



San Luis Obispo County Office of Education Manager Handbook

July 2025



Dear SLOCOE Employee:

The Mission of the San Luis Obispo County Office of Education states that we will promote student success by supporting the work of local school districts, delivering specialized student services, and providing countywide leadership and advocacy for the needs of all children. As a SLOCOE employee, you play an essential role in accomplishing this Mission. We get our work done through people, and without your contribution, our work will not be effective.

This handbook will provide guidance and direction for a variety of employment-related items, which will benefit you as you gain a solid understanding of various SLOCOE protocols and professional standards. Additional information can be found in the CSEA and CTA collective bargaining agreements, Merit System Rules for Classified Employees, and the California Education Code.

Your direct supervisor will be meeting with you to continue the orientation process and answer any questions you may have. Please take the time to review the contents prior to your meeting. I look forward to personally meeting you at the New Hire Orientation.

Sincerely,

James J. Brescia, Ed.D.
County Superintendent of Schools

**SAN LUIS OBISPO COUNTY OFFICE OF EDUCATION
MANAGEMENT HANDBOOK**

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MANAGEMENT ORGANIZATION

MANAGEMENT GROUPS: *(Revised 10/1/2021)*

In order to fulfill the needs of SLOCOE, it is necessary to have adequate, well-qualified staff. As indicated in the SLOCOE Employee Handbook, the organization of SLOCOE involves the County Superintendent for overall general administration and three divisions: Educational Support Services, Student Programs and Services and Business Services, each of which function under the direction of an Assistant Superintendent.

Supervisors are responsible for monitoring completion of employee goals and will provide oversight and support in the performance of duties of assigned staff. Managers should feel free to ask supervisors any questions that may arise in the course of employment.

In order to facilitate effective communication, the following management groups have been established:

1. Superintendent's Cabinet – Composed of Assistant Superintendents; Chief Human Resource Officer; Executive Director of Innovations; Executive Director, SELPA; Director of Facilities, Maintenance and Operations; Director of Information Technology Services; and the Superintendent's Confidential Executive Assistant, this group provides communication and interaction with the County Superintendent regarding departmental activities. It also provides input to the County Superintendent for the overall operating functions of SLOCOE.

2. Leadership Team – Composed of all certificated and classified managers, this group meets on the first Tuesday of every month for professional development activities, including training on new policies and procedures. The team reports on current affairs of the office as well as affairs at the state and federal level.

MANAGEMENT EMPLOYMENT INFORMATION

The policies and definitions listed in this handbook for management and supervisory employees at SLOCOE are the same. A **management employee** is an employee in a position having significant responsibilities for formulating SLOCOE policies or administering SLOCOE programs. A **supervisory** employee, regardless of job description, has authority in the interest of the employer to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to assign work to other employees and direct them, or to adjust their grievances, or effectively recommend that action, if in connection with the foregoing functions, the exercise of that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

(Reference: Government Code 3540.1)

The following are the classifications of management personnel in our office:

CERTIFICATED MANAGEMENT EMPLOYEE

An employee in a position requiring certification under the California Education Code and performing duties designated by the employer as management. The San Luis Obispo County Office of Education may contract with certificated management employees on a year-to-year basis or for periods not to exceed the end of the school year in which the term for which the Superintendent was elected expires.

Certificated Manager without Displacement Rights

A SLOCOE certificated manager does not receive tenure or gain seniority at any time (except as noted below), and is never classified as a permanent, probationary or substitute employee. The certificated manager serves at the pleasure of the Superintendent.

Certificated Manager with Displacement Rights

A certificated manager with displacement rights is one who has taught as a classroom teacher for SLOCOE and has obtained permanency as a teacher for SLOCOE prior to becoming a manager. Such an employee shall have permanency as a classroom teacher only, and does not obtain permanency or seniority as a manager.

Part-Time Certificated Manager

A part-time certificated manager works less than the number of days specified as work days on the certificated management salary schedule. All benefits provided to part-time certificated managers are pro-rated based on the FTE (Full Time Equivalent) of that employee. All work days are based upon an eight-hour work day.

CLASSIFIED MANAGEMENT EMPLOYEE

An employee in a position not requiring certification under the California Education Code, and performing duties designated as management duties by the employer, is considered a classified management employee.

