SCHOOL DISTRICT OF WEST DE PERE
REGULAR BOARD MEETING
WEST DE PERE HIGH SCHOOL-AUDITORIUM
665 Grant Street
October 21, 2026
Following Annual Meeting that starts at 5:00PM

I. Call meeting to order

II. Pledge of Allegiance

III. Consider approval of the agenda

IV. School District of West De Pere Mission Statement

V. Recognition of District Students and Staff

VI. Open meeting to the floor for fifteen minutes to enable district residents to bring items of general concern to the attention of the Board. Individuals will have up to 3 minutes for comment. **Public comments are reserved for in-person only.**

VII. Consider approval of the minutes of the September 14, 2026 Regular Meeting

VIII. Consider approval of the Treasurer's Report

IX. Consider previously paid bills as presented for payment approval

X. New Business
   A. Finance Committee Report
   B. Curriculum and Policy Report and First Reads:

Update 35.2:

- 2210- Curriculum development
- 2430-District sponsored clubs and activities
- 2461-Recording of IEP team meetings
- 2510-Adoption of textbooks/primary curricular resources
- 2521-Selection of supplemental instructional materials/curricular resources and equipment
- 2623-Student assessment and grading
- 3130-Assignment and transfer
- 3242-Professional growth requirements
- 5136.01-Other personal electronic devices
- 5310-Health services
- 5511-Dress and appearance
- 6325-Procurement-Federal grants/funds
- 7440.03-Small unmanned aircraft systems (Droves)
- 8325-Receipt of legal documents by district employees
- 8410-Crisis intervention
- 8500-Food services
- 8500.01-Policy and process for receiving and processing complaints alleging civil rights discrimination (including Wisconsin protected classes) in the U.S. Department of Agriculture (USDA) child nutrition programs.
- 8510-Wellness
- 8531Free and reduced lunch
- 8550-Competitive food sales
- 8600-Transportation

Special Update 35.2

- 5136-Personal communication devices
- 5505-Artificial intelligence
- 7440.02-Smart sensor and monitoring technology
- 7540-Technology
- 7540.03-Student technology acceptable use and safety
- 7540.04-Staff technology acceptable use and safety
- 7540.08-Artificial intelligence
- 8310-Public records
- 8315-Preservation of records and litigation holds
- 8330-Student records
- 8330.01-Unauthorized acquisition of student personal information

C. Consider Memo Regarding Additional Special Education Teacher at Hemlock Creek Elementary School for the Remainder of the 2026-2027 School Year

D. Consider Memo Regarding Additional Special Education Aide at the Intermediate School for the Remainder of the 2026-2027 School Year

E. Consider Memo Replacing the Mini Bus at the High School

F. Consider Memo Regarding a Memorial Bench at Hemlock Creek

G. Consider Memo Regarding the 2028 Spanish Trip

H. Consider Approval of Annual Farm Lease

I. Brown County Early Childhood Update

J. Summer School Update

K. PLC Update

L. Operational Referendum Update

M. Consider Staffing Updates

XI. Reports and Communication

XII. Consider adjourning into closed session as provided under Section 19.85 (1)(c) Wisconsin Statutes for the purpose of personnel issues. Further take notice that pursuant to Section 19.85(2) the Board may reconvene in regular session to consider matters discussed in closed session and other matters on the agenda.

XIII. Reconvene into open session

XIV. Consider matters discussed in closed session

XV. Adjourn meeting

NOTICE
The School District of West De Pere Board meeting will be available in person and via Zoom.
If you have any need for special accommodations related to accessing the meeting, please contact Stacy Schaetz at 920-337-1393 x8025.
Join Zoom Meeting https://zoom.us/j/95761459042 Phone: 1-309-205-3325 Meeting Id: Passcode: 95761459042

SCHOOL DISTRICT OF WEST DE PERE
REGULAR BOARD MEETING
DISTRICT OFFICE
September 14, 2026
5:30 PM

Board members present: Fuss, Borley, Van Den Heuvel, Dorn, Van Deurzen
Board members excused: None

The meeting was called to order at 5:30 PM by Board President Fuss followed by the Pledge of Allegiance. President Fuss stated that the area news media had been notified of the meeting as required by open meeting law and state statutes.

It was moved by Barbara Van Deurzen and seconded by Ryan Van Den Heuvel to accept the agenda. Voting Yes: 5 Voting No: 0 Motion carried.

President Fuss read the District Mission Statement out loud; *To work collaboratively to educate and empower ALL students to grow, achieve at high levels, and become independent, productive members of society.*

The Board recognized the school nutrition summer program; Anne McVey, School Nutrition Coordinator, gave the Board an update on the summer meal program. The team served breakfast and lunch to summer school students and also prepared meals for the summer bulk meal pickup. In total they served over 88,503 meals! Great job and thank you School Nutrition for all your heard work!

The meeting was opened to the floor to enable district residents to bring items of general concern to the attention of the Board. No concerns were presented.

It was moved by Barbara Van Deurzen and seconded by Ryan Van Den Heuvel that the August 24, 2026 regular meeting minutes be approved as presented. Voting Yes: 5 Voting No: 0 Motion carried.

It was moved by Scott Borley and seconded by Ryan Van Den Heuvel that the Treasurer's Report be approved. Voting Yes: 5 Voting No: 0 Motion carried.

It was moved by Scott Borley and seconded by Barbara Van Deurzen that previously paid bills to Vos Electric, VDH Electric, and Best Built be approved. Voting Yes: 4 Voting No: 0 Ryan Van Den Heuvel abstained. Motion carried.

It was moved by Ryan Van Den Heuvel and seconded by Scott Borley that previously paid bills be approved excluding bills from Vos Electric, VDH Electric, and Best Built. Voting Yes: 5 Voting No: 0 Motion carried.

Scott Borley and Jason Dorn gave a verbal update regarding the Finance Committee Meeting.

The building Principals gave the board an update on the start of school. The Board thanked them for the update.

It was moved by Scott Borely and seconded by Ryan Van Den Heuvel to approve the memos for the date of High School graduation and Middle School 8th Grade Promotion as presented. Voting Yes: 5 Voting No: 0 Motion carried.

It was moved by Ryan Van Den Heuvel and seconded by Barbara Van Deurzen to approve the October 21, 2026 Annual Meeting Agenda as presented. Voting Yes: 5 Voting No: 0 Motion carried.

Superintendent, Jason Lau, gave an update to the Board regarding the upcoming operational referendum on November 3,2026. He stated that as we get closer to election day, you will notice an increase in social media posts, mailers, and community engagement sessions. Informational sessions are scheduled for September 16 and October 7 at 6:00 PM. Both meetings will be held at the District Office.

Superintendent Jason Lau gave the Board an update on the High School Tech Ed Project. Teaching staff and students are in the renovated and new tech ed spaces. While not completely settled and a few punch list

items remain, the majority of the work is complete. Getting the space ready required a great deal of work from high school staff, the maintenance crew, and the technology department. Special thanks to all of them for working to get things ready. The entire project will be completely paid for by the end of the 2026-2027 school year.

It was moved by Ryan Van Den Heuvel and seconded by Barbara Van Deurzen to approve all staffing items as presented. Voting Yes: 5 Voting No: 0 Motion carried.

The Board was presented with various reports and communications: such as updates, various thank you's, invitations, and calendar items.

It was moved by Barbara Van Deurzen and seconded by Scott Borley at 5:56 PM that the meeting be adjourned. Voting Yes: 5 Voting No: 0 Motion carried

Barbara Van Deurzen
Clerk

DRAFT

SCHOOL DISTRICT OF WEST DE PERE
CURRICULUM and POLICY MEETING
West De Pere District Office-1674 Eisenhower Rd
October 8, 2026
7:30 a.m.

I. Call meeting to order- 7:30 a.m.

II. Review the following First Reads:

- Update 35.2
    - 2210-Curriculum development
    - 2430-District sponsored clubs and activities
    - 2461-Recording of IEP team meetings
    - 2510-Adoption of textbooks/primary curricular resources
    - 2521-Selection of supplemental instructional materials/curricular resources and equipment
    - 2623-Student assessment and grading
    - 3130-Assignment and transfer
    - 3242-Professional growth requirements
    - 5136.01-Other personal electronic devices
    - 5310-Health services
    - 5511-Dress and appearance
    - 6325-Procurement-Federal grants/funds
    - 744.03-Small unmanned aircraft systems (drones)
    - 8325-Receipt of legal documents by district employees
    - 8410-Crisis intervention
    - 8500-Food services
    - 8500.01-Policy and process for receiving and processing complaints alleging civil rights discrimination (including Wisconsin protected classes) in the U.S. Department of Agriculture (USDA) child nutrition programs
    - 8510-Wellness
    - 8531-Free and reduced lunch
    - 8550-Competitive food sales
    - 8600 Transportation
- Special Update 35.2
    - 5136 Personal communication devices
    - 5505-Artifical intelligence
    - 7440.02-Smart sensor and monitoring technology
    - 7540-Teachnology
    - 7540.03-Student technology acceptable use and safety
    - 7540.04-Staff technology acceptable use and safety
    - 7540.08-Artificial intelligence
    - 8310-Puiblic records
    - 8315-Preservation of records and litigation holds
    - 8330-Student records
    - 8330.01-Unauthorzied acquisition of student personal information

Committee discussed recommended revisions Present for **First Reading** on 10/21/2026

IV. Next meeting date: TBD

V. Adjourn meeting- 8:09 a.m.

*OVERVIEW OF UPDATE: The updated choice introduces a standardized mechanism to provide parents with advance notice of specific instructional content that may conflict with sincerely held religious beliefs, to address student exemption requests, and to provide alternative learning activities. While this choice is optional under policy, it may help the District comply with the U.S. Supreme Court ruling in Mahmoud v. Taylor (June 2025). The Supreme Court ruled that public schools provide parents with advance notice and the right to opt their children out of classroom instruction or specific readings that directly conflict with their sincerely held religious beliefs.

VOL. 35, NO. 2

po2210

Vol. 35, No. 2 - July 2026 Revised CURRICULUM DEVELOPMENT

2210 - **CURRICULUM DEVELOPMENT**

The Board recognizes its responsibility for the quality of the educational program of the schools. To this end, a District curriculum plan shall be developed, evaluated, and adopted. The plan shall include overall program evaluation processes that provide for evaluation on a continuing basis and shall provide for the review of the evaluation process at least every five (5) years. The District curriculum plan shall include sequential curriculum plans, which provides an organized set of learning experiences that build upon previously acquired knowledge and skills.

For purposes of this policy and consistent communication throughout the District, curriculum shall be defined to include the courses of study, subjects, classes, and organized activities provided by the school.

The Board directs that the curriculum shall be developed and evaluated by the District Administrator, and that curriculum plans and courses of study incorporated into the curriculum of this District:

A. provide instruction in courses consistent with statute and regulations of the Department of Public Instruction or appropriate State agency;

B. ensure, consistent with 115, Wis. Stats., and other applicable Federal and State laws and regulations, that special learning needs of students are provided for in the context of the regular program or classroom and provides for effective coordination with programs or agencies that are needed to meet those needs that cannot be dealt with in the regular program or classroom;

C. be consistent with and designed to achieve the District's philosophy and goals;

D. incorporate State-recommended performance standards for students as the basis for determining how well each student is achieving curriculum objectives;

E. allow for the development of individual talents and interests as well as recognizes that learning styles of students may differ;

F. utilize a variety of learning resources to accomplish the educational goals;

G. encourage students to utilize school counseling services in their academic and career planning;

H. in the elementary grades, provide regular instruction in reading, language arts, social studies, mathematics, science, health, physical education, art and music;

I. in grades 5 to 8, provide regular instruction in language arts, social studies, mathematics, science, health, physical education, art and music;

J. in grades 9 to 12, provide access to an educational program that enables students each year to study English, social studies, mathematics, science, vocational education, foreign language, physical education, art and music;

K. provide regular instruction in foreign language in grades 7 and 8;

L. in one of grades 5 to 8 and in one of grades 10 to 12, provide students with the instruction on shaken baby syndrome and impacted babies described in 253.15 (5), Wis. Stats.;

M. incorporate instruction in financial literacy into the curriculum in grades kindergarten to 12;

N. at least once in grades 5 to 8 and at least once in grades 9 to 12, include instruction on the Holocaust and other genocides;

O. provide that, in the social studies curriculum, instruction in the history, culture, and tribal sovereignty of Federally-recognized American Indian tribes and bands located in Wisconsin takes place at least twice in the elementary grades and once in the high school grades.

P. (X) shall include procedures for providing parents with advance notice of specific instructional content or activities that may reasonably be anticipated to substantially interfere with sincerely held religious beliefs and for honoring parental requests to excuse their child from such instruction and to provide alternative learning activities. See also Policy 2240 - Controversial Issues in the Classroom and Policy 2270 - Religion in the Curriculum. [END OF OPTION]

The District Administrator shall make progress reports to the Board periodically.

The District Administrator may propose programming using innovative instructional design as deemed to be beneficial or necessary to the continuing growth of the instructional program and to better promote the District's educational goals. Each such innovative program intended to be part of the required hours of instruction must be consistent with State law and implemented consistent with the District's curriculum as approved by the Board.

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Legal

118.01, 118.24, 118.30, 121.02(1)(k) and (L), Wis. Stats.

PI 8.001(6g)

PI 8.01(2)(L), PI 8.01(2)(K), PI 8.01(2)(k)(4)

OVERVIEW OF UPDATE:The updated changes create content restrictions for all student club advertisements and flyers displayed on District property, limiting public signage to basic logistical information. Additionally, these modifications implement an option for administrative review of organizational promotional materials to maintain structural consistency and mitigate institutional liability across all extracurricular platforms. These changes are recommended, but not required

VOL. 35, NO. 2

po2430

Vol. 35, No. 2 - July 2026 Revised DISTRICT-SPONSORED CLUBS AND ACTIVITIES

2430- **DISTRICT-SPONSORED CLUBS AND ACTIVITIES**

The Board believes that the goals and objectives of this District are best achieved by a diversity of learning experiences, including those that are not conducted in a regular classroom but are related to the District's curriculum and/or mission.

The purpose of District-sponsored activities shall be to enable students to explore a wider range of individual interests than may be available in the District's courses of study but are still related to accomplishing the educational outcomes for students as adopted by the Board in Policy 2131 - Educational Outcome Goals and Expectations. The Board encourages all students, including those students in elementary and middle school grades, to participate in such opportunities. In implementing this policy, the District Administrator shall take steps to make such opportunities accessible to all students.

For purposes of this policy, District-sponsored activities are typically those activities in which:

A. the subject matter is actually taught or will be taught in a regularly offered course;

B. the subject matter concerns the District's composite courses of study;

C. participation is required for a particular course;

D. participation results in academic credit; or

E. the subject matter is of interest to students and aligns with the District's goals and mission.

No activity shall be considered to be under the sponsorship of this Board unless it meets one (1) or more of the criteria stated above and has been approved by the District Administrator.

Such activities, along with competitive extra-curricular activities/athletics, may be conducted on or off school premises by clubs, associations, and organizations of students sponsored by the Board and directed by a staff advisor.

The Board shall allow nondistrict-sponsored, student clubs and activities during noninstructional time, in accordance with the provisions in Policy 5730 - Equal Access For Nondistrict-Sponsored,

Student Clubs and Activities.

Nondistrict-sponsored student activities that are initiated by parents or other members of the community may be allowed under the provisions of Policy 7510 - Use of District Facilities. The Board, however, will not:

A. assume any responsibility for the planning, conducting, or evaluating of such activities;

B. provide any funds or other resources

All activities that meet the criteria of this policy are sponsored by the District and are authorized to use the District name, logo, mascot, or any other name that would associate an activity with the District, provided such use is consistent with other applicable District policies.

No nondistrict-sponsored organization may use the name, logo, mascot, or any other name that would associate an activity with the District. Additionally, no nondistrict-sponsored organization may use the assets of the District including, but not limited to, facilities, technology, or communication networks without the specific permission(s) as outlined in the relevant District policies.

Students shall be fully informed of the District-sponsored activities available to them and of the eligibility standards established for participation in these activities. District-sponsored activities shall be available to all students who elect to participate and who meet eligibility standards.

All District-sponsored club communications, including flyers or posters to be displayed on school property, shall be limited to the club's name, meeting date, time, and location, **(**

) ~~- and subject to administrative approval.~~ **[END OF OPTION]**

Whenever a student becomes a member of a District-sponsored student group or national organization, such as the National Honor Society, in order to remain a member, they must continue to meet all of the eligibility criteria and abide by the principles and practices established by the group or the organization.

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Legal
120.12(23), Wis. Stats.
P.L. 98-377

OVERVIEW OF UPDATE: The replacement modernizes District regulations by restricting the unauthorized use of emerging technologies, including artificial intelligence meeting recorders and digital transcription applications. Furthermore, the revised framework establishes protocols for parental notice, grants administration the authority to suspend disruptive sessions, and disclaims institutional liability regarding the storage, security, or distribution of parent-generated media. Adoption of this replacement policy is required for legal compliance.

VOL. 35, NO. 2

po2461

Vol. 35, No. 2 - July 2026 Replacement RECORDING OF IEP TEAM MEETINGS

Replacement Policy - Vol. 35, No. 2

2461 - **RECORDING OF IEP TEAM MEETINGS**

The District recognizes that parents may wish to record (this includes audio and/or video, including AI tools) IEP Team meetings in order to better understand the IEP process, their child's IEP, or to implement their rights as a parent for access accommodations under the IDEA, Section 504 of the Rehabilitation Act of 1973, and/or the Americans with Disabilities Act.

If a parent believes that recording an IEP Team meeting is necessary, the parent should notify Director of Student Services _____ **[principal or Director of Student Services or Director of Special Education]** in writing, preferably at .least two (2) school days before the IEP Team meeting, of the parent's desire to record the meeting and the reason the recording is required.

[DRAFTING NOTE - Recent technological developments, including AI-enabled meeting recording tools, have increased the likelihood that parents may record virtual or in-person IEP meetings without advance notice. Wisconsin is a one-party consent state under 948.31 Wis. Stats, meaning a meeting participant may lawfully record the conversation. The District's current policy prohibits video recording except as a disability accommodation. The proposed revision clarifies notice expectations, affirms the District's right to record when a parent records, addresses AI tools explicitly, and preserves the integrity of the IEP process while reducing potential litigation exposure.]

The purpose of advance notice is to promote transparency, ensure appropriate logistical arrangements, and allow the District to determine whether it will also record the meeting.

Recording of an IEP Team meeting, whether audio, video, or AI-assisted, shall not disrupt the meeting or interfere with the IEP Team process. If recording becomes disruptive, the District may suspend the meeting and reschedule.

If a parent records an IEP Team meeting, the District reserves the right to record the meeting as well.

Any recording made by the District shall become part of the student's education record and will be maintained in accordance with State and Federal law. Any recording made by the parent becomes a record of the parent, and the District has no responsibility for maintenance of that particular record.

The District is not responsible for the storage, security, or distribution of recordings created by parents or other participants.

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OVERVIEW OF UPDATE: The revisions mandate that administrative personnel provide parents with timely notification regarding textbooks that may conflict with sincerely held religious beliefs, create a formal procedure for families to submit exemption requests, and require the District to provide appropriate alternative academic assignments.
These changes are recommended for adoption to help the District comply with the U.S. Supreme Court ruling in Mahmoud v. Taylor (June 2025).

VOL. 35, NO. 2

po2510

Vol. 35, No. 2 - July 2026 Revised ADOPTION OF TEXTBOOKS/PRIMARY CURRICULAR RESOURCES

2510 - **ADOPTION OF TEXTBOOKS /PRIMARY CURRICULAR RESOURCES**

The Board shall approve all textbooks used as part of the educational program of this District. The list of the adopted books shall be filed with the School District Clerk. "Textbook", for purposes of this policy, shall mean the primary ~~principal~~ source of instructional material for any given course of study, in whatever form the material may be presented, that is available or distributed to every student enrolled in the course.

The criteria established for the method of selection and subsequent Board adoption of textbooks shall not discriminate on the basis of any Protected Class consistent with Board Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity. ~~sex (including transgender status, change of sex, or gender identity), race, color, national origin, religion, creed, ancestry, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, or any other characteristic protected by Federal or State civil rights laws.~~ Further, the District Administrator shall review all textbooks to assure they reflect the cultural diversity and pluralistic nature of American society in compliance with applicable educational standards.

The District Administrator shall be responsible for the selection and recommendation of textbooks for Board consideration. In considering the approval of any proposed textbook, the Board will weigh its decisions based on recommendations related to:

A. suitability for the maturity level and educational accomplishment of the students who will be using the material;

B. freedom from bias;

C. relationship to the curriculum adopted by the Board;

D. relationship to a continuous multigrade program;

E. cost;

F. appearance and durability.

The District Administrator shall provide parents with timely notice of the adoption or use of textbooks or instructional materials that may reasonably be anticipated to substantially interfere with sincerely held religious beliefs and shall establish procedures for parents to request that their child be excused from instruction involving such materials with appropriate alternative assignments provided. See also Policy 2240 - Controversial Issues in the Classroom and 2270 - Religion in the Curriculum.

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Legal
118.03, Wis. Stats.
118.13 Wis. Stats.
121.02(1)(h) Wis. Stats
P.I. 9
P.I. 41
Fourteenth Amendment, U.S. Constitution
20 U.S.C. Section 1681, Title IX of Education Amendments Act
20 U.S.C. Section 1701 et seq., Equal Educational Opportunities Act of 1974
29 U.S.C. Section 794, Rehabilitation Act of 1973
42 U.S.C. Section 2000 et seq., Civil Rights Act of 1964
42 U.S.C. 12101 et seq., The Americans with Disabilities Act of 1990

OVERVIEW OF UPDATE:The revisions direct the administration to develop procedures to provide parents with advance notice when supplemental materials or activities conflict with sincerely held religious beliefs. These changes are recommended for adoption to help the District comply with the U.S. Supreme Court ruling in Mahmoud v. Taylor (June 2025).

VOL. 35, NO. 2

po2521

Vol. 35, No. 2 - July 2026 Revised SELECTION OF SUPPLEMENTAL INSTRUCTIONAL MATERIALS/CURRICULAR RESOURCES AND EQUIPMENT

2521 - **SELECTION OF SUPPLEMENTAL INSTRUCTIONAL MATERIALS /CURRICULAR RESOURCES AND EQUIPMENT**

The Board shall provide instructional materials and equipment, within budgetary constraints, to implement the District's educational goals and objectives and to meet students' needs. The primary objective of such instructional materials and equipment shall be to enrich, support, and implement the educational program of the school.

For purposes of this policy, the term "instructional /curricular materials" is defined as supplemental books, readings, activities, online resources, and media distributed by a classroom teacher to students for the purpose of teaching the course content in accordance with the Board-approved course of study (see Policy 2220 - Adoption of Courses of Study). Textbooks, as defined in Policy 2510 - Adoption of Textbooks /Primary Curricular Resources, are not included in this definition or policy. Learning assessment materials designed or selected by the teacher, such as quizzes, tests, exams, worksheets, lesson plans, homework assignments, and the like, are not selected by the Board and therefore not considered instructional materials for purposes of this policy.

The term "instructional equipment" is defined as tools and apparatus used by a classroom teacher for the purpose of conveying the course content or by a student for the purpose of learning the course content. Examples of instructional equipment include, but are not limited to, computing devices, projectors, screens, smartboards, chalkboards/whiteboards, televisions, DVD/video players, overhead projectors, calculators, maps, microscopes, scientific laboratory items, balls, physical activity equipment, musical equipment, career and technical education tools and appliances, art apparatus such as kilns and easels, and the like. Expendable supplies with an expected lifespan of a school year or less, and purchased with a corresponding WUFAR accounting code in accordance with DPI regulations, are not considered instructional equipment.

Any concerns by the public regarding instructional materials and equipment shall be reviewed in accordance with Policy 9130 - Public Requests, Suggestions, or Complaints.

The Board does not discriminate on the basis of any Protected Class consistent with Board Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity ~~any characteristic protected under State or Federal law including, but not limited to race, color, religion, national origin, ancestry, creed, pregnancy, marital status, parental status, sexual orientation, sex, (including gender status, change of sex or gender identity), or physical, mental, emotional, or learning disability ("Protected Classes")~~ in its selection of instructional materials and equipment.

The District Administrator shall establish procedures for providing parents with advance notice of instructional materials or activities that may reasonably be anticipated to substantially interfere with sincerely held religious beliefs and for accommodating requests to excuse students from such instruction. See also Policy 2240 - Controversial Issues in the Classroom.

The District Administrator shall periodically, provide for a systematic review, by the Board, of the District's instructional materials and equipment in order to ensure that they are appropriate for the current educational program. Any revisions that occur should be a result of the school improvement process.

Students shall be held responsible for the cost of replacing any materials or property that are lost or damaged through their negligence.

The cost of materials may be charged for materials used in those activities beyond the basic curriculum in which a student elects to participate, particularly in shop and art activities where the product becomes the property of the student.

