~ has a process in place

¹ From the Massachusetts Department of Elementary and Secondary Education’s *Creating a Safe and Supportive School Environment- Nondiscrimination on the basis of Gender Identity*

to update name changes and gender markers in the [sStudent iInformation mManagement](#)
[sSystem](#).

Any requests to change a student's legal name or gender in official records should be referred to the Assistant Superintendent for Student Services. State law mandates that data about a student's assigned gender, name change related to gender identity, and other similar information is part of

the sStudent rRecord. When a student is using a chosen name and different gender than assigned at birth, the birth name and assigned gender are considered private information. The PSB The school will make every effort to update the student's record to reflect the student's chosen name and gender and not circulate records with the assigned birth name and gender. Records with the student's assigned birth name and gender should be kept in a separate, confidential file in the counseling office.

**School staff should remember that under Family Education Rights and Privacy Act/ERPA, student records may only be accessed and disclosed to staff with a legitimate educational interest in the information.*

Disclosures to others should only be made with appropriate authorization from the administration and/or parents or the student at age 14.

Names/Pronouns:

PSB School staff should address students who identify as transgender under these guidelines by the name and pronoun that correspond to the gender identity they consistently assert while at school. Some students may feel most comfortable with gender-neutral pronouns like “ze” or “they,” or referred to by their names without the use of pronouns.

Restrooms, Locker Rooms, and Changing Facilities:

A student who has been identified as transgender under these guidelines shall be permitted to use the restroom/locker room/changing facility assigned to the gender the student consistently asserts at school. A student who is transgender and expresses a need for privacy will be provided with reasonable alternative restroom facility or accommodations such as using a separate stall or a staff facility. However, students shall not be required to use a separate non-communal facility over their objection if a communal facility corresponding to the gender the student consistently asserts is available for use.

Athletics:

Students who are transgender may participate in accordance with the gender identity they consistently assert at school.² Interscholastic athletic activities are addressed through the Massachusetts Interscholastic Athletic Association Gender Identity Policy clarification (11/13/2014).

Other Gender-Based Activities, Rules, Policies, and Practices:

According to the Massachusetts Department of Elementary and Secondary Education, “Whenever students are separated by gender in school activities or are subject to an otherwise lawful gender-specific rule, policy, or practice, students must be permitted to participate in such

² See the Massachusetts Interscholastic Athletic Association Gender Identity Policy clarification (11/13/2014).

activities or conform to such rule, policy or practice consistent with their gender identity.” (MA DESE’s *Creating a Safe and Supportive School Environment- Nondiscrimination on the Basis of Gender Identity*).

Since the Public Schools of Brookline are responsible for ensuring a safe and affirming environment for all students, staff ~~should~~will not use gender-based practices such as lining boys and girls up separately to leave the classroom or using phrases like, “boys and girls.” Additionally, staff shall not separate students by gender for instructional or curriculum purposes. [how does this square with or relate to the statement above re: “lawful gender-specific rules”?].

Safety and Support for Students Who Are Transgender:

School staff are expected to comply with any Plan developed for a student who is transgender and to notify the building administrator or other designated support person for the student if there are concerns about the Plan or about the student’s safety or welfare.

School staff should be sensitive to the fact that students who are transgender may be at higher risk for being bullied or harassed. In accordance with M.G.L. c71 sec. 370, the Brookline Bullying Prevention and Intervention Plan [I believe this predates the Bullying Prevention Policy. We should confirm that this is the cross-reference we want to use here] provides guidance to administrators and the school community in responding to bullying.

Professional Learning for the Staff:

The District shall conduct training for all staff members on their responsibilities under applicable laws and this policy, including teachers, administrators, counselors, social workers, and health staff. Information regarding this policy shall be incorporated into training for new school employees.

To the extent funding is available, the District shall use reasonable efforts to implement ongoing professional development to build the skills of all staff members to prevent, identify and respond to bullying, harassment, and discrimination. The content of such professional development shall include, but not be limited to:

- (i) terms, concepts, and current developmental understandings of gender identity, gender expression, and gender diversity in children and adolescents;
- (ii) developmentally appropriate strategies for communication with students and parents about issues related to gender identity and gender expression that protect student privacy;
- (iii) developmentally appropriate strategies for preventing and intervening in bullying incidents, including cyberbullying;
- (iv) classroom-management practices, curriculum, and resources that educators can integrate into their classrooms to help foster a more gender-inclusive environment for all students;
- (v) school and District policies regarding bullying, harassment, discrimination, and suicide prevention and responsibilities of staff.

