



Book	Policy Manual
Section	7000 Property
Title	Copy of GIFTS, GRANTS, AND BEQUESTS
Code	po7230 KMK 12-29-25
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#### 7230 - **GIFTS, GRANTS, AND BEQUESTS**

The Board is appreciative of public interest in, and goodwill toward, the schools manifested through gifts, grants, and bequests. The Board reserves the right, however, to specify the manner in which gifts are made; to define the type of gift, grant, or bequest which it considers appropriate; and to reject those which it deems inappropriate or unsuitable. If accepted, the Board will attempt to carry out the wishes of the donor.

The Board shall not discriminate in the approval and administration of gifts, grants, and bequests on the basis of any Protected Class consistent with Board Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity. ~~race, color, religion, national origin, ancestry, creed, pregnancy, marital status, parental status, sexual orientation, sex (including transgender status, change of sex, or gender identity), or physical, mental, emotional, or learning disability ("Protected Classes")~~. Complaints of discrimination in the acceptance or administration of gifts, grants, or bequests are governed by the complaint procedure outlined in Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity.

All gifts or bequests having a combined value of more than \$500 ~~that are approved by the Board~~ shall ~~will~~ be accepted by the ~~formally acknowledged at a Board meeting~~. The District Administrator may accept for the Board gifts or bequests of lesser value. ~~on the Board's behalf.~~

The Board shall provide written acknowledgment to the donor of any accepted cash donation of \$500 or more and any non-cash donation the value of which is \$500 or more. Such acknowledgment shall include the amount of cash or a description of any non-cash donation along with a good faith estimate of the value of such non-cash donation.

The Board shall provide any donor with appropriate tax forms in compliance with the requirements of the Internal Revenue Code.

Gifts, grants, and bequests shall become the property of the Board and will be subject to use by the District as determined by the policies and administrative guidelines applying to all properties, equipment, materials, and funds owned by the Board, ~~subject to the Board's effort to comply with any specific wishes of the donor~~. The title of all gifts shall be in the name of the Board.

Any equipment with a value of \$500 or more proposed to be purchased by a parent organization or non-District entity for use in the school, on District property, or at a District-related event shall be submitted to the District Administrator for analysis prior to the purchase.

The Board reserves the right ~~to refuse~~ to not accept such liability and thus prohibit the use of the equipment by students or District employees during any District-sponsored activity or on any property owned, leased, or used by the District. The Board is under no obligation to replace a gift or memorial if it is lost, stolen, destroyed, or becomes unserviceable.

All gifts to employees shall be consistent with the Board's adopted policy regarding employee ethics or gifts to an individual employee.

~~Revised 9/9/20~~

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Legal	118.13, Wis. Stats.
	118.27, Wis. Stats.
	I.R.C. 170(f)(8)
	I.R.C. 170(f)(12)
	Title VI, Civil Rights Act of 1964
	Title IX, Education Amendments of 1972
	Section 504, Rehabilitation Act of 1973
	Americans with Disabilities Act



Book	Policy Manual
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#### 7310 - **DISPOSITION OF PERSONAL PROPERTY**

The Board requires the District Administrator to review the personal property of the District periodically and to dispose of that material and equipment which is no longer usable in accordance with the terms of this policy. The disposition of real property is governed by Policy 7300 - Disposition of Real Property.

"Personal property" means property other than real property. It may be tangible, having physical existence, such as vehicles, equipment, or instructional materials or intangible, such as intellectual property.

"Real property" means land, including land improvements, structures, and appurtenances thereto, but excludes moveable machinery and equipment.

##### **A. Instructional Material**

The District shall review instructional materials (i.e., textbooks, library books, manuals, support materials, etc.) periodically to determine the relevance of such materials to the present world and current instructional programs. The following criteria will be used to review instructional materials for redistribution and possible disposal:

1. concepts or content that do not support the current goals of the curriculum
2. information that may not be current, or
3. worn beyond salvage

##### **B. Equipment**

For purposes of this policy, equipment shall mean tangible personal property (including information technology systems), a unit of furniture or furnishings, an instrument, a machine, an apparatus, or a set of articles which retains its shape and appearance with use, is nonexpendable, having a useful life of more than one (1) year, and a per-unit cost that equals or exceeds \$10,000 ~~5000~~ to replace as a single unit and does not lose its identity when incorporated into a more complex unit.

The District shall inspect the equipment used in the educational program periodically, to determine the condition and usability of such equipment in the current educational program. Should the equipment be deemed no longer serviceable or usable, the following criteria will be used to determine possible disposal:

1. repair parts for the equipment no longer readily available;

2. repair records indicate the equipment has no usable life remaining;
3. obsolete and/or no longer contributing to the educational program;
4. some potential for sale at a school auction; or
5. creates a safety or environmental hazard.

### C. Disposition

The District Administrator is authorized to dispose of obsolete instructional and other property by selling it to the highest bidder, by donation to appropriate parties, or by proper waste removal in compliance with 2 C.F.R. 200.313(e) and 200.314. Disposal of surplus property purchased with Federal funds shall be disposed of in accordance with Federal guidelines.

When there is a residual inventory of unused supplies exceeding \$10,000 in aggregate value at the end of the period of performance and the supplies are not needed for any other Federal award, the District may retain or sell the unused supplies. Unused supplies means supplies that are in new condition, not having been used or opened before. The aggregate value of unused supplies consists of all supply types, not just like-item supplies. The Federal agency or pass-through entity may be entitled to compensation in an amount prescribed in 2 C.F.R. 200.314.

When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, the District shall request disposition instructions from the Federal agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made in accordance with disposition instructions of the Federal agency.

Except as provided in §200.313 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current fair market value in excess of \$10,000 (per unit) may be retained by the non-Federal entity or sold. The Federal agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale. If the equipment is sold, the Federal agency may permit the non-Federal entity to deduct and retain from the Federal share \$1,000 or ten percent (10%) of the proceeds, whichever is less, to cover expenses associated with the selling and handling of the equipment.

The District may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the District shall be entitled to compensation for its attributable percentage of the current fair market value of the property.

When included in the terms and conditions of the Federal award, the Federal agency may permit the District to retain equipment, or authorize the Wisconsin Department of Public Instruction (DPI) to permit the District to retain equipment, with no further obligation to the Federal Government unless prohibited by Federal statute or regulation.

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T.C. 11/10/21

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Legal

2 C.F.R. 200.313, 200.314

120.10(12), Wis. Stats.

120.13(19m), Wis. Stats.



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#### 7440.01 - **VIDEO SURVEILLANCE AND ELECTRONIC MONITORING**

The Board authorizes the use of video surveillance and electronic monitoring equipment at various facilities and school sites throughout the District and on school buses. No audio or video surveillance is permitted within the District other than those authorized by policy or the District Administrator, and only if clear and visible notice is provided to any persons entering an area or building subject to video and/or audio monitoring that such monitoring may occur. This does not restrict the collection of video or audio recording at events open to the public.

