

St. Cloud Area School District 742

Administrative Regulation 625-R: Responsible Use of Artificial Intelligence

I. Purpose

This regulation translates Policy 625 into practice. It is designed to:

1. support innovation that improves teaching, learning, and operations;
2. protect developing learners from uses of AI that displace necessary thinking;
3. safeguard privacy, safety, academic integrity, and public trust; and
4. give staff a clear, lawful path for wise use.

Terms defined in Policy 625 have the same meaning here. Final authority on all matters in this regulation rests with the Superintendent. The AI Coordinator is an advisor only. Nothing in this regulation requires the use of AI.

A. Additional Definitions

The following operating definitions apply to this regulation.

- **AI Fluency.** The professional capacity of staff to select, supervise, and integrate approved AI tools in ways that improve teaching, operations, and student outcomes while preserving human judgment and legal compliance.
- **Cognitive Offloading.** The transfer of mental work to an external tool. Offloading routine or mechanical tasks can free capacity for higher-order work. Offloading the thinking a student must practice—reasoning, retrieval, sense-making, composition, or judgment—undermines learning and is not permitted when that thinking is the instructional target.
- **Meaningful AI Contribution.** AI use that substantively influences content, analysis, recommendations, or decisions beyond routine editing or clerical assistance. Meaningful AI contribution must be disclosed as required by this regulation and by assignment guidelines.
- **Risk Classification.** For tool review: **low** (no PII entered); **medium** (limited potential for PII entry); **high** (high likelihood of PII entry).

II. GOVERNANCE

A. AI Coordinator — Appointment and Term

The Superintendent will designate one District AI Coordinator. The AI Coordinator

monitors advancements, risks, and best practices; serves as a professional resource; and advises the Superintendent.

The AI Coordinator may be any administrator other than the Superintendent.

Because the role includes work that may fall outside a duty day and carries District-wide responsibility, the Superintendent shall not assign the role to a member of a PELRA bargaining unit unless the assignment is consistent with applicable agreements and law.

The AI Coordinator's term is set by the Superintendent. The AI Coordinator may consult with experts outside the District and may share critical or confidential data only under appropriate confidentiality or nondisclosure agreements.

Policy 625 authorizes the Superintendent to designate additional AI Coordinators or to establish advisory structures if the work later requires it. Until the Superintendent does so in writing, this regulation contemplates a single AI Coordinator.

B. AI Coordinator – Primary Duties

1. Meet with the Superintendent at least twice each semester, and more often as the Superintendent directs, to review the duties in this section and the status of each.
2. Solicit feedback from staff and students about classroom and operational experience with AI and provide the Superintendent a summary at check ins throughout the year.
3. Advise the Superintendent on improvements to this regulation, based on Policy 625, practical function, and student and staff feedback. This duty includes developing, updating, and maintaining procedures for an organized District response to deepfakes, privacy incidents, academic-integrity concerns, and other emerging AI risks. Those procedures shall state how concerns are reported and escalated.
4. Review and vet AI tools requested for District approval. Any staff member may request review. The AI Coordinator shall review requests within a reasonable time and, after review, make a written recommendation to the Superintendent that considers:
 - (a) adequacy of any vendor agreement under Section II.D;
 - (b) compliance with Policy 625 and this regulation;
 - (c) legitimacy of the educational or operational use; and

- (d) risk classification: low (no PII entered), medium (limited potential for PII entry), or high (high likelihood of PII entry). High-risk tools shall not be recommended unless a compliant vendor agreement, technical controls, and a documented educational necessity are in place.
5. Maintain a district-approved AI tool list. The list shall be updated as an addendum to this regulation and posted on the District website after Superintendent approval.
 6. Facilitate AI training at the request of the Superintendent.
 7. Ensure that incident-response procedures required by Section V are current and known to principals.

C. Decision-Making Authority

The Superintendent retains final authority. The AI Coordinator does not approve tools, bind the District contractually, impose discipline, or speak as the final interpreter of policy.

D. Vendor Guidelines

1. AI technologies procured by the District must include clear intellectual-property provisions. Vendors must provide bias-testing disclosure, documentation, and incident-reporting procedures.
2. District administration and the AI Coordinator shall work with legal counsel to maintain an AI vendor evaluation, procurement, and licensing process.
3. Evaluation criteria shall include data handling, model transparency, bias auditing, accessibility, FERPA/COPPA compliance, Minnesota Government Data Practices Act compliance, and data residency.
4. Educational-technology vendors must identify AI components embedded in products supplied to the District.
5. AI technologies supplied to the District must comply with District policies and procedures.
6. A contractual agreement between the District and an AI vendor must:
 - establish ownership of content created through the vendor's services;
 - prohibit vendor terms that assert broad vendor rights to user-generated content;
 - address data processing;
 - prohibit use of student and staff data for model training;
 - establish data-deletion rights;
 - include reasonable data-portability provisions;

- address vendor changes in terms, acquisition, or discontinuation; and
 - set forth breach-notification requirements consistent with Minn. Stat. § 13.055 and applicable federal law.
7. Users of District-provided AI technologies must comply with vendor terms and District rules. Violation may result in loss of access and disciplinary action.
 8. Consumer or “free” tools that treat user inputs as public or as training data are not approved for District work involving any non-public information.