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Legal
118.13, 120.13(5), 121.02(1)(h), Wis. Stats.
P.I. 9, 41, Wis. Adm. Code
Fourteenth Amendment, U.S. Constitution
20 U.S.C. Section 1681, Title IX of Education Amendments Act
20 U.S.C. Section 1701 et seq., Equal Educational Opportunities Act of 1974
29 U.S.C. Section 794, Rehabilitation Act of 1973
42 U.S.C. Section 2000 et seq., Civil Rights Act of 1964
42 U.S.C. Section 12101 et seq., The Americans with Disabilities Act of 1990
Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services, Department of Education, Office of Civil Rights, 1979

VOL. 35, NO. 2

po2623

Vol. 35, No. 2 - July 2026 Revised STUDENT ASSESSMENT AND GRADING

2623- **STUDENT ASSESSMENT AND GRADING**

The Board ~~of Education~~ shall assess student achievement and needs in all areas of the curriculum in order to determine the progress of students and to assist them in attaining District goals.

(X) The Board approves a balanced, comprehensive system of assessment that shall measure levels of student proficiency, growth, and learning needs in all areas of the curriculum in order to determine the progress of students. This information is used to:

1. Provide summative and formative opportunities for students to demonstrate their learning.
2. Accurately communicate each student's proficiency of knowledge and skill level toward grade-level outcomes.
3. Provide evidence of student proficiency and growth in relation to B oard-approved standards and learning targets.
4. Inform instruction on a regular, ongoing basis.
5. Provide meaningful feedback for student goal setting.
6. Identify strengths and weaknesses of curricular and instructional programs.

A balanced, comprehensive system of assessments includes:

1. Universal screening assessments;

2. Standards-based formative and summative classroom assessments that are authentic, valid, reliable, and aligned to grade-level learning targets;

3. Diagnostic assessments;

4. Progress Monitoring Assessments.

The Director of Instruction, in collaboration with the School Administrator, shall develop a program of standards-based assessment that includes summative and formative assessments.

[END OF OPTIONAL SECTION]

~~( )~~ ~~The Board requires that:~~

1. ~~Feedback and assessment practices are consistently applied and aligned to grade-level outcomes;~~

2. ~~Students will be offered multiple opportunities to show proficiency, including reassessments;~~

3. ~~Assessments be administered by persons who are qualified;~~

4. ~~Parents be informed of the assessment program of the school;~~

5. ~~Data regarding individual assessment performance be entered on the student's cumulative record, where it will be subject to the policy of the Board regarding student records;~~

6. ~~Results of school-wide assessments may be shared with stakeholders are approved by the Board.~~

~~**[END OF OPTIONAL SECTION]**~~

Each student's proficiencies and needs will be assessed by staff members upon the student's ~~his/her~~ entrance into the District and annually thereafter. Procedures for such assessments will include, but need not be limited to, teacher observation techniques, cumulative student records, student performance data collected through standard testing programs, student portfolios, and physical examinations.

The District Administrator shall develop and present to the Board annually a program of testing and assessment that includes:

A. State-required tests;

B. curriculum-based written and oral examinations which include the use of alternative questions, demonstrations, writing exercises, individual and group projects, performances, portfolios, and samples of best work;

C. assessment tests;

D. achievement tests.

The Board requires that tests be administered by persons who are qualified under State law and regulation.

All students shall participate in State-wide or District-wide assessments, and any student with a disability shall be provided appropriate accommodation and/or alternate assessments where necessary as indicated in the student's I.E.P. or Section 504 plan.

In addition to the testing programs, the District Administrator shall develop administrative guidelines whereby a portfolio is developed and maintained for each student.

Parental Opt-Out of Assessments (students)

The Board authorizes the District Administrator to ~~shall~~ excuse any student from the State examination administered in 4th grade, 8th grade, 9th grade, 10th grade, or 11th grade whether the test administered is the one developed by the Department of Public Instruction or the District's own test developed and approved by the DPI and the U.S. Department of Education. To opt-out of these examinations, the student's parent must submit a statement in writing to the building Principal stating that the parent is opting out of the examination(s).

~~**[ ]** - The Board also authorizes the District Administrator to accept opt-out requests from parents regarding State examinations administered in 3rd grade, 5th grade, 6th grade, and 7th grade, except when such opt-out provisions are prohibited by State or Federal law. **[END OF OPTIONAL SENTENCE]**~~

Parents may not opt any student out of the reading readiness screening required of all students in grades 4 K - 3.

[ ] GRADING

Philosophy

Classroom grades should provide feedback to students and parents. The intent of grades is not to punish, but to communicate what a student knows and is able to do compared to clearly communicated classroom expectations.

[ ] Traditional Grading

[ ] Standards-Based Grading

[ ] _____

The Board - **( )** - encourages - **( )** - discourages - **( )** - allows - **( )** - forbids - **[END OF INTERNAL OPTIONS]** - the following methodologies classroom teachers may utilize when determining grades:

1. **( )** - averaging
2. **( )** - use of extra credit
3. **( )** - grade modification for participation
4. **( )** - student behavior
5. **( )** - grade modification for "late work"
6. **( )** - grading homework
7. **( )** - curving grades based on an individual student's performance compared to a peer
8. **( )** - the use of "zero"
9. **( )** - grade modification for attendance
10. **( )** - percentages
11. **( )** - performance descriptions

12. ~~( )~~ - _____

~~[END OF OPTION S]~~

~~[ ]~~ - ~~The Board~~ - ~~( )~~ - ~~encourages~~ - ~~( )~~ - ~~requires~~ - ~~[END OF INTERNAL OPTIONS]~~ - ~~classroom grades be based on:~~

1. ~~( )~~ - ~~performance against clear descriptions of expectations (i.e. learning goals, rubrics, etc.)~~

2. ~~( )~~ - ~~the most recent performance~~

3. ~~( )~~ - _____

~~[END OF OPTION S]~~

~~Classroom achievement will be communicated to parents~~ - ~~( )~~ - ~~times a year~~ - ~~( )~~ - ~~every nine weeks~~ - ~~( )~~ - _____ ~~:~~ - ~~[END OF OPTIONS]~~

~~[ ]~~ - ~~No student will have a failing grade on their permanent student record without documented attempts to communicate with the student's parents beyond the~~ - ~~( )~~ - ~~progress report~~ - ~~( ) - report card.~~ - ~~[END OF OPTIONS]~~

~~[ ]~~ - ~~The Principal may override a classroom teacher's grade~~ - ~~( )~~ - ~~if there is evidence that the teacher did not abide by this policy.~~ - ~~[END OF OPTION]~~

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Legal
118.30, Wis. Stats.
P.I. 8.01(2r/s), Wis. Adm. Code

OVERVIEW OF UPDATE: The revisions remove the reference to "contractual requirements" and update administrative oversight. This change is recommended but not required.

VOL. 35, NO. 2

po3130

Vol. 35, No. 2 - July 2026 Revised ASSIGNMENT AND TRANSFER

3130 - **ASSIGNMENT AND TRANSFER**

The Board ~~of Education~~ believes that the appropriate placement of qualified and competent staff is essential to the successful functioning of the District.

The District Administrator shall oversee the assignment and transfer of professional personnel ~~in accordance with the provisions of the Employee Handbook~~ **[END OF OPTION]**. All placements will prioritize the best interests of the District while adhering to certification requirements. ~~( )~~ ~~The District Administrator shall be responsible for the proper assignment and transfer of all professional staff members and shall attempt to effect the optimum assignment of the professional staff in conformance with any applicable contractual or legal requirements and certification requirements. S/He shall establish an audit procedure to ensure that each instructional staff member's teaching certificate is currently in compliance with appropriate State certification criteria and has not been nullified.~~

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OVERVIEW OF UPDATE:The revision simplifies regulatory oversight by requiring professional personnel to satisfy all broad statutory conditions necessary to maintain active licensure. This change is recommended but not required.

VOL. 35, NO. 2

po3242

Vol. 35, No. 2 - July 2026 Revised PROFESSIONAL GROWTH REQUIREMENTS

3242 - **PROFESSIONAL GROWTH REQUIREMENTS**

The Board ~~of Education~~ believes that study is a prerequisite for professional growth of staff and, therefore, encourages the participation of professional staff members in in-service and other training programs.

The District Administrator shall plan programs of staff development for professional staff members. Such staff development programs should be designed to address the professional development needs of staff members who are working at a particular level, involved in a particular course or subject, or need to be prepared for a new assignment. The development plan should be designed to meet the needs of staff members or curriculum areas in each school.

Whenever feasible, principals should participate with their staff members in order to ensure better follow-up and support.

The Board may reimburse staff members for the costs incurred in participation therein, subject to prior approval of the District Administrator.

Professional staff members are expected to satisfy any applicable requirements to maintain licensure. ~~Professional staff members are expected to comply with the Professional Development Plan requirements of their license and provide timely verification of progress towards fulfilling this responsibility.~~

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Legal
121.02(b), Wis. Stats.
P.I. 8.01(2)(b), Wis. Adm. Code

Vol. 35, No. 2 - July 2026 Revised OTHER PERSONAL ELECTRONIC DEVICES

5136.01 - **OTHER PERSONAL ELECTRONIC DEVICES** ~~**TECHNOLOGY RESOURCES AND OTHER ELECTRONIC EQUIPMENT**~~

Purpose

The Board recognizes that while certain technology resources can enhance the educational environment, student-owned equipment can also lead to distractions, academic dishonesty, and disruptions. This policy governs the use of personal electronic equipment not otherwise classified as a Personal Communication Device (PCD).

Personal Communication Devices (PCDs)

The use and possession of any student-owned device capable of wireless communication (including but not limited to smartphones, tablets, laptops, and gaming devices) are strictly governed by Policy 5136 - Personal Communication Devices.

Other Personal Electronic Devices

This section applies to student-owned technology not covered under Policy 5136 - Personal Communication Devices, such as but not limited to:

1. Cameras (stand-alone photographic and/or video)

2. Lasers, laser pens, or pointers

3. Portable audio equipment (e.g., speakers, "boom-boxes," headphones)

4. electronic games or toys that do not receive or transmit a signal to another device

5. Any other electronic device that does not possess wireless data or voice transmission capability.

~~While in some instances the possession and use of technology resources (as defined in Bylaw 0100 - Definitions) and other electronic equipment or devices by a student at school may be appropriate, the possession and use of such technology resources and otherequipment or devices by students at school may also have the effect of distracting, disrupting and/or intimidating others in the school environment and leading to opportunities for academic dishonesty and other disruptions of the educational process.~~

Students may use Other Personal Electronic Devices, as defined above, ~~the following technology resources and other electronic equipment/devices~~ during instructional time for an educational or instructional purpose (e.g. taking notes, recording a class lecture, writing papers) with the teacher's permission and supervision, and may use these technology resources and other electronic equipment during non-instructional time, provided such use is consistent with the Policy 7540.03 - Student Acceptable Use and Safety:

A. ~~cameras (photographic and/or video),~~

B. ~~laptops,~~

C. ~~tablets (e.g., iPad-like devices),~~

D. ~~smartphones,~~

E. ~~e-readers (e.g., Kindle-like devices),~~

F. ~~personal digital assistants (PDAs),~~

G. p~~ortable CD/MP3 players.~~

~~Students are prohibited from using technology resources and other electronic equipment or devices in a manner that may be physically harmful to another person (e.g., shining a laser in the eyes of another student). Further, at no time may any technology resources or other electronic equipment/device be utilized by a student in a way that might reasonably create in the mind of another person an impression of being threatened, humiliated, harassed, embarrassed, or~~

~~intimidated. See Policy 5517.01 – Bullying. In particular, students are prohibited from using technology resources, a camera, or other electronic equipment/device to: (1) transmit material that is threatening, obscene, disruptive, or sexually explicit or that can be construed as harassment or disparagement of others based upon their race, national origin, sex (including sexual orientation, and gender identity), age, disability, religion, or political beliefs; and (2) send, share, view or possess pictures, text messages, e-mails or other materials of a sexual nature (i.e., sexting) in electronic or any other form. Violation of these prohibitions shall result in disciplinary action.~~

~~Furthermore, such actions will be reported to local law enforcement and child services as required by law.~~

~~Students are prohibited from using technology resources and other electronic equipment/devices to capture, record, or transmit test information or any other information in a manner constituting fraud, theft, or academic dishonesty. Similarly, students are prohibited from using technology resources and other electronic equipment and devices to capture, record, or transmit the words (i.e. audio) and/or images (i.e. pictures/video) of any student, staff member or other person in the school or while attending a school-related activity, without express prior notice and explicit consent for the capture and/or recording of such words or images. Using technology resources or other electronic equipment/devices to capture, record, or transmit audio and/or pictures/video of an individual without his/her consent is considered an invasion of privacy and is not permitted unless authorized by the building principal. Technology resources and other electronic equipment/devices are expressly banned from and may not be possessed, activated, or utilized at any time in any school situation where a reasonable expectation of personal privacy exists. These locations and circumstances include but are not limited to locker rooms, shower facilities, restrooms, and any other areas where students or others may change clothes or be in any stage or degree of disrobing or changing clothes. The building principal has authority to make determinations as to other specific locations and situations where possession of a camera or other electronic equipment/device is absolutely prohibited.~~

Unauthorized technology resources and other electronic equipment and devices will be confiscated from the student by school personnel and disciplinary action taken.

Any technology resources or other electronic equipment/device confiscated by District staff will be marked in a removable manner with the student's name and held in a secure location in the building's central office until it is retrieved by the parent ~~/guardian~~. Technology resources or other electronic equipment/devices in District custody will not be searched or otherwise tampered with unless school officials reasonably suspect that the search is required to discover evidence of a violation of the law or other school rules (e.g., a student is observed using a camera in a prohibited area). Any search will be conducted in accordance with Policy 5771 – Search and Seizure.

Students are personally and solely responsible for the care and security of any technology resources and other electronic equipment or devices they bring to school. The Board assumes no

responsibility for theft, loss, damage, or vandalism to electronic equipment and devices brought onto its property, or the unauthorized use of such devices.

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OVERVIEW OF UPDATE:The revisions elevate student privacy and parental transparency by requiring advance written notice before the administration of any periodic or necessary health services. Additionally, these revisions implement a strict five-day prior notice mandate for unforeseen invasive examinations, aligning local protocols with federal protections of student rights. These changes are recommended for adoption to help the District comply with State and Federal requirements.

Vol. 35, No. 2 - July 2026 Revised HEALTH SERVICES

5310 - **HEALTH SERVICES**

The Board actively follows all Federal and State laws aimed at protecting student privacy and providing transparency. In the rare and unusual circumstance of the District requiring a physical examination or screening, such decisions shall prioritize student privacy and parental authorization. Only after written advance notification to parents ~~( )~~ ~~no less than five (5) school days in advance~~ **[END OF OPTION]** , the ~~The~~ Board ~~of Education~~ per State law, may require students to submit to periodic health examinations to:

1. protect the school community from the spread of communicable disease;

2. determine that each student's participation in health, safety, and physical education courses meets the student's ~~his/her~~ individual needs;

3. determine that the learning potential of each child is not lessened by a remediable, physical disability.

The District shall provide advance written notification to parents any time the District determines there is a ~~specify the~~ need for health services which may include, but not be limited to:

1. student physical examinations;

2. athlete physical examinations;

3. dental examinations;

4. vision screening;

5. audiometric screening.

Any health services program will ~~should~~ also include instruction to staff members on the observance of students for conditions that indicate signs of physical health conditions which may be pertinent to the student's ability to fully access the District's programming.

Federal Protection of Student Rights

The Board shall directly notify the parents of students, at least annually at the beginning of the school year, of the specific or approximate dates during the school year when any non-emergency, invasive physical examination or screening is scheduled or expected to be scheduled for students if the examination or screening is: (1) required as a condition of attendance; (2) administered by the school and scheduled by the school in advance; and (3) not necessary to protect the immediate health and safety of a specific student, or other students.

Per Federal law, the ~~The~~ term "invasive physical examination" means any medical examination that involves the exposure of private body parts, or any act during such examination that includes incision, insertion, or injection into the body, but does not include a hearing, vision, or scoliosis screening. If for some unforeseen and unexpected reason such examinations would be conducted by the District without notification at the beginning of the school year, then the District shall provide parents with written notification of such examinations no less than five (5) school days prior to an examination.

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Legal
118.25(3)(4), 118.255, Wis. Stats.
20 U.S.C. 1232h

OVERVIEW OF UPDATE: The revisions integrate contemporary constitutional standards by requiring that administrative restrictions on student attire be based on a context-specific forecast of material and substantial disruption. Additionally, the revisions expand the categories of prohibited dress to encompass items that violate anti-harassment policies, depict obscenity, or incite violence, thereby providing school officials with clearer, defensible guidance for enforcement. The non-option changes are recommended for adoption, but are not required.

VOL. 35, NO. 2

po5511

Vol. 35, No. 2 - July 2026 Revised DRESS AND APPEARANCE

5511 - **DRESS AND APPEARANCE**

The Board recognizes that each student's mode of dress and appearance is a manifestation of personal style and individual preference and that students do possess certain individual rights, including the right to engage in expressive speech. The Board will not interfere with the right of students and their parents to make decisions regarding their appearance, except when their choices interfere with the educational program of the schools.

Accordingly, the District Administrator shall establish such dress and appearance (Dress Code) guidelines as are necessary to promote discipline, maintain order, secure the safety of students, and provide a healthy environment conducive to academic purposes. Such guidelines shall prohibit student dress or appearance practices that:

A. present a hazard to the health or safety of the individual student or to others in the school, including by way of communicating threats of harm or depictions of harmful conduct directed at others, including depictions that are reasonably likely to or are intended to incite violence against or hatred towards others ~~:~~;

B. interfere with school work, create disorder, or cause or is likely to cause a material and substantial disruption to ~~disrupt~~ the educational program; ~~;~~

C. cause excessive wear or damage to school property;

D. prevent the student from achieving educational objectives because of blocked vision or restricted movement. ~~:~~

E. (X) violate the District's anti-harassment policies by depicting images or messages that represent or promote discrimination or harassment on the basis of one or more protected classifications;

F. (X) depict or promote obscenity, pornography, or otherwise depict or describe sexual activity.

Such guidelines shall also apply to the dress requirements for members of the athletic teams, bands, and other school groups when representing the District at a public event. Where

appropriate, a uniform or specific dress requirement shall be used for students when representing the District as described.

In enforcing the dress code, the following procedures shall be used:

A. the principal shall serve as the initial arbiter of student dress and appearance within the building or at school-sponsored events or activities;

B. before taking action to enforce dress code requirements, including by requiring that a student remove, cover, or otherwise conceal the item or depiction at issue, the principal shall consider ~~determine whether~~ the expressive nature of the particular item while evaluating the application of the dress code. ~~constitutes protected speech insofar as the item independently makes a statement of a discernable nature to the observer by depiction, words, or combination of the two that does not require separate explanation.~~

~~Expressive dress may not be protected speech if it involves:~~

A. ~~obscenity;~~

B. ~~language or depictions intended to incite violence or foment hatred of others.~~

~~Dress that is protected speech may still be prohibited if it is likely to cause a substantial disruption to the educational environment. This may include dress that includes the use of vulgarity, discriminatory language including racial or ethnic slurs, negative stereotypes, violence, or other communication when the clear intent is to invoke strong reactions in observers so as to impair the ability of teachers and/or students to engage in educational pursuit.~~

In determining whether a student's dress or appearance materially interferes with schoolwork, creates disorder, or disrupts the educational program, school officials may consider the age and emotional maturity of the student audience, recent local or national events, and the unique characteristics of the school community. Decisions to restrict student dress or expression should be based on a reasonable forecast of material and substantial disruption, supported by specific facts and context, and should be documented accordingly.

No protected speech may be prohibited on the basis of disagreement by District officials with the specific point of view expressed if the topic is otherwise permitted (e.g., permitting depictions of support for one political party, but prohibiting depictions of support for the other).

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Legal
120.13(1), Wis. Stats.

Vol. 35, No. 2 - July 2026 Revised PROCUREMENT - FEDERAL GRANTS/FUNDS

6325 - **PROCUREMENT – FEDERAL GRANTS/FUNDS**

Procurement of all supplies, materials, equipment, and services paid for from Federal funds including any District matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, Board policies, and administrative procedures.

The District Administrator shall have and use a procurement and contract administration system in accordance with the USDOE requirements (2 C.F.R. 200.317-.326), including affirmative steps for small businesses, minority business, women's business enterprises, veteran-owned businesses, and labor surplus area firms, for the administration and management of Federal grants and Federally-funded programs. The District shall maintain oversight that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of the District's documented general purchasing policy and administrative guidelines (Policy 6320 - Purchasing and AG 6320A - Purchasing).

When required by Federal program legislation, all Federally-funded contracts in excess of $2,000 related to construction, alteration, repairs, painting, decorating, etc. must comply with Davis-Bacon prevailing wage requirements.

All District employees, officers, and agents who have purchasing authority shall abide by the standards of conduct covering conflicts of interest and governing the actions of its employees, officers, and agents engaged in the selection, award, and administration of contracts as established in Policy 1130 – Ethics and Conflict of Interest, Policy 3230 – Ethics and Conflict of Interest, and Policy 4230 – Ethics and Conflict of Interest.

The District will avoid acquisition of unnecessary or duplicative items. Consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. When appropriate, an analysis shall be made between leasing and purchasing property or equipment to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements, where appropriate, for procurement or use of common or shared

goods and services.

Competition

All procurement transactions under the Federal award paid for from Federal funds or District matching funds shall be conducted in a manner that provides full and open competition and that is in accordance with 2 C.F.R. Part 200, good administrative practice, and sound business judgment. To ensure objective contractor performance and eliminate unfair competitive advantage, the District shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids, from competition for such procurements.

Examples of situations that may restrict competition include, but are not limited to:

A. unreasonable requirements on firms for them to qualify to do business

B. unnecessary experience and excessive bonding requirements

C. noncompetitive pricing practices between firms or between affiliated companies

D. noncompetitive contracts to consultants who are on retainer contracts

E. organizational conflicts of interest

F. specification of only a "brand name" product instead of allowing for an "*or equal*" product to be offered and describing the performance or other relevant requirements of the procurement

G. any arbitrary action in the procurement process

To the extent that the District uses a pre-qualified list of persons, firms, or products to acquire goods and services that are subject to this policy, the pre-qualified list includes enough qualified sources to ensure maximum open and free competition. The District allows vendors to apply for consideration to be placed on the list continuously.

The District shall require that all prequalified lists of persons, firms, or products that are used in procurement transactions are current and include enough qualified sources to provide maximum open competition. When establishing or amending prequalified lists, the District (or subrecipient) must consider objective factors that evaluate price and cost to maximize competition. The District shall not preclude potential bidders from qualifying during the solicitation period.

To the extent consistent with established practices and legal requirements applicable to the recipient or subrecipient, this subpart does not prohibit recipients or subrecipients from developing written procedures for procurement transactions that incorporate a scoring mechanism that rewards bidders that commit to specific numbers and types of U.S. jobs,

minimum compensation, benefits, on-the-job-training for employees making work products or providing services on a contract, and other worker protections. This subpart also does not prohibit recipients and subrecipients from making inquiries of bidders about these subjects and 2 C.F.R. Revisions 2024: Unofficial Comparison Version assessing the responses. Any scoring mechanism must be consistent with the U.S. Constitution, applicable Federal statutes and regulations, and the terms and conditions of the Federal award.

Solicitation Language (Purchasing Procedures)

The District shall have written procurement procedures (in accordance with 2 C.F.R. 200.319(d)) that require that all solicitations incorporate a clear and accurate description of the technical requirements for the property, equipment, or service being procured. The description may include a statement of the property, equipment, or service to be procured. When necessary, the description must set forth those minimum essential characteristics and standards to which the property, equipment, or service shall conform. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to clearly and accurately describe the technical requirements, a "brand name or equivalent" description of features to provide procurement requirements may be used. The specific features of the named brand must be clearly stated and the District must identify any additional requirements that the offerors must fulfill and all other factors that will be used in evaluating bids or proposals.

The Board will not approve any expenditure for an unauthorized purchase or contract.

Procurement Methods

The District shall have and use documented procedures, consistent with the standards described above, for the following methods of procurement:

A. **Informal Procurement Methods**

Informal procurement methods for small purchases expedite the completion of transactions, minimize administrative burdens, and reduce costs. Informal procurement methods may be used when the value of the procurement transaction under a Federal award does not exceed the simplified acquisition threshold, or a lower threshold established by the State. The informal procurement methods include:

1. **Micro-Purchases**

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed **$15,000** ~~$10,000~~. To the extent practicable, the District should distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be made without soliciting competitive quotations if the District Administrator considers the price to be reasonable based

on research, experience, purchase history or other relevant information and maintains documents to support its conclusion. The District shall maintain evidence of this reasonableness in the records of all purchases made by this method.

An eligible District may self-certify a threshold of up to $50,000 on an annual basis and must maintain documentation to be made available to the Federal agency or pass-through entity and auditors in accordance with 2 C.F.R. 200.334. The self-certification, in accordance with 2 C.F.R. 200.334, must include a justification, clear identification of the threshold, and supporting documentation of any of the following:

a. a qualification as a low-risk auditee in accordance with the criteria in 2 C.F.R. 200.520;

b. an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or

c. for public institutions, a higher threshold is consistent with State law.

2. **Small Purchases**

Small purchases include the acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold of **$350,000** ~~$250,000~~. Small purchase procedures require that price or rate quotations shall be obtained from an adequate number of qualified sources.

Districts are responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures which must not exceed the threshold established in the Federal Acquisition Regulations ("FAR"). When applicable, a lower simplified acquisition threshold used by the District must be authorized or not prohibited under State, local, or tribal laws or regulations.