##### **Placement of Surveillance**

The District Administrator is responsible for determining where to install and operate fixed-location video surveillance/electronic monitoring equipment in the District. The District Administrator shall assure that video surveillance is handled in accordance with the placement, monitoring, and access considerations incorporated into the school safety plan as more fully described in Policy 8420 - School Safety and Reporting of Crime Statistics. The determination of where and when to use video surveillance/electronic monitoring equipment will be made in a nondiscriminatory manner. Video surveillance/electronic monitoring equipment may be placed in common areas in school buildings (e.g. school hallways, entryways, the front office where students, employees, and visitors are permitted to freely come and go, gymnasiums, cafeterias, libraries), the school parking lots and other outside areas, and in school buses. Except in extraordinary circumstances and with the written authorization of the District Administrator, video surveillance/electronic monitoring equipment shall not be used in areas where persons have a reasonable expectation of privacy (e.g. restrooms, locker rooms, changing areas, private offices (unless there is express consent given by the office occupant), or conference/meeting rooms) or in individual classrooms during instructional times. Security staff and Administrators are authorized to carry and use portable video cameras when responding to incidents. The Board authorizes security personnel to use body-worn video cameras while on duty but prohibits them from being operated while the individual is routinely patrolling restrooms and locker rooms unless the staff member is responding to a specific incident.

Any person who takes action to block, move, or alter the location and/or viewing angle of a video camera shall be subject to disciplinary action.

##### **Notification of Surveillance**

Wherever video surveillance or electronic monitoring are used, such notification shall identify that video or electronic surveillance are possible technologies being employed.

Legible and visible signs shall be placed at the main entrance to buildings and in the areas where video surveillance/electronic monitoring equipment is in use to notify people that their actions/behavior are subject to being monitored/recorded, which may include video footage, audio recording, or both. Additionally, the District Administrator is directed to annually notify parents and students through the Student Handbook, and staff via the Staff Handbook, of the use of video surveillance/electronic monitoring systems in their schools, which may include either video or audio footage, or

both. In cases approved by the District Administrator, camera surveillance may be used for investigatory purposes without staff, student, or public notice if the usage is calculated to further the investigation into misconduct believed to have occurred or believed to be ongoing.

### **Uses of Surveillance**

Any information obtained from video surveillance/electronic monitoring systems may only be used to support the orderly operation of the School District's schools and facilities and for law enforcement purposes, and not for any other purposes. As such, recordings obtained through the use of video surveillance/electronic monitoring equipment may be used as evidence in any disciplinary proceeding, administrative proceeding, or criminal proceeding, subject to Board policy and regulations. Further, such recordings may become a part of a student's education record or a staff member's personnel file.

Ordinarily, video surveillance/electronic monitoring equipment will not be used to make an audio recording of a conversation occurring on school grounds or property.

The Board will not place video surveillance/electronic monitoring equipment for the purpose of obtaining information for routine staff appraisal/evaluation or monitoring; however, video footage captured in the normal course of surveillance that shows information pertinent to staff performance or conduct may be used for that purpose.

Additionally, prerecorded lessons or observations of online or virtual learning sessions may be included as part of an employee's evaluation.

Further, if an employee is assigned to work remotely (i.e., telework), the Administration is authorized to conduct observations that consist of the supervisor reviewing video recordings of the employee working and/or watching the employee perform their job responsibilities through means of a live-stream that includes both video and audio.

Additionally, nothing herein shall prevent the Administration from using information gathered through electronic means (i.e., viewing a video recording or live-stream of an employee working) for employment purposes including, but not limited to, completing components of an evaluation.

Recordings that capture students may be student records and as such will be treated as confidential, subject to the Board's public records and student records policies.

### **Retention, Secure Storage, Access to and Disposal of Video Recordings**

The Board shall maintain video surveillance/electronic monitoring recordings for a limited period. Any request to view a recording under this policy must be made within seven (7) calendar days of the event/incident in order to assure its availability. Inquiries after that time period may be available depending on current retention capabilities. Unless a recording is separated and maintained for some reason by the District, any recording may be destroyed after seven (7) calendar days. If, however, action is taken by the Board/Administration, as a result of a formal complaint or incident, recordings shall be kept consistent with the Board's record retention policy depending on the nature of the video record retained, but for a minimum of one (1) year from the date of the action taken. Recordings may also be kept beyond the normal retention period if they are going to be utilized for training purposes.

Video recordings, if stored on a removable/portable device or on a locally hosted server, when not in use, shall be stored in a locked, fire-resistant cabinet or room in an area to which students and the public do not normally have access. The recordings should be clearly and properly labeled and stored. Any video data stored on a cloud-based server system must be stored pursuant to a vendor agreement that assures the confidentiality of data accessible only to school officials.

Access to and viewing of video recordings is limited to authorized personnel. The Administration is responsible for maintaining a proper audit trail for all video recordings (i.e., logs must be maintained of all instances of access to, and use of, recorded material – the log must document the person accessing the recording, the date and time of access, and the purpose). The Administration shall approve requests for access to recorded and stored video images. The building principal may authorize the viewing of recorded images in the event of an ongoing law enforcement investigation, an incident involving property damage or loss, or for other reasons deemed appropriate.

Video footage should not be removed from school officials' custody except as required by law or upon a request from law enforcement. All video recordings to be taken off-site in any portable format must be signed out by the requestor and the building principal. When returned, the requestor who originally signed the recording out and the building principal shall sign the recording back in. Video files should not be transmitted electronically to sources outside the District except as required or permitted by law and only with the approval of the District Administrator.

All video surveillance/electronic monitoring recording media shall be considered legal evidence and treated as confidential or as directed by Board counsel. The release of original video recordings to individuals or outside agencies may only occur pursuant to subpoena or court order after the same has been reviewed by Board counsel.

Original video recordings shall never be edited or manipulated in any manner. When video recordings are requested by any law enforcement agency as part of an ongoing investigation, a duplicate may be provided for that purpose. The original media shall be protected from accidental overwrite or erasure during the duplicating process. Nothing in this paragraph prohibits the redaction of personally identifiable information from duplicated media when mandated by Family Educational Rights and Privacy Act (FERPA).

Video recordings may never be sold publicly, viewed, or distributed in any other fashion except as provided for by Board policy and this guideline and consistent with State and Federal law.

Devices containing video recordings scheduled to be destroyed must be securely disposed of in such a way that the personal information cannot be reconstructed or retrieved (e.g. shredding, burning, or magnetically erasing the personal information).

### **Surveillance on School Buses**

School buses owned by the District or a contractor under contract with the District may be equipped with video and/or audio recording equipment in specified locations within the vehicle as provided in the Wisconsin Department of Transportation regulations.

This policy does not address or cover instances where school officials record a specific event (e.g. a play, music performance, athletic contest, graduation, or Board meeting) or an isolated instance where a classroom is video recorded for educational or research purposes. Authorized video recording for educational, instructional, and/or research purposes is permitted and is not addressed by this policy.

Video surveillance is to be implemented in accordance with this policy and the related guidelines and consistent with the school safety plan. The Board will not accept or tolerate the improper use of video surveillance/electronic monitoring equipment and will take appropriate action in any cases of wrongful use or violation of this policy.

Revised 8/12/19  
Revised 4/8/20  
T.C. 3/10/21  
Revised 11/10/21  
Revised 10/26/22

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Legal	19.31 19.39, 118.125, Wis. Stats. 18 U.S.C. 2510-2521 FERPA 20 U.S.C. 1232g 34 C.F.R. 99.1-99.67 Title I of the Electronic Communication Privacy Act of 1986
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Book	Policy Manual
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#### 7450 - **PROPERTY INVENTORY**

As steward of this District's property, the Board recognizes that efficient management and full replacement upon loss requires accurate inventory and properly maintained property records.