Probationary Classified Manager

Classified managers, upon initial employment, shall serve a probationary period of six (6) months or 130 days of paid service, whichever is longer. During this probationary period, a classified manager serves at the pleasure of the Superintendent and may be dismissed at any time by the Superintendent or his/her designee.

Permanent Classified Manager

Upon successful completion of the probationary period, a classified manager shall gain permanent status in the position and shall be entitled to rights identified in the Education Code and the SLOCOE Merit System. Classified managers are subject to all provisions and protections of the SLOCOE Merit System.

Part-Time Classified Manager

A part-time classified manager works less than a 260 day work year required for a 1.0 FTE (Full Time Equivalent) as listed on the appropriate management salary schedule. All benefits provided to part-time classified managers are pro-rated based on the FTE of that employee. All work days are based upon an eight-hour day.

Limited Term Classified Manager

Limited term assignments may be made for a period of six months or less, except in substitute assignments which may not exceed the authorized absence of a regular employee. Limited term positions may be filled through the temporary promotion of a qualifying permanent employee or from any available eligibility lists.

(Reference: Merit System Rule 4763.2)

Provisional Appointments

When no eligibility list exists for a vacancy, an employee may be provisionally appointed to a position while a recruitment is in process not to exceed 90 working days (except under specific guidelines listed in the Merit System rules).

NON-REEMPLOYMENT

Certificated management employees serve on a year-to-year basis at the pleasure of the Superintendent. The certificated management employee's terms of employment are based on individual employment contracts. The Superintendent may choose not to renew a certificated manager's contract for employment. Classified managers are subject to the provisions set forth in the Merit System.

Notice

Except as may be stated in an individual employment contract, the Superintendent shall notify a certificated manager of the decision not to renew his or her contract no later than March 15th, or in the case of an emergency, as determined by the Superintendent, but no later than the time period between five days after the enactment of the state budget act and August 15th of the fiscal year which that budget act applies. The Superintendent's decision not to renew a certificated manager's contract shall be final and not subject to review.

Classified managers are subject to the terms and conditions of the Merit System. Classified managers may be dismissed for any of the causes listed in the Merit System.

(Reference: Merit System Rule 4772)

LAYOFFS

If a reduction in force becomes necessary, certificated management reductions will be determined in accordance with the program needs of SLOCOE. The Superintendent will make the final determinations based upon the recommendations of division heads. Classified managers may only be laid off for lack of work or lack of funds. The procedures regarding lay-off for classified employees are outlined in the Merit System.

(Reference: Merit System Rule 4771).

PERFORMANCE EVALUATIONS

Performance evaluations provide formal opportunities for employees and supervisors to discuss performance regarding delivery of services provided by this office to its clients. The major purposes of the evaluation system are to establish annual goals, communicate excellence in performance, and discuss areas where growth has been realized and areas where improvement and growth may be necessary. Performance evaluations are the result of on-going communication between the supervisor and employee and foster a learning environment that encourages personal and professional excellence. All evaluations are based on established job performance criteria for specific positions, following an established timeline and making use of designated evaluation forms.

Evaluation of Subordinates

Classified employees and all managers (both certificated and classified) who receive evaluations that are not satisfactory will not receive step increases on their next regularly scheduled date for a pay increase. This is based on the overall rating for the entire evaluation, not on one area needing improvement. Therefore, it is essential that evaluations be turned in to the Human Resources Department in a timely manner. Managers failing to meet evaluation deadlines will have this reflected in their management evaluation.

(Reference: Merit System Rule 4872.2)

DISCIPLINARY ACTION PROCEDURE

Every employee is expected to meet the standards as established by their job description and SLOCOE rules and regulations. Disciplinary action includes any action whereby an employee is subject to suspension, disciplinary reassignment, demotion or dismissal. Certificated managers are subject to the disciplinary provisions set forth in the Education

Code, and classified managers are subject to the disciplinary provisions set forth in the Merit System rules.

The disciplinary action varies with each case depending on the seriousness and frequency of the wrongful action, situations, or inaction. In the course of an investigation, a management employee may be placed on administrative leave with pay. This system sets out a practice, not an expectation or contractual right. No employee in a management capacity shall be suspended, demoted, dismissed, or in any way discriminated against because of his or her real or perceived ancestry, race, color, religion, creed, gender, gender identity, sexual orientation, age, marital status, physical or mental disability, genetic information, or medical condition related to childbirth, or association to someone in any of these protected classes, or any other consideration made unlawful by federal, state or local laws.

