Adopted:

Board Approved:

625 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

I. PURPOSE

This policy sets clear expectations for responsible, ethical, and transparent use of artificial intelligence (AI) across Crosslake Community Schools (CCS or the district): the Crosslake PreK-8 campus and the district's online schools. It supports teaching, learning, and operations while protecting academic integrity, privacy, and equitable access.

AI is a tool of the current century. CCS expects staff and students to understand its benefits, limits, and risks, and to use it well when they use it. AI literacy is expected of everyone. Personal use of generative AI is optional: no staff member or student is required to use it to do their job or complete coursework. Used well, it improves efficiency and opens new ways to learn. Used poorly, it shortcuts the thinking learning requires, exposes private data, and erodes trust.

The district authorizes staff to use, and to permit students to use, approved AI tools as a supplement to instruction and in their work, consistent with law, district policy, and this policy.

II. GENERAL STATEMENTS OF POLICY

A. CCS supports AI use that upholds academic integrity and builds critical thinking and original work.

B. AI is an augmentative tool, not an autonomous decision-maker. Human judgment starts every AI-assisted process and a named person is accountable for how it ends (the Human-AI-Human, or H-AI-H, model).

C. AI saves time *for* people, not *on* people. Recovered time goes back to students, families, and colleagues. AI is not used to automate the relationships, feedback, and check-ins that are the human work of a school.

D. AI use is transparent, with appropriate attribution.

E. The District Superintendent or designee implements and reviews privacy and safety controls for approved tools.

F. CCS promotes equitable access to approved tools for all students and staff, in person and online.

G. CCS provides ongoing training to reduce bias and misinformation and holds users accountable for the consequences of their AI use.

H. This policy applies to all student and staff AI use on district property, at district activities, in the online learning environment, and off site when connected to the educational environment. Student use must also follow district policies on cell phones, personal and wearable devices, and the internet.

I. **District standard platform.** CCS is a Google Workspace for Education district. Gemini for Education, through a CCS Google account, is the district's standard generative AI platform

for staff and students. The board adopts this standard because Gemini runs inside the district's Workspace domain under the agreement that already covers Gmail, Drive, Docs, Meet, and Classroom: data stays in the CCS environment, is not used to train Google's public models, is covered by the district's existing FERPA and Minnesota student data privacy protections, and adds no licensing cost. It is also supervisable. The District Technology Manager turns AI access on or off by grade level or role through the Workspace admin console, retains AI activity, and monitors use through the district's filtering and alerting tools. Content safeguards for users under 18 are set by Google, and all CCS student accounts are designated as under 18. Any activity under a CCS Google account is subject to district monitoring and review, whatever device is used, and is tied to a known person rather than an anonymous login; staff and students are on notice of this and have no expectation of privacy in it. The district-owned device requirements in Articles VII and VIII add a second layer of control. A consumer tool such as ChatGPT or any chatbot not connected to the district offers none of this: the district cannot see what is entered, manage the account, enforce age or content controls, or rely on a contract covering student data. Other AI tools are used only after approval under Article VI. This includes AI features built into or added to platforms the district already uses: those features are reviewed under Article VI, and the grade bands in II.J apply to them.

J. **Grade bands.**

1. *PreK-5:* Only restricted, teacher-directed AI interactions. Focus on what AI is and how it works. Students have no access to the Gemini app or any other generative AI chatbot. Google Search remains available with Google's safeguards for users under 18, including the AI features Google builds into Search.

2. *Grades 6-8:* Structured introduction to Gemini for Education with access turned on in the Workspace admin console and Google's safeguards for users under 18. Instruction covers critical evaluation of output, digital citizenship, and using AI to learn rather than to avoid learning.

3. *Grades 9-12:* Broader access to Gemini for Education and other approved tools with accountability; preparation for AI-integrated postsecondary and work settings; advanced AI literacy, including how models work and where they fail.