The Board shall maintain a continuous inventory of all District-owned equipment and supplies, including computing devices.

For purposes of this policy, equipment shall mean tangible personal property (including information technology systems), a unit of furniture or furnishings, an instrument, a machine, an apparatus, or a set of articles which retains its shape and appearance with use, is nonexpendable, having a useful life of more than one (1) year and a per-unit cost that equals or exceeds \$500 as a single unit and does not lose its identity when incorporated into a more complex unit. When defining supplies for inventory purposes, no items will be counted whose total value is less than \$10,000 ~~5,000~~.

Capital assets include equipment as well as the following:

- A. land, buildings (facilities), and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases
- B. additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance)

Capital expenditures, which are expenditures for capital assets, require prior written approval in order to be allowable in certain situations. General-purpose equipment, buildings, and land, as well as improvements to land, buildings, or equipment which materially increase their value or useful life, are unallowable as direct charges unless the Federal awarding agency or pass-through entity provides prior written approval. Whereas capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$10,000 ~~5,000~~ or more have the prior written approval of the Federal awarding agency or pass-through entity.

When defining supplies for inventory purposes, no items will be counted whose total acquisition cost is less than \$10,000 ~~5,000~~.

"Computing devices" are machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories for printing, transmitting and receiving, or storing electronic information. Examples of computing devices include laptops, smartphones, tablets, etc. Computing devices are classified as equipment if their acquisition cost meets the above-mentioned equipment threshold. Computing devices that do not meet the acquisition cost threshold are considered supplies. Regardless of whether a computing device is classified as an equipment or supply, it must be counted during the inventory.

It shall be the duty of the Director of Technology to ensure that inventories are recorded systematically and accurately and property records of equipment are updated and adjusted annually by reference to purchase orders and withdrawal reports.



Property records of consumable supplies shall be maintained on a continuous inventory basis.

The Director of Technology shall maintain a system of property records which shall show, as appropriate to the item recorded, the:

- A. description of the property;
- B. serial number or other identification number;
- C. acquisition date;
- D. acquisition cost;
- E. location;
- F. use and condition of the property; and
- G. manufacturer.

The District is responsible for maintaining and updating property records when there is a change in the status of the property.

Equipment and computing devices acquired in whole or in part under a Federal award will vest upon acquisition to the District, subject to the following conditions:

- A. The equipment shall be used for the authorized purposes of the award project during the period of performance or until the equipment is no longer needed for the purposes of the project.
- B. While the equipment is being used for the originally-authorized purpose, the District (or subrecipient) must not dispose of or encumber its title or other interests without the approval of the Federal agency or pass-through entity.
- C. The equipment may only be used and disposed of in accordance with the provisions of the Federal agency or the pass-through entity and Policy 7300 - Disposition of Real Property/Personal Property and Policy 7310 - Disposition of Surplus Property.
- D. The District must use equipment for the project or program for which it was acquired and for as long as needed, whether or not the project or program continues to be supported by the Federal award. The District must not encumber the equipment without prior approval of the Federal agency or pass-through entity.
- E. When no longer needed for the original project or program, the equipment may be used in other activities in the following order of priority:
  - 1. activities under other Federal awards from the Federal agency that funded the original program or project; then
  - 2. activities under Federal awards from other Federal agencies. These activities include consolidated equipment for information technology systems.
- F. During the time that equipment is used on the project or program for which it was acquired, the District must also make the equipment available for use on other programs or projects supported by the Federal Government, provided that such use will not interfere with the purpose for which it was originally acquired. First preference for other use of the equipment must be given to other programs or projects supported by the Federal agency that financed the equipment. Second preference must be given to programs or projects under Federal awards from other Federal agencies. Use for non-Federally funded projects is also permissible, provided such use will not interfere with the purpose for which it was originally acquired. The District should consider charging user fees as appropriate. If the District does use equipment to earn program income, it must not charge a fee that is less than a private company would charge for similar services unless specifically authorized by Federal statute.
- G. When acquiring replacement equipment, the District may either trade-in or sell the equipment and use the proceeds to offset the cost of the replacement equipment.
- H. Property records shall be maintained that include a description of the equipment, a serial number or other identification number, the source of funding for the equipment (including the Federal Award Identification Number ("FAIN")), title holder, acquisition date, cost of the property, percentage of Federal agency contribution towards the

original purchase, the location, use, and condition of the property, and ultimate disposition data, including date of disposal and sale price of the property.

- I. A physical inventory of the property must be conducted and results reconciled with property records at least once every two (2) years.
- J. A control system shall be in place to provide safeguards for preventing loss, damage, or theft of the property. Any such loss, damage, or theft of the property must be investigated. The District must notify the Federal agency or pass-through entity of any loss, damage, or theft of equipment that will have an impact on the program.
- K. Regular maintenance procedures shall be implemented to keep the property in proper working condition.
- L. Proper sales procedures shall be established to ensure the highest possible return in the event the District is authorized or required to sell the equipment/property.
- M. When equipment acquired under a Federal award is no longer needed for the original project/program or for activities currently or previously supported by a Federal agency, the District shall request disposition instructions from the Federal agency or the pass-through entity if required by the terms and conditions of the Federal award. Disposition of the equipment shall be made in accordance with the provisions of 2 C.F.R. 200.313.

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2 C.F.R. 200.313



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## 7540.02 - **DIGITAL CONTENT AND ACCESSIBILITY**

### **A. Creating Digital Content**

The Board authorizes staff members **(X)** and students **[END OF OPTION]** to create content for the District's website and District-approved/affiliated apps and services (see Bylaw 0100 - Definitions) ("digital content").

District-generated and school-related digital content must comply with applicable State and Federal laws (e.g., copyright laws, Children's Internet Protection Act (CIPA), Section 504 of the Rehabilitation Act of 1973 (Section 504), Americans with Disabilities Act (ADA), Student Online Personal Protection Act (SOPPA), and Children's Online Privacy Protection Act (COPPA)) and reflect the professional image/brand of the District, its employees, and students. District-generated digital content must be consistent with the Board's Mission Statement and is subject to prior review and approval of the District Administrator before being published on the District's website or District-approved/affiliated apps/services.

#### **[DRAFTING NOTE: CHOOSE ONE (1), BOTH, OR NONE OF THE FOLLOWING OPTIONS.]**

**(X)** School-related student-created content for the Board's website or District-approved/affiliated apps/services are subject to Policy 5722 - School-Sponsored Publications and Productions.

**(X)** Creation of school-related content by students for the Board's website or District-approved/affiliated apps/services must be done under the supervision of a District staff member.

#### **[END OF OPTIONS]**

### **B. Purpose of Digital Content**

The purpose of digital content covered by this policy is to educate, inform, and communicate. The following criteria shall guide the development of District-generated digital content:

#### **1. Educate**

Digital content should be suitable for and usable by students and teachers to support the curriculum and the Board's Objectives as listed in the Board's Strategic Plan.

#### **2. Inform**

Digital content may inform the community about the school, teachers, students, or departments, including information about curriculum, events, class projects, student activities, and departmental policies.

#### **3. Communicate**

Digital content may communicate information about the plans, policies, and operations of the District to members of the public and other persons who may be interested in and/or affected by District matters.

The information published on the Board's website and District-approved/affiliated apps/services should reflect and support the Board's Mission Statement, Educational Philosophy, and School Improvement Process.

