MIDDLEBURGH CENTRAL SCHOOL DISTRICT

DISTRICT-WIDE SCHOOL SAFETY PLAN

2023-2024 School Year

Reviewed/Revised: August 30, 2023

Middleburgh Central School District <u>District-Wide School Safety Plan Table of Contents</u>

Introduction	page 1
Section I: General Considerations and Planning Guidelines Purpose 	pages 1-2
• Identification of Chief Emergency Officer	
Identification of School Teams	
Concept of Operations	
Plan Review and Public Comment	
 Section II: General Emergency Response Planning Identification of Potential Emergency Sites 	pages 2-5
Response Plan Options	
District Resources	
District Resource Coordination	
Annual Multi-Hazard Training	
• Annual Drills and Exercises	
 Section III: Responding to Threats and Acts of Violence Responding to Threats of Violence 	pages 5-6
Responding to Acts of Violence and Zero-Tolerance	
Law Enforcement Involvement	
Identification of Appropriate Responses	
Section IV: Communication with Others	pages 6-7
Obtaining Local Emergency AssistanceObtaining County and State Emergency Assistance	
Educational Agencies within District Boundaries	
 NYS/BOCES Communication Flow Chart 	
ICS Communication	
Section V: Prevention and Intervention StrategiesBuilding Security	pages 7
• Early Detection	
Prevention/Intervention Strategies	
Student Programs	
• Job Duties (hall monitors and security)	
Section VI: Recovery	pages 7-9
Appendix I-Emergency Remote Instruction Plan	pages 10-12

Middleburgh Central School District DISTRICT – WIDE SCHOOL SAFETY PLAN PROJECT SAVE (Safe Schools Against Violence in Education)

Commissioner's Regulation 155.17

Introduction

Emergencies and violent incidents in school districts are critical issues that must be addressed in an expeditious and effective manner. Districts are required to develop a district-wide school safety plan designed to prevent or minimize the effects of serious violent incidents declared state disaster emergencies involving a communicable disease or local public health emergency declaration and other emergencies and to facilitate the coordination of the district with local and county resources in the event of such incidents or emergencies. The district-wide plan is responsive to the needs of all schools within the district and is consistent with the more detailed emergency response plans required at the school building level. Districts stand at risk from a wide variety of acts of violence, natural, and manmade disasters. To address these threats, the State of New York has enacted the Safe Schools Against Violence in Education (SAVE) law. Project SAVE is a comprehensive planning effort that addresses prevention, response, and recovery with respect to a variety of emergencies in each school district and its schools.

The Capital Region BOCES, in coordination with the Middleburgh Central School District, supports the SAVE Legislation and intends to facilitate the planning process. The Superintendent of Schools encourages and advocates ongoing district-wide cooperation and support of Project SAVE.

Section I: General Considerations and Planning Guidelines

A. Purpose

The Middleburgh Central School District-Wide School Safety Plan was developed pursuant to Commissioner's Regulation 155.17. At the direction of the Middleburgh Central School Board of Education, the Superintendent of the Middleburgh Central School District appointed a district-wide school safety team and charged it with the development and maintenance of the district-wide school safety plan.

B. Identification of Chief Emergency Officer

The Middleburgh Central School District designates the Superintendent as the district's chief emergency officer whose duties shall include, but not be limited to:

- a. Coordination of the communication between school staff, law enforcement, and other first responders;
- b. Lead the efforts of the district-wide school safety team in the completion and yearly update by September 1st, of the district-wide school safety plan and the coordination of the district-wide plan with the building-level emergency response plan;
- c. Ensure staff understanding of the district-wide school safety plan;
- d. Ensure the completion and yearly update by September 1st, of building-level emergency response plans for each school building;
- e. Assist in the selection of security-related technology and development of policies for the use of such technology;
- f. Coordinate appropriate safety, security, and emergency training for district and school staff, including required training in the emergency response plan yearly by September 15th; and
- g. Ensure the conduct of required evacuation and lock-down drills in all district buildings as required by Education Law section 807.

h. Ensure the development of protocols for responding to a declared state disaster emergency involving a communicable disease that is substantially consistent with the provisions of section 27-c of the Labor Law.

C. Identification of School Teams

The Middleburgh Central School District has created a district-wide school safety team appointed by the board of education consisting of, but not limited to, representatives of the school board, superintendent, teachers, administrator, and parent organizations, school safety personnel, and other school personnel.