B. **Formal Procurement Methods**

When the value of the procurement for property or services under a Federal award exceeds the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are required. Formal procurement methods require following documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement method can be used in accordance with the standards on competition in 200.319 or non-competitive procurement. The formal methods of procurement are:

1. **Sealed Bids**

   Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment that amounts to more than **$350,000** ~~$250,000~~ and when the Board determines to build, repair, enlarge, improve, or demolish a school building/facility, the cost of which will exceed $50,000.

   In order for sealed bidding to be feasible, the following conditions shall be present:

   a. a complete, adequate, and realistic specification or purchase description is available;

   b. two (2) or more responsible bidders have been identified as willing and able to compete effectively for the business; and

   c. the procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally based on price.

When sealed bids are used, the following requirements apply:

a. Bids shall be solicited in accordance with the provisions of State law and Policy 6320. Bids shall be solicited from an adequate number of qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised.

b. The invitation for bids must define the items or services with specific information, including any required specifications, for the bidder to properly respond.

c. All bids will be opened at the time and place prescribed in the invitation for bids; bids will be opened publicly.

d. A firm fixed-price contract is awarded in writing to the lowest responsive bid and responsible bidder. When specified in the invitation for bids, factors such as discounts, transportation costs, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts must only be used to determine the low bid when the District determines they are a valid factor based on prior experience.

e. The Board reserves the right to reject any or all bids but must document and provide a justification for all bids it rejects.

2. **Proposals**

Procurement by proposals is a method in which either a fixed-price or cost-

reimbursement contract is awarded. This method is used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method.

If this method is used, the following requirements apply:

a. Requests for proposals require public notice and must identify all evaluation factors and their relative importance. To the maximum extent practicable, any proposals submitted in response to the public notice must be considered.

b. Proposals shall be solicited from an adequate number of sources.

c. The District must have written procedures for conducting technical evaluations and for making selections.

d. Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the District considering price and other factors.

The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby the competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where the price is not used as a selection factor, can only be used to procure A/E professional services. The method cannot be used to purchase other services provided by A/E firms that are a potential source to perform the proposed effort.

3. **Noncompetitive Procurement**

Procurement by noncompetitive proposals may be used only when one (1) or more of the following circumstances apply:

a. the aggregate amount of the procurement transaction does not exceed the micro-purchase threshold;

b. the procurement transaction can only be a fulfilled by a single source;

c. the public exigency or emergency for the requirement will not permit a delay resulting from providing public notice of a competitive solicitation;

d. the District requests in writing to use a noncompetitive procurement method, and the Federal agency or pass-through entity provides written approval; or

e. after soliciting several sources, competition is determined to be inadequate.

Domestic Preference for Procurement

The District should, to the extent practicable and consistent with law, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Such requirements shall be included in all subawards, contracts, and purchase orders under the Federal award.

Procurement of Recovered Materials

The District must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended, 42 U.S.C. 6962. These requirements include:

A. procuring only items designated in the guidelines of the Environmental Protection Agency ("EPA") at 40 C.F.R. part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds $10,000 or the value of the quantity acquired during the preceding fiscal year exceeded $10,000;

B. procuring solid waste management services in a manner that maximizes energy and resource recovery; and

C. establishing an affirmative procurement program for the procurement of recovered materials identified in the EPA guidelines.

The District should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products and services that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable.

This may include purchasing compostable items and other products and services that reduce the use of single-use plastic products.

Contract/Price Analysis

The District shall perform a cost or price analysis for every procurement transaction, including contract modifications, in excess of the Simplified Acquisition Threshold (currently **$350,000** ~~$250,000~~). The method and degree of analysis conducted depend on the facts surrounding the particular procurement transaction. For example, the District should consider potential workforce impacts in their analysis if the procurement transaction will displace public sector employees. However, as a starting point, the District must make independent estimates before receiving bids or proposals.

A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements. The District must not use the “cost plus a percentage of cost” and “percentage of construction costs” methods of contracting.

Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that the costs incurred or cost estimates included in negotiated prices would be allowable for the District according to cost principle requirements.

Time and Materials Contracts

The District uses a time and materials type contract only 1) after a determination that no other contract is suitable; and 2) if the contract includes a ceiling price that the contractor exceeds at its own risk. A time-and-materials type contract means a contract whose cost to the District is the sum of the actual costs of materials and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Because this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, the District sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Suspension and Debarment

The District will award contracts only to responsible contractors that possess the ability to perform successfully under the terms and conditions of the proposed contract. All purchasing decisions shall be made in the best interests of the District and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the District shall consider such factors as 1) contractor integrity; 2) public policy; 3) compliance; 4) proper classification of employees; 5) record of past performance; and 6) financial and technical resources.

The District shall not subcontract with or award subgrants to any person or company who is debarred or suspended. For contracts over $25,000, the District shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management, which maintains a list of such debarred or suspended vendors, at www.sam.gov; collecting a certification from the vendor; or adding a clause or condition to the covered transaction with that vendor. (2 C.F.R. Part 180 Subpart C)

Bid Protest

The District maintains the following protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the agency.

A bidder who wishes to file a bid protest shall file such notice and follow procedures prescribed by the Request For Proposals ("RFPs") or the individual bid specifications package, for resolution. Bid protests shall be filed in writing with the District Administrator within seventy-two (72) hours of the opening of the bids in protest.

Within five (5) days of receipt of a protest, the District Administrator shall review the protest as submitted and render a decision regarding the merits of the protest and any impact on the acceptance and rejection of bids submitted. Notice of the filing of a bid protest shall be communicated to the Board and shall be so noted in any subsequent recommendation for the acceptance of bids and awarding of contracts.

Failure to file a notice of intent to protest or failure to file a formal written protest within the time prescribed shall constitute a waiver of proceedings.

Maintenance of Procurement Records

The District shall maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

Records Retention

The District must retain all Federal award records for three (3) years from the date of submission of the final financial report, or as otherwise required pursuant to the Board-adopted records retention schedule, whichever is longer. For awards that are renewed quarterly or annually, the District must retain records for three (3) years from the date of submission of the quarterly or annual financial report, respectively, or as otherwise required pursuant to the Board-adopted records retention schedule, if longer. Records to be retained include, but are not limited to, financial records, supporting documentation, and statistical records. Other records retention requirements shall be in accordance with 2 C.F.R. 200.334 and the Board-adopted records retention schedule.

The District must collect, transmit, and store Federal award information in an open file, non-licensed, and machine-readable formats. The District may substitute electronic versions of original paper records through duplication or other forms of electronic conversion, provided that the procedures are subject to periodic quality control reviews. Quality control reviews must ensure that electronic conversion procedures provide safeguards against the alteration of records and assurance that records remain in a format that is readable by a computer system.

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Legal
2 C.F.R. 200.317 - .326
Appendix II to Part 200
2 C.F.R. 200.334 - 200.336
2 C.F.R. 200.520

OVERVIEW OF UPDATE:The revision establishes a framework for the Board to expressly authorize drone operations during instructional periods or approved events, subject to a five-business-day response timeline. It further cites specific statutory-based exceptions permitting law enforcement and public protective agencies to operate drones over district property for defined emergency and public safety purposes, such as active search and rescue or preventing imminent danger. These changes are required for adoption but are not required.

VOL. 35, NO. 2

po7440.03

Vol. 35, No. 2 - July 2026 Revised SMALL UNMANNED AIRCRAFT SYSTEMS (Drones)

7440.03 - **SMALL UNMANNED AIRCRAFT SYSTEMS (Drones)**

~~The Board prohibits the operation of small Unmanned Aircraft Systems (sUAS), commonly known as drones, at any time on a property that is owned or leased or contracted for by the Board at any time by any individual who is not authorized to do so by the District Administrator.~~

A drone may be operated over property owned by the District during periods when the school is open to students for instruction or when the property is being used for an event approved by the Board at the express authorization of the Board. The Board shall respond to a request for authorization within five (5) business days of receiving the request. **(** **)** The Board designates this responsibility to the **(** X **)** District Administrator **(** **)**_____ **[END OF OPTIONS]**

If sUAS (drones) are used during high school athletic activities and/or events, the use will adhere to the Wisconsin Interscholastic Athletic Association's (WIAA) administrative policies and procedures.

To be authorized to operate a drone on property owned or leased or contracted for by the Board, the individual or organization granted permission by the Board ~~a staff member or administrator or vendor employed by the Board~~ must meet all criteria for the operation of and comply with all requirements and restrictions pertaining to the operation of any sUAS established by the Federal Aviation Administration (FAA).

Failure to adhere by applicable regulations may result in loss of authorization to operate a drone on property owned or leased or contracted for by the Board, referral to local law enforcement, and/or further disciplinary action, up to and including termination.

A drone(s) may be operated over property owned by the District at the direction of the sheriff or the chief of a public protective agency having jurisdiction over the territory on which the District property is located for any of the following purposes:

1. to assist in an active search and rescue operation;

2. to locate an escaped prisoner;

3. to surveil a place or location for the purpose of executing an arrest warrant; or,

4. when a law enforcement officer has reasonable suspicion to believe that the use of a drone is necessary to prevent imminent danger to an individual or to prevent imminent destruction of evidence.

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Legal
14 C.F.R. Part 107
86 FR 4314

OVERVIEW OF UPDATE: These revisions formally define the service of legal process, clarify the District Administrator's statutory authority to receive service, and restrict other staff to accepting documents exclusively through personal service unless otherwise directed. It also establishes guidance for employees who are requested to provide testimony or documentation. These changes are recommended for adoption but are not required.

VOL. 35, NO. 2

po8325

Vol. 35, No. 2 - July 2026 Revised RECEIPT OF LEGAL DOCUMENTS BY DISTRICT EMPLOYEES

8325 - **RECEIPT OF LEGAL DOCUMENTS BY DISTRICT EMPLOYEES**

~~School employees often gain substantial personal knowledge regarding many aspects of the lives and behavior of students. As a result they may be called upon to provide testimony in the course of legal proceedings such as divorce actions involving custody disputes, criminal prosecutions or other types of legal proceedings. School employees may also be the subject of civil suits relating to the performance of their employment responsibilities, resulting in the service of legal documents requiring them to respond to allegations, produce records or provide sworn testimony.~~

Service of Legal Process

Service of legal process is defined as a formal delivery of a notice of claim, summons, complaint, writ, or other legal notice to a defendant or interested party. This action officially notifies the defendant or interested party of a lawsuit or legal proceeding, establishing a court's jurisdiction over them.

Accepting Legal Service

Legal service requires compliance with procedural rules. The Board authorizes the District Administrator to receive service of legal process for District matters, pursuant to 118.26, Wis. Stats. The District Administrator is authorized to refer legal process to the Board's legal counsel.

Staff members may not accept service of legal documents on behalf of the District unless authorized by the District Administrator to do so. If authorized by the District Administrator to accept service of legal documents on behalf of the District, staff members may only accept service through personal service and should not agree to accept service via email, fax, or any other means other than personal service unless directed to do so by the District Administrator.

The District Administrator shall be immediately informed of the receipt of any legal documents by a District staff member naming a District staff member in their official capacity as a party to a legal action or otherwise implicating the District staff member's official duties as a subject of a lawsuit or legal proceedin g.

Providing Testimony or Documentation

At times employees may be called upon to provide legal testimony or provide documentation on student or District matters. The staff member shall immediately notify **( )** their principal **( )** the District Administrator **(X) their Administrator** **__** **[END OF OPTIONS]** who shall notify the **(X)** District Administrator who shall consult with the Board's legal counsel ~~**( )** - Board's legal counsel - **( )** - _____ who shall consult with the Board's legal counsel -~~ **[END OF OPTIONS]** .

No staff member may produce confidential student records or testify concerning the content of student records without first notifying students or **( )** their principal **( )** the District Administrator **(X)** their Administrator **___** **[END OF OPTIONS]** .

~~Service of Legal Documents~~

~~Legal service requires compliance with procedural rules. Staff members may not accept service of legal documents on behalf of the District unless authorized to do so, and should not agree to accept service via e-mail, fax, or other means other than personal service unless directed to do so.~~

~~**[ ]** The District Administrator has authorization to contact legal counsel.~~

~~Student Records and Other Confidential Information~~

~~If a District staff member is served with any legal document(s) such as a subpoena or summons and complaint, requiring this staff member to answer factual allegations or appear at a particular place and time to provide testimony and/or records pertaining to any matter related to the staff member's employment, the staff member must immediately notify the building principal or District Administrator.~~

Legal documents regarding matters related to school business may implicate confidential personnel records or protected student records (see Policy 8330 - Student Records and Policy 8310 - Public Records). Observation and opinions regarding student behavior, academic performance or similar topics likewise constitute confidential records. The administration shall determine what action must be taken regarding the disclosure of and testimony related to school documents. ~~No staff member may produce confidential student records or testify concerning the content of student records without first notifying the administration.~~

~~District administration shall be immediately informed of the receipt of any legal documents by a District staff member naming a District staff member in their official capacity as a party to a legal action or otherwise implicating the District staff member's official duties as a subject of a lawsuit or legal proceeding.~~

Compliance with Legal Documents

Depending on the circumstances of the particular matter involved, District administration may determine what action must be taken in the event a staff member is issued a subpoena requiring attendance at any hearing, deposition or requiring the production of documents ~~; ;~~ however , nothing in this policy shall require any staff member to disregard, to otherwise fail, to properly comply with any legally served documents, or any court order pertaining to the staff member's testimony or production of documents.

Litigation Hold

If a Litigation Hold is initiated, the process specified in Policy 8315 - Preservation of Records and Litigation Holds shall be followed.

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Vol. 35, No. 2 - July 2026 Revised CRISIS INTERVENTION

8410 - **CRISIS INTERVENTION**

The Board is committed to maintaining a safe school environment. The Board believes that school crime and violence are multifaceted problems that need to be addressed in a manner that utilizes the best resources and coordinated efforts of District personnel, law enforcement agencies, and families. The Board further believes that administrators and local law enforcement officials must work together to provide for the safety and welfare of students while they are at school or a school-sponsored activity or while enroute to or from school or a school-sponsored activity. The Board also believes that the first step in addressing school crime and violence is to assess the extent and nature of the problem(s) or threat, and then plan and implement strategies that promote school safety and minimize the likelihood of school crime and violence.

The District Administrator shall develop administrative guidelines as appropriate to assist in providing effective intervention for students who may show warning signs that relate to violence or other threatening behaviors.

The District shall develop and the Board shall approve a school safety plan consistent with Policy 8420 - School Safety and Reporting of Crime Statistics.

Threat Assessment

The primary purpose of a threat assessment is to minimize the risk of targeted violence at school. This policy is designed to be consistent with the process for identifying, assessing, and managing students who may pose a threat as set forth in the joint U.S. Secret Service and U.S. Department of Education publication, *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*. The goal of the threat assessment process is to take appropriate preventive or corrective measures to maintain a safe school environment, protect and support potential victims, and provide assistance, as appropriate, to the student being assessed. The District also performs facilities' threat assessments, which are discussed in Policy 8420-School Safety and Reporting of Crime Statistics and part of the school safety and emergency preparedness plan and response to school violence event protocols. This policy deals with crisis intervention as it relates to individuals.

The threat assessment process is centered upon an analysis of the facts and evidence of behavior in a given situation. The appraisal of risk in a threat assessment focuses on actions,

communications, and specific circumstances that might suggest that an individual intends to cause physical harm and is engaged in planning or preparing for that event.

The Board authorizes the District Administrator to create building-level, trained threat assessment teams. Each Team shall be headed by the Principal and include appropriate staff such as a school counselor, school psychologist, instructional personnel, and, where appropriate, the School Resource Officer. At the discretion of the District Administrator, a threat assessment team may serve more than one (1) school when logistics and staff assignments make it feasible.

The Team will meet when the Principal learns a student has made a threat of violence or engages in concerning communications or behaviors that suggest the likelihood of a threatening situation.

The Team is empowered to gather information, evaluate facts, and make a determination as to whether a given student poses a threat of violence to a target. If an inquiry indicates that there is a risk of violence in a specific situation, the Team may collaborate with others to develop and implement a written plan to manage or reduce the threat posed by the student in that situation.

The District Administrator shall be responsible for the following:

A. identifying team participants by position and role;

B. requiring team participants to undergo appropriate training;

C. defining the nature and extent of behavior or communication that would trigger a threat assessment and/or action pursuant to a threat assessment;

D. defining what types of information that may be gathered during the assessment;

E. stating when and how parents of a student making a threat shall be notified and involved;

F. designating the individuals (by position) who would be responsible for gathering and investigating information;

G. identifying the steps and procedures to be followed from initiation to conclusion of the threat assessment inquiry or investigation.

Board employees, volunteers, and other school community members, including students and parents, shall immediately report to the District Administrator or Principal any expression of intent to harm another person or other statements or behaviors that suggest a student may intend to commit an act of violence.

Nothing in this policy overrides or replaces an individual's responsibility to contact 911 in an emergency or to report threats of violence if required (see Policy 8462.01 - Threats of Violence).

Regardless of threat assessment activities or protocols, disciplinary action and referral to law enforcement shall occur as required by State law and Board policy.

Threat assessment team members shall maintain student confidentiality at all times as required by Board Policy 8330 – Student Records, and State and Federal law.

Persistently Dangerous Schools

The Board recognizes that State and Federal law requires that the District report annually incidents that meet the statutory definition of violent criminal offenses that occur in a school, on school grounds, on a school conveyance, or at a school-sponsored activity. It is further understood that the Wisconsin Department of Public Instruction will then use this data to determine whether or not a school is considered "persistently dangerous" as defined by State policy.

Pursuant to the Board's stated intent to provide a safe school environment, the school administrators are expected to respond appropriately to any and all violations of the Student Code of Conduct, especially those of a serious, violent nature. In any year where the number of reportable incidents of violent criminal offenses in any school exceeds the threshold number established in State policy, the District Administrator shall convene a meeting of the building administrator, representative(s) of the local law enforcement agencies, and any other individuals deemed appropriate for the purpose of developing a plan of corrective action that can be implemented in an effort to reduce the number of these incidents in the subsequent year.

The District Administrator shall make a report to the Board about this plan of corrective action and shall recommend approval and adoption of it.

In the unexpected event that the number of reportable incidents in three (3) consecutive school years exceeds the statutory threshold and the school is identified as persistently dangerous, students attending the school shall have the choice option as provided in Policy 5113.02 - Intra-District Safe School Transfers Options.

In addition, the District Administrator shall convene a meeting of the building administrator, representative(s) of the local law enforcement agencies, and any other individuals deemed appropriate for the purpose of developing a plan of corrective action that can be implemented in an effort to reduce the number of these incidents in the subsequent year.

The transfer provision under PI 23 only applies if the District has another appropriate grade level public school, including a public charter. The U.S. Department of Education encourages but does not require Districts to explore other appropriate options such as an agreement with a neighboring school district to accept transfer pupils if there is not another school in the district for the transferring student, or alternative open-enrollment under 118.51, Wis. Stat s .

Victims of Violent Crime

The Board further recognizes that, despite the diligent efforts of school administrators and staff to provide a safe school environment, an individual student may be a victim of a violent crime in a school, on school grounds, on a school conveyance, or at a school-sponsored activity. In accordance with Federal and State law, the parents of the eligible student shall have the choice options provided by Policy 5113.02 - Intra-District Safe School Transfers Options.

T.C. 3/24/26

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Legal
118.07(4)(a)-(d) Wis. Stat.
Title IX, Section 9532 of the No Child Left Behind Act of 2001

OVERVIEW OF UPDATE: These updates are required to keep District policies updated for compliance and a Food Service Administrative Review (Audit).

VOL. 35, NO. 2

po8500

Vol. 35, No. 2 - July 2026 Revised FOOD SERVICES

8500 - **FOOD SERVICES**

The Board shall provide cafeteria facilities in all school buildings where space permits, and will provide food service for the purchase and consumption of lunch for all students.

The food-service program may participatein the Farm to School Program using locally grown food in school meals and snacks.

The food-service program shall comply with Federal and State regulations pertaining to the selection, preparation, delivery, consumption, and disposal of food and beverages, including but not limited to the current USDA school meal pattern requirements and the USDA's Smart Snacks in School nutrition standards, as well as to the fiscal management of the program. Further, the food-service program shall comply with Federal and State regulations pertaining to the fiscal management of the program as well as all the requirements pertaining to food service hiring and food service manager/operator licensure and certification. In addition, as required by law, a food safety program based on the principles of the Hazard Analysis and Critical Control Point (HACCP) system shall be implemented with the intent of preventing food-borne illnesses. For added safety and security, access to the facility and the food stored and prepared therein shall be limited to food service staff and other authorized persons.

The District's food service program shall serve only food items and beverages determined by the Food Service Department to be in compliance with the current USDA Dietary Guidelines for Americans and the USDA Smart Snacks in School nutrition guidelines. Any competitive food items and beverages that are available for sale to students ~~a la carte in the dining area~~ between midnight and thirty (30) minutes following the end of the school day shall also comply with the ~~current USDA Dietary Guidelines for Americans and the~~ USDA Smart Snacks in School nutrition guidelines, and may only be sold in accordance with Board Policy 8510 - Wellness , and Board Policy 8550 - Competitive Food Sales. Foods and beverages not associated with the food-service program may be vended in accordance with the rules and regulations set forth in Board Policy 8540 - Vending Machines.

The District Administrator will require that the food service program serve foods in the schools of the District that are wholesome and nutritious and reinforce the concepts taught in the classroom.

No food or beverage may be sold on any school premises except in accordance with the standards approved by the Board.

Dietary Modifications

Modifications Based on Compliant Medical Documentation

An adult student or student's parent requesting special dietary accommodations for a student with a disability that restricts the diet must provide the Medical Statement for Special Dietary Needs signed by a State authorized medical authority, which is a medical professional authorized in the Registered Dietitian or State of Wisconsin to write prescriptions. The request must contain the following information and must be submitted on DPI Form PI-6314, Medical Statement for Special Dietary Needs Form PI-6314 can be obtained from the Department of Public Instruction or upon request to the District's Food Service Director or Special Dietary Accommodation Coordinator **[END OF OPTION** :

A. an explanation of how the student's physical or mental impairment restricts the diet;

B. the food(s)/type(s) of foods to be avoided;

C. the food(s)/type(s) of foods to be substituted;

D. additional pertinent information, if any, that will assist in accommodating the student's needs.

A student with a disability may have an IEP or 504 plan that requires specific instruction, services, or accommodation related to the student's nutritional needs. If a student's IEP or 504 plan contains the same information that is required on a Medical Statement for Special Dietary Needs, then it is not necessary to obtain and submit a separate Medical Statement for Special Dietary Needs. The School District shall provide the accommodation as required by law, seeking clarifying medical information, as necessary.

If a Medical Statement for Special Dietary Needs is not immediately available, incomplete, unclear, or lacks sufficient detail, the Special Dietary Accommodation Coordinator or Food Service Director shall ask ~~request that~~ the student or parent/guardian request that the medical authority supplement the response so that a safe meal can be provided. ~~- In situations where a medical statement or Individual Education Plan (IEP) is not immediately available, is incomplete, or requires additional clarification, the~~ The meal modification will ~~should~~ still be made if there is enough information to provide a safe meal.

A special dietary accommodation for a student who has a disability that restricts the student's diet must be supported by a Medical Statement for Special Dietary Needs, which should be submitted to the Food Service Director who shall serve as the Special Dietary Accommodation Coordinator, whose contact information is _School Nutrition Coordinator (920) 337-1393. If the Special Dietary Accommodation Coordinator is unable to grant a requested accommodation following receipt of the medical authority's statement, the student or parent shall be provided with an explanation of the basis for the decision.

~~A student with a disability may have an IEP or 504 plan that requires specific instruction, services, or accommodation related to the student's nutritional needs. If a student's IEP or 504 plan contains the same information that is required on a Medical Statement for Special Dietary Needs, then it is not necessary to obtain and submit a separate Medical Statement for Special Dietary Needs. Form PI-6314 can be obtained from the Department of Public Instruction (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f6314-english.pdf).~~

~~The individual making an initial request for such substitutions must inform the Food Service Director or Special Dietary Accommodation Coordinator that the student has a disability that restricts the student's diet. The School District will honor the request upon receipt of the required documentation from a State authorized medical authority. In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. If the Special Dietary Accommodation Coordinator is unable to grant a requested accommodation following receipt of the medical authority's statement, the student or parent shall be provided with an explanation of the basis for the decision. Compliant requests shall be immediately implemented.~~

Disability Accommodation Grievance Procedure

The following procedure is intended to provide prompt and equitable resolution to any concern or disagreement regarding the food service program's administration of meal modifications made or requested on the basis of a student's disability. None of the procedures described in this policy section shall prevent a student or parent from pursuing a complaint with any State or Federal agency, including the USDA, using the procedures described at the end of this policy.

A. If an initial request for accommodation in the form of substituted meals is denied, the student or parent may request review of that decision by the School Nutrition Coordinatorand shall provide any communications between the student or parent and food service officials concerning the accommodation request, any documentation provided by a medical authority, and any additional information the student or parent believes is pertinent to the decision. A review of the materials provided and of the initial decision shall be completed and a response provided to the student or parent as soon as practicable following receipt of the request for review. If the initial decision is reversed, including due to additional information provided on review, the dietary accommodations shall be implemented without delay. If the initial decision is affirmed the decision is final.