When the digital content includes a photograph or personally identifiable information relating to a student, the Board will abide by the provisions of Policy 8330 - Student Records.

Under no circumstances is District-generated digital content to be used for commercial purposes, advertising, political lobbying, or to provide financial gains for any individual. Included in this prohibition is the fact that no digital content published on the District's website or District-approved/affiliated apps/services may:

1. include statements or other items that support or oppose a candidate for public office, the investigation, prosecution, or recall of a public official, or passage of a tax levy or bond issue;
2. link to a website of another organization if the other website includes such a message; or
3. communicate information that supports or opposes any labor organization or any action by, on behalf of, or against any labor organization.

**( x )** Under no circumstances shall a staff member post on their personal web pages/websites or private digital accounts (i.e., non-District-approved/affiliated apps/services) student progress reports, grades, class assignments, or any other similar class-related material. Employees are required to use the Board's website or District-approved/affiliated apps/services (e.g., \_Google Classroom, Skyward\_\_\_\_\_) **[Progressbook/PowerSchool/Infinite Campus]**) for the purpose of conveying information to students and/or parents. **[END OF OPTION]**

**( x )** Staff members are prohibited from requiring students to go to the staff member's personal web pages/websites and/or private digital accounts (i.e., non-District-approved/affiliated apps/services) (including, but not limited to, the staff member's personal accounts on Facebook, Instagram, Pinterest, YouTube Channel(s), or TikTok sites) to check grades, obtain class assignments and/or class-related materials, and/or to turn in assignments. **[END OF OPTION]**

**( )** If a staff member creates digital content related to their class, it must be hosted on the Board's website or a District-approved app/service. **[END OF OPTION]**

**( x )** The Board's website, including school-specific websites, shall be generally open/available to the public unless specific digital content is unique to a specific child and/or includes student personally identifiable information, in which case the information must be password-protected or access to it must be otherwise restricted. When digital content involving student personally identifiable information or information concerning coursework, particularly a specific student's classes/assignments, is password-protected/access is otherwise restricted, the student's parent(s)/guardian(s) will continue to have access to that digital content. **[END OF OPTION]**

Digital content published on the Board's website should reflect an understanding that both internal and external audiences will be viewing the information.

**( )** The District Administrator shall prepare administrative guidelines defining the rules and standards applicable to staff **( )** and students **[END OF OPTION]** who publish digital content on the Board's website and District-approved/affiliated apps/services.

The Board retains all proprietary rights related to the design of and content for its website(s) and any apps/services it operates and/or is affiliated with, absent written agreement to the contrary.

In order for a student's school work (i.e., work that is created in or for a class or as part of a school-sponsored extracurricular activity) to be displayed on the Board's website, the student (who is eighteen (18) years of age or older) or the student's parent (if the student is seventeen (17) years of age or younger) must provide written permission and expressly license its display without cost to the Board.

Likewise, prior written permission from a student (who is eighteen (18) years of age or older) or the student's parent (if the student is seventeen (17) years of age or younger) is necessary for a student to be identified by name on the Board's website.

### C. Accessibility of Web Content and Mobile Apps

The District is committed to providing persons with disabilities an opportunity equal to that of persons without disabilities to participate in the District's programs, benefits, and services, including those delivered through electronic and information technology, except where doing so would impose an undue burden or create a fundamental alteration. The District is further committed to ensuring persons with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as persons without a disability, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any District programs, services, and activities delivered online through the web or a mobile app, as required by Section 504 and Title II of the ADA

and their implementing regulations; and that they receive effective communication of the District's programs, services, and activities delivered in-person or online.

This policy reflects the Board's commitment and intention to comply with the requirements of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. Section 794, 34 C.F.R. Part 104, Title II of the Americans With Disabilities Act of 1990, 42 U.S.C. Section 12131, and 28 C.F.R. Part 35 in all respects. For purposes of this policy, "web content" means the "information and sensory experience to be communicated to the user by means of a user agent, including code or markup that defines the content's structure, presentation, and interactions." Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents (e.g., web content or content in mobile apps in the following electronic file formats: portable document formats (PDF), word processor file formats, presentation file formats, and spreadsheet file formats). Additionally, "mobile applications" ("mobile apps") means "software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets."

## 1. Technical Standards

Web content and mobile apps that the District provides and/or makes available, directly or through contractual, licensing or other arrangements, shall comply with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1, Level AA standards, unless the Board can demonstrate that such compliance would result in a fundamental alteration in the nature of its programs, services, or activities, or an undue financial and administrative burden.

### [DRAFTING NOTES:

**(1) Districts with a population of 50,000 or more residents must fully comply with WCAG 2.1, Level AA standards by April 24, 2026; Districts with fewer than 50,000 residents must fully comply with WCAG 2.1, Level AA standards by April 26, 2027. (2) Since the deadlines depend on the population size, Wisconsin school districts should use the population estimate on the most recent Small Area Income and Poverty estimates (SAIPE). For districts that are entirely contained within one city or county, they may rely on the population figures for that city or county. If the district is unsure what deadline applies to them, they should consult legal counsel. (3) While the Department of Justice's Final Rule allows public entities to employ alternative designs, methods, or techniques if they provide equivalent or greater accessibility and usability, Neola does not recommend that approach. If a board wants to consider an alternative technical standard, it should consult with its legal counsel. END OF DRAFTING NOTES]**

Notwithstanding the preceding, Federal regulations provide for the following content types to have limited exceptions to the WCAG 2.1, Level AA requirements:

- a. archived web content (provided all four (4) Federal criteria in 28 C.F.R. 35.104 are met);
- b. certain preexisting conventional electronic documents (with specific restrictions);
- c. third party content that is not created pursuant to a contract, license, or other arrangement between the Board and a third party;
- d. password-protected or otherwise secured documents pertaining to a specific student, their property, or their account; and
- e. preexisting social media posts.

Even when the preceding exceptions apply, the District, however, will still provide effective communication and reasonable modifications in accordance with the ADA.

Content maintained for any purpose other than reference, research, or recordkeeping does not qualify as one of the listed exceptions above, regardless of the date it was created. If the content is labeled "archived" or stored in an area clearly identified as being "archived" it still has not risen to the level required to fall into an exception.

When a person with a disability cannot access District-generated or -affiliated web content or mobile apps that meet WCAG 2.1, Level AA standards, the District will: (1) provide alternate means of access to the same information and functionality; (2) make reasonable modifications to policies, practices, or procedures; (3) ensure effective communication through appropriate auxiliary aids and services; and (4) respond to accommodation requests within thirty (30) days ( ) [insert timeframe] business days. Such accommodations may include: (a) alternative document formats (large print, Braille, audio); (b) telephone or

in-person assistance for online services; and/or (c) email or mail delivery of information typically accessed online.

## 2. Digital Accessibility Coordinator

The Board designates its ☒ Section 504/ADA Compliance Coordinator(s) ☐ Technology Director ☐ \_\_\_\_\_ **[END OF OPTIONS]** as the District's Digital Accessibility Coordinator(s). ☐ That individual ☐ Those individuals ☐ is ☐ are **[END OF OPTIONS]** responsible for coordinating and implementing this policy.

**[SELECT OPTION 1 OR 2]**

☒ **[OPTION 1]**

See Board Policy 2260.01 for the Section 504/ADA Compliance Coordinator(s)' contact information.