D. Concept of Operations

- The district-wide school safety plan is directly linked to the individual building-level emergency response plan to the school. Protocols reflected in the district-wide school safety plan guide the development and implementation of an individual building-level emergency response plan.
- In the event of an emergency or violent incident, the initial response to all emergencies at an individual school is by the building-level emergency response team.
- Upon the activation of the building-level emergency response team, the Superintendent of Schools or their designee is notified, and, where appropriate, local emergency officials are notified.
- Efforts may be supplemented by County and State resources through existing protocols.

E. Plan review and public comment

- This plan shall be reviewed and maintained by the Middleburgh Central School district-wide school safety team and reviewed on an annual basis on or before September 1st of each year. A copy of the plan is available in the Superintendent's office.
- Pursuant to Commissioner's Regulation 155.17 (e)(3), this plan was made available for public comment 30 days prior to its initial adoption, which was July 25, 2023 to August 26, 2023. The district-wide school safety plan was then adopted by the School Board on August 30, 2023, after the one, required public hearing that provided for the participation of school personnel, bus drivers, monitors, parents, students, and any other interested parties.
- While linked to the district-wide school safety plan, the building-level emergency response plan **shall be confidential** and shall not be subject to disclosure under Article 6 of the Public Officers Law or any other provision of law, in accordance with Education Law Section 2801-a. The building-level emergency response plan shall be kept confidential and shall not be disclosed except to authorized department staff and law enforcement officers.
- Full copies of the district-wide school safety plan and any amendments are submitted to the New York State Education Department within 30 days of adoption by posting this public plan on the district's website. The building-level emergency response plan is supplied to the Schoharie County Sheriff and NYS State Police within 30 days of adoption.

Section II: General Emergency Response Planning

The district-wide school safety plan provides the framework for the building-level emergency response plan. The purpose of a uniform plan is to ensure district-wide continuity for emergency responses. These general emergency responses are used to assist school employees, students, parents

and emergency responders learn one system that can be used in the Middleburgh Central School District.

- A. Identification of sites of a potential emergency, including:
 - The process for identifying the sites
 - The location of potential sites.
 - The potential internal or external hazards or emergency situations identified
 - The district-wide school safety team has recognized that there are many factors that could cause an emergency within our school building. There are also factors that need to be considered when responding to an emergency. A list of potential internal and external hazards or emergency situations has been noted in the building-level emergency response plan.
- B. The district has developed multi-hazard response guides. These guidelines are located in the building-level emergency response plan and are in ICS (Incident Command System) format. Plans for taking the following actions in response to an emergency where appropriate are, including but not limited to:
 - Initial Actions
 - Command Post Location (primary and secondary)
 - Shelter in Place: Used to shelter students/staff inside the school
 - Severe Weather
 - Bomb Threat
 - HazMat Incident
 - Hold-In Place: Limits student/staff movement while dealing with short term emergencies
 - **Evacuation**: Used to evacuate students/staff from the school
 - Before, during and after school hours, including security during evacuation and evacuation routes
 - Evacuation/Relocation Sites (internal and external)
 - Lockout: Used to secure school buildings and grounds during incidents that pose an imminent concern outside of the school
 - Lockdown: Used to secure school buildings and grounds during incidents that pose an immediate threat of violence in or around the school.
 - School Cancellation
 - Early Dismissal

Elliergeneies merude, out are not minted to.		
Air Pollution	Energy Supply Loss	Mass Casualty
Anthrax/Biological	Epidemic	Medical Emergency
Aviation Crash	Explosion	Natural Gas Leak
Bldg. Structural Failure	Fire Alarm Activation	Radiological
Bomb Threat	Flood	Rook Leak/Failure
Civil Disturbance	Heating System Failure	School Bus Accident
Crimes Against People	Hostage Situation	Severe Weather Emergency
Cybersecurity	Intruder Situation	Threats of Violence
Earthquake	Loss of Building	Water Emergency
Elec. System Failure	Loss of Buses	

Emergencies include, but are not limited to:

- **C.** The district has identified various district resources that may be available for use during an emergency, including the identification of personnel, equipment, and shelters.
- D. Using the ICS (Incident Command System) the district has identified the school officials authorized to make decisions during an emergency. Through ICS, the procedures to coordinate the use of school district resources and manpower during emergencies are clearly defined. ICS also identifies the staff members and their backups assigned to provide assistance during emergencies.
- E. The district has policies and procedures for annual multi-hazard school safety training for staff and students, including the strategies for implementing training related to multi-hazards. Beginning with the 2016-2017 school year, all staff will undergo annual training by September 15, 2016 and each subsequent September 15 thereafter on the building-level emergency response plan which includes components on violence prevention and mental health. New employees hired after the start of the school year receive this training within 30 days of hire or as part of the district's existing new hire training program, whichever is sooner. The district certifies that this training is completed during the October NYSED BEDS data collection.

The following procedures have been established to provide this training on an annual basis including but not limited to: early dismissal/go home drill, shelter-in-place, hold-in-place, evacuation/fire drills, lockout, lockdown, tabletop exercises, and Incident Command System training.

F. The district conducts drills and other training exercises to test components of the emergency response plan, including the use of tabletop exercises, in coordination with local, county, and state emergency responders and preparedness officials. A debriefing concludes each test to determine if changes to the plan are necessary.

Fire and Emergency Drills. The school district, at least once every school year, and where possible in cooperation with local county emergency preparedness plan officials, conducts one test of its emergency response procedures under its building-level emergency response plan, including sheltering, lock-down, or early dismissal, at a time not to occur more than 15 minutes earlier than the normal dismissal time.

Education Law §§ 807(1-a), 807 (b): Fire and Emergency Drills

The July 2016 amendments expanded fire drill requirements to also include emergency drills to prepare students to be able to respond appropriately in the event of a sudden emergency. The statute now requires twelve drills to be conducted each school year, four of which must be lock-down drills, and the remaining eight are required to be evacuation drills. There is still a requirement that eight of the required twelve drills must be completed in the first half of the school year. However, the date of completion has been changed from December 1 to December 31 of each school year.

The statute now explicitly requires schools to conduct lock-down drills, which are essential, because they prepare students and staff to respond to the highest level of threat with the most urgent action and the least margin for error. The goal is to have schools conduct drills where they immediately clear hallways, lock doors and take positions out of sight to practice their ability to put the building into a protective posture as quickly as possible. These emergency measures allow time for responding law enforcement to arrive on the scene and neutralize the threat. If possible, law enforcement should be involved in the drills to help prepare students and staff for their interactions and release from lock-down by uniformed officers. However, law enforcement involvement is not required by the new legislative mandate. Other protective actions such as lock-out or shelter in place are emergency actions that are usually preceded by some degree of warning time and do not require the immediate response necessary for a lock-down. While the school should be well versed in their lock-out and shelter-in-place protocols, lock-down is the only type of protective action that is specifically required by the statute.

Section III: Responding to Threats and Acts of Violence

- A. The school refers to its Crisis Intervention Plan via the post-incident response team and the Multi-Hazard Emergency Response Guides located in the building-level emergency response plan. These are reviewed by the district-wide school safety team to ensure content and consistency throughout the district. These policies and procedures are for responding to implied or direct threats of violence by students, teachers, other school personnel, and visitors to the school, including threats by students against themselves, which includes suicide. The following types of procedures are addressed in the plan:
 - The use of staff trained in de-escalation or other strategies to diffuse the situation.
 - Informing the Superintendent or designee of implied or direct threats.
 - Determining the level of threat with the Superintendent and building-level emergency response team members.
 - Contact the appropriate law enforcement agency, if necessary.
 - Monitoring the situation, adjusting the district's responses as appropriate to include possible implementation of the building-level emergency response team.
 - Communication with parent/guardian. When a student implies or specifically threatens self-inflicted violence including suicide, the school's social worker directly contacts the respective parents/guardians.
- B. The Multi-Hazard Emergency Response Guides in the building-level emergency response plan provide guidance on the district's policies and procedures for responding to direct acts of violence (i.e., Crimes Against Persons, Hostage Taking, Intruder and Kidnapping) by students, teachers, other school personnel and visitors to the school, including consideration of zero-tolerance policies for school violence. The following types of procedures are addressed in the plan:
 - Inform the Superintendent/designee

- Determine the level of threat with the superintendent/designee and the building-level emergency response team.
- If the situation warrants, isolate the immediate area.
- Monitor the situation; adjust the level of response as appropriate; if necessary, initiate a lockdown, evacuation, sheltering and/or early dismissal procedures as needed, if needed.
- Contact the appropriate law enforcement agency.