K. **One standard, three schools.** Expectations in this policy are the same for the Crosslake PreK-8 campus and both online schools; what differs is who supervises in the moment. In the online schools, the teacher of record directs student AI use for each course and assignment, and learning coaches supervise day-to-day use under that direction; together that meets the "teacher-directed" standard.

III. DEFINITIONS

Definitions are reviewed as technology, law, and practice change, and CCS provides plain-language examples for staff, students, and families.

Artificial intelligence (AI): computer-based systems that analyze data and recognize patterns to support teaching, learning, and operations, assisting but never replacing human judgment and accountability.

A. **Agentic AI.** Systems that take multistep actions on their own (browsing, running code, using other software) without a person approving each step.

B. **AI tool types.** *Student-facing* (used by or with students; student information may be entered). *Confidential* (non-instructional; processes confidential data). *Operational* (generates content from non-confidential data).

C. **Closed AI tools.** Private tools available only to district staff under a district agreement. More protected than public tools; leaks can still occur.

D. **Confidential data.** Information the district may not disclose, or may disclose only in limited circumstances, by law, policy, or contract: PII about students and employees, medical information, education records, and anything about an IEP or Section 504 plan.

E. **Deep fake.** A recording, image, or technological representation of speech or conduct so realistic a reasonable person would believe it is real, produced substantially by technical means rather than impersonation.

F. **Generative AI (GenAI).** Systems that generate text, images, audio, video, or analysis in response to prompts, including large language models.

G. **Generative AI chatbots.** Chatbots built on large language models that simulate conversation and generate content (for example ChatGPT, Claude, Google Gemini, Meta AI, Microsoft Copilot). They can "hallucinate": produce false or misleading information while sounding confident.

H. **AI companion.** A chatbot or app designed or marketed to simulate friendship, emotional support, or a personal relationship. Not an approved tool for students.

I. **Human-AI-Human model (H-AI-H).** Human judgment at the start and human accountability at the end of any AI-assisted process.

J. **Learning coach.** The adult who supervises a CCS online student's daily learning. In grades K-5, the learning coach is the student's parent, guardian, or designated adult at home. In grades 6-12, the learning coach is a CCS staff member.

K. **Personally identifiable information (PII).** Information that identifies an individual directly or in combination with other information: name; family names; address; identifiers such as Social Security number, student number, or biometrics; date or place of birth; and anything that would let a reasonable person in the school community identify the student.

L. **Publicly available AI tools.** Tools open to the public, where the public may also access what users enter.

M. **District-approved AI tool.** A platform or application reviewed and authorized under Article VI. Any staff member may request a review.

N. **Synthetic media.** Digital content in any format created in part or wholly by AI.

O. **Voice cloning.** Using AI to replicate a person's voice from recorded samples.

IV. EQUITABLE ACCESS TO AI TECHNOLOGY

To ensure fair access for all students and staff, the district will:

A. provide needed devices, connectivity, and assistive technology, and review their sufficiency regularly, including home connectivity for online students consistent with the district's handbook expectations and hotspot procedures;

B. identify and remove barriers related to socioeconomic status, disability, language, and geography;

C. train staff and students as set out in Article XIII;

D. involve students, families, learning coaches, and community in evaluating access and implementation, and seek feedback regularly; and

E. take timely corrective action where disparities in access, participation, or outcomes appear (reallocating resources, targeted training, adjusted practices, updated procedures), communicate what was done, and monitor whether it worked.

V. CURRICULUM INTEGRATION AND AI LITERACY

A. The District Superintendent will work with staff to establish instructional protocols, consistent with H-AI-H, that:

1. identify how teachers may and may not use AI in assessing student work;

2. restrict AI use in student discipline, placement, behavioral assessment, special education eligibility or services, and similar decisions;

3. require transparency when AI is part of a decision about a student;

4. give students and families the right to request human review of any consequential AI-influenced decision; and

5. set rules for any AI-assisted surveillance or behavioral monitoring tool: what is monitored, who sees it, and how families are told.