**[END OF OPTION 1]**

☐ **[OPTION 2]**

The District's Digital Accessibility Coordinator(s) can be reached at \_\_\_\_\_ **[Insert name or title, address, e-mail, phone].**

**[END OF OPTION 2]**

## 3. Third Party Content

Links included on the Board's website(s) and District-approved/affiliated mobile apps that pertain to its programs, activities, and/or services must also meet the above criteria and comply with State and Federal law (e.g. copyright laws, CIPA, Section 504, ADA, SOPPA, and COPPA). The District's Digital Accessibility Coordinator(s) or designee(s) will vet online content available on the Board's website and through District-approved/affiliated mobile apps that are related to the District's programs, activities, and/or services for compliance with this criteria for all new content published on the District's website and mobile apps after adoption of this policy.

Content posted by third parties (e.g., members of the public) on District platforms is exempt from the WCAG 2.1, Level AA requirements unless the third party is posting due to contractual, licensing, or other arrangements with the District. Those platforms, however, along with content posted by the District staff or contractors, must be fully compliant. **[DRAFTING NOTE: The District cannot contract with a third party to host the District's website, social media content, and mobile apps to avoid the District's obligations to comply with WCAG 2.1, Level AA. The third party exception only applies to content posted by an unaffiliated third party (e.g., a post by a community member on a District's social media page).]**

Additionally, nothing herein shall prevent the District from including links on its website(s) and apps/services to:

- a. recognized news/media outlets (e.g., local newspapers' websites, local television stations' websites), or
- b. websites, services, and/or apps that are developed and hosted by outside vendors or organizations that are not part of the District's program, benefits, or services.

The Board recognizes that such third party websites must contain age-appropriate advertisements that are consistent with the requirements of Policy 9700.01, AG 9700B, and State and Federal law.

## 4. Regular Audits

The District will, under the direction of the Digital Accessibility Coordinator(s) or designee(s), at regular intervals, audit the District's digital content to ensure it meets the required technical standards.

☒ This audit will occur ☐ quarterly ☐ semi-annually ☒ at least annually ☐ no less than once every two (2) years ☐, with quarterly monitoring of high-priority content and newly published materials ☐ annually ☐, with quarterly monitoring of high-priority content and newly published materials **[END OF INTERNAL OPTIONS]. [END OF OPTION]**

**[SELECT OPTION 1 OR OPTION 2]**

☐ **[OPTION 1]**

The audit must be documented ( ) and include compliance assessment reports, identified accessibility barriers, remediation plans with specific timelines, vendor compliance status, and user complaint tracking and resolution **[END OF INTERNAL OPTION]**.

**[END OF OPTION 1]**

☒ **[OPTION 2]**

If problems are identified through the audit, such problems will be documented, evaluated, and if necessary, remediated within a reasonable period.

**[END OF OPTION 2]**

## 5. Reporting Concerns or Possible Violations

If a person accessing the District's web content and/or District-approved/affiliated mobile apps (e.g., a student, prospective student, employee, guest, or visitor) ("user") believes that specific web content and/or a mobile app has violated the WCAG 2.1, Level AA standards, the user may contact the Digital Accessibility Coordinator with any accessibility concerns. The user may also file a formal complaint utilizing the procedures set out in Board Policy 2260.01 relating to Section 504 and Title II.

## D. Instructional Use of Apps/Services

**[SELECT OPTION 1 or OPTION 2]**

☐ **[OPTION 1]**

The Board requires the ( ) District Administrator ( ) \_\_\_\_\_ **[END OF INTERNAL OPTION]** to pre-approve each app/service that a teacher intends to use to supplement and enhance student learning. To be approved, the app/service must have a FERPA-compliant privacy policy, as well as comply with all requirements of the COPPA, SOPPA, CIPA, and Section 504/ADA, including the WCAG 2.1, Level AA accessibility standards.

**[END OF OPTION 1]**

☒ **[OPTION 2]**

A teacher who elects to supplement and enhance student learning through the use of apps/services is responsible for verifying/certifying to the ( ☒ ) District Administrator ( ) \_\_\_\_\_ **[END OF INTERNAL OPTION]** that the app/service has a FERPA-compliant privacy policy, and it complies with all requirements of the COPPA, CIPA, and Section 504/ADA, including the WCAG 2.1, Level AA accessibility standards.

**[END OF OPTION 2]**

The Board further requires ( ☒ ) the use of a Board-issued e-mail address in the login process for District-approved/affiliated apps/services ( ) prior written parental permission for a student seventeen (17) years of age or younger to use the student's personal e-mail address in the login process for District-approved/affiliated apps/services **[END OF OPTION]**.

## E. Training

The District will provide ( ) annual ( ☒ ) periodic **[END OF OPTION]** training for its employees who 1) create web content, documents, or multimedia materials, 2) manage the Board's website and digital services, 3) select and contract with technology vendors, and 4) work on online communications.

The training should cover:

**[SELECT OPTION 1 OR OPTION 2]**

☐ **[OPTION 1]**

1. WCAG 2.1, Level AA guidelines and success criteria,
2. accessible document creation (PDFs, Word, PowerPoint),

3. alternative text requirements for images and media,
4. video captioning and audio description requirements,
5. accessible form and navigation design,
6. color contrast and visual design standards,
7. vendor accessibility evaluation criteria, and
8. the District's responsibilities under Title II of the ADA, including its grievance procedures.

**[END OF OPTION 1]**

**[x ] [OPTION 2]**

this Policy and responsibilities associated with the specified staff members' roles related to the implementation of this policy and ensuring the District's digital content is appropriate and accessible.

**[END OF OPTION 2]**

☐ Such training shall be facilitated by qualified individuals with demonstrated knowledge, skill, and experience concerning the accessibility standards and ADA compliance. **[END OF OPTION]**

☐ New employees in covered positions must complete accessibility training within \_\_\_\_\_ **[insert timeframe]** of hire. **[END OF OPTION]**

**F. One-Way Communication Using the District Website and/or District-Approved/Affiliated Apps/Services**

The Board approves the use of its website and District-approved/affiliated apps/services to promote school activities and inform stakeholders and the general public about District news and operations.

☐ Included in this approval is the use of Short Message Service (SMS) texting for official District communications. The District SMS service will include:

**1. Consent and Privacy for SMS Communication**

The District is committed to protecting the privacy of all recipients. The following terms govern the use of SMS communication:

- a. Explicit Consent (Opt-in): The District shall obtain explicit, verifiable permission (opt-in) before sending any SMS texts to students, parents, staff, or community members.
- b. Data Sharing: Information obtained as part of the SMS consent process will not be shared, sold, or rented to third parties.
- c. Data Collection: The District will not collect or save personal data or information from its SMS users beyond what is strictly necessary to maintain the opt-in list.
- d. Confidentiality: No confidential or personally identifiable student/staff information will be exchanged through SMS text messaging.

**2. Types of SMS Communications**

If an individual has consented to receive school-related text messages from the District, they may receive messages related to:

- a. Emergencies and Cancellations
- b. ☐ School and Office Appointments
- c. ☐ General Reminders (e.g., deadlines, schedule changes)
- d. ☐ District and School Events
- e. ☐ Attendance Notifications
- f. ☐ Transportation Updates
- g. ☐ \_\_\_\_\_ **[OTHER]**
- h. ☐ \_\_\_\_\_ **[OTHER]**



**[END OF OPTIONS]**

3. Standard Messaging Disclosures

- a. Message and data rates may apply. Message frequency may vary.
- b. Users can opt-out at any time by texting ( ) "STOP" ( ) \_\_\_\_\_ **[END OF OPTION]**.
- c. ( ) \_\_\_\_\_ **[OTHER]**.

