

Adopted: _____

Centennial School District Policy #625
NEW POLICY

Revised: _____

625 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

I. PURPOSE

This policy establishes guidelines for the responsible use of AI to enhance teaching, learning, and efficiency, while upholding academic integrity, protecting privacy, and ensuring equitable access for all students and staff.

II. GENERAL STATEMENTS OF POLICY

- A. The school district supports AI use as an augmentative tool, not an autonomous decision-maker (following the Human-AI-Human, or H-AI-H, model), to enhance teaching, learning, and administrative efficiency.
- B. All student and staff use of AI must uphold academic integrity, foster critical thinking, and be transparent and responsible with appropriate attribution provided.
- C. The superintendent or designee must implement and regularly review privacy and safety controls to protect student, staff, and school district data associated with approved AI use.
- D. The policy applies to all AI use by students and staff, on and off-campus, and the school district will ensure equitable access and provide ongoing training on ethical use, bias mitigation, and accountability.
- E. The school district recognizes that a student's age may be a key consideration in determining appropriate AI use. For this reason, the school district establishes the following guidelines:
 - 1. Kindergarten through Grade 5: only highly restricted, teacher-mediated AI interactions are permitted. The focus is upon conceptual understanding of AI.
 - 2. Grades 6 through 8: structured introduction to AI tools together with appropriate guardrails. Critical thinking about AI outputs and digital citizenship will be addressed.
 - 3. Grades 9 through 12: centers upon broader AI access with accountability expectations; preparation of students for AI-integrated postsecondary and workforce environments; advanced AI literacy, including an understanding of how AI models work.

III. DEFINITIONS

- A. Confidential Data/Information
Information that the school district is prohibited by law, policy, or contract from disclosing or that the school district may disclose only in limited circumstances.

Confidential data includes, but is not limited to, personally identifiable information (PII) about students and employees, student and staff medical information, student education records, and information about any student's individualized education program (IEP) or Section 504 plan.

B. Deep Fake

Any video recording, motion-picture film, sound recording, electronic image, or photograph, or any technological representation of speech or conduct substantially derivative thereof:

1. that is so realistic that a reasonable person would believe it depicts speech or conduct of an individual who did not in fact engage in such speech or conduct; and
2. the production of which was substantially dependent upon technical means, rather than the ability of another individual to physically or verbally impersonate such individual.

C. Generative Artificial Intelligence (GenAI)

Computer-based systems that generate content—such as text, images, audio, or data analysis—in response to prompts. Generative AI includes large language models (LLMs) like ChatGPT, as well as tools that generate audio, images, or video.

D. Generative AI Chatbots

A chatbot with generative AI capabilities that uses large language models (LLMs) and machine learning to simulate natural, human-like conversations and generate content, code, or images in real time. Examples include ChatGPT, Claude, Google Gemini, Meta AI, Microsoft Copilot.

E. AI Hallucinations

Hallucinations are when AI programs, including Generative AI Chatbots, create information that is not true, misleading, or nonsensical.

F. Human-AI-Human Model (H-AI-H)

The H-AI-H model establishes a decision-making framework in K-12 education requiring human judgment at the initiation and human accountability at the conclusion of AI-assisted processes. The model ensures AI serves as an augmentative tool rather than an autonomous decision-maker.

G. Personally Identifiable Information (PII)

Personally Identifiable Information (PII) includes private information about another person, personal contact information about themselves or other persons, or other information, including, but not limited to, addresses, telephone numbers, school addresses, work addresses, identification numbers, account numbers, access codes or passwords, photographs, images, and/or likeness, or other information that would make the individual's identity easily traceable.

H. School District-Approved AI Tool

Any AI platform or application that has been reviewed and authorized by the superintendent or designee.

I. Synthetic Media

Digital content in a media format (including text, images, video, and audio) created in part or wholly through use of AI.

J. Voice Cloning

The use of AI to create a digital replica of another person's voice through the use of recorded audio samples.

IV. CURRICULUM INTEGRATION AND AI LITERACY

- A. The superintendent will work with school district staff to establish instructional protocols and criteria consistent with the H-AI-H model that:
1. identify teacher AI use to assess student work using the H-AI-H model to ensure teacher accountability for assessment using AI;
 2. restrict AI use in student disciplinary matters, student placement decisions, behavioral assessments, or similar matters;
 3. Any use of AI in the classroom or on class assignments must align with the teachers' instructions and use expectations. Teachers will provide direction when students are authorized to use AI in an assignment. Teachers will direct student use of AI, ensuring that it aligns with the school district guidelines and policies, including the school district's approved AI tools. Teachers will place emphasis on the H-AI-H model for AI use within classrooms.
- B. Use of AI must comply with the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and other federal and state laws.
- C. Students will indicate AI use on assignments as required by the teacher and the assignment.

