

(New) Board Policy 625
St. Cloud Area School District 742
Adopted: _____, 2026

625 Responsible Use of Artificial Intelligence

A Governance Framework for Responsible Innovation in Public Education

I. PURPOSE

The purpose of this policy is to establish the Board's expectations for the ethical, transparent, developmentally appropriate, and human-centered use of artificial intelligence throughout the District.

The Board recognizes AI as an enduring technological shift. Used well, it can improve teaching, learning, accessibility, communication, and operations. Used poorly, it can weaken academic integrity, displace necessary thinking, compromise privacy, amplify bias, and erode public trust.

The Board believes our schools exist to engage, inspire, educate, prepare, and empower all learners, in partnership with their community, to succeed in today's and tomorrow's society. AI should support that mission, not redefine it.

This policy establishes governance principles and delegates implementation to the Superintendent through administrative regulations. Nothing in this policy requires any student or employee to use AI. Professional judgment remains central to determining when AI is appropriate.

II. DEFINITIONS

Artificial Intelligence (AI). Computer-based systems that analyze data and recognize patterns to support teaching, learning, or administrative operations. In this District, AI is authorized only to assist human decision-making, within educational and legal constraints. AI does not replace professional judgment or human accountability.

Human-AI-Human (H-AI-H). The District's required decision-making model. A human sets purpose and context. AI may assist. A human verifies, decides, and remains accountable. AI is an augmentative tool, not an autonomous decision-maker.

Confidential Information. Information the District is prohibited by law, policy, or contract from disclosing, or may disclose only in limited circumstances. This includes, without limitation, personally identifiable information about students or employees, medical information, education records, and information about any student's individualized education program (IEP) or Section 504 plan.

Personally Identifiable Information (PII). Information that can be used to distinguish or trace an individual's identity, either directly or indirectly, consistent with FERPA and Minnesota law. PII includes, but is not limited to:

1. The student's name;
2. The name of the student's parent or other family members;
3. The address of the student or student's family;
4. A personal identifier, such as a social security number, student number, or biometric record;
5. Other indirect identifiers, such as date of birth, place of birth, and mother's maiden name;
6. Other information that, alone or in combination, is linked or linkable to a specific student and would allow a reasonable person in the school community to identify the student with reasonable certainty; or
7. Information requested by a person the District reasonably believes knows the identity of the student to whom the education record relates.

Deep Fake. Any video recording, motion-picture film, sound recording, electronic image, or photograph, or any technological representation of speech or conduct substantially derivative thereof:

1. that is so realistic that a reasonable person would believe it depicts speech or conduct of an individual who did not in fact engage in such speech or conduct; and
2. the production of which was substantially dependent upon technical means, rather than the ability of another individual to physically or verbally impersonate such individual.

AI Literacy. The knowledge, skills, and ethical understanding necessary to use, question, evaluate, and create with AI responsibly.

Productive Struggle. The effort a learner must expend on a worthwhile task that is within reach but not yet easy. Durable learning depends on that effort. AI shall not be used to remove it when the effort is the point of the work.

III. DISTRICT COMMITMENTS

The Board commits to the following principles. Administrative regulations, procedures, and practices established under this policy shall carry them out.

1. We put people first. Relationships, professional judgment, and student well-being precede convenience or speed.
2. We keep humans accountable. At minimum, the Human-AI-Human model governs AI-assisted work and learning.
3. We protect learning. AI may strengthen teaching and learning. It may not replace curiosity, wonder, productive struggle, creativity, collaboration, reflection, or mastery of essential knowledge and skills.
4. We distinguish helpful offloading from harmful offloading. Staff may use approved tools to reduce low-value administrative load so they can spend more time on students. Students may use approved tools only when the use does not displace the thinking the assignment is designed to grow.
5. We build AI literacy and staff fluency. Every student and staff member will have access to age-appropriate learning about how AI works, what it can and cannot do, and how to use it ethically. Staff will be supported toward professional fluency.
6. We use AI in developmentally appropriate ways. Expectations tighten for younger learners and expand, with stronger accountability, as students mature.
7. We build trust through transparency. Meaningful AI contribution shall be disclosed as required by regulation, assignment guidelines, and professional standards.
8. We protect privacy, safety, and public trust. Confidential information and PII shall not be entered into AI tools except as expressly authorized in administrative regulation and permitted by law and contract.
9. We expand opportunity through equitable access. Approval, training, and support shall not create a two-tier system in which only some students or staff can use approved tools well.
10. We handle community-specific and culturally significant materials with care. Such materials shall not be submitted to AI tools in ways that strip context, exploit culture, or compromise dignity.
11. We hold vendors accountable. Contracts shall address data ownership, use, retention, deletion, training prohibitions, and breach notification, consistent with the Minnesota Government Data Practices Act and FERPA.
12. We commit to continuous learning. Law, tools, and practice will change. The District will review, report, and revise.

