

WATERFORD UNION HIGH SCHOOL

Draft - Policy Manual

2.0-35.2 Regular Update for Board Consideration

19 policies

September 15, 2026

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

01 - OVERVIEW

Vol. 35, No. 2 - July 2026 OVERVIEW

WISCONSIN LOCAL UPDATE OVERVIEW AND COMMENTS**VOLUME 35 NUMBER 2****JULY 2026**

The proposed new, revised, and replacement policies, administrative guidelines, and forms included in this update have been thoroughly prepared and reviewed by Neola's legal counsel for statutory compliance. If you make revisions or substitute in their entirety policies or other materials of your own drafting, those materials should be reviewed by your legal counsel to verify compliance. Neola does not review District specific edits to update materials or District-specific policies for statutory compliance.

If a District chooses not to adopt a policy or administrative guideline, the District is still obligated to comply with applicable Federal and State laws on that topic.

If a policy or guideline is marked as a revision, the revisions have been marked in bold (to add material) and crossed out (to delete material). As you review a revised policy or guideline, you may accept one, many, or all of the revisions provided. If a policy or guideline is marked as a replacement, enough revisions have been made to justify a complete, clean replacement copy. As you review a replacement policy or guideline, you should also check the materials in your current policy or guideline to see if there is any specific wording you want included in the replacement policy. If so, any wording to be added and where it should be inserted should be forwarded with the replacement policy or guideline when it is returned to the Coshocton office for processing.

If the District authors language and adds it to a policy template or deletes content that is not marked as a choice in the policy template, then these actions will constitute District-specific edits.

Policies to be deleted from the policy manual require Board action to rescind the policy.

Your Neola Associate will contact you soon to schedule an appointment to review this update and ensure you are current on it and previous updates.

If you are not an administrative guidelines client, you did not receive those materials in this packet. Contact your Associate for more information about becoming an administrative guidelines client.

Questions?

- All Neola Production-related materials and questions should be directed to the Coshocton Office at 632 Main Street, Coshocton, Ohio 43812 (phone 800-407-5815, email: production@neola.com). Billing questions should be directed to the Stow Office at 3914 Clock Pointe Trail, Suite 103, Stow, Ohio 44224 (phone 330-926-0514, fax 330-926-0525).
- Please direct content-related questions to your Neola Associate.
- Please make any revisions on the new Neola Policy Publishing Tool using the instructions provided to you. If you encounter anything unfamiliar in the Neola Policy Publishing Tool or have questions regarding the submission process, our support team is ready to help.

Call us: 330-926-0514

Email us: support@neola.com

Processing Update Materials

Revisions to your policies and administrative guidelines should be made using the new Neola Policy Publishing Tool, following the instructions provided.

District-Specific Materials

If the District chooses, during any step of the Update process, to incorporate District specific material into a new policy or guideline that has been proposed or to insert District-specific material into a current policy or guideline for which revisions have been proposed in an update issued by Neola, then the District agrees to hold Neola harmless for those District-specific edits and acknowledges that Neola's warranty for legal challenges to that District-specific language in that policy or guideline will not be in effect. In addition, Neola retains ownership of the text from the original policy template that remains in a policy to which District-specific material has been added. District-specific materials include the following:

1. Materials from the District's existing materials that the District requests be incorporated during the drafting process;
2. New materials that the District develops in their entirety and exclusive of Neola;

3. Revisions or deletions that substantively depart from Neola’s templates; and

4. Outdated material that a District did not keep current with Neola updates.

Further, Neola does not recommend the use or incorporation of District-specific materials. Neola will, at the request of the District, incorporate District-specific materials into the licensed materials, with the implicit understanding that the District bears all risks associated with the District’s decision to request that such District specific materials be incorporated. Neola reserves the right to, but is not obligated to, advise the District to seek its own legal review of District-specific materials.

Notice Regarding Legal Accuracy

Neola is vigilant in providing policy language to clients that has been vetted for legal accuracy by outside legal counsel. Should questions arise as to the legal compliance or accuracy of Neola materials, it is our expectation that Neola's counsel would have the opportunity to assist in the resolution of such a claim. Please notify the Neola corporate office if an issue arises that requires such a review or assistance.

Policies in this update have been reviewed by Renning Lewis & Lacy, S.c. for consistency with Federal and State law.