**[END OF OPTIONS]**

**[END OF OPTION]**

Such communications constitute public records that will be archived.

When the Board or District Administrator designates communications distributed via the District's website and/or District-approved/affiliated apps/services to be one-way communication, public comments are not solicited or desired, and the website or app/service is to be considered a nonpublic forum.

If the District uses an app/service that does not allow the District to block or deactivate public comments, the District's use of that app/service will be subject to Policy 7544 – Use of Social Media unless the District is able to automatically withhold all public comments.

If unsolicited public comments can be automatically withheld, the District will retain the comments in accordance with its adopted record retention schedule but it will not review or consider those comments.

**[DRAFTING NOTE: Districts are advised to adopt a new category of records that covers such "hidden public comments" on social media. Unless dictated by State law, retention periods established by the district for such unsolicited communications should be limited.]**

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~~7540.02~~ **WEB CONTENT, APPS, AND SERVICES**

**A. ~~Creation of Content for Web Pages/Sites, Apps, and Services~~**

~~The Board authorizes staff members and students to create content, apps, and services (see Bylaw 0100, Definitions) that will be hosted by the Board on its servers or District-affiliated servers and/or published on the Internet.~~

~~The content, apps and services must comply with applicable State and Federal laws (e.g., copyright laws, Children's Internet Protection Act (CIPA), Section 504 of the Rehabilitation Act of 1973 (Section 504), Americans with Disabilities Act (ADA), and Children's Online Privacy Protection Act (COPPA)), and reflect the professional image/brand of the District, its employees, and students. Content, apps, and services must be consistent with the Board's mission statement and staff-created web content, services and apps are subject to prior review and approval of the District Administrator before being published on the Internet and/or used with students.~~

~~Student-created content, apps, and services are subject to Policy 5722—School-Sponsored Student Publications and Productions.~~

~~The creation of content, apps, and services by students must be done under the supervision of a professional staff member.~~

**B. ~~Purpose of Content of District Web Pages/Sites, Apps, and Services~~**

~~The purpose of content, apps, and services hosted by the Board on its servers or District-affiliated servers is to educate, inform, and communicate. The following criteria shall be used to guide the development of such content, apps, and services:~~

**1. ~~Educate~~**

~~Content should be suitable for and usable by students and teachers to support the curriculum and the~~

Board's objectives as listed in the Board's strategic plan.

## **2. Inform**

~~Content may inform the community about the school, teachers, students, or departments, including information about curriculum, events, class projects, student activities, and departmental policies.~~

## **3. Communicate**

~~Content may communicate information about the plans, policies, and operations of the District to members of the public and other persons who may be affected by District matters.~~

~~The information contained on the Board's website(s) should reflect and support the Board's mission statement, educational philosophy, and the school improvement process.~~

~~When the content includes a photograph or personally identifiable information relating to a student, the Board will abide by the provisions of Policy 8330—Student Records.~~

~~Under no circumstances is District created content, apps, and services to be used for commercial purposes, advertising, political lobbying or to provide financial gains for any individual. Included in this prohibition is the fact no content contained on the District's website may:~~

- ~~1. include statements or other items that support or oppose a candidate for public office, the investigation, prosecution or recall of a public official, or passage of a tax levy or bond issue;~~
- ~~2. link to a website of another organization if the other website includes such a message; or~~
- ~~3. communicate information that supports or opposes any labor organization or any action by, on behalf of, or against any labor organization.~~

~~Under no circumstances is staff member created content, apps, and services, including personal web pages/sites, to be used to post student progress reports, grades, class assignments, or any other similar class related material. Employees are required to use the Board specified website, app, or service (e.g., Progressbook, Gmail) for the purpose of conveying information to students and/or parents.~~

~~Staff members are prohibited from requiring students to go to the staff member's personal web pages/sites (including, but not limited to, their Facebook, Instagram, Pinterest pages) to check grades, obtain class assignments and/or class related materials, and/or to turn in assignments.~~

~~If a staff member creates content, apps, and services related to his/her class, it must be hosted on the Board's server or a District-affiliated server.~~

~~Unless the content, apps, and services contains student personally identifiable information, Board websites, apps, and web services that are created by students and/or staff members that are posted on the Internet should not be password protected or otherwise contain restricted access features, whereby only employees, student(s), or other limited groups of people can access the site. Community members, parents, employees, staff, students, and other website users will generally be given full access to the Board's website(s), apps, and services.~~

~~Web content, apps, and services should reflect an understanding that both internal and external audiences will be viewing the information.~~

~~School web pages/sites, apps, and services must be located on Board owned or District affiliated servers.~~

~~The District Administrator shall prepare administrative procedures defining the rules and standards applicable to the use of the Board's website and the creation of web content, apps, and services by staff and students.~~

~~The Board retains all proprietary rights related to the design of web content, apps, and services that are hosted on Board owned or District affiliated servers, absent written agreement to the contrary.~~

~~Students who want their class work to be displayed on the Board's website must have written parent permission and expressly license its display without cost to the Board.~~

~~Prior written parent permission is necessary for a student to be identified by name on the Board's website.~~

## **C. Website Accessibility**

~~The District is committed to providing persons with disabilities an opportunity equal to that of persons without disabilities to participate in the District's programs, benefits, and services, including those delivered through~~

electronic and information technology, except where doing so would impose an undue burden or create a fundamental alteration. The District is further committed to ensuring persons with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as persons without a disability, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any District programs, services, and activities delivered online, as required by Section 504 and Title II of the ADA and their implementing regulations; and that they receive effective communication of the District's programs, services, and activities delivered online.

The District adopts this policy to fulfill this commitment and affirm its intention to comply with the requirements of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, 34 C.F.R. Part 104, and Title II of the Americans With Disabilities Act of 1990, 42 U.S.C. 12131 and 28 C.F.R. Part 35 in all respects.

### **1. Technical Standards**

The District will adhere to the technical standards of compliance identified at [turtlelake.k12.wi.us](http://turtlelake.k12.wi.us). The District measures the accessibility of online content and functionality according to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 Level, and the Web Accessibility Initiative—Accessible Rich Internet Applications Suite (WAI ARIA 1.1) for web content.

### **2. Web Accessibility Coordinator**

The Board designates its Technology Director as the District's web accessibility coordinator(s). That individual(s) is responsible for coordinating and implementing this policy.

See Board Policy 2260.01 for the Section 504/ADA Compliance Coordinator(s)' contact information.

### **3. Third Party Content**

Links included on the Board's website(s), services, and apps that pertain to its programs, benefits, and/or services must also meet the above criteria and comply with State and Federal law (e.g. copyright laws, CIPA, Section 504, ADA, and COPPA). While the District strives to provide access through its website to online content provided or developed by third parties (including vendors, video sharing websites, and other sources of online content) that is in an accessible format, that is not always feasible. The District's administrators and staff, however, are aware of this requirement with respect to the selection of online content provided to students. The District's web accessibility coordinator or his/her designees will vet online content available on its website that is related to the District's programs, benefits, and/or services for compliance with this criteria for all new content placed on the District's website after adoption of this policy.