Publication:

This policy will be distributed annually to students, parents, and staff. It will be included in any student code of conduct, disciplinary policies, handbooks, and on school websites.

Resources

GLSEN: Model School District Policy on Transgender and Gender Non-conforming Students (Sept. 2018), National Center for Transgender Equality (NCTE)

~~Acton-Boxborough (MA) Policy on Transgender Students-~~

~~https://www.abschools.org/UserFiles/Servers/Server_216027/File/School%20Committee/Policies/J/JP-R-Procedure-Transgender-Students.pdf~~

MA Department of Elementary and Secondary Education: *Creating a Safe and Supportive School Environment- Nondiscrimination on the basis of Gender Identity*

Brill, Stephanie. Pepper, Rachel. *The Transgender Child: A handbook for families and professionals.* Cleis Press. San Francisco, CA, 2008.

Killerman, Sam. *A Guide to Gender: The social justice advocate's handbook.* Impetus Books. Austin, Texas. 2017.

DRAFT

Purpose and Scope

The Brookline School Committee (BSC) recognizes that first-hand experiences provided by field trips and school-sponsored trips are a most effective and worthwhile means of learning; therefore, the BSC encourages that field trips and school-sponsored trips of significant educational value, which are related to the total school program and curriculum. Additionally, due to the inherent educational value of field trips and school-sponsored trips, it is the BSC's goal that all students be able to participate in and have equal access to field trips and school-sponsored trips.

Consistent with this goal, the Superintendent of the Public Schools of Brookline (PSB) shall establish guidelines for field trips and school sponsored trips. These guidelines shall address the process for screening, evaluating and approving field trips and school-sponsored trips in order to ensure that all steps are taken for the health, safety and welfare of the participants and to ensure no substantial disruption to the educational process and the inherent educational value of the field trip and/or school-sponsored trip. Additionally, the guidelines shall provide that no student shall be denied participation in a field trip or school-sponsored trip as a consequence or form of punishment for previous behavior for which he/she already has been disciplined.

A student may only be excluded from a field trip or school-sponsored trip if the date or dates of his/her suspension or expulsion from school for a violation of school-based rules or the codes of conduct coincides with the scheduled date or dates of the field trip or school-sponsored trip, or if, in the judgment of the principal, a student's previous or current behavior poses a substantial risk to the health, safety and welfare of the student, other students and/or staff participating in the field trip and/or school-sponsored event. The guidelines also should require the prior approval of all field trips or school-sponsored trips by the principal, and the prior approval by the Superintendent of Schools and/or his/her designee of all overnight and out-of-state or out-of-country trips.

Furthermore, the guidelines shall establish procedures to assure that:

- (i) all students have parental/guardian permission for trips;
- (ii) all trips are properly supervised,
- (iii) all safety precautions are observed,
- (iv) all student files have been reviewed to determine if any accommodations or modifications are required in order for a student to participate in and have equal access to any field trip or school-sponsored trip;
- (v) all trips contribute substantially to the educational program;
- (vi) the district is monitoring whether students are excluded from participation in and/or having equal access to field trips and/or school-sponsored trips and, if so, for what reasons; and
- (vii) there are procedures in place for parents/guardians to appeal a decision to exclude a student from participation and access to a field trip and/or school-sponsored trip.

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Field Trip Policy

Field trips and school-sponsored trips require approval of the Brookline School Committee. Approval of all field trips and school-sponsored trips shall be conditional. Approval for any field trip or school-sponsored trip may be revoked if a change in circumstances, whether man-made or natural, would warrant cancellation of this field trip or school sponsored trip in the interest of the safety of the students and staff of the PSB.

The PSB and the BSC will not be responsible for any financial obligations incurred as a result of the planning of the field trip or school-sponsored trip, or for any monies that are non-refundable or are otherwise lost due to the subsequent cancellation of the field trip or school-sponsored trip or due to a student's exclusion from participation and access to a field trip or school-sponsored trip as a result of the student's suspension or expulsion from school on the date or dates of the field trip or school-sponsored trip.