BYLAWS AND POLICIES

Policy 2210 - CURRICULUM DEVELOPMENT (Revised)

This policy establishes the governing framework and structural criteria for developing, evaluating, and maintaining a sequential District curriculum that complies with state educational mandates.

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.

Policy 2430 - DISTRICT-SPONSORED CLUBS AND ACTIVITIES (Revised)

This policy defines the structural parameters for authorizing student clubs and activities and establishes a clear legal distinction between District-sanctioned programs and

independent community initiatives.

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.

Policy 2461 - RECORDING OF IEP TEAM MEETINGS (Replacement)

This policy regulates the recording of Individualized Education Program (IEP) team meetings, balancing the accommodation of parental rights with the privacy of participants and the general integrity of the collaborative process.

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.

Policy 2510 - ADOPTION OF TEXTBOOKS (Revised)

This policy establishes the legal framework and criteria for the non-discriminatory selection, evaluation, and Board approval of primary instructional materials used throughout the District.

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).

Policy 2521 - SELECTION OF INSTRUCTIONAL MATERIALS AND EQUIPMENT (Revised)

This policy establishes the definitions, criteria, and non-discrimination standards governing the acquisition of supplemental educational resources and classroom equipment.

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).

Policy 2623 - STUDENT ASSESSMENT AND GRADING (Revised)

This policy establishes the legal and administrative framework for measuring student academic proficiency and verifying compliance with state-mandated educational criteria.

The updates expand the evaluation structure while clarifying that early literacy screenings are exempt from parental opt-out provisions. Additionally, these revisions provide options for classroom grading practices, permissible methodologies, proactive parental notifications, and administrative overrides of grades. Non-optional changes are recommended but not required.

Policy 3130 - ASSIGNMENT AND TRANSFER (Revised)

This policy defines the administrative framework for the assignment and transfer of professional staff members to optimize operational efficiency and maintain compliance with state qualification standards.

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

Policy 3242 - PROFESSIONAL GROWTH REQUIREMENTS (Revised)

This policy establishes the administrative framework for continuous staff development.

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.

Policy 5136.01 - OTHER PERSONAL ELECTRONIC DEVICES (Revised)

This policy establishes the framework for student possession and utilization of personal electronic devices.

The revisions narrow the scope of this policy by separating non-wireless equipment from wireless personal communication devices, which are now covered by a separate, dedicated policy. This reorganization simplifies enforcement for school administrators and preserves essential protocols regarding confiscation of unauthorized property. These changes are recommended to better align the District's Policy Manual with the previous changes to Policy 5136 resulting from 2025 Wisconsin Act 42.

Policy 5310 - HEALTH SERVICES (Revised)

This policy establishes the statutory parameters under which the District may conduct student health screenings to protect the school population from communicable diseases and to identify remediable physical health issues.

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.

Policy 5511 - DRESS AND APPEARANCE (Revised)

This policy provides the parameters for balancing a student's individual right to expressive speech with the District's authority to maintain an orderly, safe, and non-discriminatory educational environment.

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.

Policy 6325 PROCUREMENT - FEDERAL GRANTS/FUNDS (Revised)

This policy maintains legal compliance with federal regulations when purchasing goods and services with federal grant funds, thereby protecting the District's eligibility for federal financial assistance.

The revisions reflect the new acquisition thresholds. They are not to exceed numbers. If the District desires the highest acquisition thresholds, this change is required for adoption.

Policy 7440.03 - SMALL UNMANNED AIRCRAFT SYSTEMS (Drones) (Revised)

This policy establishes clear parameters for the operation of small Unmanned Aircraft Systems (drones) on district property to ensure compliance with federal and state laws while maintaining campus safety and security.

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.

Policy 8325 - RECEIPT OF LEGAL DOCUMENTS BY DISTRICT EMPLOYEES (Revised)

This policy establishes procedures for school staff handling subpoenas, summonses, and other legal documents, protecting confidential student and District information while maintaining compliance with State legal proceedings.

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.

Policy 8410 - CRISIS INTERVENTION (Revised)

This policy establishes a collaborative framework for school safety planning, threat assessments, and crisis intervention to protect the school community's safety and well-being.