Reserved for later revision. The default rule in this regulation is that confidential information and PII shall not be entered into AI tools.

Any future exception for designated staff using approved enterprise tools would require a written Superintendent authorization, a qualifying vendor agreement under this section, role-based access controls, and review by legal counsel.

No such exception is authorized by this regulation.

III. STUDENT USE GUIDELINES

Students may use District-approved AI tools for educational purposes only as directed by teachers and only in compliance with assignment guidelines. All AI-generated content must be verified and cited as required. Students are prohibited from inputting personal, confidential, or sensitive information into AI tools, whether the information is about themselves or others.

A. Permitted Student Uses

When authorized by the teacher, students may use District-approved AI tools to:

1. Explore and explain academic concepts after they have first attempted the thinking the lesson requires;
2. Brainstorm ideas and seek guidance on research directions;
3. Receive feedback on drafts, provided the student remains responsible for revision, verification, and voice; and
4. Practice AI literacy skills the teacher has explicitly designed into the lesson. Permission is assignment-specific. A teacher may prohibit AI on any task whose purpose is to grow independent thinking, retrieval, writing, calculation, or problem-solving.

B. Productive Struggle and Cognitive Offloading

Teachers shall design learning so that AI does not remove the struggle the student needs. If the learning target is the thinking itself, AI shall not do that thinking for the student.

Students may not use AI to complete work in a manner that offloads the cognitive demand the assignment is intended to build. Using AI to check, extend, or critique work the student has already produced is different from using AI to produce the work. Teachers shall make that distinction visible in assignment guidelines.

C. Verification and Academic Integrity

1. Students must verify AI-generated information using reliable sources such as course materials, scientific papers, or reputable educational sources identified by the teacher.
2. Any content generated or significantly assisted by AI—any meaningful AI contribution—must be disclosed and cited as required by the teacher and the assignment.
3. Submitting AI-generated content, or content significantly assisted by AI, as original work without attribution is prohibited and will be treated as an academic-integrity violation under applicable classroom rules and the Student Discipline Policy.

D. Privacy and Data Protection

Students must not upload or input personal, confidential, proprietary, or sensitive information into any AI tool. Examples include but are not limited to:

1. Passwords and account credentials;
2. Names, likenesses, or Social Security numbers;
3. Credit card or bank account numbers;
4. Information from non-public District documents; and
5. Details from IEPs, Section 504 plans, or medical records.

E. Prohibited Student Uses

Students may not use AI tools to:

1. Create, access, or display harmful, threatening, obscene, disruptive, or sexually explicit material;
2. Engage in harassment, discrimination, bullying, or disparagement of others based on race, ethnicity, national origin, sex, gender, sexual orientation, age, disability, religion, or political beliefs;
3. Violate any District policy, classroom rule, or applicable law; or

4. Create deepfakes, synthetic media, voice cloning, or similar content.

F. Developmental Expectations for Student Independence

Staff shall apply the following grade-band limits when authorizing student use:

- **Grades K–3:** No independent or unsupervised student use of AI. District-approved tools may be used only under direct teacher supervision and only for teacher-directed instructional purposes. The instructional focus is awareness, not production.
- **Grades 4–5:** Structured, teacher-directed, limited exposure emphasizing AI awareness and the difference between a tool and a thinker.
- **Grades 6–8:** Structured student use emphasizing digital citizenship, verification, citation, and critical thinking. Independent use is permitted only on tasks the teacher has designated.
- **Grades 9–12:** Expanded student use emphasizing ethical application, disclosure, workforce readiness, and AI literacy. Independence increases only where the student can verify, cite, and remain accountable.

These bands are ceilings, not mandates. A teacher may impose stricter limits.

G. Reporting and Support

Students should report concerns about AI misuse or unsafe practices to the teacher or principal.

H. Consequences

Violations will be addressed by teachers and school staff under the Student Discipline Policy. Consequences may include loss of AI privileges and further disciplinary or legal action as appropriate. Corrective teaching shall accompany discipline when the student's error is primarily a gap in understanding rather than willful misconduct.