NOTE: The **Middleburgh Central School** "Code of Conduct" describes policies and procedures for responding to acts of violence by students, teachers, other school personnel, and visitors to the school.

- C. Response protocols are identified in the Building-level Emergency Response Plan in the ICS format along with definitions of ICS Roles and Responsibilities. The Multi-Hazard Emergency Response Guides address specific procedures for responding to bomb threats, intruders, hostage-takings, and kidnapping.
- D. The following protocols for appropriate responses to emergencies are provided as examples of responses to bomb threats, hostage-takings, intrusions, and kidnappings:
 - Identification of decision-makers.
 - Plans to safeguard students and staff.
 - Procedures to provide transportation, if necessary.
 - Procedures to notify parents.
 - Procedures to notify the media.
 - Debriefing procedures.
- E. The district has established policies and procedures to contact parents, guardians or persons in parental relation to the students in the event of a violent incident or an early dismissal.

Section IV: Communication with Others

The District-wide School Safety Plan provides the framework for the Building-level Emergency Response Plan.

- A. The Middleburgh Central School District is fortun ate to have substantial ties to the community of Middleburgh and Schoharie County. If there were to be an emergency within our facility, that facility would call 911 for emergency assistance. If involvement is needed from other local government agencies, then the Superintendent or designee would act as that contact person. Additional procedures for communications can be found in the Building-level Emergency Response Plan including local emergency contacts and phone numbers, and the NYS/BOCES Communication Flow Chart. These contacts provide guidance for obtaining assistance during emergencies from emergency services organizations and local governments.
- B. Arrangements for obtaining advice and assistance from local government officials including the county or city officials responsible for the implementation of Article 2-B of the Executive Law is carried out through the protocols established in the NYS/BOCES Communication Flow Chart. The following are examples of the types of arrangements that could be used by the district during county-wide emergencies:

- C. If there is a disaster within the district that has the potential to impact other educational agencies within the district boundaries, the Chief Emergency Officer activates a phone tree to inform all necessary parties. The phone tree is located in the Building-level Emergency Response Plan.
- D. Along with the phone tree, the district also maintains the following information about each educational agency located in the **confidential**, Building-level Emergency Response Plan:
 - School population
 - Number of staff
 - Transportation needs
 - Business and home telephone numbers of key officials of each such educational agency

Section V: Prevention and Intervention Strategies

The District-wide School Safety Plan provides the framework for the Building-Level Emergency Response Plan.

- A. The district has developed policies and procedures related to school building security, including, where appropriate: visitor sign-in and badge procedures, employee badges, and security procedures.
- B. The Middleburgh CSD has implemented procedures for the dissemination of informative materials regarding the early detection of potentially violent behaviors, including, but not limited to: the identification of family, community, and environmental factors to teachers, administrators, parents, and other persons in parental relation to students of the school district or board, students and other persons deemed appropriate to receive such information.
- C. Appropriate prevention and intervention strategies such as:
 - Collaborative agreements with state and local law enforcement officials designed to ensure that school safety officers and other security personnel are adequately trained including being trained to de-escalate potentially violent situations
 - Non-violent conflict resolution training programs
 - Peer mediation programs and youth courts
 - Extended day and other school safety programs
- D. The district has created and supported strategies for improving communication among students and between students and staff and reporting of potentially violent incidents, such as the establishment of:
 - Youth Homerun Programs
 - Peer mediation;
 - Conflict resolution;
 - Creating a forum or designating a mentor for students concerned with bullying or violence, Establishing anonymous reporting mechanisms for school violence;
 - Others based on district need.

Section VI: Recovery

Recovery addresses the help needed for all involved to heal and restore the school community to "normal" operations. The District Plan supports the school building plan by deploying district

resources that support the school's building-level emergency response team and the post-incident response team.

Recovery plans include mental health/emotional recovery, academic, physical, and business recovery, and can continue long after the actual emergency. The District has a social worker and school psychologist resources and supports systems. The District has the ability to coordinate with schools, local, Schoharie County, and State disaster mental health services. The District's role with mental health services includes looking at the school culture and climate, providing student access to services, and following threat assessment procedures.