This update incorporates Wisconsin Administrative Code PI 23 to clarify that safe-school transfer options are available only if the District has another appropriate grade-level school or public charter school, and that Federal recommendations apply if no local transfer options exist. This change is recommended for adoption, but is not required.

Neola Annual Policy Updates for District Food Service from DPI

- **Policy 8500 - FOOD SERVICES (Revised)**
- **Policy 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 (New)**
- **Policy 8510 - WELLNESS (Revised)**
- **Policy 8531 - FREE AND REDUCED-PRICE MEALS (Revised)**
- **Policy 8550 - COMPETITIVE FOOD SALES (Revised)**

Neola confers each year with the School Nutrition Program Compliance Unit (SNPCU) at the Wisconsin Department of Instruction regarding required updates to the policies they include in Administrative Reviews for our client districts. All the changes in the above policy group were made after consultation with the SNPCU and a review of our most current templates.

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

Policy 8600 - TRANSPORTATION (Revised)

This policy establishes the regulatory and operational standards for transporting students safely.

This update aligns the policy with Wisconsin Act 160 for audio and video surveillance on school buses and notifications. It also restricts access to recordings to safeguard student privacy. These changes are required for adoption, if the District intends to use audio or video surveillance on school buses.

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

03 - Legal Alert

Treatment of Advance Directives (DNR) in the School Setting

Legal Alert

To:	Neola Clients
From:	Renning, Lewis & Lacy, S.C.
Re:	Treatment of Advance Directives (DNR) in the School Setting
Date:	May 2026

Neola clients have inquired about the removal of reference to the treatment of student advanced directives, often referred to as Do-Not-Resuscitate orders ("DNR"), in Neola template policies. The following is an explanation of why that was done and recommendations regarding District treatment of the subject.

What is a DNR

A DNR order is a type of advanced directive issued by the individual's attending health care professional, meaning the individual with primary responsibility for the patient's care, that directs specific individuals in the delivery of lifesaving interventions. Wis. Stat. §154.01(1r). If properly issued and properly represented on the patient, with no signs that it has been revoked (including damage to the DNR bracelet), a DNR directs specific individuals not to render cardiac and/or pulmonary resuscitation efforts. Among other criteria, the patient must be at least 18 years of age. It does not require that other forms of potentially lifesaving measures be withheld, for example, the Heimlich maneuver in the case of a choking student would not be withheld due to a DNR. The presence of a DNR is indicated by the individual wearing a specialized bracelet.

Wisconsin law defines what a DNR is and the categories of individuals required to comply with the DNR:

(2) “Do-not-resuscitate order” means a written order issued under the requirements of this subchapter that directs emergency medical services practitioners, emergency medical responders, and emergency health care facilities personnel not to attempt cardiopulmonary resuscitation on a person for whom the order is issued if that person suffers cardiac or respiratory arrest. Wis. Stat. §154.17(2).

The statute defines a DNR order as one that directs (1) emergency medical services practitioners, (2) emergency medical responders, and (3) emergency health care facilities personnel not to attempt to resuscitate the individual. These categories are defined as follows:

1. “emergency medical services practitioners” means an emergency medical technician, an advanced emergency medical technician, an emergency medical technician — intermediate, or a paramedic. Wis. Stat. §256.01(5). Emergency medical technicians and paramedics are defined as an individual licensed as an emergency medical technician or paramedic by the Wisconsin Department of Health Services. Wis. Stat. §256.01(6) and (15).
2. “emergency medical responders” means a person who is certified by the Wisconsin Department of Health Services as an emergency medical responder and who, as a condition of employment or as a member of an organization that provides emergency medical care before hospitalization, provides emergency medical care to a sick, disabled, or injured individual. Wis. Stat. §256.01(4p).
3. “emergency health care facilities” includes any hospital, nursing home, community-based residential facility, county home, county infirmary, county hospital, county mental health center, or other facility licensed as a health care facility by the Wisconsin Department of Health Services. Wis. Stat. §150.84(2).

Only the identified individuals are obligated to adhere to a DNR and are required to know the circumstances in which a DNR may have been revoked. Most importantly, only those individuals are granted criminal and civil liability immunity for failing to render life-saving cardio-pulmonary aid.