MANAGEMENT SALARY & BENEFITS

CABINET OFFICIALS SALARY SCHEDULES *(Revised 7/1/2025)*

The Cabinet Officials salary schedule consists of a salary range for each classification; initial salary placement is based upon experience and education, and is determined by the County Superintendent of Schools. There are fifteen steps in each salary range. Each step is approximately 3% above the previous step.

CABINET OFFICIALS MERIT INCREASES

An annual merit increase of 0-5% will be provided, based on evaluation of performance.

CABINET OFFICIALS LONGEVITY

Longevity will be awarded a total of 2.5% following five (5) years of SLOCOE service; a total of 5% following ten (10) years of service; a total of 7.5% following fifteen (15) years of service, and 10% following twenty (20) years of service. Longevity increases are granted on July 1st of the calendar year in which five, ten, fifteen, or twenty years of service has been completed. For example, if five years is completed on December 31st, the longevity increase would have been awarded the previous July 1st, even though only four and a half years had been completed. If five years is completed on January 1st, the longevity increase would be awarded the next July 1st, after five and a half years is completed.

MANAGEMENT SALARY SCHEDULES: *(Revised 5/1/2025)*

The management salary schedules consist of a salary range for each classification level and is assigned according to the degree of knowledge, complexity, accountability, and working conditions required for that classification.

There are twenty steps in each salary range. Each step is approximately 3% above the previous step. Any cost-of-living adjustment (COLA) typically applies to all steps on the management salary schedules. The salary schedules can be found on the SLOCOE website at www.slococoe.org.

(Reference: Board Policy 4351)

MANAGEMENT STEP INCREASES

Step increases are granted on July 1st of each year. Managers who meet all the criteria below will be granted one step increase for each year of service until the maximum salary for the classification is reached.

- 1) A satisfactory performance evaluation is received on or before June 1st of each year.

- 2) The manager is in paid status for .75 FTE or more of the work days of a 1.0 FTE. For example, a .50 FTE management employee would require two years to achieve the .75 FTE criteria and would step every other year.

Management employees will be eligible for a salary increase on July 1st of their second calendar year in which all eligibility criteria are met. For example, the first year a manager is hired (at any time during the calendar year) and meet all the criteria above, the manager is eligible for a salary step increase on July 1st of the next calendar year. This also applies to current management employees that promote or accept another management position.

Managers who promote or accept another management position will step on July 1st of their second calendar year in the new position.

MANAGEMENT LONGEVITY

Longevity in a management position will be awarded at a total of 2.5% following five years of management service; a total of 5% following ten years of management service and a total of 7.5% following fifteen years of management service. Longevity increases are granted on July 1st of the calendar year in which five, ten, or fifteen years of management service has been completed. For example, if five years is completed on December 31st, the longevity increase would have been awarded the previous July 1st, even though only four and a half years had been completed. If five years is completed on January 1st, the longevity increase would be awarded the next July 1st, after five and a half years is completed.

EQUALIZED PAY

SLOCOE equalizes pay over a full 12-month period. With equalized pay the gross amount of each pay warrant is the same for each month, regardless of the number of days worked each month. For example, work days in the month of December may be fewer than the number of work days in October, however both pay warrants reflect the same amount of pay. If an employee has a change of status during the work year (transfers or promotes to another position) payroll will adjust pay based on the actual days worked prior to the change of status. The department will be asked to submit a work calendar of actual days worked. Payroll will make an adjustment between what has been paid up to that point and what has actually been worked up to that point. If an employee has worked more days than the equalized pay process has paid, the employee will receive a pay warrant with compensation for the days worked, but not yet paid through the equalized pay process. If an employee has worked less days than the equalized pay process has paid, the employee will receive a pay warrant reflecting a deduction of time previously paid, but not actually worked.

ADDITIONAL DUTIES

If additional on-going duties are required that are outside the scope of the regular position, resulting in a higher level of responsibility or significant changes to the position, the supervisor should discuss this with the Chief Human Resources Officer.