No student shall be denied participation in a field trip or school-sponsored trip that takes place during the school day because of financial inability to pay the fee. Each club, team or group is responsible for raising all of the money necessary to fund a field trip or school-sponsored trip that is being proposed by a group of students. No fundraising or other preparations for a field trip or school-sponsored trip should occur until the field trip or school-sponsored trip has been approved. No financial support will be available from the PSB or the BSC for any overnight, out-of-state or out-of-country travel unless an athletic team or academic team or competition has qualified for an overnight, out-of-state or out-of-country competition and in these narrow circumstances final approval of funding for such travel by an athletic team or academic team is subject to final approval by the Superintendent.

The PSB and the BSC will not be responsible for any expenses incurred as a result of a chaperone's decision to send a student participant home earlier than the scheduled return date due to the student's unacceptable behavior. Students and their parents/guardians will be held responsible for any damage done to hotels, rental properties, real or personal property. Parents/guardians must agree to pay for any damages that may be done by their son/daughter and/or aid school officials in collecting money necessary to do so.

For all field trips requiring transportation, transportation must be provided by a common carrier that is licensed to do business in the Commonwealth of Massachusetts and is licensed for passenger transport by the Federal Motor Carrier Safety Administration, or in an approved Public Schools of Brookline licensed vehicle or by public transportation, such as the MBTA, bus, train or other form of public transportation.

All charter services for field trips or school-sponsored trips must be provided by a common carrier that is licensed by the Commonwealth of Massachusetts to provide charter services and is licensed for passenger transport by the Federal Motor Carrier Safety Administration. All vendors that provide transportation for field trips or school-sponsored trips must provide evidence that their driver(s) are licensed by a government agency in the Commonwealth of Massachusetts to drive the vehicles being used to provide the transportation for the field trips and/or the charter services for the field trips. All transportation vendors also must maintain liability insurance with a minimum of \$500,000 (five hundred thousand dollars) per occurrence for bodily injury. No transportation vendor shall be used to provide transportation and/or charter services for field trips or school-sponsored trips if it has a rating of "conditional" or

Comment [1]: this doesn't make sense for out of state trips that require transportation.

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Field Trip Policy

"unsatisfactory" issued by the Federal Motor Carrier Safety Administration. Nothing in this field trip policy should be construed to prohibit field trips where students travel by means of walking.

Comment [2]: what are expectations of carriers outside of the US?

Use of privately owned vehicles or leased vans to transport students to and from field trips, athletic events or school sponsored trips are strictly prohibited, except in the case of emergency. Determination of the existence of an emergency will be made by the principal and/or lead chaperone if the principal is not present. Staff and parents/guardians who use their own vehicles risk being legally liable for any injury a student sustains while in the vehicle.

Overnight accommodations should be made in advance with safety and security in mind and, whenever possible, travel between the hours of midnight and 6:00 a.m. should be avoided, trip itineraries should leave enough room for drivers to rest in conformity with federal hour-of-service requirements and common sense and take into account the likelihood of delays due to weather, traffic and unanticipated factors.

When on field trips, all PSB chaperones are considered to be at work. This means that chaperones are not to engage in the use of alcohol or tobacco during field trips or school sponsored trips. The student to chaperone ratio should be 10 to 1. While we encourage parents to attend field and school sponsored trips, every effort should be made to meet the 10 to 1 ratio with PSB employees. Any parents who chaperone trips must be cleared through the CORI/SORI system with PSB.

All staff chaperoning out-of-the-country school sponsored trips, must be trained by a designated field trip trainer each time they will chaperone an out-of-the-country field or school sponsored trip.