A DNR can be rescinded and legal indications of such rescission may be complicated to identify. For example, the law provides that a DNR may be invalid:

(6) Valid do-not-resuscitate bracelet. A do-not-resuscitate bracelet that has not been removed, altered, or tampered with in any way shall be presumed valid, unless the patient, the patient’s guardian, or the patient’s health care agent expresses to the emergency medical services practitioner, emergency medical responder, or emergency health care facility personnel the patient’s desire to be resuscitated.

(6m) Desire of the patient. The desire of a patient to be resuscitated supersedes the effect of that patient's do-not-resuscitate order at all times.

Wis. Stat. §154.26(6) and (6m).

School staff are not necessarily going to be aware of what a tampered with DNR looks, which may include if the bracelet has been burned, cut, defaced, or removed. Wis. Stat. §154.21. Absent training on what a currently active DNR bracelet must look like, staff that "honor" a DNR may be accused of just the opposite.

Application in Schools

The groups defined in the advanced directive law excerpted above are unlikely to include any school personnel, including a private duty nurse. School personnel that do qualify under one of the categories above would be required to withhold cardiac or pulmonary aid to an individual with a DNR, but a nurse or any other staff member not covered does not enjoy the liability protections associated with failing to render aid.

Addressing the circumstances of a student with a DNR should be handled through the District's required emergency nursing services plan. That plan must be developed as follows (Wis. Admin Code PI 8.01(g)):

(g) Emergency nursing services. Each school district board shall provide emergency nursing services under a written policy adopted and implemented by the school district board which meets all of the following requirements.

1. The emergency nursing policies shall be developed by a professional nurse or nurses registered in Wisconsin in cooperation with other school district personnel and representatives from community health agencies and services as may be designated by the board.

2. Policies for emergency nursing services shall include protocols for dealing with pupil accidental injury, illness and administration of medication at all school sponsored activities including but not limited to curricular, co-curricular and extra-curricular activities and a method to record each incident of service provided.

3. Arrangements shall be made with a licensed physician to serve as medical advisor for the emergency nursing service.

4. The emergency nursing services shall be available during the regular school day and during all school sponsored activities of pupils.

5. Pupil emergency information cards, equipment, supplies and space for the emergency nursing services shall be appropriate and readily accessible.

6. A review and evaluation by the school board shall be made of the emergency nursing services program at least annually.

The Board's policy requiring the development of the plan is found in Policy 5310.01 – Emergency Nursing Services/Plan. Consistent with the regulations, the policy identifies those areas that must be covered with the plan and that the plan must be developed locally, with the school nurse and local health care professionals. Accordingly, a policy template beyond what is identified in 5310.01 cannot reasonably be provided.

An individual school district's plan does not by regulation require reference to do-not-resuscitate orders, but such a plan certainly could do so. Specific consultation with legal counsel in addition to the local community health professionals is required if the plan will address DNR orders generally. Alternatively, a student with a DNR should have in place either an IEP or a 504 plan where advanced directives such as a DNR may appropriately be addressed specific to that student.

Wisconsin Department of Public Instruction Position

The Wisconsin DPI does not take an official position relative to the development of policies and/or application of protocols relative to student DNRs. Likewise, the National Association of School Nurses position on DNRs (or Do Not Attempt to Resuscitate – DNAR) is that schools should have “policies, protocols, and practices that enable each student to receive best practice care, as designated by clear and specific directives for the individual”.¹ Effectively, this position is that DNR application is individualized and to be devised through a student's Individualized Health Plan (IHP), which is developed with the school nursing service and the student's medical team.

Based on these school nursing positions, Neola's position remains that generalized policy language concerning student DNRs is not appropriate. Rather, Districts should evaluate whether to implement protocols concerning a specific student's DNR if such circumstances present themselves.

Conclusion

In short, a blanket policy to honor or to not honor a DNR exposes school personnel to risk of civil and/or criminal liability in most cases. Any district determination relative to policy language or the like should be reviewed by legal counsel and by the District's liability carrier to assure that any staff member without statutory immunity is covered in the event of a claim. Preferably, implementation of DNR protocols should only be established in the context of a specific student's situation.

¹ National Association of School Nurses Position Statement: Do Not Attempt Resuscitation (Orders) in School - , National Association of School Nurses, National Association of School

Nurses, 2025. This position statement was referred to in inquiries to the DPI nursing team.