B. AI use on coursework must follow the teacher's instructions. Teachers state clearly, for each assignment or category, whether and how AI may be used, and direct student use within district guidelines and the approved-tool list.

C. **Designing for thinking.** AI integration must protect the productive struggle learning requires. Research shows unrestricted AI access can raise practice scores while lowering what students retain, and that guardrailed, pedagogically designed AI avoids that harm: how a tool is designed into a course matters more than whether students have it. Teachers are expected to design assessments that make thinking visible (explanations of reasoning, verbal or recorded defenses, process evidence, synchronous work) and to use AI tools configured to guide rather than give answers. This is a course-design expectation, not a ban on AI.

D. AI literacy is part of the curriculum at every grade band, aligned to a recognized framework such as the TeachAI/ISTE AI literacy framework and Minnesota Generative AI Alliance resources: what AI is, how it produces output, where it is unreliable or biased, how to protect one's data, and how to use it to learn rather than to replace learning.

VI. AI SUB-COMMITTEE

The District Technology Committee, led by the District Technology Manager, carries out the AI governance work in this policy through an **AI Sub-Committee**. The sub-committee includes teachers and staff from each CCS school, at least one student, at least one parent or guardian, and community members as appointed. It develops, implements, and annually reviews AI procedures, keeps them aligned with district policy and law, gathers stakeholder feedback, and recommends updates to procedures and the approved-tool list.

A. **Appointment.** The board directs the District Superintendent to appoint sub-committee members and set its size, structure, and terms.

B. **AI Use Plan.** The sub-committee develops, and recommends to the board for approval, a district AI Use Plan: a road map for AI use aligned with the district's mission, strategic plan, and resources. The plan must protect the safety and security of students, employees, and the district; prioritize data security; and require informed review of the privacy policies of any product considered, including later changes.

C. **Procedures.** The District Superintendent directs the sub-committee to recommend procedures for board approval that:

1. prohibit AI use inconsistent with district policy, classroom instructions, or federal or Minnesota law;
2. prohibit AI use inconsistent with conduct expectations, including discrimination, harassment, hazing, and bullying;
3. prohibit entering confidential staff or student data into AI tools;
4. apply H-AI-H to any consequential action involving AI;
5. promote AI literacy;
6. require transparency and accountability in disclosing AI use;
7. require administrative vetting before any tool is recommended to staff or students;
8. maintain the approved-tool list under the district standard in II.I and explain how to request approval of a new tool;
9. ensure AI-generated material is retained under the records retention schedule (Article XI);
10. make clear that users are responsible for the reasonably foreseeable consequences of their AI use;
11. guide response to incidents in which AI-generated images, audio, video, or text involving minors are created or distributed;
12. guide counselors, teachers, learning coaches, and staff in recognizing and addressing a student's unhealthy AI dependency, parasocial or emotional relationships with chatbots or companions, overreliance on AI for emotional support or decisions, and related mental health impacts, with a clear path to supports under Policy 537;
13. address agentic and autonomous AI; and
14. establish the AI incident response plan under Article XII.

D. **AI Coordinator.** The District Technology Manager serves as AI Coordinator: monitoring developments, risks, and best practices and advising the district. The District Superintendent may designate additional coordinators, including an instructional counterpart. The coordinator may consult outside experts but shares confidential data only under appropriate confidentiality agreements. Selection of student-facing AI tools is part of curriculum development and instructional materials selection; the coordinator directs implementation of the AI Use Plan for those tools and keeps the plan current.

VII. STUDENT USE GUIDELINES

Students in grades 6-12 may use Gemini for Education through their CCS Google account on a district-owned device, and any other tool approved under Article VI, for educational purposes as directed by their teachers. No other generative AI tool is permitted on district devices, accounts, or networks. AI-generated content must be verified and cited.

A. **Permitted uses (when authorized by the teacher):** exploring and explaining concepts; brainstorming and research direction; feedback on drafts; skill practice.