A Cabinet member may request that an employee assigned for a period of no less than fifteen consecutive full work days may be paid a 10% stipend if the duties are part of a management position whose incumbent is on a full time, non-intermittent leave of absence of the management position is vacant and under recruitment. The assigned duties must be time sensitive and essential in order to prevent the stoppage of business. A limited term appointment or temporary hire may not also be performing duties for the same management position. The stipend must be pre-approved by the Chief Human Resources Officer.

MANAGEMENT WORK HOURS

Management employees at SLOCOE are required to work hours as directed by their supervisor. Management employees are paid based on eight-hour work days and will normally be at work during the regular business hours of 8:00 a.m. to 5:00 p.m. Managers shall work the necessary number of hours per day to perform the duties of the position. As a result, management positions are based on annual salaries and not hourly positions. Most managers are exempt from earning overtime based on the Fair Labor Standards Act requirements and therefore do not turn in time cards for extra work. The exception to this is non-exempt positions, which are listed on the management salary schedules. As a result of the exempt status, it is expected that certain professional responsibilities will be performed outside regular business hours, such as in the evening or on weekends.

MANAGEMENT WORK DAYS

Each certificated management classification has a designated number of contract days indicated on the appropriate management salary schedule. Certificated managers who are required to hold administrative credentials as a condition of employment have a minimum of 215 work days based on STRS requirements for a county office administrator. Each classified management classification has a designated work year indicated on the appropriate management salary schedule.

Managers working less than a 1.0 FTE (Full Time Equivalent) as listed on the salary schedule will receive a prorated salary and service credit. Management positions reflect eight-hour work days.

A management employee may be authorized to work days in excess of the number of days designated for the classification on the management salary schedule. However, it will not be considered a guarantee for increased days in future years. The number of contract days may be reduced from the previous school year to the following school year based on program funding.

NON-WORK DAYS

The appropriate supervisor shall be responsible for approving non-work day schedules. Time off shall be scheduled in advance so as not to interfere with the normal functions of the department. In addition to listing absences on the work calendar that is turned in to an employee's supervisor, classified managers are expected to enter non work days into Frontline Absence Management by July 31 each year.

PAY CALENDARS

Each manager is assigned a pay calendar which determines how the employee is paid. Certificated managers have work days and unpaid non-work days. Classified managers have work days, paid holidays and paid vacation days. Classified managers assigned to positions with less than a 260-day work year will also have unpaid non-work days. In the event a manager does not complete a full work year, the pay calendar is reconciled with the work calendar to determine final pay.

WORK CALENDARS

In addition to the pay calendar, managers are required to fill out a work day calendar (AKA duty-day calendar) that reflects actual days worked. For classified managers, vacation and, if applicable, non-work days also need to be filled out. This is to give managers the maximum amount of flexibility possible. The purpose of the work day calendar is to provide a plan for the department so that the employee will be assured of working the required number of work days, during the year and to assure that there is appropriate coverage to provide continuity of services. The work day calendars are maintained in the department. If a manager does not work a full year because the manager is a late start, transfers, promotes, goes on a leave of absence mid-year, resigns, or works an alternative schedule, calendars are submitted to the Human Resources department.

LIFE INSURANCE BENEFITS FOR MANAGEMENT

See the SLOCOE Employee Handbook for general information on Health, Dental and Vision Insurance for all employees. Management employees that enroll in SLOCOE health insurance receive a \$100,000 life insurance policy. This policy covers the employee only.

(Reference: Board Policy 4349)

LEAVES OF ABSENCE

REPORTING ABSENCES

Managers are expected to report sick leave, personal necessity, and bereavement leave for any full work day. Classified managers are also expected to enter non-work days by July 31st of each fiscal year and vacation days as they are planned. See the SLOCOE Employee Handbook for more information on reporting absences. In addition to reporting absences, managers are expected to monitor the absences of their employees. Managers are encouraged to require their employees to use the pre-approval process in advance of all known absences. Should an employee use a leave inappropriately, it is expected that the manager will have a conversation with the employee and not approve the leave.

VACATION HOURS: *(Revised 10/1/2021)*

For general information on vacation, see the SLOCOE Employee Handbook. Vacation days for classified managers are listed on the appropriate management salary schedule.

