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Proposed Chapter 10 Regulations
Areas of Concern

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2012 MAR -1 P 1:30

Section 10.8 (g) (4) (5) (6)

Requirement: Provide Current Student Roster, Teacher/Employee Roster and Current Yearbook to Law Enforcement on or before September 30 of each school year.

Objection:

A student and staff roster provided prior to September 30 will have minimal value, as information regarding student and staff is constantly changing. Information provided on or before September 30 will be inaccurate within a few days or weeks because of transient nature of school students and staff. Additionally, current year Yearbooks are not available until May and provide minimal value to law enforcement for identification. Most public school systems maintain digital photo ID's which are tracked and maintained in computerized enrollment systems.

Recommendation

Current student and staff rosters will be provided upon request or activation of an Emergency Command Center. Photo Id's of students will be provided upon request.

Section 10.8 (g) (4) (5) (6)

Requirement

Provide Current Student Roster, Teacher/Employee Roster and Current Yearbook to Fire Departments on or before September 30 of each school year.

Objection:

Many fire departments in Pennsylvania consist of solely volunteer members who are not required to undergo background checks or clearances. Additionally, junior firefighters of school age may have access to rosters and emergency planning information. Operational Security concerns regarding the confidential nature of student information and district emergency plans as identified in section 10.8 (g)(1-10) would be of critical importance and could be easily compromised. Current year Yearbooks are not available until May, and again provide minimal value to fire departments for identification. Most public school systems maintain digital photo ID's which are tracked and maintained in computerized enrollment systems.

Recommendation

In the event of an emergency, student rosters, staff rosters and confidential district emergency planning information will be made available to Fire Department personnel through the Incident Command System as prescribed and in accordance with NIMS. Photo Id's of students will be provided upon request.

Cooper, Kathy

From: Michelle L. Elliott
Sent: Thursday, March 01, 2012 12:15 PM
To: IRRRC; Wilmarth, Fiona E.; Schalles, Scott R.; Hoffman, Stephen F.
Subject: FW: Comments on Ch 10
Attachments: Proposed Chapter 10 Regulation Concerns V2.docx

From: Kauffman, Bob [<mailto:Rkauffman@mbgsd.org>]
Sent: Thursday, March 01, 2012 12:07 PM
To: Michelle L. Elliott
Subject: Comments on Ch 10

Please find attached comments on the proposed Chapter 10 Regulations.

Respectfully submitted,

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