B. **Verification and integrity.** Students verify AI output against reliable sources; disclose and cite AI-generated or AI-assisted content as the teacher requires; and never submit it as original work without attribution.

C. **Privacy.** Students do not enter personal, confidential, or sensitive information about themselves or others into any AI tool: passwords; names, likenesses, or Social Security numbers; financial account numbers; non-public school documents; IEP, 504, or medical details.

D. **Prohibited uses.** Students may not use AI to: (1) create, access, or display harmful, threatening, obscene, disruptive, or sexually explicit material; (2) harass, discriminate against, bully, or disparage others based on a protected characteristic; (3) violate district policy, classroom rules, or law; (4) create deep fakes, synthetic media, or voice clones of another person without that person's explicit and lawful consent; or (5) use AI companions on district devices, accounts, or networks. The district cannot control personal devices; it addresses companion use outside district systems through education, family guidance, and the supports in VII.E.

E. **Wellbeing.** An AI chatbot is not a substitute for a counselor, teacher, learning coach, parent, or friend. Students relying on AI for emotional support, companionship, or serious decisions are encouraged to talk with a trusted adult; staff who notice signs follow the guidance under VI.C.12.

F. **Reporting.** Students report AI misuse or unsafe practices to a teacher, counselor, or principal, through their learning coach, or through the district's confidential reporting tool.

G. **Consequences.** Violations are addressed under the Student Discipline Policy and the academic integrity procedures in the student handbook, and may include loss of AI privileges. A suspected violation begins with a conversation, and no student is disciplined on the basis of an AI detection tool alone (VIII.A.6).

VIII. STAFF USE GUIDELINES

Staff may use district-approved AI tools in instruction and in their work, consistent with law and district policy. Staff perform district work, including all AI use, only on district-owned devices through their CCS Google account. Personal devices and personal accounts are not permitted for district work of any kind, without exception (see Policy 524). The district provides ongoing training and reviews these guidelines regularly.

A. **Instructional use.**

1. Staff may use AI for ideas, outlines, lesson supplements, differentiation, and curriculum development.

2. Staff guide student use: clear per-assignment expectations, attribution, fact-checking, and proofreading.

3. Staff evaluate each AI use for context, accuracy, reliability, and alignment with standards, and apply H-AI-H whenever students are involved.

4. Staff supervise student use. Online, this means course-level expectations communicated to students and learning coaches.

5. A teacher who suspects a violation first talks with the student, then follows the academic integrity procedures in the student handbook and consults administration on next steps.

6. AI detection tools have high false-positive rates and disproportionately flag multilingual students, students with disabilities, and students with distinctive writing styles. A detection tool must be independently validated before use and may never be the sole basis for a finding; evidence rests on the teacher's knowledge of the student's work, process evidence, and conversation with the student.

7. **Human relationships stay human.** Staff may use AI to prepare, organize, and reduce administrative friction so more time goes to students. Staff may not use AI to generate individual feedback, check-ins, or personal communications presented as their own without meaningful review and personalization.

B. **Work use.** Staff may use AI for document assistance, research, administrative tasks, data analysis, and automation, consistent with district policy, keeping human oversight and professional responsibility for all work.

C. **Privacy.**

1. Staff AI use complies with data and student privacy law and district policy.

2. Staff do not enter confidential, private, proprietary, personally identifiable, or sensitive information (passwords, credentials, financial account numbers, personnel records, special education and health records, non-public documents) into any tool other than Gemini for Education through a CCS Google account or another district-approved closed tool under a signed agreement. A personal Gemini login, the free Gemini app, and consumer AI tools are not covered. Rule of thumb: if it belongs in a Google Doc, it can go in Gemini through a CCS account; if the tool is anything else, keep student and staff information out.

