

NHDOE Federal Funds Monitoring

Corrective Action Plan

(Use a separate form for each Corrective Action Item)

Subrecipient contact: Heidi Duford

Subrecipient: Alton School District SAU 72

Action Item: Fiscal Monitoring Finding FY20 #01

Description: Drug Free Workplace policy in accordance with 34 CFR 84.200 and the Drug-Free Workplace Act

Date: 11/4/2021

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- X (2) Revised CAP being implemented
- (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

Timothy Broadrick, Superintendent 11/04/2021
Name of person completing this form Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

Policy GBEC/ADB Drug-free Workplace/Drug-free Schools has been drafted to comply with 34 CFR 84.200 and the Drug-free Workplace Act of 1988 and is on the Alton School Board's posted meeting agenda for November 8, 2021.

Corrective Action Plan Update or other explanation as necessary, (status date: //) If option (3) is selected, please explain how this was implemented in the space below:

Please return to the Bureau of Federal Compliance within 30 days of receipt.

The New Hampshire Department of Education does not discriminate on the basis of race, color, religion, marital status, national/ethnic origin, age, sex, sexual orientation, or disability in its programs, activities and employment practices.

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Subrecipient contact: Heidi Duford

Subrecipient: Alton School District SAU 72

Action Item: Fiscal Monitoring Finding FY20 #02

Description: Procurement Procedures for Educational Services valued over \$10,000 per year

Date: 11/4/2021

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- (2) Revised CAP being implemented
- X (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

<u>Timothy Broadrick, Superintendent</u>	<u>11/04/2021</u>
Name of person completing this form	Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

Corrective Action Plan Update or other explanation as necessary, (status date: //) If option (3) is selected, please explain how this was implemented in the space below:

The new superintendent and business administrator implemented procurement procedures during July, 2021. Alton Central School administrators attended training on August 10, 2021. The page from the SAU's procedural guide related to purchasing of educational services valued above \$10,000 is attached hereto.

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Purchasing Educational Services Above \$10,000

1. Procurement of services that meet a student educational need shall be made in consultation with the Business Administrator.
2. The school administrator responsible for the services shall initiate a Request for Qualifications (RFQ). This process shall be in writing and shall include, at a minimum:
 - a. A statement regarding the desired qualifications of the vendor;
 - b. An estimate of the number of teachers/classes/students to be served and/or the amount of time that may be required;
 - c. A date by which vendor responses must be submitted.
3. To be considered responsive, vendors must provide, at a minimum:
 - a. The individual's, organization's, and/or its employees' qualifications to provide the desired services, including but not limited to legal and regulatory requirements;
 - b. A per-unit price for each service the vendor proposes to provide (units may be class periods or hours);
 - c. A "not-to-exceed" annual total cost to provide the services estimated in the RFQ.
4. The administrator may consider the above factors, as well as other qualitative factors that depend on the administrator's expertise, when recommending a contract.
5. The administrator shall recommend one or more contracts to the SAU office. In this recommendation, the administrator shall include a list of all vendors to whom the RFQ was provided, a list of those who responded, and a brief rationale for his or her recommendation(s). This rationale must include an explanation for any single-source, proprietary, or other non-competitive procurement.
6. In order to protect the school's ability to provide FAPE for every student, all educational service contracts
 - a) shall be non-exclusive and
 - b) shall contain termination language with no liquidated damages to the school.
7. The Business Administrator or Superintendent must sign all contracts above \$10,000 for educational services.
 - a. Authorization to exceed any service contract's "not to exceed" cost must be requested in writing from the SAU office and may be granted only by the Business Administrator or Superintendent.

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Subrecipient contact: Heidi Duford

Subrecipient: Alton School District SAU 72

Action Item: Fiscal Monitoring Finding FY20 #03

Description: Federal grant-compliant timesheets

Date: 11/4/2021

Please check the box that most appropriately matches the District's status in implementing the Corrective Action Plan (CAP). Please also provide any documentation that supports the District's assertion that the CAP has been fully implemented.

- (1) Partially implemented
- (2) Revised CAP being implemented
- X (3) Fully implemented
- (4) No further action required (provide detailed explanation below):

Timothy Broadrick, Superintendent 11/04/2021
Name of person completing this form Date

If options (1) or (2) are selected, please explain the implementation status &/or how the CAP was revised as well as the anticipated completion date in the space below:

Corrective Action Plan Update or other explanation as necessary, (status date: //) If option (3) is selected, please explain how this was implemented in the space below:

The new business administrator implemented a federal grant-compliant time card in July, 2021. A copy is attached hereto.

Please return to the Bureau of Federal Compliance within 30 days of receipt.

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ALTON CENTRAL SCHOOL TIME CARD

Two weeks ending: _____

Employee _____ MONTH _____ DAY _____ YEAR _____

DATE	ACTIVITY	TIME OF ARRIVAL		LUNCH		END OF WORKDAY		TOTAL WORKED HOURS	PRE-APPROVED ADD'L HRS.		TOTAL ADD'L HRS.
		IN	OUT	IN	OUT	IN	OUT		IN	OUT	
Sunday											
Monday											
Tuesday											
Wednesday											
Thursday											
Friday											
Saturday											
TOTAL WORK HOURS											
Sunday											
Monday											
Tuesday											
Wednesday											
Thursday											
Friday											
Saturday											
TOTAL WORK HOURS											
TOTAL HOURS TO BE PAID											

I certify that I have been working solely in activities supported by the _____ grant for the hours recorded above.