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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 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 non-district-sponsored, student clubs and activities during non-instructional time, in accordance with the provisions in Policy 5730 - Equal Access For Non-District-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:

- A. will not assume any responsibility for the planning, conducting, or evaluating of such activities;
- B. will not provide any funds or other resources;
- C. will not allow any member of the District's staff to assist in the planning, conducting, or evaluating of such an activity during the hours when is functioning as a member of the staff.

All activities which 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 which 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 which 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.

In addition to the eligibility requirements established by the Wisconsin Interscholastic Athletic Association, to be eligible for any athletic or other extra-curricular activity, a student must abide by the rules and regulations of the co-curricular code of conduct.

An exception may be made by the administrator if the student has been participating in an intervention program and has shown satisfactory progress toward achieving the minimum grade-point average.

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}

The District Administrator shall prepare administrative guidelines to implement a program of clubs and activities. Such guidelines should ensure that the needs and interests of the students are properly assessed and procedures are established for continuing evaluation of each club and activity.

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.

Revised 11/20/17

Revised 4/26/21

Revised 3/21/22

T.C. 9/27/22

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Legal

120.12(23), Wis. Stats.

P.L. 98-377

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po2461

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

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 Special Education ~~_____~~ **[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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2461-- RECORDING OF IEP TEAM MEETINGS

In order to facilitate parents' ability to fully participate in the IEP process, parents of students with disabilities are ordinarily permitted to audio record IEP Team meetings in accordance with the procedures set forth.

1. Parents wishing to audio record an IEP Team meeting must utilize their own recording device and tapes and provide notice to the District prior to the date of the scheduled IEP Team meeting.
2. Parents must obtain the consent of any staff member or other participant in the IEP meeting prior to the meeting in order to tape record the meeting. If any member of the IEP team does not consent to an audio recording of the meeting, the parent will not be permitted to record the meeting, but other accommodation will be made if the tape recording is requested for the parent, due to his/her own disability, to access the IEP process.

3. If parent(s) elects to audio record an IEP Team meeting, the District will also record the meeting and maintain as a student record, in accordance with State and Federal law.

Video recording an IEP Team meeting is prohibited, unless it is required to permit a parent to access the IEP process, ensure that the parent is able to understand the IEP or implement the IEP, it will effectively remove a parent(s) barrier to access the IEP process caused by a disability. Documentation of the parent's disability and need for accommodations is required.

If the District records an IEP Team meeting, the resulting recording shall become a part of the student's educational record and will be maintained in accordance with State and Federal law.

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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. impact on community standards;

F. manner of selection;

G. cost;

H. 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.

Revised 3/17/10

Revised 1/22/17

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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

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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 develop administrative guidelines for the selection and maintenance of all instructional materials and equipment.

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.

The Superintendent shall be responsible for setting up criteria by which additional instructional materials (supplementary books, teaching supplies, maps, globes, reference, etc.) may be provided and shall make provision for the purchase of such materials within the annual budget submitted to the Board, with due regard for the necessity and economical use of such material.

Students shall be held responsible for the cost of replacing any materials or properties which 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 industrial technology education, art, and food class activities where the product becomes the property of the student.

Revised 3/17/10

Revised 1/22/17

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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

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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/H e 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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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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.

The Board may reimburse staff members for the costs incurred in participation therein, subject Employee Handbook guidelines. All requests are 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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P.I. 8.01(2)(b), Wis. Adm. Code

121.02(b), Wis. Stats.

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po5310

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:

- A. protect the school community from the spread of communicable disease;
- B. determine that each student's participation in health, safety, and physical education courses meets the student's ~~his/her~~ individual needs;
- C. 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:

- A. student physical examinations;
- B. athlete physical examinations;
- C. dental examinations;
- D. vision screening;
- E. 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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118.25(3)(4), 118.255, Wis. Stats.

20 U.S.C. 1232h

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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, including dress that promotes or depicts illegal activity, such as illegal drug use, underage alcohol consumption, or similar activities;
- C. ~~- 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; (-)~~
- D. ~~(-) - depict or promote obscenity, pornography, or otherwise depict or describe sexual activity;~~
- E. cause excessive wear or damage to school property;
- F. prevent the student from achieving educational objectives because of blocked vision or restricted movement.