3. Staff enter the least data necessary and use de-identified or hypothetical information where the task allows.

D. **Prohibited uses.** Staff may not use AI to do anything listed in VII.D(1)-(4), or to make or materially influence a consequential decision about a student or employee (discipline, evaluation, placement, eligibility, hiring) without the human review H-AI-H requires.

E. **Discipline.** Violations may result in discipline, up to and including termination, under the district's employee discipline policy.

IX. DATA AND ARTIFICIAL INTELLIGENCE

All AI data use complies with state and federal law and district policy, especially student data under FERPA, IDEA, CIPA, COPPA, and the Minnesota Government Data Practices Act (including the technology-provider provisions of Minn. Stat. 13.32). The district reviews privacy safeguards at least annually and evaluates any change to an AI product for its effect on data security. Users assume a consumer AI product makes entered data available to the vendor and others unless the district holds a written agreement saying otherwise.

X. AI VENDOR AGREEMENTS AND LICENSING

A. Procured AI technologies include clear intellectual property provisions, bias-testing disclosure, documentation, and incident reporting procedures.

B. Administration and the AI Sub-Committee work with legal counsel on a vendor evaluation, procurement, and licensing process consistent with Policy 721.

C. Evaluation criteria include data handling, model transparency, bias auditing, accessibility, FERPA and COPPA compliance, age-appropriateness and content safeguards for student-facing tools, and data residency.

D. Vendors identify AI components in products they supply, including AI features added to existing platforms after purchase.

E. Supplied AI technologies comply with this policy and board-approved procedures.

F. A contract with an AI vendor must: (1) establish ownership of content created through the service, with no broad vendor rights to user content; (2) address data processing; (3) prohibit use of student data for model training; (4) establish data deletion rights; (5) provide risk tiers aligned with this policy's tool types; (6) include interoperability requirements that prevent lock-in; (7) address changes in terms, acquisition, or discontinuation; and (8) set breach notification requirements.

G. Users comply with vendor terms; violations may result in loss of access and discipline.

XI. AI AND RECORDS RETENTION

AI-generated or AI-assisted material is a district record when it documents a district action, policy, or operation, or is relied on in an educational, administrative, or financial decision, and is retained under the district's records retention schedule.

XII. REPORTING AI-RELATED CONCERNS, MISUSE, AND INCIDENTS

A. Staff and students report concerns or suspected misuse to the building principal or designee, or through the district's confidential reporting tool.

B. The sub-committee develops an AI incident response plan covering AI-generated child sexual abuse material or intimate imagery (including takedown requests to platforms under the federal TAKE IT DOWN Act, which requires removal within 48 hours of a valid request), data breaches through an AI tool, AI-facilitated cheating at scale, deep fakes, and student welfare concerns including AI dependency or a chatbot's role in a student crisis. The plan establishes notification protocols (parents and learning coaches, law enforcement, state and federal agencies as appropriate), escalation paths naming responsible staff, evidence preservation, and post-incident review.

C. The plan is incorporated into Policy 806 (Crisis Management) and the district's Standard Response Protocol so staff follow one set of escalation paths.

XIII. TRAINING

The district trains all staff and students on this policy, the AI procedures and AI Use Plan, and related policies on data privacy and acceptable use. Training is grade-band appropriate for students and role-appropriate for staff, with plain-language guidance for learning coaches.

XIV. NOTICE

The district informs students, parents, guardians, and learning coaches about AI use in the district: approved tools, how student data is protected, and significant changes to the AI Use Plan.

XV. REVIEW

Administration regularly reviews AI use and recommends updates to the board. The AI Sub-Committee, with student and staff input, reviews the AI Use Plan, procedures, approved tools, and vendor agreements at least annually.

