

Zionsville Community Schools

Board of School Trustees Meeting “Item for Consideration”

Old Business • Date: September 14, 2026

Policy Revision – Second Reading

Category:

☐ Human Resources, Personnel/Staffing	☐ Curriculum, Instruction, Assessment	
☐ Finance, Budgeting, Accounting	☐ Student Services	☒ Board Policy
☐ Facilities, Transportation, Nutrition	☐ Community Relations	☐ Other

Type of Board of Trustees Consideration Sought:

Action	☒
Discussion	☐
Report	☐

Facts of this Matter:

Governor Braun signed House Enrolled Act 1360 (HEA 1360) on March 4, 2026. HEA 1360 alters some requirements of the Access to Public Records Act (APRA), with changes taking effect on July 1, 2026. To help school districts unpack what has changed when processing records requests, the Indiana School Boards Association (ISBA) sent a memo outlining the changes. The following summary is directly taken from ISBA’s memo.

In recent years, public agencies have reported an increasing number of bulk public records requests that appear to originate from automated sources rather than individuals. Additionally, public agencies reported a growth of phishing attempts when reviewing public records requests that have been submitted via email.

The increasing number of requests, together with the rise of data scraping and automated systems employed by certain organizations, resulted in significant strain on public agency resources. To address this growing trend, HEA 1360 makes several significant changes to Indiana’s APRA. The changes modernize the public records process and set reasonable limits to protect agency resources. This Overview covers five (5) topics.

- First, HEA 1360 authorizes public agencies to establish an electronic portal to receive and acknowledge public records requests. These portals can screen requests and track their sources. For example, a portal may confirm the requester is a real person, verify their address, check Indiana residency, and flag submissions from known sources of phishing (deceptive requests designed to trick staff) or data scraping (automated tools that extract large amounts of data).*
- Second, HEA 1360 allows agencies to prioritize Indiana resident requests and requests submitted for civic, journalistic, academic, or personal use. Agencies can deprioritize both out-of-state requests and automated requests while charging a supplemental fee for these requests.*
- Third, HEA 1360 allows agencies to deny suspected data scraping requests, phishing requests, and requests that could compromise the agency’s electronic systems or data, while also mandating that agencies report suspected requests to OPAC.*

- *Fourth, HEA 1360 authorizes agencies to deny requests that are duplicative of the litigation discovery process.*
- *Finally, HEA 1360 requires the public access counselor to coordinate with public agencies and compile information from Indiana's public agencies. Specifically, the counselor must track the number and type of requests received and flag patterns tied to automation, phishing, or data scraping. IC 5-14-4-10(8). To support this, public agencies must report certain information to OPAC throughout the year and submit a full annual report each June.*

Objective POSITIVES:

Including references to HEA 1360 in Board policy will put emphasis on the new APRA requirements and help district leaders and staff discern and deny requests that fall outside the new requirements of APRA and help eliminate hours spent trying to find responsive documents to automated requests and data scraping.

Objective NEGATIVES:

None.

Financial Implications related to this item or approach:

Implementation of these new changes as released by the Office of the Public Access Counselor (OPAC) will decrease the number of hours spent by staff reviewing and completing requests that do not meet the new requirements.

Suggested Wording for a Motion, if any:

I move to approve the suggested changes to Board Policy 8310 as presented.