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:~~

1. ~~obscenity;~~
2. ~~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).

Students who violate the foregoing rules will not be admitted to class and may be subject to additional consequences.

If the clothing cannot be removed or concealed, the student may be sent home after contact is made with the student's parent.

Revised 9/19/07

Revised 4/26/21

T.C. 11/9/21

T.C. 1/29/25

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120.13 (1), Wis. Stats.

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po6325

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 that 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 on a continuous basis.

The District shall require that all prequalified lists of persons, firms, or products which 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 which 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~~ ~~\$3,500~~. 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.

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~~ ~~\$150,000~~. Small purchase procedures require that price or rate quotations shall be obtained from two (2) 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 which amounts to more than ~~\$350,000~~ ~~\$150,000~~, unless otherwise required by State law.

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 two (2) 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 two (2) 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 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 sub-awards, 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 bio-based, 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 ~~\$250,000~~ **\$350,000**). 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 sub-grants 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.

Revised 6/25/24

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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

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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 - (-) - 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).

(See AG 7440.03 - Small Unmanned Aircraft Systems (Drones))

Failure to adhere by applicable regulations ~~(-)~~ and AG 7440.03 - Small Unmanned Aircraft Systems (Drones) 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.

14 C.F.R. Part 107
114.045 Wis. Stats.
86 FR 4314

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Legal

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

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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 proceeding.

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 () - _____ - [END OF OPTIONS] who shall notify the () - 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 . () - _____ - [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.

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po8410

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.

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.

Revised 10/28/19

T.C. 12/21/20

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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

P.I. 23

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po8500

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

8500 - FOOD SERVICES

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

This policy only applies to those schools in the District that participate in the National School Lunch Program (NSLP). Schools that do not participate in the NSLP shall abide by all applicable State and Federal regulations.

The administration may also provide a breakfast program in accordance with procedures established by the United States Department of Agriculture (USDA) School Breakfast Program. The food-service program may participate in 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.

The District Administrator shall provide the District's vendors and/or Food Service Management Contractor a copy of this policy and any implementing guidelines and that any pertinent agreements are consistent with this policy and any implementing guidelines.

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 Registered Dietitian or State authorized medical authority, which is a medical professional authorized in the 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** **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 Ashley Rupp, 262-534-3189, Extension 1314, Arupp@wuhs.us. 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>) or upon request to the District's Food Service Director or Special Dietary Accommodation Coordinator.~~

~~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 Building Administrator and 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 may be appealed to the District Administrator whose 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 Administrator or District Administrator for review. The administrator's determination shall be final.

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.

~~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~~ 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 District Administrator. 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 are the responsibility of the program.

A periodic review of the food-service accounts shall be made by the District Administrator. 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 meal payment 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 C.F.R. 210.9(b) (17) and 7 C.F.R. 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

No student will be permitted to purchase any meals for which the student does not have sufficient balance in their food service account or sufficient cash on their person to purchase the food items.

Students receiving paid or reduced-price **meals lunch** who do not have **a** sufficient account balance or cash on hand to purchase a meal will be provided an alternate. The District Administrator shall, in coordination with the District's food service, assure that any alternate meals that are provided meet the requisite USDA guidelines for alternate meals. The cost of the alternate meal will be added to the delinquent account.

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.

Refunding Excess Funds

Any remaining funds in a student's meal account 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.

Revised 10/28/19

Revised 3/4/21

Revised 3/21/22

T.C. 9/27/22

Revised 1/22/24

Revised 11/25/24

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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

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

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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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po8510

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

8510 - **WELLNESS**

As required by law, the Board for the Waterford Union High School District establishes the following wellness policy.

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 his/her 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

[Choose One of the Following but the First Option is Recommended:]

~~[] - The District Administrator shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy- () - and is authorized to designate a staff member or members with responsibility to assure that wellness initiatives are followed in the District's schools. [END OF OPTIONAL SENTENCE]~~

[] - The designated official for oversight of the wellness policy is Jim McClowry, Athletic and Activities Director _____ **{ INSERT NAME/TITLE }** : - () - The official shall convene the Wellness Committee and lead the review, updating, and evaluation of the policy. **[END OF OPTIONAL SENTENCE]**

~~() - Each school shall designate a site coordinator who shall ensure compliance with the policy. [END OF OPTIONAL PARAGRAPH]~~

Required Public Involvement

The District Administrator is encouraged to form a wellness committee to carry out this function. The wellness committee shall be an administrative committee with members recruited and appointed by the District Administrator.