B. Any other complaint or disagreement with the food service administration concerning implementation of special dietary accommodations based on a student's disability shall be presented to the Special Dietary Accommodation Coordinator. The student or parent shall specify the nature of the concern and any requested remedy in writing. The Coordinator shall promptly review the grievance and either contact the student or parent for any required clarification of the request or to seek to reach an agreement regarding how to best address the concern. If no agreement is reached, the Coordinator shall make a determination and notify the student or parent in writing as soon as practicable. If the

grievance is affirmed in any respect, the Coordinator shall propose a plan for implementing appropriate remedial measures. If the student or parent is dissatisfied with the Coordinator's determination, the student or parent may submit a written request to the Building Principal or District Administrator for review. The administrator's determination shall be final.

Modifications Based on Noncompliant Medical Requests

On a case-by-case basis, substitutions to the standard meal requirements may be made, at no additional charge, for students who provide a signed statement from a qualified medical authority that the student cannot consume certain food items due to medical or other special dietary needs, but which does not comply with the requirements above. To qualify for such consideration and substitutions the medical statement must identify:

A. the medical or dietary need that restricts the student's diet; and

B. the food(s) to be omitted from the student's diet and the food(s) or choice of foods that may be substituted.

IMPLEMENTATION AND DISCONTINUATION

Review

Upon receipt of a request for a special dietary accommodation, the Food Service Director or Special Dietary Accommodation Coordinator shall review the request to ensure it is supported as required by Federal law and District policy and if not, shall request additional or clarifying information from the student or parent making the request.

Implementation

When the need for a special dietary accommodation is supported by a Medical Statement for Special Dietary Needs signed by a State authorized medical authority, the District will offer a reasonable modification that effectively accommodates the student's disability. Following USDA Child Nutrition Program regulations, the School District may consider factors such as cost and efficiency and is not required to prepare a specific meal, provide a specific brand of food, or provide a meal beyond the meals provided to other students.

~~For students who have an IEP or 504 plan that requires specific food related accommodations, the School District shall provide the accommodation as required by law, seeking clarifying medical information, as necessary.~~

~~A special dietary request will be approved and implemented upon submission of a completed authorized medical statement. In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal.~~

Student Absence

If a student receiving a special dietary accommodation is absent or does not wish to participate in school lunch on a day an accommodation is planned, the student or parent shall contact the Special Dietary Accommodation Coordinator by 9:00 a.m. the same day.

Renewing A Special Dietary Request

An authorized Medical Statement does not need to be updated annually. However, the Special Dietary Accommodation Coordinator may annually seek clarification or updates on special dietary requests.

Discontinuation of a Special Dietary Request

A special dietary request or part of a request may be discontinued by a parent by submitting the request in writing to the Special Dietary Accommodation Coordinator or shall be discontinued consistent with the medical authority's ~~authorities~~ recommendation provided with the Medical Statement for Special Dietary Needs.

Meal Charges

Lunches sold by the school may be purchased by students , ~~and~~ staff members , and community residents in accordance with the rules of the District's school lunch program.

The operation and supervision of the food-service program shall be the responsibility of the School Nutrition Coordinator. Food services shall be operated on a self-supporting basis with revenue from students, staff, Federal reimbursement, and surplus food. The Board shall assist the program by furnishing available space, initial major equipment, and utensils. Maintenance and replacement of equipment is the responsibility of the program.

A periodic review of the food-service accounts shall be made by the Business Manager. Any surplus funds from the National School Lunch Program shall be used to support the operation and improvement of the school meal program(s) through allowable expenditures as determined by the District Administrator. Surplus funds from a-la-carte foods purchased using funds from the nonprofit food service account must accrue to the nonprofit food service account.

Unpaid Meal Charges

Unpaid meal charges incurred through the inability to collect mealpayment from students is an unallowable cost to the nonprofit school food service account.

Delinquent debt is when payment for unpaid meal charges is overdue to the nonprofit school food service account. It is considered collectable while efforts are being made to collect it. The delinquent debt remains on the accounting documents until it is either collected or written off.

Delinquent debt may be carried over year to year as long as the student is still enrolled at the school food authority (SFA).

Bad debt is when local officials have determined that further collection efforts of unpaid meal charges are uncollectable. When this happens, the delinquent debt must be re-classified as bad debt and written off as an operating loss. Since the nonprofit school food service account cannot be used to cover the bad debt, a transfer from the general fund, state or local funds, school or community organizations such as the PTA or from donated funds must be made to cover the total amount of bad debt. When delinquent debt is converted to bad debt, records of this must be kept in accordance with the records retention requirement in 7 CFR 210.9(b) (17) and 7 CFR 210.15(b).

Any related collection cost, including legal cost, arising from such bad debt after they have been determined to be uncollectable are also unallowable. District efforts to collect bad debt shall be in accordance with Policy 6152 - Student Fees, Fines, and Charges.

Negative Account Balances

Students will be permitted to purchase meals from the District's food service using either cash on hand or a food service account. A student may be allowed to incur a negative food service account balance subject to the following conditions.

Students may be permitted to accumulate negative food service account balance. A student shall not be permitted to purchase a la carte items without sufficient account balance or cash on hand.

A student who has exceeded the permissible negative balance amount in their account and does not have cash on hand sufficient to purchase a meal will be treated respectfully. The District will provide meals to students with unpaid meal balances without stigmatizing them, will provide parents of students who charge meals with notification when a student charges a meal, and will make efforts to collect the charges incurred by the students.

If a student has reached the permissible level of negative lunch account balance, they shall be provided a regular reimbursable meal that follows the USDA meal pattern, the cost of which shall continue to accrue to a negative lunch account balance.

All households shall be notified about this policy and any implementing guidelines at the start of each school year and to households transferring to the school or School District during the school year, as well as informed about access to this policy and any implementing guidelines. All District staff with responsibility for enforcing the policies shall be notified about the provisions of this policy and any implementing guidelines, as well as provided access to this policy and any implementing guidelines. The policy will be posted on the District website.

Refunding Excess Funds

Any remaining funds in a student's meal account above $5.00 must be refunded to the household unless the funds can be transferred to a sibling or a paid household has chosen to

donate those funds to the school food service account. When attempts to contact the household have been unsuccessful, funds must be reported to the Wisconsin Department of Revenue as unclaimed property. Account funds remaining for a student eligible for free or reduced-price meals cannot be donated and must be reported as unclaimed property.

Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf or https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sfa-civil-rights-complaints-procedure-template.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. Mail:
   U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410; or

2. Fax:
   (833) 256-1665 or (202) 690-7442; or

3. E-mail:
   program.intake@usda.gov.

This institution is an equal opportunity provider.

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Legal

SP 32-2015 Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs
SP 59-2016 Modifications to Accommodate Disabilities in the School Meal Program
OMB Circular No. A-87 USDA Smart Snacks in School Food Guidelines (effective July 1, 2014)
Child Nutrition Act of 1966, 42 U.S.C. 1771 et seq.
Healthy, Hunger-Free Kids Act of 2010 and Richard B. Russell National School Lunch Act, 42 U.S.C. 1751 et seq.
42 U.S.C. 1758
15.137, Wis. Stats.
93.49, Wis. Stats.
115.34 - 115.345, Wis. Stats.
120.10(16), Wis. Stats.
120.13(10), Wis. Stats.
7 C.F.R. Part 15b
7 C.F.R. Part 210
7 C.F.R. Part 215
7 C.F.R. Part 220
7 C.F.R. Part 225
7 C.F.R. Part 226
7 C.F.R. Part 227
7 C.F.R. Part 235
7 C.F.R. Part 240
7 C.F.R. Part 245
42 U.S.C. Chapter 13

VOL. 35, NO. 2

po8500.01

Vol. 35, No. 2 - July 2026 New POLICY AND PROCESS FOR RECEIVING AND PROCESSING COMPLAINTS ALLEGING CIVIL RIGHTS DISCRIMINATION (INCLUDING WISCONSIN PROTECTED CLASSES) IN THE U.S. DEPARTMENT OF AGRICULTURE (USDA) CHILD NUTRITION PROGRAMS

New Policy - Vol. 35, No. 2

8500.01 - **POLICY AND PROCESS FOR RECEIVING AND PROCESSING COMPLAINTS ALLEGING CIVIL RIGHTS DISCRIMINATION (INCLUDING WISCONSIN PROTECTED CLASSES) IN THE U.S. DEPARTMENT OF AGRICULTURE (USDA) CHILD NUTRITION PROGRAMS**

Federal law prohibits discrimination on the basis of these protected classes: race, color, national origin, sex (including gender identity and sexual orientation), disability, and age. Any person alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints can be accepted verbally, in writing, anonymously, and from third party representatives.

Upon receipt of a complaint, the receiver of the complaint at the school/district should immediately:

A. Contact the School Food Authority (SFA) USDA Child Nutrition Programs Civil Rights Coordinator, listed above.

B. The recipient of the complaint and/or SFA Civil Rights Coordinator must provide the individual with the information necessary to file a complaint and not impede the individual’s right to file.

C. After explaining the complaint process, the recipient of the complaint and/or SFA Civil Rights Coordinator may try to resolve the situation in real time. Remember to advise the complainant of their right to file the complaint at the federal level if they wish to do so.

D. Document the complaint:

1. Utilize the USDA Program Discrimination Complaint Form (Spanish) or make an effort to obtain all of the following information:

    a. Name, address, and phone number of complainant,

    b. Specific name and location of entity delivering the benefit or service,

    c. The nature of the incident, action, or method of administration that led the complainant to feel discriminated against,

    d. The basis on which the complainant feels discriminated (race, color, national origin, sex, etc.),

    e. The names, titles, business addresses, and phone numbers of persons who may have knowledge of the discriminatory action,

    f. The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions.

2. Either the complainant, the receiver of the complaint, or the SFA Civil Rights Coordinator, should document the complaint. If a complainant makes the allegations verbally or refuses to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint.

E. All verbal, written, or anonymous complaints received by the SFA must be forwarded to the Wisconsin Department of Public Instruction, Bureau of School Nutrition Director **within five days** of receiving the complaint.

Wisconsin Department of Public Instruction (DPI)

Mail: Director, Bureau of School Nutrition
P.O. Box 7841
Madison, WI 53707
Email: jessica.sharkus@dpi.wi.gov

WI DPI will forward the complaint to the USDA Midwest Regional Office for processing.

F. All Civil Rights complaints received must be tracked on a Civil Rights complaint log. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know. A Civil Rights Complaint Log Template is available on the Bureau of School Nutrition civil rights webpage.

USDA Non-Discrimination Statement

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. Mail:

   U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410; or

2. Fax:

   (833) 256-1665 or (202) 690-7442; or

3. Email:

   program.intake@usda.gov

This institution is an equal opportunity provider.

Wisconsin Protected Classes

Wisconsin state law prohibits discrimination on the basis of the federal protected classes, but also includes pregnancy, marital status, parental status, sexual orientation, religion, creed, and ancestry.

Any complaints received alleging civil rights discrimination specifically for the Wisconsin state protected classes should follow the same procedures above.

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VOL. 35, NO. 2

po8510

Vol. 35, No. 2 - July 2026 Revised WELLNESS

8510 - **WELLNESS**

As required by law, the Board for the School District of West De Pere establishes the following wellness policy.

Policy Preamble

The Board recognizes that good nutrition and regular physical activity affect the health and well-being of the District's students. Furthermore, research suggests that there is a positive correlation between a student's health and well-being and their ability to learn. Moreover, schools can play an important role in the developmental process by which students establish their health and nutrition habits by providing nutritious meals and snacks through the schools' meal programs, by supporting the development of good eating habits, and by promoting increased physical activity both in and out of school.

Students ~~Schools alone, however, cannot develop in students~~ healthy behaviors and habits with regard to eating and exercise cannot be accomplished by the schools alone. It will be necessary for not only the staff, but also parents and the public at large to be involved in a community-wide effort to promote, support, and model such healthy behaviors and habits.

The Board sets the following goals in an effort to enable students to establish good health and nutrition choices to:

A. promote nutrition education with the objective of improving students' health;

B. improve the health and well-being of our children, increase consumption of healthful foods during the school day, and create an environment that reinforces the development of healthy eating habits;

C. promote nutrition guidelines, a healthy eating environment, child nutrition programs, and food safety and security on each school campus with the objective of promoting student health;

D. provide opportunities for every student to develop the knowledge and skills for specific physical activities, maintain physical fitness, regularly participate in physical activity, and understand the short and long-term benefits of a physically active lifestyle;

E. promote the health and wellness of students and staff through other school based activities.

Wellness Policy Leadership

The District Administrator shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy to assure that wellness initiatives are followed in the District's schools.

Required Public Involvement

~~The District Administrator shall obtain the input of District collaborators to participate in the development, implementation, and periodic review and update of the policy. The collaborators may include parents, students, representatives of the school food authority, educational staff (including physical education teachers), school health professionals, Board members, members of the public, medical/health care professionals, and other school administrators.~~

The District shall invite a diverse group of collaborators to participate in the development, implementation, and periodic review and update of the Wellness Policy. Collaborators may include:

1. **(** X **)** administrators;
2. **( )** Board members;
3. **( )** classroom teacher(s);
4. **( )** physical education teacher(s);
5. **(** X **)** school food service representative(s);
6. **(** X **)** school nurse(s);
7. **( )** community member/parent(s);
8. **( )** student(s);

9. ( ) medical/health care professional(s);

10. (X) nutrition and/or health education teacher(s);

11. ( ) school counselor(s);

12. ( ) local business representatives(s);

13. ( ) Other: _____

Committee Formation

The District shall convene a Wellness Committee that meets at least one (1) time during the school year to establish goals and oversee school health policies and programs, including development, implementation, and periodic review and update of this Wellness Policy.

~~**Committee Representatives**~~

~~The District shall invite a diverse group of collaborators to participate in the development, implementation, and periodic review and update of the Wellness Policy.~~

~~Collaborators may include:~~

A. ~~administrator(s);~~

B. ~~Board member(s);~~

C. ~~classroom teacher(s);~~

D. ~~physical education teacher(s);~~

E. ~~school food service representative(s);~~

F. ~~school nurse(s);~~

G. ~~community member/parent(s);~~

H. ~~student(s);~~

I. ~~medical/health care professional(s);~~

J. ~~nutrition and/or health education teacher(s);~~

K. ~~school counselor(s);~~

L. ~~local business representative(s);~~

M. ~~Others.~~

Nutrition Standard for All Foods

The District is committed to serving healthy meals to our students. The school meal programs aim to improve the diet and health of school children, model healthy eating patterns, and support healthy choices while accommodating cultural food preferences and special dietary needs.

School Meal Programs

Standards and Guidelines for School Meal Programs

A. All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010. (https://www.fns.usda.gov/nslp/national-school-lunch-program-meal-pattern-chart)

B. Drinking water is available for students during mealtimes. When drinking fountains are not present in the cafeteria, water cups/jugs are available.

C. All schools in the District participate in USDA child nutrition programs, including NSLP, SBP, SFSP.

D. All meals are accessible to all students.

E. Withholding food as a punishment shall be strictly prohibited.

F. All meals are appealing and attractive and served in clean and pleasant settings.

G. ~~When drinking fountains are not present in the cafeteria, water cups/jugs are available.~~

H. Students are provided at least fifteen (15) minutes to eat breakfast and at least twenty (20) to eat lunch after being seated.

I. All school campuses are “closed” meaning that students are not permitted to leave the school grounds during the school day.

J. Menus shall be posted on the District website and will include nutrient content.

K. All school nutrition program directors, managers, and staff shall meet or exceed hiring and annual continuing education/training requirements in the USDA professional standards for child nutrition professionals.

School Meal Program Participation

The District:

A. shall notify parents of the availability of the breakfast, lunch, and summer food programs and shall be encouraged to determine eligibility for reduced or free meals;

B. shall allow students the opportunity to provide input on menu items;

C. shall explore the use of nontraditional breakfast service models (such as breakfast in the classroom) to increase breakfast participation.

Standards for Foods and Beverages Sold Outside of School Meals

All food and beverages sold ~~and served~~ outside of the school meal programs ("competitive" foods and beverages), between midnight and thirty (30) minutes after the end of the instructional school day, shall, at a minimum, meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. https://fns-prod.azureedge.us/sites/default/files/resource-files/smartsnacks.pdf

Fundraising ~~**Fund-Raising**~~

A. ~~Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.~~

B. The District adheres to the Wisconsin Department of Public Instruction fundraiser ~~fund-raiser~~ exemption policy and allows two (2) exempt fundraisers ~~fund-raisers~~ per student organization per school per year. All other fundraisers ~~fund-raisers~~ sold during the school day will meet the Smart Snacks nutrition standards. No restrictions are placed on the sale of food/beverage items sold thirty (30) minutes after the end of the instructional school day. ~~outside of the school day.~~

Nutrition Education

A. The primary goal of nutrition education is to influence students' lifelong eating behaviors.

B. Nutrition education shall include enjoyable, developmentally appropriate, and culturally relevant participatory activities, such as contests, promotions, taste testing, and others.

C. Nutrition education shall extend beyond the classroom by engaging and involving the school's food service staff.

Nutrition Promotion

The District is committed to providing a school environment that encourages students to practice healthy eating and physical activity. Students shall receive consistent nutrition messages that promote health throughout schools, classrooms, cafeterias, and school media.

Physical Activity

A. The District shall provide students with age and grade-appropriate opportunities to engage in physical activity.

B. Physical activity during the school day shall not be withheld as punishment.

C. Physical activity and movement shall be integrated, when possible, across the curricula and throughout the school day.

D. All students in grades K-4 shall be provided with a daily recess period at least twenty (20) minutes in duration. Recess shall not be used as a reward or punishment.

E. Outdoor recess shall be offered weather permitting.

F. In addition to planned physical education, the school shall provide age-appropriate physical activities (e.g., recess during the school day, intramurals and clubs before and after school, and interscholastic sports) that meet the needs of all students, including males, females, students with disabilities, and students with special health care needs.

G. All students in grades 5 - 12 shall have the opportunity to participate in extra-curricular activities and intramural programs that emphasize physical activity.

H. All students in grades 5 -12 shall have the opportunity to participate in interscholastic sports programs.

Physical Education

A. A sequential, comprehensive physical education program shall be provided for students in K-12 in accordance with the physical education academic content standards and benchmarks adopted by the State.

B. The sequential, comprehensive physical education curriculum shall provide students with opportunities to learn, practice, and be assessed on developmentally appropriate knowledge, attitudes, and skills necessary to engage in lifelong, health-enhancing physical activity.

C. All District middle school students are required to take the equivalent of one (1) academic year of physical education.

D. All-District high school students are required to receive at least 1.5 credits of physical education prior to graduation unless the District allows for the substitution of 0.5 credit per Policy 5460 - Graduation Requirements.

E. The physical education curriculum shall provide sequential instruction related to the knowledge, attitudes, and skills necessary to participate in lifelong, health-enhancing physical activity.

F. Physical education classes shall provide students with opportunities to learn, practice, and be assessed on developmentally appropriate knowledge and attitudes necessary to engage in lifelong, health-enhancing physical activity.

G. The sequential, comprehensive physical education curriculum shall stress the importance of remaining physically active for life.

H. All physical education classes are taught by licensed teachers who are certified to teach physical education.

I. In health education classes, the District shall include topics of physical activity, including: the physical, psychological, or social benefits of physical activity; how physical activity can contribute to a healthy weight; how physical activity can contribute to the academic learning process; how an inactive lifestyle contributes to chronic disease; and decreasing sedentary activities.

J. Planned instruction in physical education shall teach cooperation, fair play, and responsible participation.

Other Activities That Promote School Wellness

A. As appropriate, schools shall support students, staff, and parents' efforts to maintain a healthy lifestyle.

B. Students shall be allowed to bring and carry throughout the day approved water bottles filled with only water.

Staff Wellness

The District will implement the following activities below to promote healthy eating and physical activity among school staff.

A. Administration of flu shots at school.

B. Encouragement of staff members to set medical appointments for screening for cancer, heart disease, diabetes, and other diseases.

Community Engagement

A. The District shall work with community partners, including Bellin Health and Health Departments to support District wellness.

B. The District shall inform and invite parents to participate in school-sponsored activities throughout the year.

Monitoring and Evaluation - Triennial Assessment

The District will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy, progress towards meeting policy goals, and how the policy compares to a model policy, as established by the USDA. The District will use the Wisconsin Local Wellness Policy Triennial Assessment Report Card to fulfill the triennial assessment requirement. The results of the triennial assessment will be made available to the public.

Update/Inform the Public

The District will actively inform and update the public about the content of and any updates to the policy through the District website and Board meetings.

Record Retention

The District Administrator shall require that the District retains documentation pertaining to the development, review, evaluation, and update of the policy, including a copy of the current policy.

Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

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https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. Mail:
   U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410; or

2. Fax:
   (833) 256-1665 or (202) 690-7442; or

3. E-mail:
   program.intake@usda.gov.

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Legal
42 U.S.C. 1751 et seq.
42 U.S.C. 1771 et seq.

Vol. 35, No. 2 - July 2026 FREE AND REDUCED-PRICE MEALS

8531 - **FREE AND REDUCED-PRICE MEALS**

The Board recognizes the importance of good nutrition to each student's educational performance.

The Board shall provide eligible children with lunch at a reduced rate or at no charge to the student, ~~as well as free milk for qualifying students~~.

If the District participates in the Wisconsin School Day Milk Program, qualifying students shall receive milk at no charge.

Children, eligible for free or reduced-price meals, shall be determined by the criteria established by the USDA Child Nutrition Program. These criteria are issued annually by the Federal government through the Wisconsin Department of Public Instruction's (DPI) administration of the School Nutrition Programs.

The Board designates the School Nutrition Coordinator to determine in accordance with Board standards, the eligibility of students for free and/or reduced-price meals.

At least once annually at the beginning of each school year, the school shall notify all families of the availability, eligibility requirements, and application procedure for free and reduced price meals by distributing an application to the family of each student enrolled in the school. The notice shall contain all information required by State and Federal regulation.

The District shall seek out and apply for such Federal, State, and local funds as may be applied to the District's program of free and reduced price meals.

Any student identified as homeless, a foster child, a runaway, a migrant, or who is enrolled in Head Start shall be considered eligible for free meals and free milk.

Students receiving free or reduced meals or milk shall not be subjected to any of the following actions related to their receipt of meal service:

A. the District shall not publish or otherwise publicize names of children receiving free or reduced -price meals or milk;

B. the District's meal service will not use special tokens or tickets that identify students as receiving free or reduced -price meals or milk;

C. no student shall be required to work or perform any service in order to receive food service;

D. students receiving free or reduced - price meal or milk ~~service~~ shall not be required to use a separate line or separate eating area, nor shall they be required to receive meals at a different time ~~based on eligibility for the free or reduce program~~;

E. all students shall have the same choices for meals and milk regardless of whether the student is paying full price or receiving free or reduced -price meal ~~service~~ benefits.

The District Administrator shall regularly evaluate the free and reduced -price lunch program to determine whether the District or school may qualify for s~~pecial assistance certification or~~ Community Eligibility Provision (CEP) to reduce the paperwork burden on families qualifying for free and reduced -price meals. ~~Any schools identified as CEP eligible shall be notified.~~

If the District has received approval to extend free meals to all students in one (1) or more of the District's schools through the Community Eligibility Provision (CEP), such participation in CEP means that all students attending those qualifying schools receive free meal service on an equal basis, and that no individual household applications may be collected. If any school is found in any fourth year of CEP to have less than twenty-five percent (25%) but more than fifteen percent (15%), the Food Service Director has the option to ~~shall~~ notify DPI and request an additional year of CEP eligibility through a grace year.

Unless exempted by DPI, annually prior to a date established by the Department of Agriculture and/or the DPI, the Food Service Director shall notify DPI of any school in the District with an identified student percentage (ISP) of at least twenty- five percent (25%) . ~~that has twenty-five percent (25%) free and reduced lunch eligible or that has less than twenty-five percent (25%) but more than fifteen percent (15%) identified student percentage.~~

Nondiscrimination Statement

~~The following statement applies to all programs administered by the District that are funded in whole or in part by the U.S. Department of Agriculture (USDA):~~

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or

local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

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1. Mail:
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   1400 Independence Avenue, SW
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2. Fax:
   (833) 256-1665 or (202) 690-7442; or

3. E-mail:
   program.intake@usda.gov.

This institution is an equal opportunity provider.

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Legal
115.34-115.345, 120.10(16), 120.13(10), Wis. Stats.
42 U.S.C. 1771 et seq.
7 C.F.R. Part 245

Vol. 35, No. 2 - July 2026 Revised COMPETITIVE FOOD SALES

8550 - **COMPETITIVE FOOD SALES**

The food-service program will comply with the provisions set forth in the USDA Smart Snack Rule ~~Federal law~~ regarding sale of competitive food which is all foods and beverages sold to students on the school campus during the school day, other than reimbursable meals.

Only the food-service program shall sell food and beverages to students in elementary schools during regular school hours.

In secondary schools, the food-service program shall be the sole provider of food and beverage items sold until thirty (30) minutes following the last lunch period, at which time student clubs and organizations and/or District support organizations may request approval to sell foods and beverage items in accordance with the Board's policies. Accordingly, all food items and beverages for sale to students for consumption on campus from vending machines, from school stores, or as fundraisers by student clubs and organizations and/or District support organizations shall comply with the current USDA Dietary Guidelines for Americans and Smart Snack Rules, and shall only be available between thirty (30) minutes following the last school lunch period and thirty (30) minutes after the close of the regular school day.