A. District Support for Middleburgh Central School:

The Building-level Emergency Response Plan provides resources for supporting the building-level emergency response team and post-incident response team. The district's Incident Command System (ICS) identifies back-ups to relieve team members. This provides team members the opportunity to rotate personnel, fill in if assigned personnel are unavailable, and debrief in a supportive environment.

The district realizes that some emergencies may overwhelm an individual school's ability to manage an extreme crisis. If/when the school is faced with an emergency such as threats of violence or actual violent incidents, the district-wide school safety team assists as follows:

- Acting as a sounding board regarding the implied or direct threats and/or violent acts.
- Assisting in determining the level of threat and appropriate response.
- Monitoring the situation and adjusting the district's response as appropriate.
- Assisting with parent/guardian, faculty/staff, and media communication.
- Assisting with coordinating building and grounds security in conjunction with local and State Police.
- Assisting with offering a backup post-incident response team (i.e., another school district's team and/or an outside group) as needed, if needed.
- Offering debriefing sessions as needed working in conjunction with local, [insert county name here] County and/or State emergency responders.

B. Disaster Mental Health Services

If/when a building-level emergency response team or post-incident response team is faced with an emergency that may overwhelm the school's ability to manage an extreme crisis, the district-wide school safety team assists as follows:

- Activating the district-wide post-incident response team. The district has a school social worker, school psychologist, and a school nurse who have local connections to:
 - Neighboring school districts
 - Schoharie County Department of Mental Health
- Offers district support and looking for continued feedback from those directly impacted during the incident, with projected plans to assist if needed during heightened stressful times such as a re-occurrence of a similar event and anniversaries of the original event.
- Assisting with parent/guardian, student, and faculty/staff debriefing and/or post-incident crisis intervention. The debriefing is also used in part to evaluate the district's plan for possible revisions. If needed, assist in contacting additional outside mental health

resources such as the National Organization for Victim Assistance (1-800-try-nova; <u>www.try-nova.org</u>).

- Assisting the schools with written statements going out to faculty/staff, parents/guardians, press releases, and media requests through the district's Public Information Officer.
- Educators play a critical role in the success of students, not just academically, but socially and emotionally as well. Knowing how to recognize the signs of crisis, emotional trauma and other related mental health issues is critical. Additional resources are provided through NYSED's mental health guidance for educators available via: http://www.pl2.nysed.gov/sss/documents/MentalHealthResourcesforEducators.pdf, including the one-page summary from the U.S. Department of Health and Human Services, titled "What Educators Should Know".

The district supports the recovery phase and reevaluates current multi-hazard and violence prevention practices and school safety activities.

Appendix I-Emergency Remote Instruction Plan – 2023-2024

Following the COVID-19 pandemic, school districts in New York are required to have a plan for how children will be educated if a school or schools must close under emergency conditions. These Emergency Remote Instruction Plans (ERI Plans) are included as part of the district-wide school safety plan, which is reviewed annually by district and building-level emergency response teams, adopted annually by the Board of Education and submitted to the New York State Education Department.

Communication and Engagement

To help inform our Emergency Remote Instruction Plan, the district completes an annual Student Digital Resources data collection report to better understand the level of access students have to devices (e.g., laptop, Chromebook, cell phone) and the Internet. The survey will be sent home with all students during the month of September as part of the required documents.

The purpose of this survey is to ensure that, to the extent possible, students can access the Internet and receive remote instruction, if necessary, under emergency conditions. This survey is conducted on an annual basis. Students and families may update their access information at any time by contacting the student's school. It is our goal that this plan is aligned with the information provided by families in the Student Digital Resources data collection.

The district has also developed a plan for communicating all necessary information should a school or schools need to close. The district will use existing internal and external communications channels to notify staff, students, and families/caregivers about remote learning schedules with as much advance notice as possible. This communication will include information about how computing devices (e.g., computers, hot spots, etc.) are being disseminated to students and families who need them. In the event that the district needs to implement this plan, we will use ParentSquare as the primary method of communication to families and staff. This platform allows for text and phone calls to be made directly to families. Additionally, there are tools within the platform for the electronic delivery of documents.

The district will provide students and their families with multiple ways to contact schools and teachers during remote learning, including email, ParentSquare and phone messages.