IV. STAFF USE GUIDELINES

Staff may use District-approved AI tools to enhance educational experiences and to perform work responsibilities, provided all use complies with law and District policy. Staff must not input confidential, proprietary, or sensitive information into AI tools. Staff are responsible for guiding and supervising student use, setting clear

expectations, and ensuring proper attribution.

A. Staff Use for Educational Purposes

1. Staff may consult approved AI tools for ideas, outlines, differentiation, feedback stems, and other methods that enhance students' educational experience, including lesson design and curriculum development.
2. Staff shall guide students in AI use, including clear expectations, attribution, fact-checking, and proofreading.
3. Staff shall evaluate the appropriateness of AI case by case—accuracy, reliability, developmental fit, and alignment with curriculum standards and the learning target.
4. Staff shall implement the H-AI-H model whenever AI is used with or for students.
5. Staff must supervise student use so that it remains appropriate and does not displace productive struggle.
6. A teacher who suspects plagiarism or prohibited AI use shall first confer with the student to determine whether the student understood the expectation.
7. Teachers shall consult school administration before investigating a possible violation beyond that initial conversation.
8. An AI-detection tool may have high false-positive rates and may disproportionately flag multilingual speakers or students with distinctive writing styles. A detection tool may be used only if it is independently validated and approved by the Superintendent. Detection output shall never be the sole basis for a finding that a student violated this regulation or related rules.

B. Grade-Band Guidance

Educators retain professional discretion to determine when AI supports learning and when students should work independently. Learning experiences shall intentionally preserve curiosity, wonder, productive struggle, creativity, collaboration, reflection, and mastery of foundational knowledge and skills. Staff shall follow the developmental expectations in Section III.F.

C. Staff Use for Work Responsibilities

1. Staff may use approved AI tools to assist with work responsibilities, including document drafting, research support, administrative tasks, meeting preparation, and communication, provided the use is consistent with this regulation and other District policies.

2. Staff shall implement the H-AI-H model and maintain human oversight and professional responsibility for all work in which AI has been used.
3. A staff member remains fully accountable for accuracy, tone, legality, equity, and professional fitness of any product issued in the staff member's name or the District's name, including content AI helped produce.
4. Meaningful AI contribution to materials that will be used with students, families, the Board, or the public shall be reviewed by the staff member before use. Staff shall not present AI output as factual without verification.

D. Privacy and Data Protection

1. Staff use of any AI tool must comply with applicable law, including student-privacy and government-data law, and with District policies on student and personnel information.
2. Staff shall not upload or input confidential data, private data, proprietary information, PII, or other sensitive information, including District or student information, into any AI tool. Examples include passwords; names or likenesses used to identify a specific person in a non-public context; Social Security numbers; financial account numbers; personnel material; information from non-public District documents; IEP or Section 504 content; medical information; and any other non-public information that could harm a student, staff member, or the District if disclosed.
3. Staff shall treat consumer AI tools as if inputs become public. Only tools on the approved list, used as approved, may be used for District work.

E. Prohibited Staff Uses

Staff may not use AI tools to:

1. Create, access, or display harmful, threatening, obscene, disruptive, or sexually explicit material;
2. Engage in harassment, discrimination, bullying, or disparagement of others based on race, ethnicity, national origin, sex, gender, sexual orientation, age, disability, religion, or political beliefs;
3. Violate any District policy, classroom rule, or applicable law;
4. Create deepfakes, synthetic media, voice cloning, or similar content. Staff may not create synthetic images, audio, video, or text concerning another individual without that individual's explicit and legally permissible consent; or

5. Use AI as the sole basis for decisions about student discipline, special education eligibility or placement, grading of individual student performance, or employment actions.

F. Discipline

Staff who violate this regulation may be subject to discipline, including termination, as set forth in the Discipline, Suspension, and Dismissal of School District Employees policy and other applicable policies or agreements.

V. REPORTING AI-RELATED CONCERNS, MISUSE AND INCIDENTS

Staff and students shall contact the building principal or the principal's designee if concerns arise regarding safe and effective use of AI, or if they suspect misuse that violates District policy, this regulation, or law.

The principal shall escalate to the AI Coordinator and, as appropriate, to the Superintendent, the District's responsible authority for government data, and legal counsel.

The AI Coordinator shall maintain written procedures, approved by the Superintendent, that address at a minimum:

1. Deepfakes and nonconsensual synthetic media;
2. Privacy or data incidents connected to AI tools;
3. Academic-integrity incidents involving AI;
4. Suspected generation or possession of illegal content;
5. Notification paths to parents/guardians, law enforcement, and state or federal agencies when legally required;
6. Evidence preservation; and
7. Post-incident review.