Other areas to consider for policy

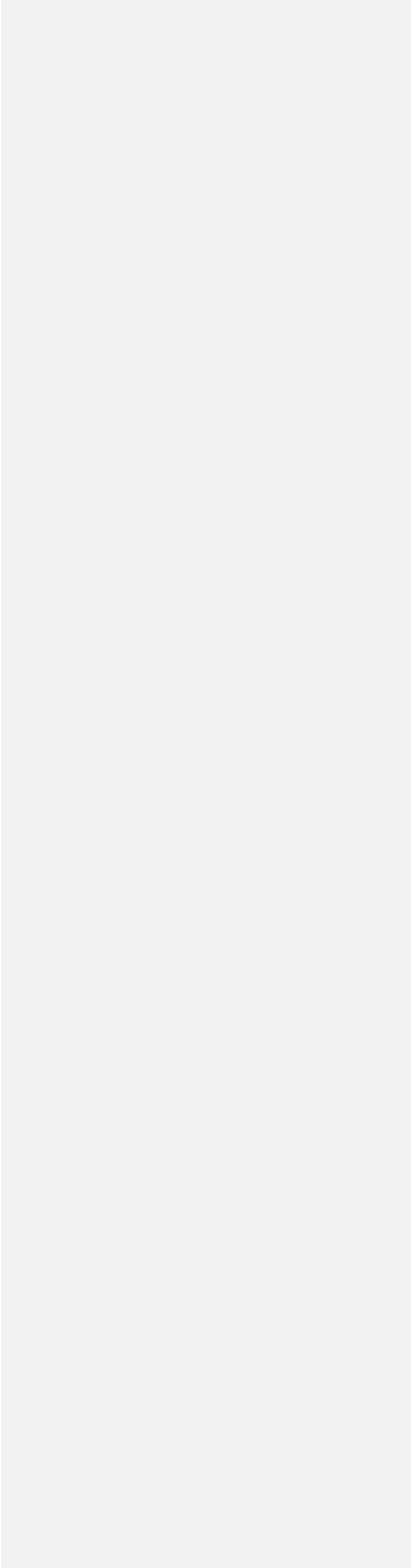
Purpose of field trips	Curricular/Educational Field Trip Cultural Field Trip Community Building Field Trip Service Learning Field Trip
Primary responsibility for field trips	Who is this? Teacher, principal, coordinator?
Written language	Are permission slips translated into home language?
Timeline for submission of field trip requests	How far in advance are field trips requests required? (Day trips, overnight, international)
Transportation	Do we have preferred vendors? Do we use our own transportation department?
Financial assistance?	What is required? How is financial assistance

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	gained?
Preparation for trips	How are students prepared for trips?
Safety procedures and guidelines	What safety requirements should be a part of the policy?
Accessibility	How do students and staff who are differently abled have access to trips?
Notification of colleagues of field trips	Do we have any requirements for this?
Current background checks for all chaperones	Should this be in the policy? How long is a background check good for? (this needs to be part of larger PSB policy). Time frame for requests for background checks?
Chaperones	Ratios? Ages? Number of PSB employees required based on type of field trip? Students with IEPs? What are chaperones obligated to? Can chaperones bring their children on trips?
Emergency protocols	Do we want to mention the requirement of safety procedures or planning as part of the policy?
Requirements for sleeping arrangements?	Maximum number of students in a room? Number of students to a bed?
Parental Authorization	Medicine administration Emergency care International travel/flights
CPR/First Aid training	Do we want a level of competence for chaperones? For different types of field trips?
Swimming/Water activities	Do we allow recreational swimming? What are the expectations? What about trips for the swim team? What are expectations? Cruises? Kayaking? Canoeing?
Student exclusion or self exclusion from field trips	What is required for these situations?
Recruiting diverse student and chaperones	What are the expectations for diversity?
Student attendance	How is student attendance marked?
Independent travel	Can students travel independently during a

	<p>field trip? Can students travel independently to a field trip? Can families who live where a field trip is being held pick a student up to spend time with them?</p>
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Proposed Revision 4.2.19 Draft

SECTION D
FISCAL MANAGEMENT
24. Student Activity Accounts

The purpose of this school committee policy is to

- 1) Comply with the enactment of a state law on student activity accounts as codified in Section 47 of Chapter 71 of the General Laws of Massachusetts (MGL) passed in 1996.
- 2) Comply with Chapter 41, section 35, whereby the treasurer must take custody of all monies belonging to the city or town and must scrupulously account for those monies.
- 3) Ensure that policy and procedure govern only student activity money, and not money that is governed under another M.G.L.
- 4) Require adequate internal control to ensure the projection of student monies; and
- 5) Require that procedures be established to support policy and provide for the segregation of duties

A program of co-curricular activities established by the School Committee should ensure that young people have an opportunity to take part in co-curricular and extra-classroom experiences; should provide efficient procedures for their creation, operation, and demise; and should outline a system for the safeguarding, accounting, and internal control of extra-classroom activity funds.