Nothing in the preceding paragraph, however, shall prevent the District from including links on the Board's website(s) to:

- a. recognized news/media outlets (e.g., local newspapers' websites, local television stations' websites), or
- b. websites, services, and/or apps that are developed and hosted by outside vendors or organizations that are not part of the District's program, benefits, or services.

The Board recognizes that such third party websites may not contain age appropriate advertisements that are consistent with the requirements of Policy 9700.01, AG 9700B, and State and Federal law.

### **4. Regular Audits**

The District, under the direction of the web accessibility coordinator(s) or his/her/their designees, will, at regular intervals, audit the District's online content and measure this content against the technical standards adopted above.

If problems are identified through the audit, such problems will be documented, evaluated, and, if necessary, remediated within a reasonable period of time.

### **5. Reporting Concerns or Possible Violations**

If any student, prospective student, employee, guest, or visitor believes that the District has violated the technical standards in its online content, s/he may contact the web accessibility coordinator with any accessibility concerns. S/He may also file a formal complaint utilizing the procedures set out in Board

~~Policy 2260 and Policy 2260.01 relating to Section 504 and Title II the use of a Board-issued e-mail address in the login process.~~

**D. Annual Training**

~~The District will provide periodic training for its employees who are responsible for creating or distributing information with online content so that these employees are aware of this policy and understand their roles and responsibilities with respect to web design, documents and multimedia content.~~

**E. One-Way Communication Using District Web Content, Apps and Services**

~~The District is authorized to use web pages/sites, apps and services to promote school activities and inform stakeholders and the general public about District news and operations.~~

~~Such communications constitute public records that will be archived.~~

~~When the Board or District Administrator designates communications distributed via District web pages/sites, apps and services to be one-way communication, public comments are not solicited or desired, and the web site, app or service is to be considered a nonpublic forum.~~

~~If the District uses a apps and web service that does not allow the District to block or deactivate public comments (e.g., Facebook, which does not allow comments to be turned off, or Twitter, which does not permit users to disable private messages or mentions/replies), the District's use of that apps and web service will be subject to Policy 7544 —Use of Social Media, unless the District is able to automatically withhold all public comments.~~

~~If unsolicited public comments can be automatically withheld, the District will retain the comments in accordance with its adopted record retention schedule but it will not review or consider those comments.~~

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Legal

Wis. Stats. 947.0125

Wis. Stats. 948.11

Wis. Stats. 995.55

Protecting Children in the 21st Century Act, Pub. L. No. 110-385, Title II, Stat. 4096 (2008)

Children's Internet Protection Act (CIPA), Pub. L. No. 106-554 (2001)

20 U.S.C. 1232g

34 C.F.R. Part 99



Book	Policy Manual
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## 7540.08 - **ARTIFICIAL INTELLIGENCE (AI)**

The Board acknowledges the positive impact and transformative potential of Artificial Intelligence (AI) in education and operations, emphasizing a balanced, people-centered approach. It supports the responsible and innovative use of AI in classrooms and professional settings, with the understanding that AI should enhance human interaction and instruction, not replace it, and all AI-driven decisions require human review. The District Administrator is authorized to support the use of artificial intelligence technology when its use is consistent with the District's mission, goals, and operational integrity. The **(x)** District Administrator **( )** \_\_\_\_\_ **[END OF OPTIONS]** is responsible for overseeing and ensuring compliance of this policy.

### **Definitions**

For purposes of this policy, the following definitions apply:

#### **Artificial Intelligence (AI)**

AI refers to systems or tools capable of performing tasks that typically require human intelligence including, but not limited to, decision-making, problem-solving, and language understanding. AI is computer code that can resemble human intelligence to complete a given task (e.g., problem-solving, planning, etc.). It involves developing algorithms and systems that can perceive, reason, learn, and make decisions based on data made available to the AI tool.

#### **Generative AI**

A subset of AI that uses large language models (LLMs) and other advanced algorithms to create content, such as text, images, audio, or video, in response to user input.

Generative AI works by analyzing large datasets to learn patterns and features, which it then uses to generate new, original content. It uses complex algorithms, often based on neural networks, to make predictions based on the input data it has processed; thereby enabling it to create a wide range of outputs, from text and images to music and code, that mimic the style or characteristics of the data on which it was trained.

At its core, generative AI predicts the flows of language. Trained on massive amounts of text taken from publicly available internet sources to recognize the relationships that most commonly exist between individual units of meaning (including full or partial words, phrases, and sentences), LLMs can, with great frequency, generate replies to users' prompts that are contextually appropriate, linguistically facile, and factually correct.

#### **Natural Language Processing (NLP)**

A field of artificial intelligence that focuses on enabling computers to understand, interpret, and respond to human language in a meaningful way. Examples of NLP include, but are not limited to, Grammarly, GPT-Based APIs, Google Cloud Natural Language AI, Microsoft Azure Text Analytics, IBM Watson NLP, Amazon Comprehend, etc.

#### **Large Language Model (LLM)**

A sophisticated AI system trained on extensive text data to process and produce language; recognize patterns, grammar, and nuances. It can perform tasks like text generation, question answering, and language translation.

### **Algorithm**

A set of rules or instructions guiding AI operations and decision-making.

### **Personally Identifiable Data/Personal Data**

Refers to any information that can directly or indirectly identify an individual including, but not limited to, names, addresses, student records, and health information.

### **Proprietary Information/Data**

Refers to a broad category of non-public, sensitive, or confidential data belonging to the District, its staff, or its operations. This information is considered the District's. This information is generally protected from unauthorized disclosure or use.

### **Open AI ("Open-Source AI")**

Definition: AI models where the developers openly share the model's architecture, underlying code, and often the "weights" (the learned parameters of the model), and sometimes the training data. Open AI models accessed publicly present a high risk of data release, as data input is often used for AI tool training and can be publicly available. Open AI models may require the District to implement and manage its own wrapper or filtering layer. As a result, it is not recommended that Open AI tools/applications are used in districts due to the high potential of violating Federal and State laws. Open-Source AI also produces less reliable content, because it is accessing a pool of data that is not universally verified as accurate.

### **Closed AI ("Closed-Source/Proprietary AI")**

Definition: AI models where the developers obscure or protect the model's architecture, underlying code, training data, and weights. Users interact with the model via a restricted service. Closed AI may offer better, contractually-guaranteed data security (e.g., "enterprise" versions), but its "black box" nature still requires a formal audit and contract. Closed AI developers typically manage these filters internally. Closed-Source or Proprietary AI produces more reliable results because it is accessing data sources that are controlled and can be verified as accurate.

Any use of artificial intelligence technology in the District's educational program or operations must be in accordance with State and Federal law as well as Board policies ( **x** ) including, but not limited to, the following: Policy 5505 – Academic Honesty; Policy 5500 – Student Code of Classroom Conduct; Policy 5500.01 – Conduct in Virtual Classroom; Policy 5517 – Student Anti-Harassment; Policy 5517.01 – Bullying; Policy 2266 – Nondiscrimination on the Basis of Sex in Education Programs and Activities; Policy 8330 – Student Records; Policy 2240 – Controversial Issues in the Classroom; Policy 7540.03 – Student Technology Acceptable Use and Safety; and Policy 7540.04 – Staff Technology Acceptable Use and Safety. **[DRAFTING NOTE: Confirm and Select as Needed] [END OF OPTION]**

## **General Principles**

### **A. Transparency**

Users of AI tools must disclose when and how these tools have been employed in the creation of academic or professional work.