Nondiscrimination Statement

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calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. Mail:
   U.S. Department of Agriculture
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2. Fax:
   (833) 256-1665 or (202) 690-7442; or

3. E-mail:
   program.intake@usda.gov.

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Legal
Title 7 C.F.R. 210.11

Vol. 35, No. 2 - July 2026 Revised TRANSPORTATION

8600 - **TRANSPORTATION**

It is the policy of the Board to provide transportation for those students, of any age, whose distance from their school makes this service necessary within the limitations established by State law and the regulations of the Department of Public Instruction or other appropriate agency.

School buses and student-transportation vehicles shall be purchased, housed, and maintained by the District or the District shall contract for transportation services in accordance with Policy 8680 - Transportation Services Contracts for the transportation of resident students between their home areas and the schools of the District to which they are assigned. In accordance with State law, the District shall not transport students by alternative transportation methods of vehicles carrying more than nine (9) passengers and the operator. This prohibition does not apply to school buses operated in compliance with the Wisconsin Department of Transportation's regulations.

All school buses and student-transportation vehicles, whether purchased, leased, or contracted for as provided in Policy 8680 - Transportation Services Contracts shall comply with specifications defined in State and Federal law. Each operator of a school vehicle used to transport students of the District shall be licensed for the purpose for which the vehicle is being used and shall operate the vehicles in accordance with Federal and State laws.

Transportation for private school students, eligible for transportation under State law, shall be provided on the same basis as for District students.

For the purposes of this policy, the term "student with a disability" refers to a student who qualifies for special education under the Individuals with Disabilities Education Act (IDEA). In addition to transportation provided routinely to all students, some students with disabilities require transportation (often called "specialized transportation") as a related service as part of their individualized education program (IEP). Students with disabilities are entitled to transportation as a related service only if the IEP team has determined that transportation is necessary for the student to benefit from special education. Outside of IEP team determinations about specialized transportation, State and local officials set most transportation policies and procedures.

Transportation must be viewed as a way to include students with disabilities with their nondisabled peers. In general, transportation for students with disabilities should occur in the same manner as for their peers. This may be especially important for students with disabilities

who have limited opportunities during the school day to interact with their nondisabled peers. Safety issues must also be taken into consideration when determining appropriate transportation arrangements.

Transportation of eligible students with exceptional educational needs or attending a technical education program shall be arranged through the use of District-owned vehicles, through cooperation with other districts, through commercial carriers, and/or by other means in the most efficient and economical manner.

Transportation privileges may be revoked if the student's conduct is in violation of the District Administrator's administrative guidelines or the Code of Conduct pertaining to student transportation. Such revocation shall be in accord with statutorily-required procedures.

Nonroutine Use of School Buses

The Board may permit the school buses owned or leased by this District to be used for purposes other than regularly scheduled routes to and from school in accordance with legal requirements, provided such trips do not interfere with routine school transportation services.

Vehicles must be operated when possible by an employee of this District, or otherwise by a qualified individual approved by the District Administrator. The cost of transportation shall be reimbursed to the Board based on the actual cost to the District of the school bus usage.

Surveillance on School Buses

The Board authorizes the District Administrator to install and operate video and audio surveillance on District buses to enhance student safety and well-being.

Any agreement with a transportation contractor for the provision of transportation services for the District shall have language regarding the use of video and audio surveillance on all school buses.

The ~~It is strongly recommended that the~~ District shall provide notification to students and parents regarding this policy permitting video **(X)** and audio **[END OF OPTION]** surveillance on District buses, and shall clearly post notice of such surveillance on the interior of the bus. Recordings pursuant to this policy shall remain confidential except for use by school officials or law enforcement for investigations, school discipline, or criminal prosecutions.

The Board shall maintain video surveillance/electronic monitoring recordings for a limited period. Any request to view a recording under this policy should be made promptly after the event/incident in order to assure its availability. Delayed inquiries may not be available depending on current retention capabilities. If action is taken by the Board/Administration, as a result of a formal complaint or incident, recordings, if available, shall be kept consistent with the Board's record retention policy.

District-Owned Vehicles Used for Transporting Students

All drivers of motor vehicles owned by the District and used for transportation of students shall be under written contract with the Board as required by 121.52, Wis. Stats.

All operators of motor vehicles owned by the District and used for transportation of students shall be subject to the provisions of 121.555, Wis. Stats. and may be subject to the District's employee drug testing policy in accordance with Policy 8601 - Controlled Substance and Alcohol Policy for Employees that Transport Students.

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Legal
120.13(27m), 121.52, 121.53, 121.54 et seq., 121.555(1)(a) Wis. Stats.
Wis. Admin. Code Trans 300.81

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised PERSONAL COMMUNICATION DEVICES

5136 - **PERSONAL COMMUNICATION DEVICES**

The Board is aware that Personal Communication Devices (PCDs) are used by students and parents to communicate with each other. However, the use of PCDs on school grounds must be appropriately regulated to protect students, staff, and the learning environment.

~~"Personal communication devices" (~~ PCDs ~~)~~, also referred to as "wireless communication devices", as used in this policy, mean a portable wireless device that has the capability to provide voice, messaging, or other data communication between two (2) or more parties and includes all of the following:

A. cellular/mobile telephone;

tablet computer;

A. laptop computer;

B. gaming device;

C. smartphone;

D. e-reader;

E. smartwatch;

F. wearable technology;

G. any other web-enabled devices of any type.

Students may use PCDs before and after school, during their lunch break, in between classes as long as they do not create a distraction, disruption or otherwise interfere with the educational environment, during after-school activities (e.g., extra curricular activities), or at school-related functions. Use of PCDs, except those approved by a teacher or administrator, at any other time is prohibited and they must be powered completely off (i.e., not just placed into vibrate or silent mode) and stored out of sight.

All PCD use must consistently adhere to the standards outlined in Policy 7540.08 – Artificial Intelligence (AI).

Students may not use PCDs on school property or at a school-sponsored activity to access and/or view Internet websites that are otherwise blocked to students at school. Student s are prohibited from unauthorized use of, or access to, the District's wired and/or wireless network.

Students may use PCDs while riding to and from school on a school bus or other Board-provided vehicles or on a school bus or Board-provided vehicle during school-sponsored activities, at the discretion of the bus driver, classroom teacher, or sponsor/advisor/coach. Distracting behavior that creates an unsafe environment will not be tolerated.

During after-school activities, PCDs shall be powered completely off (not just placed into vibrate or silent mode) and stored out of sight when directed by the administrator or sponsor.

Except as authorized by a teacher, administrator or IEP team, students are prohibited from using PCDs during the school day, including while off-campus on a field trip, to capture, record and/or transmit the words or sounds (i.e., audio) and/or images (i.e., pictures/video) of any student, staff member or other person. Using a PCD to capture, record, and/or transmit audio and/or pictures/video of an individual without proper consent is considered an invasion of privacy and is not permitted. Students who violate this provision and/or use a PCD to violate the privacy rights of another person may have their PCD confiscated and held until the end of the school day a parent picks it up, and may be directed to delete the audio and/or picture/video file. If the violation involves potentially illegal activity, the confiscated-PCD may be turned over to law enforcement.

PCDs, with cameras or any other recording capabilities, may not be activated or utilized at any time in any school situation where a reasonable expectation of personal privacy exists. These locations and circumstances include, but are not limited to, classrooms, gymnasiums, locker rooms, shower facilities, rest/bathrooms, and any other areas where students or others may change clothes or be in any stage or degree of disrobing or changing clothes. The District Administrator and building principals are authorized to determine other specific locations and situations where use of a PCD is absolutely prohibited.

Students shall have no expectation of confidentiality with respect to their use of PCDs on school premises/property.

Students may not use a PCD in any way that might reasonably create in the mind of another person an impression of being threatened, humiliated, harassed, embarrassed, or intimidated. See Policy 5517.01 – Bullying. In particular, students are prohibited from using PCDs to: (1) transmit material that is threatening, obscene, disruptive, or sexually explicit or that can be construed as harassment or disparagement of others based upon any Protected Class consistent with Board Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity; and (2) engage in "sexting" - i.e., sending, receiving, sharing, viewing, or possessing pictures, text messages, e-mails or other materials of a sexual nature in electronic or any other form. Violation

of these prohibitions shall result in disciplinary action. Furthermore, such actions will be reported to local law enforcement and child services as required by law.

Students are also prohibited from using a PCD to capture, record, and/or transmit test information or any other information in a manner constituting fraud, theft, cheating, or academic dishonesty. Likewise, students are prohibited from using PCDs to receive such information.

Possession of a PCD by a student at school during school hours and/or during extra-curricular activities is a privilege that may be forfeited by any student who fails to abide by the terms of this policy, or otherwise abuses this privilege.

Policy Violations

Violations of this policy may result in disciplinary action and/or confiscation of the PCD. The building principal will also refer the matter to law enforcement or child services if the violation involves an illegal activity (e.g., child pornography, sexting). Discipline will be imposed on an escalating scale ranging from a warning to an expulsion based on the number of previous violations and/or the nature of or circumstances surrounding a particular violation. If the PCD is confiscated, it will be released/returned to the student's parent after the student complies with any other disciplinary consequences that are imposed, unless the violation involves potentially illegal activity in which case the PCD may be turned over to law enforcement. A confiscated device will be marked in a removable manner with the student's name and held in a secure location in the building's central office until it is retrieved by the parent or turned over to law enforcement. School officials will not search or otherwise tamper with PCDs in District custody unless they reasonably suspect that the search is required to discover evidence of a violation of the law or other school rules. Any search will be conducted in accordance with Policy 5771 Search and Seizure. If multiple offenses occur, a student may lose the privilege to bring a PCD to school for a designated length of time or on a permanent basis.

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Student use of PCDs in the following circumstances will not be considered a violation of this policy:

A. **Emergency or Threat:** Student use of a PCD is allowed in the event of an emergency or a perceived threat to address the safety and security of students and staff.

B. **Health Care Management:** Student use is authorized as necessary to manage or support a specific student’s health care needs as approved by the District Nurse.

C. **Individualized Education Plans:** Student use is authorized consistent with a student’s Individualized Education Program (IEP) or a plan developed under Section 504 of the federal Rehabilitation Act of 1973.

D. **Educational Purposes:** Student use is authorized by a teacher for legitimate educational purposes during instructional time as described above.

(X) Duty to Report

A (X) person ( ) staff member ( ) student **[END OF OPTIONS]** who discovers a student using a PCD in violation of this policy is required to report the violation to the building principal.

[END OF OPTIONAL SECTION]

Students Responsible for Their PCDs

Students are personally and solely responsible for the care and security of their PCDs. The Board assumes no responsibility for theft, loss, or damage to, or misuse or unauthorized use of, PCDs brought onto its property.

Annual Notice

No later than October 1 of each year, the Department of Public Instruction (DPI) shall be notified by the District of whether any changes have been made to this policy and, if so, the updated policy shall be submitted to the DPI.

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OVERVIEW OF UPDATE:The updates are critical because they expand the definition of cheating to include modern violations, such as faking research data and using artificial intelligence to hide copied work. Finally, these changes protect student rights by requiring a full review of the facts, ensuring that automated AI software cannot be used as the sole reason to punish a student. These changes are recommended but not required.

po5505

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised ACADEMIC HONESTY

5505 – **ACADEMIC HONESTY**

The Board values honesty and expects integrity in the District's students. Violating academic honesty expectations erodes the trust between teachers and students as well as compromises the academic standing of other students. So that each student learns the skills being taught, and is judged solely on their own merits, the Board prohibits any student from presenting someone else's work as their own, using artificial intelligence platforms in place of one's own work, providing unauthorized assistance to another student, and cheating in any manner.

All school work submitted for the purpose of meeting course requirements must be the individual student's original work or the original work of a group of students for group projects. It is prohibited for any student to unfairly advance their own academic performance or that of any other student. Likewise, no student may intentionally limit or impede the academic performance or intellectual pursuits of other students.

Academic dishonesty includes, but is not limited to:

A. plagiarism (of ideas, work, research, speech, art, music, etc.);

B. forgery of another's work;

C. presenting the results that are the product of an artificial intelligence (AI) platform as one's own where the use of AI was not specifically allowed by the teacher as part of the assignment;

D. downloading or copying information from other sources and presenting it as one's own;

E. using language translation work of someone else or using technology when the expectation is doing one's own translation;

F. copying another person's work;

G. allowing another person to copy one's own work;

H. stealing another person's work;

I. doing another person's work for them;

J. distributing copies of one's work for use by others;

K. distributing copies of someone else's work for use by others for academic gain or advantage;

L. intentionally accessing another's work for the purpose of presenting it as one's own for academic gain or advantage;

M. distributing or receiving answers to assignments, quizzes, tests, assessments, etc.

N. distributing or receiving questions from quizzes, tests, assessments, etc.

O. using AI to modify another person's work to avoid detection;

P. collaborating on an assignment when independent work is required;

Q. fabricating data, citations, sources, research results, or evidence;

R. receiving unauthorized assistance from another person (tutor, parent, peer, online forum, contract service, etc.);

Use of Artificial Intelligence/Natural Language Processing Tools For School Work

In order to ensure the integrity of the educational process and to promote fair and equal opportunities for all students, except as outlined below, the use of Artificial Intelligence (AI) and Natural Language Processing (NLP) tools (collectively, "AI/NLP tools") is strictly prohibited for the completion of school work. The use of AI/NLP tools, without the express permission/consent of a teacher, undermines the learning and problem-solving skills that are essential to academic success and that the staff is tasked to develop in each student. Students are encouraged to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI/NLP tools and they should ask their teachers when they have questions and/or need assistance. Unauthorized use of AI/NLP tools is considered a form of plagiarism and any student found using these tools without permission or in a prohibited manner will be disciplined in accordance with the Student Code of Conduct. (See Policy 7540.08 - Artificial Intelligence (AI))

Notwithstanding the preceding, students can use AI/NLP tools in the school setting if they receive prior permission/consent from their teacher, so long as they use the AI/NLP tools in an ethical and responsible manner. Teachers have the discretion to authorize students to use AI/NLP tools for the following uses:

A. Research assistance: AI/NLP tools can be used to help students quickly and efficiently search for and find relevant information for their school projects and assignments.

B. Data Analysis: AI/NLP tools can be used to help students to analyze, understand, and interpret large amounts of data, such as text documents or social media posts. This can be particularly useful for research projects or data analysis assignments – e.g., scientific experiments and marketing research.

C. Language translation: AI/NLP tools can be used to translate texts or documents into different languages, which can be helpful for students who are learning a new language or for students who are studying texts written in a different language.

D. Writing assistance: AI/NLP tools can provide grammar and spelling corrections, as well as suggest alternative word choices and sentence structure, to help students improve their writing skills. Proper citation when using AI/NLP tools is required when non-original AI/NLP generated content is incorporated into any work product. **(** X **)** Citation when using AI/NLP tools for spell check, grammar assistance, and similar refinement/editing tools does not need to be disclosed unless required by a student's teacher. **[END OPTION]**

E. Accessibility: AI/NLP tools can be used to help students with disabilities access and understand written materials. For example, text-to-speech software can help students with specific learning disabilities or visual impairments to read texts and AI-powered translation tools can help students with hearing impairments understand spoken language.

Staff and Administration have the responsibility for monitoring students' work for compliance with this policy.

When enrolled
in Advanced Placement (AP), International Baccalaureate (IB), Early College Credit Programs (ECCP), Start College Now (SCN), or any other third-party, District-sponsored programming, students are expected to follow the corresponding policies and guidelines regarding the use of AI/NLP.

All teachers, beginning in the elementary grades, will educate students as to what constitutes academic dishonesty and what is acceptable and unacceptable behavior in District schools regarding academic integrity.

AI Detection Tools - AI detection tools are only preliminary investigative resources, and their findings are not conclusive proof of academic misconduct. Disciplinary action requires a comprehensive review of all evidence and established procedures, and cannot be based solely on an automated detection report.

(X **)** Requirements for AI Detection:

1. **Not a Sole Indicator:** The use of AI detection as the sole basis for academic integrity determinations is prohibited. It should serve only as a starting point or one input in a broader inquiry.

2. **Transparency:** Employees must disclose the use of AI detection software in course syllabi, curricula, or specific assignment guidelines where it will be employed.

3. **Documentation:** Record the specific detection result and the tool used.

4. **Student Dialogue:** Provide the student with a formal opportunity to respond to the concern.

5. **Holistic Review:** Apply professional judgment alongside the detection output to determine if a policy violation has occurred.

[END OF OPTIONAL SECTION]

Before any disciplinary action is taken based in part on AI detection output, employees must exercise professional judgment rather than treating detection software results as conclusive.

Students who are found to have violated ~~violate~~ this policy are subject to disciplinary consequences.

Teachers are authorized, in consultation with their Principal, to apply appropriate consequences for violations of this policy. Disciplinary consequences for significant violations may include removal from the class with a failing grade, removal from student leadership positions, elimination of honors recognition, loss of membership in honor organizations, as well as other disciplinary consequences appropriate to the nature of the violation.

Parents shall be contacted as soon as practicable to report any alleged acts of academic dishonesty by their child.

Repeated violations of this policy will result in additional disciplinary consequences, up to and including suspension and expulsion.

Student and/or parent appeals of disciplinary consequences resulting from violation of this policy may be made within five (5) business days to the Principal whose decision shall be final. If the Principal was the staff member responsible for the disciplinary consequence being appealed, then student and/or parent appeals should be directed within five (5) business days to the District Administrator whose decision shall be final.

A summary of this policy shall be included in the Student Handbook and the Employee Handbook.

Revised 12/15/25
T.C. 3/24/26

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Legal
118.01, 118.164, 120.12, Wis. Stats.

OVERVIEW OF UPDATE:The updates are critical because they expand the District's oversight to include the use of Artificial Intelligence (AI) for monitoring and analyzing real-time video footage. Finally, these changes provide greater operational flexibility by allowing mobile tracking equipment and creating a new exception for authorized instructional uses. These changes are recommended but not required.

po7440.02

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised SMART SENSOR AND MONITORING TECHNOLOGY

7440.02 - **SMART SENSOR AND MONITORING TECHNOLOGY**

In order to protect students and faculty, promote security and protect the health, welfare and safety of students, staff and visitors, the Board authorizes the use of smart sensor and electronic monitoring equipment on school property, and in school buildings and school buses. Smart sensor and monitoring technology uses devices that can sense, collect, and process a variety of environmental information. Smart sensor and monitoring technology also includes utilizing Artificial Intelligence (AI) to monitor, analyze, and identify real-time and recorded video footage for surveillance and investigative purposes. Information obtained through smart sensor devices may be used to identify intruders and persons breaking the law, Board policy, or the Student Code of Conduct ~~(i.e., it may be used as evidence in disciplinary actions and criminal proceedings)~~.

The monitoring of actions and behavior of individuals who come onto school property is a significant factor in maintaining order and discipline and protecting students, staff, visitors, and school and student property. Smart sensor monitoring systems serve to complement other means being employed in the District to promote and foster a safe and secure teaching and learning environment for students and staff. The Board recognizes that the use of a smart sensor monitoring system does not replace the need for the ongoing vigilance of the school staff assigned by the building principal to monitor and supervise the school building. Rather, the smart sensor monitoring system serves as an appropriate and useful tool with which to augment or support the in-person supervision provided by staff. The building principal is responsible for verifying that due diligence is observed in maintaining general campus safety and security.

The District Administrator is responsible for determining where to install and operate **( )**

~~fixed-location~~ **[END OF OPTION]** smart sensor monitoring equipment in the District. The determination of where and when to use smart sensor equipment shall ~~will~~ be made in a nondiscriminatory manner. Smart sensor equipment may be placed in designated areas in school buildings (e.g., school hallways, restrooms, classrooms, locker rooms, entryways, the front office where students, employees, and visitors are permitted to freely come and go, gymnasiums, cafeterias, libraries).

Any person who takes action to block, move, or alter the location of a smart sensor shall be subject to disciplinary action.

Except for instructional use of smart sensor monitoring authorized by the District Administrator, any ~~Any~~ information obtained from smart sensor monitoring systems may only be used to support the orderly operation of the District's schools and facilities, and for law enforcement purposes, and not for any other purposes. As such, information obtained through the use of smart sensor equipment may be used as evidence in any disciplinary proceedings, administrative proceedings or criminal proceedings, subject to Board policy and administrative guidelines.

Smart sensor technology is to be implemented in accordance with this policy and any related guidelines. The Board will not accept or tolerate the improper use of smart sensor and monitoring technology and will take appropriate action in any cases of wrongful use of such technology.

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OVERVIEW OF UPDATE:The updates are important because they officially recognize Artificial Intelligence (AI) tools as a fundamental part of the District's technology infrastructure. These changes require all AI software and hardware to meet the same strict oversight, inventory, and data privacy rules as traditional school equipment. Finally, this revision protects student data and ensures human accountability while guiding the responsible use of emerging technologies. These changes are recommended but not required.

po7540

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised TECHNOLOGY

7540 - **TECHNOLOGY**

The Board is committed to the effective use of technology to both enhance the quality of student learning and the efficiency of District operations.

Students' use of District technology resources (see definition in Bylaw 0100 - Definitions) is a privilege not a right. Students and their parents must comply with Policy 7540.03 - Student Technology Acceptable Use and Safety.

The District Administrator shall develop, recommend for approval by the Board, and implement a written District Technology Procedure (DTP). One of the primary purposes of the DTP is to evaluate new and emerging technologies **(X)** including the strategic integration and governance of Artificial Intelligence (AI) tools **[END OPTION]** and how they will play a role in student achievement and success and/or efficient and effective District operations.

The DTP shall set forth procedures for the proper acquisition of technology. The DTP shall also provide guidance to staff and students concerning making safe, appropriate and ethical use of District technology resources, as well as inform both staff and students about disciplinary actions that will be taken if Board technology and/or networks are abused in any way or used in an illegal or unethical manner. (See Policy 7540.03 - Student Technology Acceptable Use and Safety, and Policy 7540.04 - Staff Technology Acceptable Use and Safety)

The District Administrator, in conjunction with the Curriculum Director, shall review the DTP and recommend the approval of any changes, amendments, or revisions to the Board.

This policy, along with the Student and Staff Technology Acceptable Use and Safety policies, and the Student Code of Conduct, further govern students' and staff members' use of their personal communication devices (see Policy 5136 - Personal Communication Devices and Policy 7530.02 - Staff and School Officials Use of Personal Communication Devices). Users have no right or expectation of privacy when using District technology resources (including, but not limited to, privacy in the content of their personal files, e-mails, and records of their online activity when using the District's computer network and/or Internet connection).

Further, safeguards shall be established so that the Board's investment in both hardware and software achieves the benefits of technology and inhibits negative side effects. Accordingly,

students shall be educated about appropriate online behavior including, but not limited to, using social media, which is defined in Bylaw 0100 - Definitions, to interact with others online; interacting with other individuals in chat rooms or on blogs; and, recognizing what constitutes cyberbullying, understanding cyberbullying is a violation of Board policy, and learning appropriate responses if they experience cyberbullying. Social media does not include sending or receiving e-mail through the use of District-issued e-mail accounts.

District Policy on Artificial Intelligence (AI) Use

The District considers Artificial Intelligence (AI) tools to be a fundamental part of its technology infrastructure. Therefore, all AI technology , including software and hardware that is procured, developed, or utilized , is subject to the same oversight, inventory, and management standards as all other District technology assets.

The Board has established Policy 7540.08 - Artificial Intelligence (AI) to ensure the ethical, responsible, and compliant use of AI by everyone in the school community.

Equipment Security and Retention Procedures

The District invests significant resources in making current technology available for staff and students. Individual usage of devices that are not in a fixed location must be in accordance with these guidelines. The term "device" for purposes of this guideline includes District-owned computers, tablets, smart devices, and any other hardware or software systems or equipment owned or leased by the District.

A. **Identification:**

1. A label with the District's name and an identification number will be placed on each device owned by the District.

2. Records of the identification number, serial number, model, etc. for each device shall be maintained in the Technology Department.

3. Records on each piece of software and software license, organized by title and course or program, shall be maintained in the Technology Department.

4. District devices are assigned, identified, and tracked through an online management system.

B. **Use of District-owned Devices:**

All devices to be used either in the District or off-school premises shall be checked out through the Technology Department. Devices may not be used for the purpose of copying materials in violation of copyright laws.

The person signing the request is responsible for the condition of the device until checked back in.

No device may be used to access any material that is prohibited by the District's technology usage policies, Policy 7540.03 - Student Technology Acceptable Use and Safety and Policy 7540.04 - Staff Technology Acceptable Use and Safety. Devices may not be used to access content that is unlawful or potentially harmful to the device and may never be used to access any "darkweb" content. Specifically, use of devices to access material that poses a risk of introducing viruses, malware, or other destructive content is strictly prohibited. Users are responsible for replacing devices that are inoperable due to the introduction of such malicious content while in the user's possession.

C. **Requests for Personal Use:**

Personal use of devices by students, staff, and shall be in accordance with Policy 7530 - Lending of District-Owned Equipment.