The School Committee authorizes the principals to receive money in connection with the conduct of authorized student organizations and legitimate co-curricular activities (field trips, plays, prom, student initiated fund raisers). The School Business Administrator shall develop operation procedures and guidelines for these accounts and conduct annual internal audits of these accounts. All funds raised for student purposes shall be deposited with the Town Treasurer as required by Chapter 41, section 35.

A student activity account shall only be used for monies raised by approved student organizations and expended by those students for their direct benefit. Funds raised or donated, which laws other than the student activities laws, such as fees, grants, govern, or general-purpose donation, cannot be deposited into a student activity account. In addition, funds belonging to staff through sunshine fund or other activities unrelated to students may not be deposited as student activity funds. At no time shall accounts be used to benefit staff.

- 1) Bank accounts will be issued via the Town Treasurer at a bank with a branch in Brookline.
 - a) All accounts shall be interest bearing as allowable under banking services selected by the Town Treasurer.
 - b) All online crowdfunding sites, ticketing sites, or other online tools to collect funds on the behalf of students shall be established by and under the control of the Town Treasurer;
 - c) All monies received in conjunction with approved student activities shall be deposited into the student activity agency account.
 - d) Two Accounts shall be established:
 - i) Savings/Depository Account:

- (1) There will be no maximum amount set for the savings/depository account.
- (2) All receipts shall be deposited with the Town Treasurer and credited against a building designated student activity savings/depository account.

ii) Checking Account: Each school principal will be provided with a checking account for expenditure purposes.

- (1) The maximum a school can have in its checking account at any time for an Elementary School maximum, \$10,000; and High School maximum, \$25,000.
- (2) No individual check or series of checks from the Student Activity Checking Accounts shall be written over \$3,000. Vendors owed more than this amount by contract or agreement shall have deposits made mid-contract/agreement payments made timely through the Town Warrant process or use the district credit card procedures. Writing multiple checks to circumvent this clause will cause the checking account to be frozen and check writing privileges to be revoked.
- (3) Deposits into the checking account shall be made under the direction of the Town Treasurer.

2) Expenditures/Accounting System

- a) The Superintendent and Town Finance Director, as assisted by the School Business Administrator, shall ensure that an accounting system for student activity funds be established in sufficient manner to facilitate basic reconciliation and control procedures.
- b) All expenditures shall be reported and recorded under the Town's financial system and follow all other school committee policies that apply and be submitted to School Business Administrator timely;
- c) Expenditures from the savings/depository account are encouraged since these will pass through the warrant process prior to the check being issued.
- d) Expenditures from the checking account, while discouraged are necessary in the following circumstances: Town warrant process will not meet payment deadline, Town procurement card will not be accepted, and attendance is unknown until day of event. Documentation of checks written shall be submitted to the School Finance Office within three business days of the check being written.
- e) Reimbursement to Employees and or volunteers via the checking account is expressly prohibited. All Reimbursements must be issued through the Town Warrant and follow Town policy, practice, and procedure.

Comment [1]: mike dipietro

3) Signature Authority

- a) All contractual obligations on behalf of students must follow the School Committee's Authorized Signature Policy
- b) Principals may sign checks from the checking account with an original signature. Signature stamps are not permitted.

