



POLICY 6.032

5-E I recommend that the Board approve development of the proposed **new** Policy 6.032, entitled "Use of Biometrics."

[Contact: Steve Bonino, PX 52017.]

Development

CONSENT ITEM

- This proposed new policy is intended to implement the use of biometrics at schools selected by the Superintendent as a form of identification of students at the cafeteria point of sale.
- Under this policy, parents will have the opportunity to opt-out, if they do not want their student to participate.
- Staff advises that:
 - Biometrics should provide for a more secure system for parents and students. The use of the finger template instead of a pin number restricts access to students accounts in which prepayments have been made.
 - Biometrics should provide for a more efficient process in the breakfast and lunch lines. Line speed has been documented to increase by 20% with the implementation of biometrics which allows for additional time for the students to consume their meals.
 - Biometrics should provide for a more accountable system where students cannot share his/her pin number and where absent students cannot be recorded as receiving a meal (USDA requires that each student be identified individually as he/she purchases a meal. This system would decrease the amount of time spent reconciling daily records against absentees for audit purposes)
 - Since biometrics cannot be lost, forgotten, or stolen, it should provide for a more convenient system for parents, students and staff.
 - Beginning in August of FY10 schools that currently participate in our 100% Accessible Breakfast Program, where all students receive free breakfasts, will need to re-qualify for the Provision 2 program. This will require all students be identified as they go through the line for breakfast. Some schools are feeding 500 students in 20 minutes for breakfast and School Food Service would not be able to serve all these students in that time frame without the efficiency that the

biometrics will allow.

POLICY 6.032

USE OF BIOMETRICS

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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.

- 33 c. The biometric information will be treated as student educational information
34 and will not be shared with anyone outside the District, unless allowed under
35 Policy 5.50. The District will follow applicable standards and procedures set
36 forth in the District's Student Records Policy 5.50.
- 37 d. Moreover, biometric identification information is exempt from public records
38 disclosure as stated within Florida Statutes Section 119.071(5) (g) 1.
- 39 e. School Food Service will include biometric information into its annual
40 communications to parents that will explain the use of biometrics and notify
41 them of the opt-out option and where to find the form.
- 42 f. An Opt-Out form (PBSD 2299 – School Food Service Student Biometric
43 Enrollment Opt-Out Request) will be made available at schools and is located
44 on the District's forms web site currently at
45 <http://www.palmbeach.k12.fl.us/Records/FormSearch.asp> and on the School
46 Food Service web site at
47 <http://sdpbc.palmbeach.k12.fl.us/sites/pub/9151/default.aspx> . A parent must
48 use this form in the event the parent wishes to have his/her child not use
49 biometrics. In the case where a parent opts out, the District will make
50 available a different form of identification for that child, including PIN number,
51 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 year
54 end any students who have withdrawn from the District will have his/her
55 biometric template removed from the active database and will need to re-enroll
56 if returning to the District in the future. All active students will have his/her
57 biometric information stored for use the next year. Year end databases are
58 retained according to the District's record retention schedule.

59 4. **Standards**

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

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

- 66 a. *Permanent employees with access to biometric information* must:
- 67 i. Keep secure and confidential all biometric information.
- 68 ii. Maintain biometric information in a "secure" environment limited to only
69 designated employees.

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

79 The Superintendent, or designee, is further authorized to impose further standards,
80 requirements and responsibilities in administrative procedures and guidelines established
81 to implement this policy.

82 5. **Compliance**

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

86 STATUTORY AUTHORITY: Fla. Stat. §§ 1001.32(2); 1001.41(1) & (2); 1001.42(16)
87 LAWS IMPLEMENTED: Fla. Stat. §§ 1001.32(2); 1001.42(16); 1006.06; 119.071(5) (g)
88 STATE BOARD OF EDUCATION RULE: F.A.C. 6A-7.0411
89 HISTORY: ___/___2009

Legal Signoff:

The Legal Department has reviewed proposed Policy 6.032 and finds it legally sufficient for development by the Board.

Attorney

Date



THE SCHOOL DISTRICT OF PALM BEACH COUNTY

School Food Service Student Biometric Enrollment Opt-Out Request

Complete this form (print or type) and return to your student's School Food Service Manager if you **DO NOT** want your child to be enrolled in the biometric software. There is no need to complete this form and return it to the school unless you want your child **NOT** to participate in biometric identification. If you have any questions regarding biometrics, contact your School Food Service Manager.

Date _____

Student Name _____

Student ID # _____

School Name _____

Grade _____

The School Food Service Department utilizes biometrics in the cafeteria to identify your child. A touchpad sensor is used to match the image of your child's finger to his/her school ID. No additional information is gained or stored. This information is kept secure and private similar to other student educational information. **This is not a fingerprint.** The finger scan cannot be printed. Your child's finger image will resemble this in the School Food Service system:



The use of a finger image will be easier for students and teachers than having to learn a PIN number or having to remember to bring an ID card to school each day. There will also be no way for your child's account to be accessed by another student.

However, if you would prefer that your child not participate, sign this sheet and return it to the school if you opt-out. Your child would then be able to use his/her student number, pin number or have a bar code scan as identification at the register. You may also opt out at any time during the year or in future years.

(Optional) I have decided to **OPT OUT** my student (named above) from participating because:

Signature of Parent/Guardian

Date

Print Parent/Guardian Name