Additionally, a device shall not be used to access any material that is prohibited by the District's technology usage policies. (See Policy 7540.03 - Student Technology Acceptable Use and Safety and Policy 7540.04 - Staff Technology Acceptable Use and Safety)

If allowed for personal use, devices may not be used to access content that is unlawful or potentially harmful to the device and may never be used to access any "darkweb" content. Specifically, use of devices to access material that poses a risk of introducing viruses, malware, or other destructive content is strictly prohibited. Users are responsible for replacing devices that are inoperable due to the introduction of such malicious content while in the user's possession.

No business use shall be made of any borrowed devices. Software shall not be used in violation of any licensing agreement, nor shall it be copied.

No software or other applications may be downloaded onto any device except by the District's Technology Department and only as authorized by the District Administrator.

Users will be responsible for arranging safe transportation and housing for use off school premises.

D. **Staff Services:**

Media staff will instruct the user on the correct operation of devices. Media staff may assist

other staff members in obtaining materials for instructional use by recording and/or copying within copyright guidelines.

E. **Equipment Inventory and Repair:**

All devices will be inventoried pursuant to Policy 7450 - Property Inventory.

If a piece of equipment requires repair, it will be sent to the Technology Department.

F. **Report of Loss:**

If any device is lost, the Principal and the Technology Department shall be notified. The Principal may notify the police if deemed appropriate.

The Board prohibits students from using District technology resources to access and/or use social media for other than instructional purposes.

Staff may use District-approved social media platforms/sites in accordance with Policy 7544 - Use of Social Media and, pursuant to Policy 7530.02 ~~7540.02~~ - Staff and School Officials Use of Personal Communication Devices, may use web content, apps, and services for one-way communication with the District's constituents. Authorized staff may use District technology resources to access and use District-approved social media platforms/sites to increase awareness of District programs and activities, as well as to promote achievements of staff and students, provided the District Administrator approves, in advance, such access and use. Use of District-approved social media platforms/sites for business-related purposes is subject to Wisconsin's public records laws and, as set forth in Policy 7544 - Use of Social Media, staff members are responsible for archiving their social media and complying with the District's record retention schedule. See Policy 8310 – Public Records– Public Records.

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Legal
947.0125, Wis. Stats.
948.11, Wis. Stats.

OVERVIEW OF UPDATE: The updates are important because they introduce new rules regarding information generated by Artificial Intelligence (AI) tools. Any student who misuses AI in these harmful ways may be subject to discipline up to and including expulsion and shall be reported to law enforcement. These changes are recommended but not required.

VOL. 35, NO. 2 - SPECIAL UPDATE - ARTIFICIAL INTELLIGENCE (AI)

po7540.03

STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY

ADOPTED Sep 18, 2025 · REVISED Jun 13, 2026

7540.03 - **STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY**

Technology has fundamentally altered the ways in which information is accessed, communicated, and transferred in society. As a result, educators are continually adapting their means and methods of instruction, and the way they approach student learning to incorporate the vast, diverse, and unique resources available through the Internet. The Board provides technology resources (as defined in Bylaw 0100 - Definitions) to support the educational and professional needs of its students and staff. With respect to students, District Technology Resources afford them the opportunity to acquire the skills and knowledge to learn effectively and live productively in a digital world. The Board provides students with access to the Internet for limited educational purposes only and utilizes online educational services/apps to enhance the instruction delivered to its students. The District's computer network and Internet system do not serve as a public access service or a public forum, and the Board imposes reasonable restrictions on its use consistent with its limited educational purpose.

The Board regulates the use of District technology resources by principles consistent with applicable local, State, and Federal laws, the District's educational mission, and articulated expectations of student conduct as delineated in the Student Code of Conduct. This policy and its related administrative guidelines and the Student Code of Conduct govern students' use of District Technology Resources and students' personal communication devices when they are connected to the District computer network, Internet connection, and/or online educational services/apps, or when used while the student is on Board-owned property or at a Board-sponsored activity (see Policy 5136 - Personal Communication Devices).

Users are required to refrain from actions that are illegal (such as libel, slander, vandalism, harassment, theft, plagiarism, inappropriate access, and the like) or unkind (such as personal attacks, invasion of privacy, injurious comment, and the like). Because its Technology Resources are not unlimited, the Board has also instituted restrictions aimed at preserving these resources, such as placing limits on use of bandwidth, storage space, and printers.

Users have no right or expectation to privacy when using District Technology Resources (including, but not limited to, privacy in the content of their personal files, e-mails, and records of their online activity when using the District's computer network and/or Internet connection).

The Board may not be able to technologically limit access to services through its technology resources to only those who have been authorized for the purpose of instruction, study and research related to the curriculum. Unlike in the past when educators and community members had the opportunity to review and screen materials to assess their appropriateness for supporting and enriching the curriculum according to adopted guidelines and reasonable selection criteria (taking into account the varied instructional needs, learning styles, abilities, and developmental levels of the students who would be exposed to them), access to the Internet, because it serves as a gateway to any publicly available file server in the world, opens classrooms and students to electronic information resources that may not have been screened by educators for use by students of various ages.

Pursuant to Federal law, the Board has implemented technology protection measures, that protect against (e.g., filter or block) access to visual displays/depictions/materials that are obscene, constitute child pornography, and/or are harmful to minors, as defined by the Children's Internet Protection Act. At the discretion of the Board or the District Administrator, the technology protection measures may be configured to protect against access to other material considered inappropriate for students to access. The technology protection measures may not be disabled at any time that students may be using the District technology resources, if such disabling will cease to protect against access to materials that are prohibited under the Children's Internet Protection Act. Any student who attempts to disable the technology protection measures will be subject to discipline.

The Board utilizes software and/or hardware to monitor online activity of students and to block/filter access to child pornography and other material that is obscene, objectionable, inappropriate and/or harmful to minors. "Harmful to minors" is a term defined by the Communications Act of 1934 (47 U.S.C. 254(h)(7)) as any picture, image, graphic image file, or other visual depiction that:

A. taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion;

B. depicts, describes, or represents, in a patently offensive way with respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals;

C. taken as a whole, lacks serious literary, artistic, political, or scientific value as to minors.

At the discretion of the Board or the District Administrator, the technology protection measure may be configured to protect against access to other material considered inappropriate for students to access. The technology protection measure may not be disabled at any time that students may be using the District technology resources, if such disabling will cease to protect against access to materials that are prohibited under the Children's Internet Protection Act. Any student who attempts to disable the technology protection measures will be subject to discipline.

The District Administrator or the Technology Department may temporarily or permanently unblock access to websites or online educational services/apps containing appropriate material if access to such sites has been inappropriately blocked by the technology protection measure. The determination of whether material is appropriate or inappropriate shall be based on the content of the material and the intended use of the material, not on the protection actions of the technology protection measure.

Parents are advised that a determined user may be able to gain access to services and/or resources on the Internet that the Board has not authorized for educational purposes. In fact, it is impossible to guarantee students will not gain access through the Internet to information and communications that they and/or their parents may find inappropriate, offensive, objectionable or controversial. Parents of minors are responsible for setting and conveying the standards that their children should follow when using the Internet.

Pursuant to Federal law, students shall receive education about the following:

A. safety and security while using e-mail, chat rooms, social media, and other forms of direct electronic communications;

B. the dangers inherent with the online disclosure of personally identifiable information;

C. the consequences of unauthorized access (e.g., "hacking", "harvesting", "digital piracy", "data mining", etc.), cyberbullying, and other unlawful or inappropriate activities by students online;

D. unauthorized disclosure, use, and dissemination of personally identifiable information regarding minors.

Staff members shall provide instruction for their students regarding the appropriate use of technology and online safety and security as specified above. Furthermore, staff members will monitor the online activities of students while at school.

Monitoring may include, but is not necessarily limited to, visual observations of online activities during class sessions; or use of specific monitoring tools to review browser history and network, server, and computer logs.

Building Principals are responsible for providing training so that Internet users under their supervision are knowledgeable about this policy and its accompanying guidelines. The Board expects that staff members will provide guidance and instruction to students in the appropriate use of District technology resources. Such training shall include, but not be limited to, education concerning appropriate online behavior, including interacting with other individuals on social media, including in chat rooms, and cyberbullying awareness and response. All users of District technology resources (and their parents if they are minors) are required to confirm their agreement to abide by the terms and conditions of this policy by signing the District technology use form during the annual student registration process and/or during each user login procedure.

Off premises use of E-Rate supported technology must be primarily for an educational purpose that is integral, immediate, and proximate to the education of students.

Students will be assigned a school email account that they are required to utilize for all school-related electronic communications, including those to staff members, peers, and individuals and/or organizations outside the District with whom they are communicating for school-related projects and assignments. Further, as directed and authorized by their teachers, they shall use their school-assigned email account when signing-up/registering for access to various online educational services, including mobile applications/apps that will be utilized by the student for educational purposes.

Students are responsible for good behavior when using District technology resources - i.e., behavior comparable to that expected of students when they are in classrooms, school hallways, and other school premises and school-sponsored events. Communications on the Internet are often public in nature. The Board does not approve any use of its technology resources that is not authorized by or conducted strictly in compliance with this policy.

When using PCDs to communicate with Board members, staff and/or volunteers, students must use District-approved communication platforms.

The approved communication platform(s) is/are:

A. District email/messaging;

B. District-approved social media platform(s) - (see also Policy 7544 - Use of Social Media);

C. District approved management systems, district chosen communication platforms for co-curricular activities.

When students communicate with staff, volunteers, or Board members using PCDs, discussions must be appropriate, professional, and related to legitimate school purposes. These communications shall occur only when absolutely necessary. Appropriate content includes:

A. Instructional communication (assignments, coursework, academic support);

B. School-related activities (clubs, athletics, events, field trips, rehearsals);

C. Scheduling or logistical information related to classes or school programs;

D. Pedagogical assistance related to school participation (clarifying expectations, reminders, or academic assistance); and,

E. Safety or emergency communication when necessary.

Communications must remain professional in tone, limited to educational or school-related matters, and consistent with District policies regarding staff–student boundaries. Failure to follow these policy expectations may result in discipline up to and including termination, as well as referral to law enforcement if deemed appropriate. The level of discipline will depend on the severity of the violation. This policy applies to communication that occurs during or outside of school hours.

Authorized and Appropriate Use of Artificial Intelligence (AI)

All use of AI technology by students must adhere to the requirements and standards detailed in Policy 7540.08 – Artificial Intelligence (AI).

Use of AI to Generate any Synthetic Intimate Representation

Any staff member or student suspected of using AI or other technological means to create a synthetic intimate representation will be referred to law enforcement in addition to any disciplinary action imposed by administration. Synthetic Intimate Representation means a representation of a nude or partially nude person, or of a person engaged in sexual activity, or as otherwise prohibited by law that is generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts conduct of the identifiable person.

~~**Expectations for Responsible Artificial Intelligence (AI) Use**~~ **AI Prohibited Data Input**

Students are strictly prohibited from inputting Personally Identifiable Information (PII), confidential student or staff data, or any non-public school records into any AI tool or service that has not been explicitly approved and contracted with by the District.

Students are expected to adhere to principles of transparency, proper citation, and responsible use of AI in all academic and school-related activities. Students must disclose the use and extent of AI assistance on any submitted work as required by staff.

Students are prohibited from using technology and/or AI to bully, harass, threaten, impersonate, create, or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used for academic dishonesty, privacy violations, or any conduct that materially disrupts the educational environment. Violations of this policy will result in disciplinary action consistent with Policy 5500 - Student Codes of Conduct and other applicable Board policies.

Academic Honesty

The unauthorized use of Artificial Intelligence tools to generate or complete academic work shall constitute a violation of the District's policy on academic honesty. (See Policy 5505 - Academic Honesty)

All student use of AI technology must comply with the requirements and standards set forth in Policy 7540.08 – Artificial Intelligence (AI).

Students may only use District technology resources to access or use social media if it is done for educational purposes in accordance with their teacher's approved plan for such use.

Users who disregard this policy and its accompanying guidelines may have their use privileges suspended or revoked, and disciplinary action taken against them. Users are personally responsible and liable, both civilly and criminally, for uses of District technology resources that are not authorized by this policy and its accompanying guidelines.

The Board designates the District Administrator as the administrator(s) responsible for initiating, implementing, and enforcing this policy and its accompanying guidelines as they apply to students' use of District technology resources.

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Legal
H.R. 4577, P.L. 106-554, Children's Internet Protection Act of 2000
47 U.S.C. 254(h), (1), Communications Act of 1934, as amended
20 U.S.C. 6801 et seq., Part F, Elementary and Secondary Education Act of 1965, as amended
18 U.S.C. 2256
18 U.S.C. 1460
18 U.S.C. 2246
47 C.F.R. 54.500
47 C.F.R. 54.501
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47 C.F.R. 54.522
47 C.F.R. 54.523

942.09, Wis. Stats.
118.07(7), Wis. Stats.

OVERVIEW OF UPDATE: The updates are important because they create new information for using Artificial Intelligence (AI) tools at work. These changes protect the school community by banning staff from entering private student data into AI systems and strictly prohibiting the creation of fake or inappropriate images. Staff members who violate the provisions of this policy may be subject to discipline, up to and including termination, and reporting to law enforcement. These changes are recommended but not required.

po7540.04

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY

7540.04 - **STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY**

Technology has fundamentally altered the ways in which information is accessed, communicated, and transferred in society. As a result, educators are continually adapting their means and methods of instruction, and the way they approach student learning to incorporate the vast, diverse, and unique resources available through the Internet. The Board provides Technology and Information Resources (as defined by Bylaw 0100 - Definitions) to support the educational and professional needs of its staff and students. The Board provides staff with access to the Internet for limited educational purposes only and utilizes online educational services/apps to enhance the instruction delivered to its students and to facilitate the staff's work. The District's computer network and Internet system do not serve as a public access service or a public forum, and the Board imposes reasonable restrictions on its use consistent with its limited educational purpose.

The Board regulates the use of District Technology and Information Resources by principles consistent with applicable local, State, and Federal laws, and the District's educational mission. This policy and its related administrative guidelines, Policy 7544 - Use of Social Media and any applicable employment contracts govern the staffs' use of the District's computers, laptops, tablets, personal communication devices (as defined by Policy 7540.02 - Digital Content and Accessibility ~~Web Content, Apps, and Services~~), when they are connected to the District computer network, Internet connection, and/or educational services/apps.

Users are required to refrain from actions that are illegal (such as libel, slander, vandalism, harassment, theft, plagiarism, inappropriate access, and the like) or unkind (such as personal attacks, invasion of privacy, injurious comment, and the like). Because its Technology Resources are not unlimited, the Board has also instituted restrictions aimed at preserving these resources, such as placing limits on the use of bandwidth, storage space, and printers.

Users have no right or expectation to privacy when using District Technology and Information Resources (including, but not limited to, privacy in the content of their personal files, e-mails, and records of their online activity when using the District's computer network and/or Internet connection).

Staff members are expected to utilize District technology and information resources to promote educational excellence in our schools by providing students with the opportunity to develop the

resource sharing, innovation, and communication skills and tools that are essential to both life and work. The Board encourages the faculty to develop the appropriate skills necessary to effectively access, analyze, evaluate, and utilize these resources to enrich educational activities. The instructional use of the Internet and online educational services will be guided by the Board's Policy 2521 - Selection of Instructional Materials and Equipment.

The Internet is a global information and communication network that provides a valuable education and information resources to our students. The Internet connects computers and users in the District with computers and users worldwide. Through the Internet, students and staff can access relevant information that will enhance their learning and the education process. Further, District technology and resources provide students and staff with the opportunity to communicate with other people from throughout the world. Access to such a vast quantity of information and resources brings with it, however, certain unique challenges.

The Board may not be able to technologically limit access to services through its technology resources to only those that have been authorized for the purpose of instruction, study, and research related to the curriculum. Unlike in the past when educators and community members had the opportunity to review and screen materials to assess their appropriateness for supporting and enriching the curriculum according to adopted guidelines and reasonable selection criteria (taking into account the varied instructional needs, learning styles, abilities, and developmental levels of the students who would be exposed to them), access to the Internet, because it serves as a gateway to any publicly available file server in the world, opens classrooms and students to electronic information resources that may not have been screened by educators for use by students of various ages.

Pursuant to Federal law, the Board has implemented technology protection measures, that protect against (e.g., filter or block) access to visual displays/depictions/materials that are obscene, constitute child pornography, and/or are harmful to minors, as defined by the Children's Internet Protection Act. At the discretion of the Board or District Administrator, the technology protection measures may also be configured to protect against access to other material considered inappropriate for students to access. The Board also utilizes software and/or hardware to monitor online activity of staff members to restrict access to child pornography and other material that is obscene, objectionable, inappropriate and/or harmful to minors. The technology protection measures may not be disabled at any time that students may be using the District's technology resources if such disabling will cease to protect against access to materials that are prohibited under the Children's Internet Protection Act. Any staff member who attempts to disable the technology protection measures without express written consent of an appropriate administrator will be subject to disciplinary action, up to and including termination.

The Board utilizes software and/or hardware to monitor online activity of staff and to block/filter access to child pornography and other material that is obscene, objectionable, inappropriate and/or harmful to minors. "Harmful to minors" is a term defined by the Communications Act of 1934 (47 U.S.C. 254 (h)(7)) as any picture, image, graphic image file, or other visual depiction that:

A. taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion;

B. depicts, describes or represents, in a patently offensive way with respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals;

C. taken as a whole, lacks serious literary, artistic, political, or scientific value to minors.

The District Administrator or Technology Department may temporarily or permanently unblock access to websites or online educational services/apps containing appropriate material if access to such sites has been inappropriately blocked by the technology protection measures. The determination of whether the material is appropriate or inappropriate shall be based on the content of the material and the intended use of the material, not on the protection actions of the technology protection measures.

Authorized and Appropriate Use of Artificial Intelligence (AI)

Staff are expected to use District-approved AI tools responsibly and ethically to support essential professional functions, including, but not limited to, instruction, providing student feedback, and improving workflow efficiency.

All use of AI technology by staff must adhere to the requirements and standards detailed in Policy 7540.08 – Artificial Intelligence (AI).

Use of AI to Generate any Synthetic Intimate Representation

Any staff member or student suspected of using AI or other technological means to create a synthetic intimate representation will be referred to law enforcement in addition to any disciplinary action imposed by administration. Synthetic Intimate Representation means a representation of a nude or partially nude person, or of a person engaged in sexual activity, or as otherwise prohibited by law that is generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts conduct of the identifiable person.

AI Prohibited Data Input

Staff shall use AI tools responsibly, ethically, and in compliance with district technology, student records, and data privacy policies.

Staff must not enter student Personally Identifiable Information (PII), staff PII, or proprietary District data into any AI system or service unless it has been explicitly reviewed, approved, and contracted by the District.

Staff members are prohibited from using AI tools to bully, harass, threaten, impersonate, or create or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used in ways that violate student or employee privacy, compromise confidential information, engage in academic or professional misconduct, or otherwise disrupt the educational environment.

Any misuse of AI that violates Board policy, professional standards, or applicable law may result in disciplinary action, up to and including termination of employment.

Staff members will participate in professional development programs in accordance with the provisions of this policy. Training shall include:

A. the safety and security of students while using e-mail, chat rooms, social networking sites and other forms of direct electronic communications;

B. the inherent danger of students disclosing personally identifiable information when using AI and when online;

C. the consequences of unauthorized access (e.g., "hacking", "harvesting", "digital piracy", "data mining", etc.), cyberbullying and other unlawful or inappropriate activities by students or staff online; and

D. unauthorized disclosure, use, and dissemination of personally identifiable information regarding minors.

Furthermore, staff members shall provide instruction for their students regarding the appropriate technology use and online safety and security as specified above, and staff members will monitor students' online activities while at school.

Monitoring may include, but is not necessarily limited to, visual observations of online activities during class sessions; or use of specific monitoring tools to review browser history and network, server, and computer logs.

The disclosure of personally identifiable information about students online is prohibited.

Building Principals are responsible for providing training so that staff users of District technology resources under the Principal's supervision are knowledgeable about this policy and its accompanying guidelines. The Board expects that staff members will provide guidance and instruction to students in the appropriate use of the District technology resources. Such training shall include, but not be limited to, education concerning appropriate online behavior, including interacting with other individuals on social media, including chat rooms and cyberbullying awareness and response. All users of District technology resources are required to confirm their agreement to abide by the terms and conditions of this policy and its accompanying guidelines by signing the District technology use form during the Employee Handbook receipt and acceptance process and/or during the network login process. Pursuant to Policy 7540.06 - District-Issued Staff

E-Mail Account, staff and Board members using the District's e-mail system shall acknowledge their review of, and intent to comply with, the District's policy on acceptable use of District-issued email accounts.

Off premises use of E-Rate supported technology must be primarily for an educational purpose that is integral, immediate, and proximate to the education of students.

Staff will be assigned a school email address that they are required to utilize for all school-related electronic communications, including those to students, parents and other constituents, fellow staff members, and vendors or individuals seeking to do business with the District.

Staff members' use of District technology resources to access or use social media is to be consistent with Policy 7544 - Use of Social Media and its accompanying guideline.

An employee's personal or private use of social media may have unintended consequences. While the Board respects its employees' First Amendment rights, those rights do not include permission to post inflammatory comments that could compromise the District's mission, undermine staff relationships, or cause a substantial disruption to the school environment. This warning includes staff members' online conduct that occurs off school property including from the employee's personal computer. Postings to social media should be done in a manner sensitive to the staff member's professional responsibilities.

General school rules for behavior and communication apply.

Users who disregard this policy and its accompanying guidelines may have their use privileges suspended or revoked, and disciplinary action taken against them. Users are personally responsible and liable, both civilly and criminally, for uses of District technology and information resources that are not authorized by this policy and its accompanying guidelines.

The Board designates the District Administrator as the administrators responsible for initiating, implementing, and enforcing this policy and its accompanying guidelines as they apply to staff members' use of District technology and information resources.

In addition, Federal and State confidentiality laws forbid schools and their employees from using or disclosing student education records without parental consent. See Policy 8330 - Student Records. Education records include a wide variety of information; posting personally identifiable information about students is not permitted. Staff members who violate State and Federal confidentiality laws or privacy laws related to the disclosure of confidential employee information may be disciplined.

Staff members retain rights of communication for collective bargaining purposes and union organizational activities.

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Legal

P.L. 106-554, Children's Internet Protection Act of 2000
47 U.S.C. 254(h, 1), Communications Act of 1934, as amended
20 U.S.C. 6801 et seq., Part F, Elementary and Secondary Education Act of 1965, as amended (2003)
18 U.S.C. 2256
18 U.S.C. 1460
18 U.S.C. 2246
20 U.S.C. 6777
20 U.S.C. 9134 (2003)
47 C.F.R. 54.500
47 C.F.R. 54.501
47 C.F.R. 54.502
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47 C.F.R. 54.523

OVERVIEW OF UPDATE:The updates are important because they group AI into different technical categories and ban unvetted public AI tools from handling private student or staff information. These changes also protect the District by requiring strict contracts that stop outside tech companies from using school data to train their global models. Finally, the new rules add strict safeguards for autonomous AI Agents and require that any AI-generated files properly comply with public records laws. These changes are recommended but not required.

po7540.08

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised ARTIFICIAL INTELLIGENCE (AI)

7540.08 - **ARTIFICIAL INTELLIGENCE (AI)**

The Board acknowledges the positive impact and transformative potential of Artificial Intelligence (AI) in education and operations, emphasizing a balanced, people-centered approach. It supports the responsible and innovative use of AI in classrooms and professional settings, with the understanding that AI should enhance human interaction and instruction, not replace it, and all AI-driven decisions require human review. The District Administrator is authorized to support the use of artificial intelligence technology when its use is consistent with the District's mission, goals, and operational integrity. The Director of Curriculum is responsible for overseeing and ensuring compliance of this policy.

Definitions

For purposes of this policy, the following definitions apply:

Artificial Intelligence (AI)

AI refers to systems or tools capable of performing tasks that typically require human intelligence including, but not limited to, decision-making, problem-solving, and language understanding. AI is computer code that can resemble human intelligence to complete a given task (e.g., problem-solving, planning, etc.). It involves developing algorithms and systems that can perceive, reason, learn, and make decisions based on data made available to the AI tool.

Generative AI

A subset of AI that uses large language models (LLMs) and other advanced algorithms to create content, such as text, images, audio, or video, in response to user input.

Generative AI works by analyzing large datasets to learn patterns and features, which it then uses to generate new, original content. It uses complex algorithms, often based on neural networks, to make predictions based on the input data it has processed; thereby enabling it to create a wide range of outputs, from text and images to music and code, that mimic the style or characteristics of the data on which it was trained.

At its core, generative AI predicts the flows of language. Trained on massive amounts of text taken from publicly available internet sources to recognize the relationships that most commonly exist between individual units of meaning (including full or partial words, phrases, and sentences), LLMs can, with great frequency, generate replies to users' prompts that are contextually appropriate, linguistically facile, and factually correct.

Natural Language Processing (NLP)

A field of artificial intelligence that focuses on enabling computers to understand, interpret, and respond to human language in a meaningful way. Examples of NLP include, but are not limited to, Grammarly, GPT-Based APIs, Google Cloud Natural Language AI, Microsoft Azure Text Analytics, IBM Watson NLP, Amazon Comprehend, etc.

Large Language Model (LLM)

A sophisticated AI system trained on extensive text data to process and produce language; recognize patterns, grammar, and nuances. It can perform tasks like text generation, question answering, and language translation.