IV. GOVERNANCE

The Board establishes guiding principles and provides oversight. The Superintendent is responsible for implementation through administrative regulations and operational guidance.

The Superintendent shall designate at least one AI Coordinator to monitor advancements, risks, and best practices and to advise the Superintendent. The Superintendent may designate more than one AI Coordinator and may establish advisory structures or governance teams.

The Superintendent retains final decision-making authority over AI implementation matters. Where advisory bodies offer differing recommendations, the Superintendent or designee resolves the matter.

The AI Coordinator's role is advisory.

V. SCOPE

This policy applies to students, employees, volunteers, contractors, and others acting on behalf of the District. It applies to AI use that has a direct connection to District programs, operations, or technology resources, including use that occurs off campus when that link exists.

This policy does not require the use of AI. Absence of AI from a lesson, assignment, or work process remains a valid professional choice.

VI. SUPERINTENDENT RESPONSIBILITIES

The Superintendent shall establish administrative regulations addressing, at minimum:

- governance and the AI Coordinator role;
- AI tool review, risk classification, and an approved-tool list;
- vendor evaluation, procurement, and data-governance agreements;
- privacy, cybersecurity, and records retention
- developmentally appropriate student use and the protection of productive struggle;
- staff use, H-AI-H expectations, and academic integrity;
- AI literacy, fluency and understanding for students and staff

- transparency and disclosure of meaningful AI contribution;
- incident reporting and response, including deepfakes, privacy incidents, and integrity concerns;
- enforcement consistent with existing student and employee discipline policies; and
- continuous improvement.

Regulations shall be written so they can be updated as technology, law, and practice evolve, without requiring the Board to legislate operating detail.

VII. REVIEW AND REPORTING

The Superintendent shall report to the Board at least annually on implementation, emerging opportunities and risks, legal developments, the approved-tool environment, training progress, incidents of significance, and recommended policy revisions.

The Board shall review this policy at least annually so that it remains current with evolving law, technology, and District practice.

Legal References:

Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act);
 Minn. Stat. § 13.055 (Government Entity Data Breach Notification);
 Minn. Stat. § 13.32 (Educational Data);
 Minn. Stat. § 604.32;
 Minn. Stat. § 609.771;
 Minn. Stat. § 617.262;
 20 U.S.C. § 1232g and 34 C.F.R. Part 99 (FERPA);
 20 U.S.C. § 1232h (PPRA);
 Individuals with Disabilities Education Act, 20 U.S.C. §§ 1400–1419 and 34 C.F.R. Part 300;
 Section 504 of the Rehabilitation Act, 29 U.S.C. § 794;
 Americans with Disabilities Act, 42 U.S.C. § 12101 et seq.; 15 U.S.C. §§ 6501–6506 (COPPA);
 17 U.S.C. § 101 et seq. (Copyright Act);
 18 U.S.C. §§ 2510–2523; 18 U.S.C. §§ 2701–2713;
 Title VII of the Civil Rights Act, 42 U.S.C. § 2000e et seq.;
 MSBA/MASA Model Policy 625.

Cross References to ISD742 Policies:

Policy 208 (Development, Adoption, and Implementation of Policies);

Policy 305 (Policy Implementation); Policy 306 (Administrator Code of Ethics);
Policy 401 (Equal Employment Opportunity);
Policy 402 (Disability Nondiscrimination);
Policy 406 (Public and Private Personnel Data);
Policy 409 (Employee Publications, Instructional Materials, Inventions, and Creations);
Policy 422 (Policies Incorporated by Reference – Employees);
Policy 496 (School Employees Code of Ethics);
Policy 506 (Student Discipline);
Policy 514 (Bullying Prohibition);
Policy 515 (Protection and Privacy of Pupil Records);
Policy 520 (Student Surveys);
Policy 521 (Student Disability Nondiscrimination);
Policy 522 (Title IX Sex Nondiscrimination);
Policy 523 (Policies Incorporated by Reference – Students);
Policy 524 (Internet, Technology, and Cell Phone Acceptable Use and Safety);
Policy 608 (Instructional Services – Special Education);
Policy 618 (Assessment of Student Achievement);
Policy 620 (Credit for Learning);
Policy 624 (Online Instruction);
Policy 722 (Public Data and Data Subject Requests)

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