Those procedures shall be treated as an operational addendum to this regulation.

VI. TRAINING OF DISTRICT STAFF, TEACHERS AND STUDENTS

The District will train staff, teachers, and students on this regulation, related procedures, data-management and privacy rules, acceptable uses, and prohibitions.

Training will be developmentally appropriate for students and role-appropriate for staff. Completion expectations shall be set by the Superintendent.

VII. NOTICE

The District will inform students, parents, and guardians about AI use in the District, including how to access the approved-tool list and how to raise concerns. Significant changes to this regulation or to the approved-tool environment shall be communicated through ordinary District notice channels.

VIII. RECORDS

Content created or substantially assisted by AI is a District record when it documents District business, decisions, or official action. Such records shall be retained according to the District's records-retention schedule. Staff shall not use AI tools in a manner that prevents the District from meeting retention, discovery, or data-request obligations.

Legal References:

Minn. Stat. § 13.02 (Definitions)
Minn. Stat. § 13.03 (Access to Government Data)
Minn. Stat. § 13.05 (Duties of Responsible Authority)
Minn. Stat. § 13.32 (Educational Data)
Minn. Stat. § 604.32 (Cause of Action for Nonconsensual Dissemination of a Deep Fake Depicting Intimate Parts or Sexual Acts)
Minn. Stat. § 609.771 (Use of Deep Fake Technology to Influence Election)
Minn. Stat. § 617.262 (Nonconsensual Dissemination of a Deep Fake Depicting Intimate Parts or Sexual Acts)
15 U.S.C. §§ 6501-6506 (Children's Online Privacy Protection Act)
18 U.S.C. §§ 2510-2523 (Electronic Communications Privacy Act)
18 U.S.C. §§ 2701-2713 (Stored Communications Act)
20 U.S.C. § 1232g (Family Educational Rights and Privacy Act)
20 U.S.C. § 1232h (Protection of Pupil Rights Amendment)
20 U.S.C. §§ 1400-1419 (Individuals with Disabilities Education Act)
29 U.S.C. § 701 et seq. (Rehabilitation Act of 1973)
42 U.S.C. § 2000e et seq. (Title VII of the Civil Rights Act)
42 U.S.C. § 12101 et seq. (Americans with Disabilities Act)
34 C.F.R. Part 99 (Family Educational Rights and Privacy Act)

Cross References:

MSBA/MASA Model Policy 409: Employee Publications, Instructional Materials, Inventions, and Creations
MSBA/MASA Model Policy 506: Student Discipline (Forms Attached)
MSBA/MASA Model Policy 514: Bullying Prohibition Policy
MSBA/MASA Model Policy 515: Protection and Privacy of Pupil Records (Form Attached)
MSBA/MASA Model Policy 524: Internet, Technology, and Cell Phone Acceptable Use and Safety Policy (Form Attached)
MSBA/MASA Model Policy 524.5: Personal Electronic Communication Devices
MSBA/MASA Model Policy 601: School District Curriculum and Instruction Goals
MSBA/MASA Model Policy 603: Curriculum Development

Resources:

U.S. Department of Education: [Artificial Intelligence and the Future of Teaching and Learning](#) (accessed 11/03/25)

U.S. Department of Education: [Artificial Intelligence \(AI\) Guidance](#)

Minnesota Department of Education: [Artificial Intelligence in Education](#) (accessed 11/03/25)

Minnesota IT Services: [Transparent Artificial Intelligence Governance Alliance](#) (accessed 02/24/26)

MNGAIA AI4MN: [Centering Relationships, Empowering Learners: AI that Elevates Human Work](#) (accessed 02/16/26)

Consortium for School Networking (CoSN): [Artificial Intelligence](#) (accessed 12/12/25)

Digital Promise: [Artificial Intelligence in Education](#) (accessed 12/12/25)

International Society for Technology in Education (ISTE): [Artificial Intelligence in Education](#) (accessed 12/12/25)

National AI Literacy Day: [AI Literacy Day Resources](#) (accessed 12/12/25)

National Center on Education and the Economy (NCEE): [Framework for AI-Powered Learning Environments](#) (accessed 11/03/25)

PIPC-AASA: [A District Guide to Data Minimization in the Age of AI](#) (accessed 11/14/25)

Public Interest Privacy Center: [From Data Privacy to Discrimination: Examining the Legal Ramifications of AI in Schools \(April 2024\)](#) (accessed 12/12/25)

TeachAI: [AI Guidance for Schools Toolkit](#) (accessed 11/03/25)