Device, Internet and Platform Access

To support remote learning, the district will make computer devices available to all students and families who need them. The district currently has a 1:1 device availability for all students in grades K-12. Students at the secondary level (7-12) currently take their devices home on a daily basis, and should the plan need to be implemented, devices will be available for delivery to the homes of students in grades K-6 or available for pickup at the school.

To the extent possible, the district will also support students and families with accessing the Internet at home. Where that is not possible, the district will work with community partners to secure Wi-Fi access points for students and families so that they may participate in remote learning. As learned from the COVID-19 pandemic, the availability of internet access can vary by individual home due to the availability of broadband

connections and cellular access. Should the plan need to be implemented, the district will make Wi-Fi available for all students who do not have home access. The best option for each family will depend on an assessment of their available means of access to broadband and/or cellular.

There will be those students in our community for whom remote learning through digital technology is not appropriate or possible. For these students, the district will assess each student's individual needs and whether in-person learning is an option. Other methods that will be considered include instruction by phone and/or the delivery of hard-copy materials to the student's home.

The district will also take steps to ensure that school staff members have the necessary tools, i.e., computing devices and Internet access, to deliver emergency remote instruction from their place of residence.

To ensure high-quality remote learning experiences, the district has standardized the use of a single online learning platform, Google Classroom and Google Meet, to the extent possible, and developed a common, coordinated set of guidelines for teachers to follow when using the platform with students.

Teaching and Learning

Our district has developed an emergency remote instruction plan that would support all students. When a remote learning model is necessary, certain groups of students will be prioritized for in-person learning to the greatest extent possible, depending on the nature of the emergency. This includes, but is not limited to, special education students, English language learners, and students with technology or connectivity needs.

Acknowledging that the typical content in each grade level or course may need to be adjusted, content will be prioritized to ensure that students receive instruction for the prioritized learning standards, key understandings, and skills necessary for students' success in future study.

Instruction will focus on "core" subject areas; however, elective courses will continue to be offered in a remote learning environment. All instruction will continue to be aligned to the New York State Learning Standards.

Virtual learning schedules have been developed by grade level. If an emergency requires the district to move to virtual learning, these schedules will be shared with students and families in accordance with the communication strategies outlined earlier in this plan. Students will be given opportunities to engage with teachers and classmates through live instruction, question and answer periods with teachers and group work (i.e., synchronous learning). Teachers will ensure that their students are directly engaged with them and their class peers in experiential learning on a regular basis. Supplementing this time will be self-guided projects, readings and other age-appropriate assignments that can be completed by the students remotely (i.e., asynchronous learning).

The district recognizes that there will be students for whom remote instruction via digital technology is not appropriate. In an emergency, as the district is assessing which students need devices or access to the Internet, the district will also assess which students may require additional support. Depending on the nature

of the emergency, this may involve some level of in-person instruction for these students either at a school building within the district or at a community location, as appropriate. These decisions will be made in partnership with local health officials and emergency personnel, as applicable. Other instructional methods that will be considered include instruction by phone and/or the delivery of hard-copy materials to the student's home.

Support Services

Based on the learning model we have developed, students with disabilities and/or an Individualized Education Plans will continue to receive support services in accordance with their individualized education plans (IEP) should remote learning become necessary. It is the expectation that all service providers (e.g., teachers, paraprofessionals, related service providers) will sign-on to the remote learning platform to support students as needed. This will include large classroom settings in the remote learning environment, as well as the use of breakout rooms or one-on-one virtual meetings as necessary.

The district will follow its existing engagement and communication protocols with parents regarding the provision of special education services for their child.

Tele-therapy will be utilized for therapies/related services as Individualized Education Plans dictate. Speech therapists, Occupational Therapists, Physical Therapists and Social Workers will schedule times with families and students to provide necessary therapies via tele-therapy. A consent form to provide these services will be sent home to each student with whom their IEP necessitates one or all of the aforementioned therapies.

Funding Requirements

Depending on the nature of the emergency, the district will first review the number of emergency days that are available as well as the number of unused school vacation days. The district's goal is to ensure 100% State funding for state aid purposes by providing instruction for all required 180 days. Should the emergency extend beyond the number of available emergency days, this plan would be implemented with the goal of providing instruction on each remaining day of the school calendar with at minimum 900 minutes of yearly instruction for elementary students and 990 minutes of yearly instruction for secondary students.