Classified Managers

Classified managers with a 260-day work year should have no greater than an annual maximum vacation hour accrual of 200 hours each fiscal year. A classified manager with less than a 260-day work year have a prorated annual maximum vacation hour accrual cap. Once a classified management employee reaches their respective vacation hour cap, vacation hours will no longer accrue. Once vacation hours are utilized, dropping the balance below their maximum accrual cap, monthly vacation hours will resume to accruing towards the manager's respective accrual cap.

Maximum vacation accrual caps are listed below in hours:

<u>Work Year</u>	<u>Maximum Accrual Cap</u>
224-260	200
214-223	192
200-213	192
190-199	168
175-189	161
Less than 174	156

Supervisors are responsible for managing vacation scheduling of their management and classified bargaining unit employees. The Superintendent may authorize an additional number of hours of annual vacation carryover when it is necessary to deny a vacation leave requested to meet the needs of the county office.

Classified Bargaining Unit Member Promoted to Management:

(Revised 7/1/2025)

Any classified bargaining unit SLOCOE employee accepting a classified management position shall have accrued vacation migrate to the newly accepted classified management position up to 200 hours. The accrual cap of 200 hours for classified management employees is applied to all classified management employees. Should a newly accepted classified management employee have an accrued vacation balance in excess of 200 hours, the employee will have the option to be paid out the existing accrued vacation balance or have the existing accrued vacation balance prorated at the new management salary rate. Any excess hours will be paid out or utilized to drop below the maximum accrual cap. Once vacation hours drop below the maximum accrual cap, monthly vacation hours will begin to accrue again up to the accrual cap of 200 hours.

SICK LEAVE

Sick leave is authorized for all management employees. Management employees shall accrue sick credit as follows:

- 175 – 189 duty days = ten (10) days per year
- 190 – 200 duty days = eleven (11) days per year
- 201 – 220 duty days = twelve (12) days per year
- 221 – above = thirteen (13) days per year

Management employees working less than 175 duty days will receive a pro-rated sick leave accrual based upon the assigned number of duty days.

PERSONAL NECESSITY LEAVE

A maximum of seven days per year of current and accrued sick leave may be used for personal necessity for management employees.

Events justifying personal necessity leave will include:

1. Death of a member of the employee's immediate family when additional leave is required beyond that provided in the bereavement leave policy.
2. An accident involving the employee's personal property, a member of the employee's immediate family, or an immediate family member's property.
3. Appearance in court as a litigant or a witness under subpoena.
4. Religious holiday.
5. To attend to an illness of the employee's child, parent, spouse or registered domestic partner.
6. Other occasions the employee cannot reasonably be expected to disregard during working hours.

Personal necessity leave shall be requested at least three working days in advance, except for purposes of death, serious illness of immediate family members, or accident involving personal property.

EXTENDED SICK LEAVE (DIFFERENTIAL PAY)

See SLOCOE Employee Handbook for general information about extended sick leave. For purposes of calculating the differential for all management employees, the management employee is entitled to 100 days of 50% pay. (*Reference: Education Code 45196*)

BEREAVEMENT LEAVE

An employee will receive Bereavement Leave in the amount of six days without loss of pay due to the death of an immediate family member. For the purposes of bereavement leave, immediate family means the employee's spouse or registered Domestic Partner. The following relatives, (including "step," "foster" and "in-law") of the employee or the employee's spouse or Registered Domestic Partner: Grandmother, Grandfather, Mother, Father, Sister, Brother, Child and Grandchild. In addition, any relative of the employee living in the immediate household of the employee, are considered immediate family for the purpose of bereavement leave. Immediate family does not include Aunt, Uncle, Niece, Nephew or an ex-spouse or any family members of an ex-spouse.

(*Reference: Education Code 44985 and 45194*)

INDUSTRIAL INJURY AND ILLNESS LEAVE (WORKER'S COMPENSATION)

Classified managers who have successfully completed an initial probationary period will be granted a leave of absence with pay for a period of 60 working days in any one fiscal year for the same industrial injury/illness. Certificated managers are eligible for 60 days paid leave of absence immediately upon hire. If the 60 days overlap into the next fiscal year, salary will be paid for only those days remaining at the end of the fiscal year in which the industrial injury/illness occurred. To qualify for leave with pay, the absence must have been recommended by the attending physician. Industrial leave is not deducted from accrued sick leave. Such leave shall not be accumulated from year to year. Employees who are unable to return to work after 60 days may be eligible for additional leave, such as sick or extended sick leave.