- 4) Interest Earned: The interest earned by the Student Activity Agency Account will be retained by the fund and the School Committee will periodically allocate these funds to purposes as recommended by the School Principal. The interest earned on each student activity bank account shall remain in the account and be recorded as a separate line item by the building principal. Said interest shall be used to cover the following expenditures without requiring further approval from the School Committee.
- (a) The cost of periodic outside audits of the accounts;
 - (b) Purchase forms and supplies related to maintaining the student activity agency account by the school;
 - (c) The cost of student(s) attending a class or school function when students are charged for such, but the Financial Assistance policy determines the family is unable to cover such expenses;
 - (d) Refreshments for parents/student activities and for volunteers who have helped support the student programs;
 - (e) Rectify a deficit student activity account balance; and
 - (f) Bookkeeper/Manager of Student Accounts.
 - (g) To reimburse the Town or pay directly for any banking fees associated with the accounts, or the acceptance of credit cards, or other online payment option that may become available.
- 5) Commissions: Any monies paid to the school , advisor, chaperone, or to a student activity organization as commissions, honorarium for speaking, or remunerations related to a student activity club, organization, or field trip belong to the students. These funds should be deposited to one or more specific student activity sub-accounts (example: yearbook, senior class), as approved by the School Committee upon the recommendation of the Principal and acceptance. At no time shall such commissions be used to benefit staff.
- a) Commissions from Student Pictures will be used to support financial assistance and in the same manner as Interest Earned.
 - b) All other commissions, honorarium for speaking, or remunerations are accepted and deposited with the student club, organization, or field trip that generated the gift. E.g. Travel Companies may provide for a "free trip/ticket" or stipend to chaperones. "Free Ticket"/Stipend value must be calculated as part of the total trip costs.
- 6) Tax Exemption: Student Activities are conducted under the umbrella of the Town's tax exemption and expenditures made on behalf of student, are therefore tax exempt. Since student are not, in and of themselves tax exempt entities, purchase that student make on their own behalf are not tax exempt. Sales Tax on purchases that student make on their own behalf will be reimbursed at the discretion of the Town Comptroller.
- 7) Undesignated Earnings: Should a school have any undesignated earnings, the Principal must present a plan for the collection and expenditure of such monies to the School Committee for approval.

- 8) Deficit Account Balances: Individual activity accounts shall not be permitted to be in a deficit position because such a position represents a liability to other individual activities or possibly to future class accounts. In the event that a specific student activity develops a deficit balance not resulting from timing, the deficit may be resolved using one of the following remedial actions:
 - a) School Committee Appropriation;
 - b) Accumulated interest earnings;
 - c) Surpluses of inactive accounts, upon approval of the School Committee;
 - d) Gift from an activity with a surplus balance, upon written approve of one or more student representatives and the School Principal; and
 - e) Any other legal means.

- 9) Reporting and Record Keeping:
 - a) The School Business Administrator shall provide a Student Activity Manual to all employees upon hiring and distribute updates to all employees as necessary providing guidelines and procedures for all aspects of this policy;
 - b) Principals, faculty, and staff shall comply with this policy, and the guidelines and procedures provided in the Student Activity Manual.
 - c) Principals shall submit monthly reconciliations to the School Finance Office for all banking activity within 30 days of receipt of the monthly bank statements. The School Finance Office will reconcile all banking activity against the town financial system and submit full reconciliation package to the Town Treasurer.
 - d) The School Business Administrator shall conduct an annual internal audit of each Student Activity Account to document compliance with this policy.

- 10) The Superintendent must approve all student organizations requiring student activity accounts under each building fund.
 - a) Each student account must be specific to a student organization.
 - b) Students will follow the requirements for forming a student organization under School Committee policy and the guidelines and procedures provided in the Student Activity Manual.
 - c) Students will recommend the establishment of Student Activity Accounts to the building Principal.
 - d) The Principal, in turn, will make a recommendation to the Superintendent of Schools.
 - e) The accounts must be specific to a student organization.
 - f) Discretionary or commingled accounts will not be allowed under this policy.

- 11) Graduating Class Funds and Liquidation of Activities Funds
Funds held on behalf of graduating classes are to be held within the Student Activity Checking Account for the High School. Such funds shall be designated by the class' Year of Graduation, such as Class of 2017, etc.

Student class funds remain with the class through graduation. Once graduated, the class accounts shall remain open for 90 days. At the close of 90 days all remaining funds are liquidated and

distributed as directed by a vote by the senior class officers. Absent a vote or direction, School Committee designates remaining funds will be used to support financial assistance and in the same manner as Interest Earned.

Any school organizations which do not meet at least once annually and which do not duly elect officers shall be considered inactive, and their funds shall be liquidated and divided equally among the remaining student organizations (non-class-specific funds) in the building.

All class and student organizations shall be asked to agree to the above procedure through adding a provision to their constitutions that any time their organization ceases to meet regularly and elect officers as constitutionally required, their funds may be taken over by the School Committee.