



POLICY 6.032

- 4-G** I recommend that the Board approve repeal-adoption of the proposed repeal of Policy 6.032, entitled "Use of Biometrics."

[Contact: Mike Burke, PX 48584 and Allison Monbleau, PX 52021.]

Repeal-Adoption

CONSENT ITEM

- The proposed policy was approved for repeal-development at the February 25, 2015 Board meeting.
- This policy is being repealed as the use of biometrics is disallowed by Section 1002.222 (1)(a), Florida Statutes.

POLICY 6.032

USE OF BIOMETRICS

1. Purpose

- a. ~~It is the intent of the School Board, through its School Food Service Department, to utilize biometrics as an additional form of identification of students at the point of sale in the cafeteria. Due to USDA regulations for the National School Lunch Program, every student must be identified as he/she receives a meal.~~
- b. ~~Biometrics is more secure than other forms of identification since it cannot be forgotten, lost, stolen or shared.~~
- c. ~~Biometrics allows for a more efficient identification process of students which decreases processing time at the point of sale.~~
- d. ~~Biometrics would allow School Food Service to be more efficient in accounting for the meals in accordance with USDA regulations while at the same time serving the nutritional needs of the students.~~

2. Definition

- a. ~~Biometrics is a technology that utilizes an automated touchpad to recognize a person based on finger image or template.~~
- b. ~~Biometrics will use a point on the finger for the image and will not utilize actual fingerprints. It is not possible to generate a fingerprint from the stored biometric template.~~

3. Policy

- a. ~~The Superintendent/designee will determine which schools may utilize biometrics in the cafeteria based on efficiency and accountability needs, success of biometrics in other schools, ability to implement at a school, resource availability, and budgetary constraints.~~
- b. ~~The biometric information will be collected by the School Food Service Department through an enrollment process on a touch pad device and the templates will communicate to the School Food Service central office server where they will be stored. Students transferring from one District school to another will not need to re-enroll as the template will communicate to the new school's accountability software.~~
- c. ~~The biometric information will be treated as student educational information and will not be shared with anyone outside the District, unless~~

34 ~~allowed under Policy 5.50. The District will follow applicable standards and~~
35 ~~procedures set forth in the District's Student Records Policy 5.50.~~

36 ~~d. Moreover, biometric identification information is exempt from public~~
37 ~~records disclosure as stated within Florida Statutes Section 119.071(5) (g)~~
38 ~~1.~~

39 ~~e. The New and Returning Student Registration Form (PBSD 0636) or the~~
40 ~~Opt-In form (PBSD 2299) will be utilized as a communication tool to the~~
41 ~~parents regarding biometrics. Participation in the biometric program will~~
42 ~~be managed through the use of either of these forms. These forms are~~
43 ~~incorporated herein by reference as part of this policy, will be made~~
44 ~~available at schools and are on the District's forms web site located at~~
45 ~~www.palmbeach.k12.fl.us/Records/FormSearch.asp. The registration form~~
46 ~~(PBSD 0636) shall be verified under penalties of perjury pursuant to~~
47 ~~Florida Statutes Section 92.525 and shall include an opt in procedure to~~
48 ~~participate in the biometric program.~~

49 ~~f. In the case where a student is not participating in the program, the District~~
50 ~~will make available a different form of identification for that child, including~~
51 ~~PIN number, barcode roster, or barcode card.~~

52 ~~g. The School Food Service central office will be responsible for maintaining~~
53 ~~biometric data pursuant to the District's records retention schedule. At~~
54 ~~year end any students who have withdrawn from the District will have~~
55 ~~his/her biometric template removed from the active database and will need~~
56 ~~to re-enroll if returning to the District in the future. All active students will~~
57 ~~have his/her biometric information stored for use the next year. Year end~~
58 ~~databases are retained according to the District's record retention~~
59 ~~schedule.~~

60 ~~4. Standards~~

61 ~~It is the responsibility of all School District employees and third parties that have~~
62 ~~access to hold biometric data in confidence at all times, consistent with sub-~~
63 ~~paragraphs 3 (b) and 3 (c) above. Biometric information should be disclosed only~~
64 ~~for a required business purpose.~~

65 ~~The School District shall design adequate processes and procedural standards to~~
66 ~~protect biometric information held and/or used in accordance with this policy.~~
67 ~~Such standards, requirements and responsibilities shall include, but not be~~
68 ~~limited to, the following:~~

69 ~~a. *Permanent employees with access to biometric information must:*~~

70 ~~i. *Keep secure and confidential all biometric information.*~~

- 71 ii. ~~Maintain biometric information in a "secure" environment limited to~~
72 ~~only designated employees.~~
- 73 iii. ~~Restrict access to biometric data and processing to appropriate and~~
74 ~~authorized employees.~~
- 75 iv. ~~Ensure that all biometric data is protected against fraud,~~
76 ~~unauthorized use or other compromise.~~
- 77 v. ~~Restrict access to biometric information to the minimum number of~~
78 ~~people possible, including only to the appropriate personnel. These~~
79 ~~persons are defined as needing access in order to perform their~~
80 ~~day to day responsibilities.~~
- 81 vi. ~~Not release biometric information in any form unless there is a~~
82 ~~legitimate business purpose as provided herein.~~

83 ~~The Superintendent, or designee, is further authorized to impose further~~
84 ~~standards, requirements and responsibilities in administrative procedures and~~
85 ~~guidelines established to implement this policy.~~

86 5. ~~Compliance~~

87 ~~An Employee's failure to comply with this Policy or the associated, required~~
88 ~~administrative procedures will be deemed a violation of this Policy and subject~~
89 ~~the employee to personnel action up to and including termination.~~

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STATUTORY ~~Fla. Stat. §§ 1001.32(2); 1001.41(1) & (2); 1001.42(16)~~
AUTHORITY:

LAWS ~~Fla. Stat. §§ 1001.32(2); 1001.42(16); 1006.06; 119.071(5) (g)~~
IMPLEMENTED:

STATE BOARD OF ~~F.A.C. 6A-7.0411~~
EDUCATION RULE:

HISTORY: ~~6/3/2009; Repealed: __/__/2015.~~

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Legal Signoff:

The Legal Department has reviewed the proposed repeal of Policy 6.032 and finds it legally sufficient for repeal-adoption by the Board.



Attorney



Date