(*Reference: Board Policy 4160.3*)

CATASTROPHIC LEAVE

A catastrophic leave program is available to allow management employees to donate available accrued paid leave benefits to another management employee. See general information in the SLOCOE Employee Handbook. For classified managers, the combined total of all leave, including accrued sick leave, may not exceed five school months. For certificated managers, accrued sick leave is not included in the five school-month

computation. Please contact the Human Resources Department for specific rules and procedures regarding the use of catastrophic leave.

HEALTH AND SAFETY

INDUSTRIAL INJURIES/ ILLNESSES

In compliance with California law, and to promote the concept of a safe workplace, SLOCOE maintains an Injury and Illness Prevention Program (IIPP). The complete IIPP document is given to all managers upon hire and available for review at any time in the Human Resources Department. It is the responsibility of the manager to follow up when an employee reports an industrial (work-related) illness or injury. Failure to report an injury/illness at the time it occurs may be grounds for disciplinary action for which the supervisor may be required to take action.

WORKERS COMPENSATION

If an injury or illness requires medical attention, Human Resources must be notified, and an employee will be instructed to seek treatment at one of SLOCOE's designated medical facilities. Whenever possible, a manager should accompany the employee to the designated medical facility. Employees should not seek medical treatment without authorization from a supervisor or the Human Resources Department. Proper procedure must be followed in order for SLOCOE to accept responsibility for an injury and related medical bills. Treatment at a hospital emergency room is only authorized when an actual emergency exists.

Supervisors must obtain and complete the appropriate paperwork from the designated Administrative Assistant. It is the supervisor's responsibility to complete, sign, and forward the paperwork to Human Resources in a timely manner. Following treatment by a designated medical facility, employees should submit the Physician's Return to Work Evaluation form to the immediate supervisor. If modified work or time off is recommended, the restrictions should be discussed with the immediate supervisor and the Human Resources Department.

For additional information, see the *Industrial Injury or Illness Leave* and/or *Worker's Compensation Benefits* sections of the SLOCOE Employee Handbook.
(Reference: Board Policy 4315, 4315.1)

SLOCOE POLICIES AND PROCEDURES

SEXUAL HARASSMENT & ABUSIVE CONDUCT PREVENTION TRAINING FOR MANAGERS

As of January 1, 2006, AB 1825 mandated that all managers receive two hours of sexual harassment prevention training every two years. SLOCOE provides this training during odd number years, generally in November or December. Attendance is mandatory. Sexual harassment is any unwanted, unwelcome, or unsolicited sexual conduct imposed on a person who regards it as offensive or undesirable. When a person finds the conduct is unwelcome, it becomes illegal. If the employee or student states that she or he finds the behavior offensive, the actions are unwelcome. Often victims will seek to avoid confrontation or may fear reprisals and consequently do not clearly state their objection. Therefore, all employees must learn to be sensitive to how their actions may be perceived by others, no matter what they personally may believe or intend.

Employees who believe they are being sexually harassed, or observe inappropriate behavior in the work area or at any SLOCOE activity should contact the Human Resources Department. It is an employee's right to file a complaint under the Complaint Procedure, and the duty of a management employee to report and investigate, as directed, allegations and incidents of sexual harassment.

(Reference: Board Policy 4341)

APPEARANCE AND DRESS

The San Luis Obispo County Office of Education deals with the public. Common sense in personal appearance, should be considered in neatness, cleanliness, and clothing and should be followed by all employees. Managers should model professional attire at all times.

OUTSIDE EMPLOYMENT

Regular management assignments are considered to be full-time professional positions. Management employees should not engage in outside employment if it impairs their efficiency with the San Luis Obispo County Office of Education, or if the nature of the outside work would create a conflict of interest. If there is a question concerning the appropriateness of such employment, the manager is required to consult with his/her immediate supervisor.

(Reference: Board Policy 4415)

PROFESSIONAL MEMBERSHIPS

SLOCOE encourages employees to join professional organizations that will promote and advance education. Reimbursement for professional memberships is at the discretion of the appropriate Assistant Superintendent. Information received from an institutional membership must be made available to all interested employees.

(Reference: Board Policy 2142)