Legal References:
Minn. Stat. §§ 13.02, 13.03, 13.05, 13.32 (Government Data Practices; Educational Data)
§ 604.32 and § 617.262 (Nonconsensual Dissemination of a Deep Fake)
§ 609.771 (Deep Fakes in Elections)
§ 121A.0361 (Anonymous Threat Reporting)
15 U.S.C. §§ 6501-6506 (COPPA)
18 U.S.C. §§ 2510-2523 and 2701-2713 (Electronic Communications Privacy Act; Stored Communications Act)
20 U.S.C. § 1232g and 34 C.F.R. Part 99 (FERPA)
20 U.S.C. § 1232h (PPRA)
20 U.S.C. §§ 1400-1419 (IDEA)
29 U.S.C. § 701 et seq. (Rehabilitation Act)
42 U.S.C. § 2000e et seq. (Title VII)
42 U.S.C. § 12101 et seq. (ADA)
47 U.S.C. § 254(h) (CIPA)
TAKE IT DOWN Act, Pub. L. 119-12 (2025)

Cross References:
CCS Policy 406 (Personnel Data)
CCS Policy 409 (Employee Publications and Creations)
CCS Policy 506 (Student Discipline)
CCS Policy 514 (Bullying Prohibition)
CCS Policy 515 (Pupil Records)
CCS Policy 524 (Internet, Technology, and Cell Phone Acceptable Use)
CCS Policy 524.5 (Personal Electronic Communication Devices)
CCS Policy 537 (Suicide Prevention, Intervention, and Postvention)
CCS Policy 601 (Curriculum and Instruction Goals)
CCS Policy 603 (Curriculum Development)
CCS Policy 624 (Online Instruction)
CCS Policy 721 (Procurement)
CCS Policy 722 (Public Data and Data Subject Requests)
CCS Policy 806 (Crisis Management)

Resources:
U.S. Department of Education, Dear Colleague Letter on AI (July 2025)
Minnesota Department of Education, Artificial Intelligence in Education (2026)
Minnesota IT Services, Transparent Artificial Intelligence Governance Alliance (TAIGA)
Minnesota Generative AI Alliance for Education (MNGAIA / AI4MN)
TeachAI, AI Guidance for Schools Toolkit and AI Literacy Framework
CoSN, Artificial Intelligence in Education
Digital Promise, Artificial Intelligence in Education
NCEE, Framework for AI-Powered Learning Environments
Public Interest Privacy Center and AASA, A District Guide to Data Minimization in the Age of AI
Bastani et al., PNAS (2025), Generative AI without guardrails can harm learning — Randomized trial, ~1,000 Turkish high schoolers. Unrestricted GPT-4 raised

practice scores 48% but lowered exam scores 17%; a guardrailed tutor version (hints, not answers) kept gains without the harm. (supports V.C)

Kestin et al., Harvard (2025), AI tutoring outperforms in-class active learning — AI tutor built on pedagogy principles outperformed active-learning lecture in college physics. With Bastani: design matters more than access. (supports V.C)

Liang et al., Patterns (2023), GPT detectors are biased against non-native English writers — Seven GPT detectors flagged 61% of non-native writers' TOEFL essays as AI; near zero for native writers. (supports VIII.A.6)

Common Sense Media (July 2025), Talk, Trust, and Trade-Offs: How and Why Teens Use AI Companions — 72% of U.S. teens have used AI companions; one in three find them as satisfying as human friends; no companion use under 18 recommended. (supports III.H, VI.C.12, VII.D-E)

Federal Trade Commission (Sept 2025), 6(b) inquiry into AI companion chatbots — Orders to seven chatbot makers on child-safety practices. (supports VI.C.12, XII.B)

TAKE IT DOWN Act, S. 146, Pub. L. 119-12 (May 2025) — Criminalizes nonconsensual intimate images including AI deepfakes; platforms must remove within 48 hours of a valid request. (supports XII.B)

Pew Research Center (Feb 2026), How Teens Use and View AI — 54% of teens use chatbots for schoolwork; 59% say AI cheating happens regularly; 12% have used AI for emotional support. (supports I, V.B)

CCS Online Staff PD, Designed Friction and the Human Edge (Oct 2026) — District standard: save time for people, not on people. (supports II.C, VIII.A.7)