~~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. () - School-level health advisory or wellness committees may assist in the planning and implementation of these Wellness initiatives. [END OF OPTION]~~

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. (-) administrators;
2. - (-) Board members;
3. - classroom teacher(s); (-)
4. - physical education teacher(s); (-)
5. - school food service representative(s); (-)
6. (-) school nurse(s);
7. - community member/parent(s) ; (-)
8. (.) student (s);
9. - medical/health care professional(s); (-)
10. - nutrition and/or health education teacher(s); (-)
11. (-) - school counselor(s);
12. (-) - local business representatives(s);
13. (-) - Other: _____

District Administrator Responsibilities

The District Administrator shall be responsible for accomplishing the following:

- A. assess the current environment in each of the District's schools;

- B. measure the implementation of the District’s wellness policy in each of the District’s schools;
- C. review the District’s current wellness policy;
- D. recommend revision of the policy, as necessary; and
- E. present the wellness policy, with any necessary revisions, to the Board for approval or re-adoption if revisions are necessary.

The District Administrator will oversee development, implementation, and evaluation of the wellness procedures.

The District Administrator shall conduct reviews of the progress toward school wellness procedures, identify areas for improvement, and recommend revision of procedures as necessary.

Before the end of each school year the District Administrator shall submit to the Board their report in which they describe the environment in each of the District’s schools and the implementation of the wellness policy in each school, and identify any revisions to the policy the committee deems necessary.

The District Administrator shall report annually to the Board on the District’s wellness programs, including the assessment of the environment in the District, evaluation of wellness policy implementation District-wide, and the areas for improvement, if any, identified.

School Wellness Committee

Committee Formation

To assist in the creation of a healthy school environment, the District shall establish a Wellness Committee that will provide an ongoing review and evaluation of the Wellness Policy. The Committee shall meet no less than one (1) time during the school year to implement, assess and review, and make recommendations for changes to the 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. (-) Other: _____.

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

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>)

School Meal Program Participation

The District 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;

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) 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>

Foods Offered/Provided but Not Sold

The District encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations will be promoted and a list of ideas is available.

Nutrition Education

With regard to nutrition education, the District shall:

- A. Nutrition education shall be included in the health curriculum so that instruction is sequential and standards-based and provides students with the knowledge, attitudes, and skills necessary to lead healthy lives.
- B. Nutrition education shall be included in the sequential, comprehensive Health curriculum in accordance with the curriculum standards and benchmarks established by the State.
- C. Nutrition education shall be integrated into other subject areas of the curriculum, when appropriate, to complement, but not replace, the standards and benchmarks for health education.

- D. Nutrition education standards and benchmarks shall be age-appropriate and culturally relevant.
- E. The standards and benchmarks for nutrition education shall be behavior focused.
- F. Nutrition education shall extend beyond the classroom by engaging and involving the school's food service staff.
- G. Nutrition education posters, such as the MyPlate Guide, will be displayed in the cafeteria.
- H. The school cafeteria shall serve as a learning lab by allowing students to apply the knowledge, attitudes, and skills taught in the classroom when making choices at mealtime.
- I. Nutrition education shall reinforce lifelong balance by emphasizing the link between caloric intake (eating) and exercise in ways that are age-appropriate.
- J. Nutrition education benchmarks and standards include a focus on media literacy as it relates to food marketing strategies.
- K. Nutrition education standards and benchmarks promote the benefits of a balanced diet that includes fruits, vegetables, whole grain products, and low-fat and fat-free dairy products.
- L. Instruction related to the standards and benchmarks for nutrition education shall be provided by highly qualified teachers.

Nutrition Promotion

Physical Activity

- A. Physical activity during the school day shall not be withheld as punishment. Participation on sports teams may be exempt from this rule if related to failure to meet WIAA or other school codes, e.g. academic or attendance requirements.
- B. Physical activity and movement shall be integrated, when possible, across the curricula and throughout the school day.
- C. Schools shall encourage families to provide physical activity outside the regular school day, such as outdoor play at home, participation in sports sponsored by community agencies or organizations, and in lifelong physical activities like bowling, swimming, or tennis.