SIGNATURE OF EMPLOYEE _____

SIGNATURE OF SUPERVISOR _____

WHEN THE PAY PERIOD ENDS SIGN AND THEN PUT YOUR COMPLETED TIME CARD IN YOUR SUPERVISOR'S MAILBOX
OVERTIME MUST BE PRE-APPROVED

DRUG-FREE WORKPLACE / DRUG-FREE SCHOOLS**A. Drug-Free Workplace**

1. All District workplaces are drug- and alcohol-free. All employees and contracted personnel are prohibited from:
 - a. Unlawfully manufacturing, dispensing, distributing, possessing, using, or being under the influence of any controlled substance or drug while on or in the workplace, including employees possessing a "medical marijuana" card.
 - b. Distributing, consuming, using, possessing, or being under the influence of alcohol while on or in the workplace.
2. For purposes of this policy, a "controlled substance or drug" means and includes any controlled substance or drug defined in the Controlled Substances Act, 21 U.S.C. § 812(c), or New Hampshire Controlled Drug Act RSA 318-B.
3. For purposes of this policy, "workplace" shall mean the site for the performance of work, and will include at a minimum any District building or grounds owned or operated by the District, any school-owned vehicle, and any other school-approved vehicle used to transport students to and from school or school activities. It shall also include off-school property during any school-sponsored or school-approved activity, event or function such as a field trip or athletic event where students are under the jurisdiction, care or control of the District.
4. As a condition of employment, each employee and all contracted personnel will:
 - a. Abide by the terms of this policy respecting a drug- and alcohol-free workplace, including any administrative rules, regulations or procedures implementing this policy; and
 - b. Notify his or her supervisor of his or her conviction under any criminal drug statute, for a violation occurring on District premises or while performing work for the District, no later than five (5) days after such conviction.
5. In order to make employees aware of dangers of drug and alcohol abuse, the District will endeavor to:
 - a. Provide each employee with a copy of the District drug- and alcohol-free workplace policy;
 - b. Post notice of the District drug- and alcohol-free workplace policy in a place where other information for employees is posted;
 - c. Establish a drug-free awareness program to educate employees about the dangers of drug abuse and drug use in the work place, the specifics of this policy, including, the consequences for violating the policy, and any information about available drug and alcohol counseling, rehabilitation, reentry, or other employee-assistance programs.

B. District Action Upon Violation of Policy

An employee who violates this policy may be subject to disciplinary action; up to and including termination of employment. Alternatively, the Board may require an employee to successfully

complete an appropriate drug- or alcohol-abuse, employee-assistance rehabilitation program.

The Board will take disciplinary action with respect to an employee convicted of a drug offense in the workplace, within thirty (30) days of receiving notice of a conviction. Should District employees or contracted personnel be engaged in the performance of work under a federal contract or grant, or under a state contract or grant, the Superintendent will notify the appropriate state or federal agency from which the District receives contract or grant moneys of an employee/contracted personnel's conviction, within ten (10) days after receiving notice of the conviction.

The processes for disciplinary action shall be those provided generally to other misconduct for the employee/contractor personnel as may be found in applicable collective bargaining agreements, individual contracts, School Board policies, contractor agreements, and or governing law. Disciplinary action should be applied consistently and fairly with respect to employees of the District and/or contractor personnel as the case may be.

C. Drug-Free School Zone

Pursuant to New Hampshire's "Drug-Free School Zone" law (RSA Chapter 193-B), it is unlawful for any person to manufacture, sell prescribe administer, dispense, or possess with intent to sell, dispense or compound any controlled drug or its analog, within a "drug-free school zone". The Superintendent is directed to assure that the District is and remains in compliance with the requirements of RSA 193-B, I, and N.H. Ed. Part 316 with respect to establishment, mapping and signage of the drug-free zone around each school of the District.

OPTIONAL - MAY ONLY BE ADOPTED UPON REQUEST BY A SYRINGE SERVICE PROGRAM ADMINISTRATOR - see 2nd paragraph of NHSBA revision note September 2018 below. Notwithstanding above paragraph, the board grants an exception to allow for a Syringe Service Program within the boundaries of the Drug-Free Zone of the Barnstead Elementary School, and as requested by Barnstead School District, a syringe service program administrator/operator as that terms is used in RSA 318-B:43 and 45.

D. Implementation and Review

- a. The Superintendent is directed to promulgate administrative procedures and rules necessary and appropriate to implement the provisions of this policy.
- b. In order to maintain a drug-free workplace, the Superintendent will perform a biennial review of the implementation of this policy. The review shall be designed to (i) determine and assure compliance with the notification requirements of section A.5.a, b and d; (ii) determine the effectiveness of programs established under paragraph A.5.c above; (iii) ensure that disciplinary sanctions are consistently and fairly enforced; and (iv) and identify any changes required, if any.

Legal References:

- *41 U.S.C. §101, et. Seq. - Drug-free workplace requirements for Federal contractors, and Federal grant recipients*
- *RSA Chapter 193-B Drug Free School Zones*
- *N.H. Admin. Code, Ed. Part 316*

First Reading & Adoption: 2/10/14 (New)

Frist Reading: 2/8/16

Second Reading & Adoption: 5/17/16

First Reading: 11/8/21

Second Reading & Adoption: 11/8/21