Algorithm

A set of rules or instructions guiding AI operations and decision-making.

Personally Identifiable Data/Personal Data

Refers to any information that can directly or indirectly identify an individual including, but not limited to, names, addresses, student records, and health information.

Proprietary Information/Data

Refers to a broad category of non-public, sensitive, or confidential data belonging to the District, its staff, or its operations. This information is considered the District's. This information is generally protected from unauthorized disclosure or use.

Public-Domain AI

AI models where the developers may openly share the model's architecture (Open-Source) or provide free, public access to a closed-source interface (e.g., standard web-based chatbots). Because these tools are typically used without a formal District contract, they present a high risk of data exposure.

1. **Shared Data Training:** Data input into these tools is frequently used to train the global model, making the information publicly available or accessible to the provider.

2. **Lack of Filtering:** These models may require the District to manually implement its own "wrapper" or filtering layers to manage safety.

3. **Reliability Issues:** Content produced may be less reliable as it often draws from unverified, publicly scraped data sources.

Due to the high potential for violating Federal and State privacy laws (including FERPA and 118.125, Wis. Stats.), the use of Public-Domain AI is prohibited for any task involving student records, Personally Identifiable Information(PII), or confidential District operations.

~~Open AI ("Open-Source AI")~~

~~Definition: AI models where the developers openly share the model's architecture, underlying code, and often the "weights" (the learned parameters of the model), and sometimes the training data. Open AI models accessed publicly present a high risk of data release, as data input is often used for AI tool training and can be~~ p ~~ublicly available. Open AI models may require the District to implement and manage its own wrapper or filtering layer. As a result, it is not recommended that Open AI tools/applications are used in districts due to the high potential of violating Federal and State laws. Open-Source AI also produces less reliable content, because it is accessing a pool of data that is not universally verified as accurate.~~

~~Closed AI ("Closed-Source/Proprietary AI")~~

~~Definition: AI models where the developers obscure or protect the model's architecture, underlying code, training data, and weights. Users interact with the model via a restricted service. Closed AI may offer better, contractually-guaranteed data security (e.g., "enterprise" versions), but its "black box" nature still requires a formal audit and contract. Closed AI developers typically manage these filters internally. Closed-Source or Proprietary AI produces more reliable results because it is accessing data sources that are controlled and can be verified as accurate.~~

~~Any use of artificial intelligence technology in the District's educational program or operations must be in accordance with State and Federal law as well as Board policies.~~

Enterprise-Grade AI

AI models where the developers protect the model's architecture, underlying code, and training data, typically providing access via a restricted service or "black box" interface. Unlike consumer tools, Enterprise-Grade AI is provided under a formal contract or agreement that:

1. **Guarantees Data Privacy & Security:** Ensures all District data remains isolated within a private "tenant" or environment.

2. **Prohibits Model Training:** Strictly ensures that District data, including student and staff information, is not used to train the provider's global models.

3. **Provides Managed Oversight:** Includes internally managed filters and verifiable data sources, often producing more reliable and accurate results than unvetted models.

Due to the "black box" nature of these systems, the District still requires a formal audit and contract to verify that these security and privacy safeguards are technically enforced.

Locally Hosted AI

AI models deployed and operated entirely on District-owned hardware, with no data transmitted to external servers. Locally hosted models may be either consumer-grade or enterprise-grade in origin. When properly configured, locally hosted AI tools represent a high standard of data privacy because student and staff data never leaves District infrastructure. The District still requires a formal audit to verify that these security and privacy safeguards are technically enforced.

AI Agent

An AI agent is an autonomous software entity that can observe its environment, make decisions, and take actions to achieve specific goals without direct human intervention for every step. Unlike standard AI chatbots, AI Agents have the capacity to execute tasks (e.g., sending emails, modifying files). Due to the heightened risks regarding network security, data confidentiality, and the potential for autonomous errors, the use of AI Agents requires a higher level of review and ( )

written [END OF OPTION] a pproval from the (X) IT Department ( )_____[END OF OPTIONS] prior to implementation.

General Principles

A. **Transparency**
Users of AI tools must disclose when and how these tools have been employed in the creation of academic work, ~~or~~ professional work , or used to influence and/or make decisions. **( )** Spell check, grammar assistance, and similar refinement/editing tools do not need to be disclosed unless required by a student's teacher .

B. **Ethical Use**

District employees who use AI technologies must do so in ways consistent with institutional values, privacy standards, Family Educational Rights and Privacy Act (FERPA), Individual with Disabilities Education Act (IDEA), copyright laws, and ethical principles, honesty, trustworthiness, and personal dignity of both employees and students.

C. **Content Responsibility**

District employees who use AI technologies are responsible for the content created by that AI tool.

D. **Use of AI in Relation to Other Policies**

Any use of artificial intelligence technology in the District's educational program or operations must be in accordance with State and Federal law as well as Board policies **( )** including, but not limited to, the following: Policy 5505 – Academic Honesty; Policy 5500 – Student Code of Classroom Conduct; Policy 5500.01 – Conduct in Virtual Classroom; Policy 5517 – Student Anti-Harassment; Policy 5517.01 – Bullying; Policy 2266 – Nondiscrimination on the Basis of Sex in Education Programs and Activities; Policy 2240 – Controversial Issues in the Classroom; Policy 8310 - Public Records; Policy 8330 – Student Records; Policy 7540.03 – Student Technology Acceptable Use and Safety; and Policy 7540.04 – Staff Technology Acceptable Use and Safety. **[DRAFTING NOTE: Confirm and Select as Needed]**

AI Tool ~~Evaluation~~ and Approval

[DRAFTING NOTE: Cho o se one, two , or three of the options below. The district should understand all legal risks associated with this selection.]

The District will approve the use of **( )** Public-Domain AI **(** X **)** Enterprise-Grade AI **, ( )** Locally Hosted AI tool(s) **[** END OF OPTIONS **]** once each tool has been reviewed and verified for compliance with Federal law, State statute, and Board policies.

[END OF OPTIONS]

AI Tool Evaluation

Before adopting any AI tool or system, the District will conduct a comprehensive risk assessment — evaluating data sources (including use of student Personally Identifiable Information), decision-making impacts on students, potential bias or disparate impact, and vendor compliance with privacy, security, and data retention laws — and ensure all contracts include clear legal, ethical, and technical safeguards aligned with FERPA, IDEA, COPPA, PPRA, Wisconsin statutes, and District policies. AI systems must be reviewed to ensure they are nondiscriminatory, fully accessible, and do not compromise the rights or individualized support of students, particularly those protected under Federal and State civil rights laws.

AI Tool Selection

The District approves the use of ~~Closed~~ AI tools as delineated in the policy ~~only ; ;~~ that have been carefully reviewed, evaluated and approved by the Director of Curriculum for students and staff use.

Transparency

The District is committed to transparency and accountability in AI use by informing teachers, students, and parents when AI influences or makes decisions, clearly explaining how it works and what data it uses, assigning oversight to the Director of Curriculum, and conducting regular audits to evaluateaccuracy, fairness, and impact on equity and student rights. [ ] The District will maintain a public AI Tool Inventory that lists every approved AI tool and includes a summary of its data-handling and privacy features. [END OF OPTION]

Vendor Vetting & Contracts

All AI tools used by the district must undergo a formal risk assessment by the IT/Legal department to review their Terms of Service and data handling practices to ensure compliance with all Federal and State privacy laws.The District prohibits the input by any user of any student information, staff information, or confidential district data into any AI tool that does not have a formal, vetted contract guaranteeing data privacy and non-use for training.

[DRAFTING NOTE : It is recommended that the District maintain a list for clarity, but one is not required.]

( ) The District maintains a centralized Approved AI Tool Inventory. Any tool not identified on this list is considered legally unvetted and is prohibited for District use. **[END OF OPTIONS]**

Compliance with Student Data Privacy Mandates

All contracts with third-party AI providers that involve the processing, storage, or transmission of student data must include a formal Data Protection Addendum (DPA). To ensure compliance with all federal laws, state statutes, and district policies (including but not limited to FERPA (34 CFR 99.31) and 118.125, Wis. Stat s.), the DPA must technically and legally enforce the following:

1. **School Official Designation:** The Vendor must contractually acknowledge that it is acting as a "School Official" with a legitimate educational interest. The Vendor shall remain under the "direct control" of the District regarding the use and maintenance of all education records.

2. **Data Ownership & Custody:** The District retains sole ownership and legal custody of all data provided to or generated by the AI tool. The Vendor is prohibited from claiming any proprietary interest in student-generated content or District-provided PII.

3. **Prohibition on Model Training:** The Vendor must provide a "Zero-Retention" or "Private Tenant" guarantee, ensuring that District data—including de-identified or "anonymized" inputs—is never used to train, refine, or improve the Vendor's global AI models or shared with third-party aggregators.

4. **Security & Breach Notification:** The Vendor must employ industry-standard encryption (AES-256 or higher) and provide immediate notification within seventy two (72) **[INSERT NUMBER]** hours of any suspected unauthorized acquisition of student personal information, in alignment with Policy 8330.01 - Unauthorized Acquisition of Student Personal Information. **[DRAFTING NOTE : Since the State legal requirement is 45 days, many districts use their contracts to create a much**

tighter window (often 24, 48, or 72 hours) to allow enough time to investigate before the 45-day clock runs out - 134.94, Wis. Stat s .]

5. **Right to Audit & Deletion:** The District reserves the right to audit the Vendor's data-handling logs. Upon termination of the agreement, the Vendor must provide a certificate of destruction for all District data within thirty (30) days.

Employee Use of AI

Instructional Integration: Employees may integrate AI tools into their instruction at their discretion and should clearly define the parameters for AI usage in the classroom by students using only District-approved AI applications/tools.

Transparency & Professional Responsibility: When using AI to create instructional materials, assessments, or feedback, employees shall maintain transparency by disclosing the role of AI in these processes. Employees must review and verify the accuracy and appropriateness of any AI-generated content. While AI may be used to assist with routine support functions, employees remain responsible for the intellectual core and final verification of all professional work products (including lesson plans, evaluations, and communications) to ensure the accuracy and appropriateness of the content.

Data Privacy & Information Security: Employees shall not input sensitive, confidential, personally identifiable, or proprietary information about students, colleagues, or institutional operations into AI systems that lack safeguards and policies to protect such data from being used in their training models . ~~, and if such information will be entered into an AI system, employees shall seek the approval of their Principal before doing so.~~ ( ) If an employee intends to enter personally identifiable information, sensitive or proprietary data into an AI tool, they must first ensure the tool is on the District's Approved AI Tool Inventory . If it is not, they must seek written approval from their **( )** Principal **( )** Supervisor **[END OF OPTION S]**, who will consult with the **( )** IT Department **( )**_____ **[END OF OPTIONS]** regarding legal and privacy safeguards.

Academic Integrity & Detection: Using AI detection software to enforce academic integrity should be done in accordance with the knowledge that this software is not foolproof and that the disruptive nature of AI technologies in education can lead to considerable confusion regarding expectations for AI use. Employees should use AI-detection ethically and as the starting point of an inquiry into a possible violation of academic integrity rather than as a definitive indication of student dishonesty. Employees must also disclose the use of AI software in course curricula.

Workflow Enhancement: Employees may use AI tools to enhance workflows, such as drafting communications, analyzing data, or developing reports, provided the outputs are verified for

accuracy and compliance with State and Board policies. The use of AI tools for such purposes should be disclosed when disseminating AI output.

Records Management: Any record, or portion thereof, generated or compiled by an artificial intelligence (AI) system is subject to all provisions of this policy, other applicable Board policies, **( )** administrative guidelines , **[END OPTION]** and state or federal laws. The District is fully responsible for the accuracy, security, access, and disclosure of all AI-generated content within a record, as if created solely by a District employee. (see policy 8330 - Student Records and policy 8310 - Public Records)

Behavioral Prohibitions: Staff members are prohibited from using artificial intelligence (AI) tools to bully, harass, threaten, impersonate, or create or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used in ways that violate student or employee privacy, compromise confidential information, engage in academic or professional misconduct, or otherwise disrupt the educational environment.

Student Use of AI

Instruction: Students shall receive age appropriate instruction about responsible AI use, digital citizenship, privacy, and the risks/limitations of AI prior to using AI.

Academic Standard and Authorized Use: Students are expected to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI tools and they should ask their teacher(s) when they have questions and/or need assistance.

Students may use AI tools for academic purposes when specifically and clearly permitted by their teacher(s). The use of AI must be properly disclosed and cited in accordance with the established guidelines and not be employed to undermine authentic learning or learning objectives for the course or assignment.

If a student has any questions about whether they are permitted to use AI tools for a specific class assignment, they should ask their teacher(s).

Behavioral Prohibitions: Students are prohibited from using AI to bully, harass, threaten, impersonate, or create or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used for academic dishonesty, privacy violations, or any conduct that materially disrupts the educational environment. Violations of this policy will result in disciplinary action consistent with Policy 5500 - Student Code of Classroom Conduct and other applicable Board policies.

Academic Misconduct and Consequences: Unauthorized use of AI tools will be considered a form of plagiarism, unauthorized collaboration, or misrepresentation of AI-generated content as original work and any student found using these tools without permission or in a prohibited manner will be disciplined in accordance with the Student Handbook or Policy 5500 – Student Code of Conduct and Policy 5505 – Academic Honesty. AI-detection results shall not serve as the

sole basis for a finding of academic dishonesty without additional corroborating evidence or student inquiry.

Academic Accessibility :

AI tools can be utilized to assist students with disabilities in accessing and understanding written materials. For example, text-to-speech software can help students with specific learning disabilities, visual impairments, or other disabilities in reading texts, and AI-powered translation tools can help students with hearing impairments understand spoken language (e.g., create transcripts or provide closed-captioning for spoken material). Specific use of AI technologies beyond universal application for students with disabilities is best addressed in each student's Individual Education Plan (IEP).

Use of AI to Generate any Synthetic Intimate Representation

Any staff member or student suspected of using AI or other technological means to create a synthetic intimate representation will be referred to law enforcement in addition to any disciplinary action imposed by administration. Synthetic Intimate Representation means a representation generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts conduct of the identifiable person.

Employee Training

Employees will receive training periodically to ensure adherence to this and other related policies, data privacy, student records, and allowable/approved AI tools in the District.

Non-Academic Use of AI

Students and staff are prohibited in the use of AI from generating false or knowingly misleading representations of other students, staff, volunteers, or Board members that are reasonably interpreted as derogatory, threatening, or otherwise objectionable to a reasonable person, including by way of AI generated or manipulated visual or verbal depictions of any such individual, or the distribution of such depictions through any means, for example via social media, regardless of whether the distributor created the depictions themselves.

Enforcement

Violation of this policy may result in disciplinary consequences. Students may be disciplined for violations, up to and including suspension or expulsion. Staff may be disciplined for violations, up to and including suspension or termination of employment. The District Administrator will refer any illegal acts to law enforcement.

Questions or Concerns

Staff, parents, or members of the public who have questions or concerns regarding this policy or the use of AI in the District should contact the Director of Curriculum.

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Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised PUBLIC RECORDS

8310 - **PUBLIC RECORDS**

The Board recognizes its responsibility to maintain the public records of this District and to make such records available for inspection and reproduction. The Board designates the Administrative Assistant to the Superintendent and Board of Education as the District Records Custodian (DRC), to be the legal custodian of records for the District. The DRC shall safely keep and preserve the public records of the District and shall have the authority to render decisions and carry out duties related to those public records, including providing the notice required under 19.34(1) Wis. Stats., identifying the positions of the District that constitute a local public office pursuant to 19.32(1dm), and 19.42 (7w), Wis. Stats., and other required information. The DRC may deny access to records only in accordance with the law. The DRC is authorized and encouraged to consult with the District's legal counsel to determine whether to deny access to a records request in whole or in part.

Under the Wisconsin Public Records Law, a "record" is defined as any material on which written, drawn, printed, spoken, visual, or electromagnetic information or electronically generated or stored data is recorded or preserved, regardless of physical form or characteristics, that has been created or is being kept by the authority. It includes handwritten, typed, or printed pages, maps, charts, photographs, films, recordings, tapes, optical discs, and any other medium on which electronically generated or stored data is recorded or preserved. A "record" does not include drafts, notes, preliminary computations, and like materials prepared for the originator's personal use or prepared by the originator in the name of a person for whom the originator is working; materials that are purely the personal property of the custodian and have no relation to the office held; materials to which access is limited by copyright, patent, or bequest; and published materials in the possession of an authority other than a public library that are available for sale, or that are available for inspection at a public library. The personal use exception applies to notes created by the originator solely for the purpose of refreshing the originator's recollection and as a matter of convenience (not part of assigned job duties), but does not apply to notes that are distributed to others for the purpose of communicating information or notes that are created or retained for the purpose of memorializing agency activity.

Any record, or portion thereof, generated or compiled by an Artificial Intelligence (AI) system and/or social media/ Personal Communication Devices (PCD) communications between students and board members, staff, and/or volunteers are subject to all provisions of this policy and all other applicable Board policies, **( )** administrative guidelines, **[END OF OPTION]** and state

or federal laws. The District maintains full and sole responsibility for the accuracy, security, access, and disclosure of all AI-generated content within a student's education record, as if the content were created solely by a District employee.

In addition, records may be exempted from disclosure as a matter of statute or common law or, under the balancing test, the public interest in disclosure may be outweighed by the public interest in non-disclosure.

Any person may make an oral or written request for any public records of the District. The person may inspect or receive copies of the public record requested. The District will respond as soon as practicable and without delay , however, the amount of time a request takes to complete varies based on the volume and complexity of the request, the volume of records located that require review, available staff time to complete the request, and other factors that affect the process of fulfilling a request . The District will either provide the requested documents, subject to any redactions, or inform the requester of the District's decision to deny the request and the reason for the denial .

The District will comply with the Safe at Home/Address Confidentiality Program administered by the Wisconsin Department of Justice. (See Policy 5111 - Eligibility of Resident/Nonresident Students, Policy 8320 - Personnel Records, and Policy 8330 - Student Records.)

The District may impose a fee upon the requester of a copy of a record of $0.0135 (black & white) $0.0632 (color) per page, which represents the actual, necessary, and direct cost of reproduction of the record.

In addition, the District may impose a fee upon a requester for the actual time spent by District employees in locating a record, if the cost is $50.00 or more. In calculating location costs, the District will use the applicable employee's hourly rate for salary and benefits.

The District may also charge the requester for any equipment required to fill the request (such as videotapes, computer disks, etc.). The District may impose a fee upon a requester for the actual, necessary, and direct cost of mailing or shipping of any copies that are mailed or shipped to the requester.

The District may require prepayment of fees if the total amount exceeds $5.00. If payment is required, the District will calculate the actual cost and charge the requester. If advance payment is required, the District will either invoice the requester for the difference between the estimate and actual cost or refund any overpayment.

[X **]** The District may provide copies of a record without charge or at a reduced charge where the District determines that the waiver or reduction of the fee is in the public interest. **[END OF OPTION]**

No public record may be removed from the office in which it is maintained except by a Board officer or employee in the course of the performance of their duties.

Nothing in this policy shall be construed as preventing a Board member from inspecting, in the performance of official Board member duties, any record of this District, except student records and certain portions of personnel records.

Records Retention Schedule

19.21(6), Wis. Stats. requires that school districts retain public records, other than student records, for seven (7) years, unless a shorter period is fixed by the Public Records Board (PRB) in a records retention schedule subsequently adopted by the Board.

The Board has approved the following current records retention schedules developed by the Wisconsin Historical Society and PRB:

A. Wisconsin Public School District and Related Records GRS

B. Administrative and Related Records GRS

C. Budget and Related Records GRS

D. Facilities Management and Related Records GRS

E. Fiscal and Accounting and Related Records GRS

F. Human Resources and Related Records GRS

G. Information Technology and Related Records GRS

H. Payroll and Benefits and Related Records GRS

I. Purchasing & Procurement and Related Records GRS

J. Risk Management and Related Records GRS

K. Wisconsin Municipal and Related Records GRS

The District will retain public records in accordance with the preceding general records schedule(s). In the event that the preceding general records schedules adopted do not define the retention period for a particular record, the District will retain the record for seven (7) years.

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Legal

19.21, Wis. Stats.
19.31-39, Wis. Stats.
19.42, Wis. Stats.
118.125, Wis. Stats.
120.13(12), Wis. Stats.

OVERVIEW OF UPDATE:This update expands the scope of preserved data to include artificial intelligence information. It also formalizes operational protocols by requiring coordination with insurance defense counsel, the immediate suspension of automatic deletion schedules, and access limitations on District devices undergoing review. These changes are recommended, but not required.

po8315

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised PRESERVATION OF RECORDS AND LITIGATION HOLDS

8315 - PRESERVATION OF RECORDS AND LITIGATION HOLDS ~~**INFORMATION MANAGEMENT**~~

~~The Board recognizes its responsibility, in certain circumstances, to maintain information created, maintained or otherwise stored by the District outside the "Records Retention Schedule" in Policy 8310 - Public Records. In such situations, a "Litigation Hold" procedure will be utilized to identify and preserve information relevant to a specific matter. "Information" includes both paper documents and electronically stored information ("ESI"). When implementing the "Litigation Hold," the District will identify individuals in possession or custody of paper documents, ESI and electronic media containing ESI, and inform them of their obligation to preserve the documents and ESI outside the "Records Retention Schedule" in Policy 8310. The District will also identify third parties with custody or control over paper documents, ESI, or electronic media storing ESI, and request them to preserve that information. All information falling within a "Litigation Hold," which is under the control of the District, must be preserved in a readily accessible form under the requirements of Policy 8310. Failure to comply with a Litigation Hold notice mayresult in disciplinary action, up to and including possible termination.~~

The ~~Instances where the~~ Board must preserve records and Electronically Stored Information (ESI) beyond ~~maintain information outside~~ the ~~"~~ Records Retention Schedule ~~"~~ in Policy 8310 - Public Records when ~~include~~:

A. ~~when the Board has specific information and/or written notice from an individual, parent or student of an intent to file an appeal of student discipline to State court;~~

B. ~~when~~ the Board receives ~~has~~ specific information and/or written notice that litigation has been commenced or when it is threatened or imminent even though the litigation has not yet been filed in any tribunal. Litigation Hold expectations apply in threatened or imminent litigation in federal or state court, before an administrative agency, or upon service of a notice of circumstances of a claim pursuant to Wis. Stats. 893.80; ~~in Federal or State court;~~

C. ~~when the Board is served with litigation, including, but not limited to, notice of a lawsuit in Federal or State court, or notice of a student disciplinary appeal to State court;~~

D. ~~when the Board receives specific information and/or written notification from an employee, labor union, or other person of an intent to file a claim against the Board, its members, employees or agents at an administrative agency such as the Equal Employment Opportunity Commission, Wisconsin Employment Relations Commission, U.S. Department of Education Office for Civil Rights, or a Wisconsin Equal Rights Division regarding a claim against the Board, its members, employees or agents;~~

E. ~~when the Board receives specific information and/or written notification from an administrative agency such as the Equal Employment Opportunity Commission, Wisconsin Employment Relations Commission, U.S. Department of Education Office for Civil Rights, or a Wisconsin Equal Rights Division regarding a claim against the Board, its members, employees or agents;~~

F. ~~when~~ the Board receives written notification from a third party requesting that the Board maintain information that could be at issue in litigation or potential litigation against a ~~that~~ third party;

G. ~~when the District Administrator recommends the termination of an employee to the Board pursuant to a labor contract;~~

H. when the Board explores, contemplates initiating or initiates litigation.

All information falling within a Litigation Hold, which is under the control of the District, must be preserved in a readily accessible form under the requirements of Policy 8310 - Public Records. An employee's failure to comply with a Litigation Hold notice and this Policy shall subject the employee to disciplinary action, up to and including termination of employment in accordance with Policy 3139-4139 - Staff Discipline **(** X **)** and the Employee Handbook **[END OF OPTION]**.

Any board member or District employee who receives specific information or written notice that may trigger a Litigation Hold shall immediately provide that information or notice to the District Administrator.

When implementing a Litigation Hold, the District Administrator shall notify the District's insurance company or broker, when appropriate, and follow the direction of appointed insurance defense counsel. The District shall take reasonable steps, with the help of the insurance defense counsel, to determine the scope of the hold, including identifying individuals who have relevant information, identifying where relevant records and ESI are stored, and preserving such materials. The District Administrator shall notify individuals in possession or custody of records and ESI, and inform them of their obligation to preserve records and ESI outside the Records Retention

Schedule in Policy 8310 - Public Records. The District shall suspend routine destruction, deletion, overwriting, or automatic retention rules for records and ESI covered by the hold.

If a staff member's or board member's District-provided device (computer, cell phone, etc.) must be taken out of service to properly preserve the contents due to a Litigation Hold, that individual may not access the device for any reason, including for access to personal items that may have been stored. Once a device is placed on a Litigation Hold, access will be limited to those authorized to access the device pursuant to the advice of legal counsel in consultation with IT professionals involved.

Definitions

[ ] For purposes of this policy, records, documents, electronically stored information (ESI), electronic media, and other covered information shall have the meaning set forth in AG 8315 - Litigation Hold Procedures. **[DRAFTING NOTE: This option SHALL be selected if AG 8315 is adopted. If this option is selected, the definitions below shall NOT be selected.]**

"Documents" includes, but is not limited to, writings, drawings, graphs, charts, photographs, blueprints, sound recordings, images and other data or data compilations stored in any medium from which information can be obtained or translated if necessary.