Physical Education

- A. The physical education curriculum shall provide sequential instruction related to the knowledge, attitudes, and skills necessary to participate in lifelong, health-enhancing physical activity.
- B. The sequential, comprehensive physical education curriculum shall stress the importance of remaining physically active for life.
- C. 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.
- D. Planned instruction in physical education shall be sufficient for students to achieve a proficient level with regard to the standards and benchmarks established by the State.
- E. The K-12 program shall include instruction in physical education as well as opportunities to participate in competitive and non-competitive team sports to encourage lifelong physical activity.
- F. Planned instruction in physical education shall require students to be engaged in moderate to vigorous physical activity for at least fifty percent (50%) of scheduled class time.
- G. All physical education classes are taught by licensed teachers who are certified to teach physical education.
- H. Planned instruction in physical education shall teach cooperation, fair play, and responsible participation.
- I. Planned instruction in physical education shall meet the needs of all students, including those who are not athletically gifted.
- J. Planned instruction in physical education shall be presented in an environment free of embarrassment, humiliation, shaming, taunting, bullying or harassment of any kind.
- K. Planned instruction in physical education shall include cooperative as well as competitive games.
- L. Planned instruction in physical education shall take into account gender and cultural differences.

M. Waivers, exemptions, or substitutions for physical education classes are not granted.

With regard to other school-based activities the District shall:

- A. The schools shall provide at least twenty-five (25) minutes daily for students to eat.
- B. Students at Waterford School District are not permitted to have drinks in the classroom other than bottled water.
- C. Schools may limit the number of celebrations involving serving food during the school day to no more than one (1) party per class per quarter.
- D. The schools may provide opportunities for staff, parents, and other community members to model healthy eating habits by dining with students in the school dining areas.
- E. The schools may demonstrate support for the health of all students by hosting health clinics and screenings and encouraging parents to enroll their eligible children in Medicaid or in other children's health insurance programs for which they may qualify.

Furthermore, with the objectives of enhancing student health and well-being, the following guidelines are established:

- A. In accordance with Policy 8500 - Food Service, the food service program shall comply with Federal and State regulations pertaining to the selection, preparation, consumption, and disposal of food and beverages as well as to the fiscal management of the program.
- B. As set forth in Policy 8531 - Free and Reduced Price Meals, the guidelines for reimbursable school meals are not less restrictive than the guidelines issued by the U.S. Department of Agriculture (USDA).
- C. The food service program will strive to be financially self-supporting; however, if it is necessary to subsidize the operation, it will not be through the sale of foods that are not approved for school lunch programs under the guidelines issued by the USDA.
- D. The food service program will provide all students affordable access to the varied and nutritious foods they need to be healthy and to learn well.
- E. The food service program shall be administered by a qualified nutrition professional.

- F. The food service program shall be administered by a director who is properly qualified, certificated, licensed, or credentialed, according to current professional standards.
- G. All food service personnel shall receive pre-service training in food service operations.
- H. Continuing professional development may be provided for all staff of the food service program.

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:

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.

Nondiscrimination Statement

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Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

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2. Fax:

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3. E-mail:

program.intake@usda.gov.

This institution is an equal opportunity provider.

Revised 1/22/17

Revised 11/25/24

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Legal

42 U.S.C. 1751, Sec. 204

42 U.S.C. 1771

2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po8531

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 may provide needy children with breakfast and 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 District Administrator 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.

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 - priced 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 ~~special 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 an identified student percentage 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.

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This institution is an equal opportunity provider.

Revised 5/22/17

Revised 3/4/21

T.C. 9/7/23

Revised 1/22/24

Revised 11/25/24

Revised 3/17/25

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

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2.0-35.2 REGULAR UPDATE FOR BOARD CONSIDERATION

po8600

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 may 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.

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.

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.

The District shall provide notification to students and parents regarding this policy permitting video and audio 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.

Revised 10/27/08

Revised 4/23/18

Revised 10/30/23

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Legal

347.446, 120.13 (27m), 121.52, 121.53, 121.54 et seq., 121.555(1)(a) Wis. Stats.

Wis. Admin. Code Trans 300.81