### **B. Ethical Use**

District employees who use AI technologies must do so in ways consistent with institutional values, privacy standards, Family Educational Rights and Privacy Act (FERPA), Individual with Disabilities Education Act (IDEA), copyright laws, and ethical principles, honesty, trustworthiness, and personal dignity of both employees and students.

### **C. Content Responsibility**

District employees who use AI technologies are responsible for the content created by that AI tool.

## Evaluation and Approval

Before adopting any AI tool or system, the District will conduct a comprehensive risk assessment — evaluating data sources (including use of student Personally Identifiable Information), decision-making impacts on students, potential bias or disparate impact, and vendor compliance with privacy, security, and data retention laws — and ensure all contracts include clear legal, ethical, and technical safeguards aligned with FERPA, IDEA, COPPA, PPRA, Wisconsin statutes, and District policies. AI systems must be reviewed to ensure they are nondiscriminatory, fully accessible, and do not compromise the rights or individualized support of students, particularly those protected under federal and state civil rights laws.

## AI Tool Selection

The District approves the use of Closed AI tools only, that have been carefully reviewed, evaluated and approved by ( ☒ ) \_\_\_\_\_ the Director of Technology \_\_\_\_\_ [e.g., IT Director, Curriculum Director, or a AI Committee] for students and staff use.

## Transparency

The District is committed to transparency and accountability in AI use by informing teachers, students, and parents when AI influences decisions, clearly explaining how it works and what data it uses, assigning oversight to ( ☒ ) \_\_\_\_\_ the Director of Technology \_\_\_\_\_, and conducting regular audits to evaluate accuracy, fairness, and impact on equity and student rights. The District will maintain a public AI Tool Inventory that lists every approved AI tool and includes a summary of its data-handling and privacy features. [ ☐ ] The AI Tool Inventory will be posted on the District website. **[END OPTION]**

## Vendor Vetting & Contracts

All AI tools used by the district must undergo a formal risk assessment by the IT/Legal department to review their Terms of Service and data handling practices to ensure compliance with all Federal and State privacy laws. The District prohibits the input by any user of any student information, staff information, or confidential district data into any AI tool that does not have a formal, vetted contract guaranteeing data privacy and non-use for training.

## Employee Use of AI

Employees may integrate AI tools into their instruction at their discretion and should clearly define the parameters for AI usage in the classroom by students using District-approved AI applications/tools.

When using AI to create instructional materials, assessments, or feedback, employees shall maintain transparency by disclosing the role of AI in these processes. Employees must review and verify the accuracy and appropriateness of any AI-generated content.

Employees shall not input sensitive, confidential, personally identifiable, or proprietary information about students, colleagues, or institutional operations into AI systems that lack safeguards and policies to protect such data from being used in their training models, and if such information will be entered into an AI system, employees shall seek the approval of their ( ☐ ) supervisor ( ☒ ) Principal **[END OF OPTION]** before doing so.

Using AI detection software to enforce academic integrity should be done in accordance with the knowledge that this software is not foolproof and that the disruptive nature of AI technologies in education can lead to considerable confusion regarding expectations for AI use. Employees should use AI-detection ethically and as the starting point of an inquiry into a possible violation of academic integrity rather than as a definitive indication of student dishonesty. Employees must also disclose the use of AI software in course curricula.

Employees may use AI tools to enhance workflows, such as drafting communications, analyzing data, or developing reports, provided the outputs are verified for accuracy and compliance with State and Board policies. The use of AI tools for such purposes should be disclosed when disseminating AI output.

## Student Use of AI

Students shall receive age-appropriate instruction about responsible AI use, digital citizenship, privacy, and the risks/limitations of AI prior to using AI.

Students are expected to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI tools and they should ask their teacher(s) when they have questions and/or need assistance.

Students may use AI tools for academic purposes when specifically and clearly permitted by their teacher(s). The use of AI must be properly disclosed and cited in accordance with the established guidelines and not be employed to undermine authentic learning or learning objectives for the course or assignment.

If a student has any questions about whether they are permitted to use AI tools for a specific class assignment, they should ask their teacher(s).

Unauthorized use of AI tools will be considered a form of plagiarism, unauthorized collaboration, or misrepresentation of AI-generated content as original work and any student found using these tools without permission or in a prohibited manner will be disciplined in accordance with the Student Handbook or Policy 5500 – Student Code of Conduct and Policy 5505 – Academic Honesty. **[DRAFTING NOTE: Confirm the Board has adopted both of these policies if included in this policy]**

### **Academic Accessibility**

AI tools can be utilized to assist students with disabilities in accessing and understanding written materials. For example, text-to-speech software can help students with specific learning disabilities, visual impairments, or other disabilities in reading texts, and AI-powered translation tools can help students with hearing impairments understand spoken language (e.g., create transcripts or provide closed-captioning for spoken material). Specific use of AI technologies beyond universal application for students with disabilities is best addressed in each student's Individual Education Plan (IEP).

### **Employee Training**

Employees will receive training ( ) annually ( **x** ) periodically **[END OF OPTION]** to ensure adherence to this and other related policies, data privacy, student records, and allowable/approved AI tools in the District.

### **Non-Academic Use of AI**

Students and staff are prohibited in the use of AI from generating false or knowingly misleading representations of other students, staff, volunteers, or Board members that are reasonably interpreted as derogatory, threatening, or otherwise objectionable to a reasonable person, including by way of AI generated or manipulated visual or verbal depictions of any such individual, or the distribution of such depictions through any means, for example via social media, regardless of whether the distributor created the depictions themselves.

### **Enforcement**

Violation of this policy may result in disciplinary consequences. Students may be disciplined for violations, up to and including suspension or expulsion. Staff may be disciplined for violations, up to and including suspension or termination of employment. The District Administrator will refer any illegal acts to law enforcement.

### **Questions or Concerns**

Staff, parents, or members of the public who have questions or concerns regarding this policy or the use of AI in the District should contact the ( **x** ) District Administrator ( ) \_\_\_\_\_.

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### ~~7540.08 — ARTIFICIAL INTELLIGENCE (AI)~~

~~The Board recognizes the positive impact that artificial intelligence (AI) technology may have in the District's educational program and operations. The District Administrator is authorized to support the use of artificial intelligence technology when its use is consistent with the District's mission, goals, and operational integrity.~~

~~Any use of artificial intelligence technology in the District's educational program or operations must be in accordance with State and Federal law as well as Board policies including, but not limited to the following: Policy 5405—Academic Honesty; Policy 5500—Student Code of Classroom Conduct; Policy 5500.01—Conduct in Virtual Classroom; Policy 5517—Student Anti-Harassment; Policy 5517.01—Bullying; Policy 2266—Nondiscrimination on the Basis of Sex in Education Programs and Activities; Policy 8330—Student Records; Policy 2240—Controversial Issues in the Classroom; Policy 7540.03—Student Technology Acceptable Use and Safety; and Policy 7540.04—Staff Technology Acceptable Use and Safety.~~

~~Violation of this policy may result in disciplinary consequences. Students may be disciplined for violations, up to and including suspension or expulsion. Staff may be disciplined for violations, up to and including suspension or termination of employment. The Administration will refer any illegal acts to law enforcement.~~

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