"ESI" includes, but is not limited to, writings, drawings, graphs, charts, photographs, blueprints, sound recordings, images and other data or data compilations stored in any electronic media from which information can be obtained or translated if necessary. It includes, but is not limited to, e-mails, e-mail attachments, instant messages, word processing files, spreadsheets, pictures, application program and data files, databases, data files, metadata, system files, electronic calendar appointments, scheduling program files, TIFF files, PDF files, MPG files, JPG files, GIF files, network share files, internal websites, external websites, newsgroups, directories, security and access information, legacy data, audio recordings, voice mails, phone logs, faxes, internet histories, caches, cookies, ~~or~~ logs of activity on computer systems that may have been used to process or store electronic data, and/or Artificial Intelligence (AI) data, including but not limited to prompts, model inputs, generated outputs, and usage logs.

"Electronic media" includes, but is not limited to, hard drives (including portable hard disk drives "HDD's"), floppy drives, disaster recovery media, and storage media (including DVD's, CD's, floppy discs, Zip discs/drives, Jazz discs/drives, USB memory drives, jump disc/drives, flash discs/drives, keychain discs/drives, thumb discs/drives, smart cards, micro-film, backup tapes, cassette tapes, cartridges, etc.), accessed, used and/or stored on/in/through the following locations: networks and servers; laptop and desktop work computers; home and personal computers; other computer systems; backup computers or servers; archives; personal digital assistants ("PDAs" – including Palm, Blackberry, cellular phone, tablet PC, etc.); pagers; firewalls; audit trails and logs, printers;

copiers; scanners; digital cameras; photographic devices; and video cameras and devices. Electronic media shall also include any item containing or maintaining ESI that is obtained by the District for Board member or employee usage or that an employee uses for such purpose (even if privately owned by the Board member or employee) from the date this policy is adopted into the future.

Initiation and Removal of a "Litigation Hold"

The Board or the District Administrator may initiate a "Litigation Hold" under this policy. Upon initiating a Litigation Hold, the District Administrator or designee shall notify the District Records Custodian to suspend disposal of records potentially covered by the hold. ~~If the District Administrator initiates a "Litigation Hold," s/he or the Board's legal counsel will notify the Board of the reason the Litigation Hold was instituted and its scope. When implementing a Litigation Hold, the Board or District Administrator mayutilize an Electronically Stored Information Team ("ESI Team").~~ The Board's legal counsel shall be involved in implementation of the "Litigation Hold Procedure

A "Litigation Hold" shall remain in place until removed by the Board. A "Litigation Hold" may be removed when the litigation or administrative agency matter has been resolved or can no longer be initiated. Any record ~~information~~ maintained under this policy shall fall back under the "Records Retention Schedule" in Policy 8310 - Public Records once the "Litigation Hold" is removed. When a Litigation Hold is removed, the District Administrator or designee shall notify affected individuals, third parties, and records personnel that the hold has ended.

The District shall document reasonable steps taken to initiate, implement, monitor, and remove a Litigation Hold.

Custody of Third-Party and AI-Hosted Information

Records and ESI maintained in third-party hosted systems, including District-contracted AI platforms, shall be preserved in accordance with this policy ( ) and AG 8315 - Litigation Hold Procedure [END OF OPTION].

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Legal
Federal Rules of Civil Procedure 34, 37(f)

OVERVIEW OF UPDATE:The updates are important because they state that records created by Artificial Intelligence (AI) or shared through social media are official student records. These changes also make the school responsible for the safety and accuracy of AI-created files. Finally, a change clarifies that parents can look at files related to their child, no matter what format they are in or where they are stored, unless a specific legal exception applies. These changes are recommended but not required.

po8330

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised STUDENT RECORDS

8330 - **STUDENT RECORDS**

In order to provide appropriate educational services and programming, the Board must collect, retain, and use information about individual students. Simultaneously, the Board recognizes the need to safeguard students' privacy and restrict access to students' personally identifiable information.

Except for data identified by policy as "directory data," student "personally identifiable information" includes, but is not limited to: the student's name; the name of the student's parent or other family members; the address of the student or student's family; a personal identifier, such as the student's social security number, student number, or biometric record; other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the District reasonably believes knows the identity of the student to whom the education record relates.

Reference in this policy to "directory data," includes reference to "directory information," in the context of the Family Educational Rights and Privacy Act (FERPA).

The Board is responsible for the records of all students who attend or have attended schools in this District. Only records mandated by the State or Federal government and/or necessary and relevant to the function of the School District or specifically permitted by this Board will be compiled by Board employees.

In all cases, permitted, narrative information in student records shall be objectively-based on the personal observation or knowledge of the originator.

Any student record, or portion thereof, generated or compiled by an artificial intelligence (AI) system and/or social media/ Personal Communication Devices (PCD) communications between students and board members, staff, and/or volunteers is subject to all provisions of this policy and all other applicable Board policies, **( )** AG 8330 - Student Records **[END OF OPTION]**, and state or federal laws.

The District maintains full and sole responsibility for the accuracy, security, access, and disclosure of all AI-generated content within a student's education record, as if the content were created solely by a District employee.

Student records shall be available only to students and their parents, eligible students, designated school officials who have a legitimate educational interest in the information, or to other individuals or organizations as permitted by law. For purposes of this policy and in accordance with FERPA, all records, files, documents, and other materials maintained by the District that are directly related to a student—regardless of format, storage location, or whether they are kept separately from the official student file—are considered education records and are accessible to parents or eligible students upon request, unless a specific legal exception applies.

Address Confidentiality Program

Students who are verified participants in the Safe at Home/Address Confidentiality Program administered by the Wisconsin Department of Justice shall be permitted to use their substitute assigned address for all District purposes. The Board shall refrain from including the student's actual/confidential residential address in any student records or files (including electronic records and files) or disclosing the student's actual/confidential residential address when releasing student records. The Board shall only list the address designated by the Wisconsin Department of Justice to serve as the student's address in any student records or files, including electronic records and files. Further, the Board shall use the student's substitute assigned address for any and all communications and correspondence between the Board and the parent(s) of the student (or adult student). The student's actual/confidential residential address shall be maintained in a separate confidential file that is not accessible to the public or any employees without a legitimate purpose. The intentional disclosure of a student's actual/confidential residential address is prohibited.

The Board may enter into a memorandum of understanding with a county department under State statutes (s. 46.215, 46.22, or 46.23) or a tribal organization, as defined under Federal law, that permits disclosure of information contained in student records as provided under State law in cases in which the student's parent if the student is a minor, or the student if the student is an adult, does not grant permission for such disclosure.

The term "parents" includes legal guardians or other persons standing in loco parentis (such as a grandparent or stepparent with whom the child lives or a person who is legally responsible for the welfare of the child). The term "eligible student" or "adult student" refers to a student who is eighteen (18) years of age or older.

Both parents shall have equal access to student records unless stipulated otherwise by court order or law. In the case of adult students, parents may be allowed access to the records without the student's consent, provided the student is considered a dependent under section 152 of the Internal Revenue Code, and provided that the student has not made a written request to the District that their parents not be permitted access to personally identifiable information from their records.

A school official is a person employed by the Board as an administrator, supervisor, teacher/instructor (including substitutes), or support staff member (including health or medical staff and law enforcement unit personnel); a person serving on the Board; a person or company with whom the Board has contracted to perform a special task (such as an attorney, auditor, or medical consultant); a contractor, consultant, volunteer, or other party to whom the Board has outsourced a service otherwise performed by Board employees (e.g. a therapist); or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing tasks (including volunteers).

"Legitimate educational interest" is defined as a "direct or delegated responsibility for helping the student achieve one (1) or more of the educational goals of the District" or if the record is necessary in order for the school official to perform an administrative, supervisory, or instructional task or to perform a service or benefit for the student or the student's family. The Board directs that reasonable and appropriate methods (including but not limited to physical and/or technological access controls) are utilized to control access to student records and to make certain that school officials obtain access to only those education records in which they have a legitimate educational interest.

The Board authorizes the administration to:

A. forward student records, including disciplinary records with respect to suspensions and expulsions, upon request to a private or public school or school district in which a student of this District is enrolled, seeks or intends to enroll, or is instructed to enroll, on a full-time or part-time basis, upon condition that:

    1. a reasonable attempt is made to notify the student's parent or eligible student of the transfer (unless the disclosure is initiated by the parent or eligible student; or the Board's annual notification - Form 8330 F9 - includes a notice that the Board will forward education records to other agencies or institutions that have requested the records and in which the student seeks or intends to enroll or is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer);

    2. the parent or eligible student, upon request, receive a copy of the record;

    3. the parent or eligible student, upon request, has an opportunity for a hearing to challenge the content of the record; and

    4. no later than the next working day, the District shall transfer to another school, including a private or tribal school, or school district, all student records relating to a specific student if the transferring school district or private school has received written notice from the student (if an adult) or their parent or guardian if the student is a minor that the student intends to enroll in the other school or school district or written notice from the other school or school district that the student has enrolled or from a court that the student has been placed in a juvenile correctional facility, as

defined in s. 938.02(10p), or a secured residential care center for children and youth, as defined in s. 938.02(15g);

In this subsection, “school" and “school district" include any juvenile correctional facility, secured residential care center for children and youth, adult correctional institution, mental health institute, or center for the developmentally disabled that provides an educational program for its residents instead of, or in addition to, that which is provided by public, private, and tribal schools.

B. forward student records, including disciplinary records with respect to suspensions and expulsions, upon request to a juvenile detention facility in which the student has been placed, or a juvenile court that has taken jurisdiction of the student;

C. disclose student records that are pertinent to addressing a student's educational needs to a caseworker or other representative of the Department of Children and Families, a county department under s. 46.215, 46.22, or 46.23, or a tribal organization, as defined in 25 USC 450b(L), that is legally responsible for the care and protection of the student, if the caseworker or other representative is authorized by that department, county department, or tribal organization to access the student's case plan;

D. provide "personally-identifiable" information to appropriate parties, including parents of an eligible student, whose knowledge of the information is necessary to protect the health or safety of the student or other individuals, if there is an articulable and significant threat to the health or safety of a student or other individuals, considering the totality of the circumstances;

E. report a crime committed by a child to appropriate authorities, and with respect to reporting a crime committed by a student with a disability, to transmit copies of the student's special education and disciplinary records to the authorities for their consideration;

F. release de-identified records and information in accordance with Federal regulations;

G. disclose personally identifiable information from education records, without consent, to organizations conducting studies "for or on behalf of" the District for purposes of developing, validating or administering predictive tests, administering student aid programs, or improving instruction;

Information disclosed under this exception must be protected so that students and parents cannot be personally identified by anyone other than a representative of the organization conducting the study, and must be destroyed when no longer needed for the study. In order to release information under this provision, the District will enter into a written agreement with the recipient organization that specifies the purpose of the study.

This written agreement must include: (1) specification of the purpose, scope, duration of

the study, and the information to be disclosed; (2) a statement requiring the organization to use the personally identifiable information only to meet the purpose of the study; (3) a statement requiring the organization to prohibit personal identification of parents and students by anyone other than a representative of the organization with legitimate interests; and (4) a requirement that the organization destroy all personally identifiable information when it is no longer needed for the study, along with a specific time period in which the information must be destroyed.

While the disclosure of personally identifiable information without consent is allowed under this exception, it is recommended that whenever possible the administration either release de-identified information or remove the students' names and social security identification numbers to reduce the risk of unauthorized disclosure of personally identifiable information.

H. disclose personally identifiable information from education records without consent, to authorized representatives of the Federal government, as well as State and local educational authorities;
The disclosed records must be used to audit or evaluate a Federal or State supported education program, or to enforce or comply with Federal requirements related to those education programs. A written agreement between the parties is required under this exception.

This written agreement must include: (1) designation of the receiving entity as an authorized representative; (2) specification of the information to be disclosed; (3) specification that the purpose of the disclosure is to carry out an audit or evaluation of a government-supported educational program or to enforce or comply with the program's legal requirements; (4) a summary of the activity that includes a description of methodology and an explanation of why personally identifiable information is necessary to accomplish the activity; (5) a statement requiring the organization to destroy all personally identifiable information when it is no longer needed for the study, along with a specific time period in which the information must be destroyed; and (6) a statement of policies and procedures that will protect personally identifiable information from further disclosure or unauthorized use.

Under the audit exception, the District will use "reasonable methods" to verify that the authorized representative complies with FERPA regulations. Specifically, the District will verify, to the greatest extent practicable, that the personally identifiable information is used only for the audit, evaluation, or enforcement of a government-supported educational program. The District will also ascertain the legitimacy of the audit or evaluation and will only disclose the specific records that the authorized representative needs. Further, the District will require the authorized representative to use the records only for the specified purpose and not to disclose the information any further, such as for another audit or evaluation. Finally, the District will verify that the information is destroyed when no longer needed for the audit, evaluation, or compliance activity.

I. request each person or party requesting access to a student's record to abide by Federal regulations and State laws concerning the disclosure of information.

The Board will comply with a legitimate request for access to a student's records within a reasonable period of time but not more than forty-five (45) days after receiving the request or within such shorter period as may be applicable to students with disabilities. Upon the request of the viewer, a record shall be reproduced unless said record is copyrighted, or otherwise restricted, and the viewer may be charged a fee equivalent to the cost of handling and reproduction. Based upon reasonable requests, viewers of education records will receive explanation and interpretation of the records.

The Board shall maintain a record of each request for access and each disclosure of personally identifiable information. Such disclosure records will indicate the student, person viewing the record, their legitimate interest in the information, information disclosed, date of disclosure, and date parental/eligible student consent was obtained (if required).

Only "directory information" regarding a student shall be released to any person or party, other than the student or their parent, without the written consent of the parent, or, if the student is an eligible student, without the written consent of the student, except as provided by applicable law.

DIRECTORY DATA

Each year, the District Administrator shall provide a public notice to students and their parents of the District's intent to make available, upon request, certain information known as "directory data." The Board designates as student "directory data":

A. a student's name;

B. address;

C. telephone number;

D. date and place of birth;

E. participation in officially recognized activities and sports;

F. height and/or weight, if a member of an athletic team;

G. dates of attendance;

H. date of graduation;

I. degrees and awards received;

J. name of the school most recently previously attended.

Directory data may also include a student ID number, user ID, or other unique personal identifier used by the student when accessing or communicating in a District's electronic systems, if, standing alone, it cannot be used to access student education records (i.e., a pin number, password, or other factor is also needed).

Parents and eligible students may refuse to allow the Board to disclose any or all of such "directory data" upon written notification to the Board within fourteen (14) days after receipt of the District Administrator's annual public notice or enrollment of the student into the District if such enrollment occurs after the annual public notice. Any parent or eligible student who refuses to allow disclosure of directory data and who participates in the extra-curricular activity must complete the appropriate acknowledgement, which includes a limitation on the refusal to disclose directory data obtained during the course of the student's participation in extra-curricular activities.

In accordance with Federal and State law, the Board shall release the names, addresses, District assigned e-mail addresses (if available), and telephone listings of secondary students to a recruiting officer for any branch of the United States Armed Forces or an institution of higher education who requests such information. A secondary school student or parent of the student may request in writing that the student's name, address, District assigned e-mail address (if available), and telephone listing not be released without prior consent of the parent(s)/eligible student. The recruiting officer is to sign a form indicating that "any information received by the recruiting officer shall be used solely for the purpose of informing students about military service and shall not be released to any person other than individuals within the recruiting services of the Armed Forces." The District Administrator is authorized to charge mailing fees for providing this information to a recruiting officer.

Whenever consent of the parent(s)/eligible student is required for the inspection and/or release of a student's health or education records or for the release of "directory data," either parent may provide such consent unless agreed to otherwise in writing by both parents or specifically stated by court order. If the student is under the guardianship of an institution, the District Administrator shall appoint a person who has no conflicting interest to provide such written consent.

The Board may disclose "directory data," on former students without student or parental consent unless the parent or eligible student previously submitted a request that such information not be disclosed without their prior written consent.

The Board shall not collect or use personal information obtained from students or their parents for the purpose of marketing or for selling that information.

INSPECTION OF INFORMATION COLLECTION INSTRUMENT

The parent of a student or an eligible student has the right to inspect upon request any instrument used in the collection of personal information before the instrument is administered or distributed to a student. Personal information for this section is defined as individually identifiable information including a student or parent's first and last name, a home or other physical address

(including street name and the name of the city or town), a telephone number, or a Social Security identification number. In order to review the instrument, the parent or eligible student must submit a written request to the building principal at least fourteen (14) business days before the scheduled date of the activity. The instrument will be provided to the parent or eligible student within fourteen (14) business days of the principal receiving the request.

The District Administrator shall directly notify the parent(s) of a student and eligible students, at least annually at the beginning of the school year, of the specific or approximate dates during the school year when such activities are scheduled or expected to be scheduled.

This section does not apply to the collection, disclosure, or use of personal information collected from students for the exclusive purpose of developing, evaluating, or providing educational products or services for or to students or educational institutions, such as the following:

A. college or other postsecondary education recruitment, or military recruitment;

B. book clubs, magazines, and programs providing access to low-cost literary products;

C. curriculum and instructional materials used by elementary and secondary schools;

D. tests and assessments used by elementary and secondary schools to provide cognitive, evaluative, diagnostic, clinical, aptitude, or achievement information about students (or to generate other statistically useful data for the purpose of securing such tests and assessments) and the subsequent analysis and public release of the aggregate data from such tests and assessments;

E. the sale by students of products or services to raise funds for school-related or education-related activities;

F. student recognition programs.

The District Administrator shall prepare administrative guidelines so that students and parents are adequately informed each year regarding their rights to:

A. inspect and review the student's education records;

B. request amendments if the parent believes the record is inaccurate, misleading, or violates the student's privacy rights;

C. consent to disclosures of personally-identifiable information contained in the student's education records, except to those disclosures allowed by the law;

D. challenge Board noncompliance with a parent's request to amend the records through a hearing;

E. file a complaint with the United States Department of Education;

F. obtain a copy of the Board's policy and administrative guidelines on student records.

The District Administrator shall also develop guidelines for:

A. the proper storage and retention of records including a list of the type and location of records;

B. informing Board employees of the Federal and State laws concerning student records.

The Board authorizes the use of computer data storage for the recording, filing, maintaining, and preserving of records.

No liability shall attach to any member, officer, or employee of this Board as a consequence of permitting access or furnishing student records in accordance with this policy and regulations.

Any entity receiving personally identifiable information pursuant to a study, audit, evaluation, or enforcement/compliance activity must comply with all FERPA regulations. Further, such an entity must enter into a written contract with the Board delineating its responsibilities in safeguarding the disclosed information. Specifically, the entity must demonstrate the existence of a sound data security plan or data stewardship program, and must also provide assurances that the personally identifiable information will not be redisclosed without prior authorization from the Board. Further, the entity conducting the study, audit, evaluation, or enforcement/compliance activity is required to destroy the disclosed information once it is no longer needed or when the timeframe for the activity has ended, as specified in its written agreement with the Board.

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Legal
46.215, Wis. Stats.
46.22, Wis. Stats.
46.23, Wis. Stats.
115.298, Wis. Stats.
118.125, Wis. Stats.
118.125(2)(q), Wis. Stats.
20 U.S.C. Section 1232f (FERPA)
20 U.S.C. Section 1232g (FERPA)
20 U.S.C. Section 1232h (FERPA)
20 U.S.C. Section 1232i (FERPA)
20 U.S.C. 1400 et seq., Individuals with Disabilities Education Improvement Act
20 U.S.C. 7165(b)
20 U.S.C. 7908
25 U.S.C. 450b(L)

26 U.S.C. 152
34 C.F.R. Part 99

OVERVIEW OF UPDATE:The updates expand the data breach rules to cover leaks caused by Artificial Intelligence (AI) systems or outside technology vendors. Additionally, the changes allows the District does not waste resources sending out unnecessary warnings if a leak poses no real risk of fraud or identity theft. Finally, these updates keep the school aligned with updated Wisconsin state laws regarding data privacy. These changes are recommended but not required.

po8330.01

Vol. 35, No. 2 - Artificial Intelligence (AI) - July 2026 Revised UNAUTHORIZED ACQUISITION OF STUDENT PERSONAL INFORMATION

8330.01 - **UNAUTHORIZED ACQUISITION OF STUDENT PERSONAL INFORMATION**

The Board ~~of Education~~ is responsible for maintaining records of all students attending schools in this District.

If the District becomes aware of the unauthorized acquisition of "Personal Information", including acquisition facilitated by an Artificial Intelligence (AI) system or its associated vendor platform, the District shall make reasonable efforts to notify each affected student, and if a minor, the parents, that their personal information has been accessed. "Personal Information" includes the individual's social security number, driver's license number, State identification number, the number of financial accounts or access codes, the individual's deoxyribonucleic acid (DNA) profile, or the individual's unique biometric data including fingerprint, voice print, retina or iris image, or any other unique physical representation.

The notice shall be issued within a reasonable time, not to exceed forty-five (45) days after the District learns of the acquisition of the personal information. The notice shall indicate that the District knows of the unauthorized acquisition of personal information pertaining to the student. The notice shall be by mail or by a method the District has previously employed to communicate with the students.

If, as the result of a single incident, the District is required to notify 1,000 or more students, the District shall without unreasonable delay notify all consumer reporting agencies that compile and maintain files on consumers on a nationwide basis of the timing, distribution, and content of the notices sent to the students. Notification is not required if the acquisition of personal information does not create a material risk of identity theft or fraud to the subject of the personal information.

Upon written request from the student who has received a notice, the District shall identify the personal information that was acquired.

A law enforcement agency may, in order to protect an investigation or homeland security, ask the District not to provide a notice for any period of time and the District's notification process shall begin at the end of that time period.

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Legal
134.98 Wis. Stats.



HEMLOCK CREEK ELEMENTARY

1900 Williams Grant Drive • De Pere, WI 54115

Kathleen Held — Principal • Michael Kowalczyk — Associate Principal • (920) 425-1900 • FAX (920) 425-1914

To: Dr. Lau and the Board of Education

From: K. Held/M. Kowalczyk

Date: Sept. 28, 2026

Re: Request for approval - Memorial Bench Honoring Owen Obey

Dear Members of the West De Pere School Board,

I am requesting approval to add a memorial bench and plaque to the Hemlock Creek Elementary playground in memory of **Owen Obey**, a former Hemlock Creek student who passed away from cancer as a second grader. Owen would have been a fourth grader at Hemlock Creek this year.

The bench would provide a meaningful and lasting way to honor Owen's memory and recognize the impact he had on our students, staff, and school community. We believe it would also mean a great deal to Owen's family.

A similar memorial bench was placed at Dickinson Elementary for another student who lost their battle with cancer. We would like to create a similar tribute for Owen at Hemlock Creek.

We will be seeking funding for the bench and plaque through the **Hemlock Creek PTO**, so there would be no cost to the district.

Per **Board Policy 7250.01**, I am requesting the Board's approval to move forward with this memorial. We appreciate your consideration of this meaningful tribute to Owen.

Sincerely,

Kathleen McMorris
Principal
Hemlock Creek Elementary

Memorandum

To: Dr. Lau, Superintendent & Board of Education

CC: Dr. Gerke, High School Principal

From: Scott Eggart, High School Associate Principal & Activities Director

Date: 10/5/2026

Re: Notification of 2028 Spanish Trip

Ms. Eggart and Ms. DeKeyser have proposed a 10 day trip to Spain during Spring Break 2028 (dates TBA). This would be in their regular rotation for the trip. The students would miss 2 ½ days of school for travel

The trip will be planned by Language and Friendship and would include the students staying with a Spanish family and touring Spain as a group.

The cost of the trip will be approximately $3500-$4000 per student.

School District of West De Pere

Board Update

A Vision of Pride and Excellence

October 2026

WW Phantom Fun Day

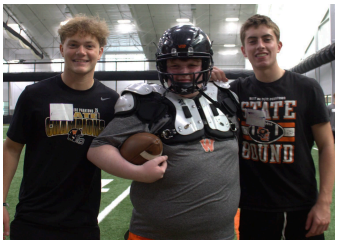
Westwood Elementary Phantom Fun Day was a blast! Special thanks to the High School football team for coming over to help with the color run.



Teaming Up

High School football players teamed up with Syble Hopp students for a Unified Football Camp! Athletes had the chance to learn new skills, play together, and enjoy plenty of fun on the field.





WW Field Trip

Westwood students in 4th grade went to Heritage Hill, 3rd Grade went to Lambeau Field, and 4K went to Berryland. On top of that, the De Pere firefighters came to visit 4K - 2nd grade.









HC Celebrates Pete the Cat

Hemlock Creek Kindergarteners celebrate Pete the Cat Day.





HC Fieldtrip

4th graders from Hemlock Creek Elementary School went on a Geology field trip to Bayshore Park and Scott Quarry.



Upcoming Events

- Middle School Halloween Band Concert Oct. 27th at 7:00PM in the Middle School Gym
- Soup for the Soul Nov. 5th 5-6:30PM in the High School Commons
- Intermediate School Musical- *How to Train a Dragon the Musical Jr.* Dec. 3rd & 4th at 6:30PM and Dec. 5 at 1:30PM in the High School Auditorium.