V. STUDENT USE GUIDELINES

Students may use school district-approved AI tools for educational purposes only as directed by teachers and in compliance with assignment guidelines. All AI-generated content must be verified and properly cited. Students are prohibited from inputting personal, confidential, or sensitive information into AI tools, whether such information is about themselves or others. Violations will be addressed according to Policy 506: Student Discipline, Policy 514: Bullying Prohibition, and Policy 524: Technology Acceptable Use and Safety, with corrective action and support provided as needed.

A. Verification and Academic Integrity

1. Students must verify AI-generated information using reliable sources such as textbooks, scientific papers, or reputable educational websites.
2. Any content generated or significantly assisted by AI must be transparent and cited as required by the teacher and the assignment.
3. Submitting AI-generated content or content significantly assisted by AI as original work without attribution is prohibited per Policy 506: Student Discipline.

B. Privacy and Data Protection

Students must not upload or input personally identifiable information, confidential, proprietary, or sensitive information into any AI tool.

C. Reporting and Support

Students should report concerns about AI misuse or unsafe practices to the teacher or principal per policy 506: Student Discipline and policy 524: Technology Acceptable Use and Safety.

D. Consequences for Misuse

Student violations of this policy will be addressed by teachers and school staff. Disciplinary action may be taken as outlined in the school district's Student Discipline Policy 506. Violation may result in loss of AI or technology privileges per Policy 524: Technology Acceptable Use and Safety, and/or further disciplinary or legal action, as appropriate.

VI. STAFF USE GUIDELINES

Staff may use school district-approved AI tools to enhance educational experiences, provided all use complies with applicable laws and school district policies. Staff must not input confidential, proprietary, or sensitive information into AI tools. Staff are responsible for guiding and supervising student use, setting clear expectations, and

ensuring proper attribution. Violations may result in disciplinary action as outlined in school district policy.

A. Staff Use of AI for Educational Purposes

1. Staff may consult AI for ideas, outlines, and other methods to enhance students' educational experience, such as supplementing lesson plans, providing differentiated or personalized instruction, and aiding in curriculum development.
2. Staff should guide students in AI use, including creation of clear expectations for AI tool use, attribution guidance, fact-checking, and proofreading.
3. Staff should carefully evaluate the appropriateness of AI for educational purposes on a case-by-case basis, considering their appropriateness for each educational context, accuracy, reliability, and alignment with curriculum standards.
4. Staff should implement the H-AI-H model for classroom AI use.
5. Teachers who suspect plagiarism should consult Policy 506: Student Discipline, and school administration to determine appropriate steps to investigate possible violation of this policy.

B. Staff Use for Work Responsibilities

1. The school district supports AI use by school staff to assist with work responsibilities, improve efficiency, and support students and their families, staff, and the school district. These uses include, but are not limited to, document assistance, research support, administrative tasks, data analysis, and automation.
2. School district staff use of AI to fulfill work responsibilities must be consistent with this policy and other school district policies, procedures, and rules.
3. School district staff shall implement the H-AI-H model and maintain human oversight and professional responsibility for all work, including work in which AI tools have been utilized. The final human touch in the H-AI-H model should include a level of expertise to verify validity of AI output.

C. Privacy and Data Protection

1. Staff must ensure that their use of any AI tool is school district approved and complies with applicable laws, including those governing

data and student privacy, and school district policies, including, without limitation, those regarding student information.

2. Staff should not upload or input any confidential data, private data, proprietary information, personally identifiable information, or sensitive information, including any such school district or student information into any AI tool. Examples include passwords, personal information such as names, likeness, Social Security numbers, credit card or bank account numbers and other credentials, personnel material, information from non-public school district documents, including those identified as or understood to be confidential or sensitive (based on their nature or context) or any other non-public school district information that might be harmful to the school district if disclosed.

D. Discipline

Staff who violate this policy may be subject to discipline, including termination, as set forth in Policy 403: Discipline, Suspension, and Dismissal of School District Employees.

VII. DATA AND ARTIFICIAL INTELLIGENCE

All data and AI use must comply with all state and federal laws and school district regulations and requirements, including the school district's acceptable use and data policies. All school district users must ensure that all AI interactions comply with state and federal laws, especially regarding student data under FERPA, IDEA, CIPA, and COPPA.

Although AI products may claim to have some privacy safeguards in place, users should assume that all consumer AI products make data publicly available unless otherwise indicated pursuant to explicit official agreement with the school district.

VIII. VENDOR AGREEMENTS AND LICENSING

- A. AI technologies procured by the school district must include clear intellectual property rights provisions. Vendors must provide bias testing disclosure, documentation, and incident reporting procedures.
- B. Educational technology vendors must identify AI technology components embedded in the educational technology supplied to the school district.
- C. AI technologies supplied to the school district must comply with the school district's policies and procedures, including this and other district policies.
- D. A contractual agreement between the school district and a vendor must include a standard data sharing agreement as outlined with legal counsel.

- E. Users of AI technologies provided by the school district must comply with vendor terms of service and licensing agreements. Violation of an AI technology service agreement may result in the user’s loss of access and disciplinary action.

IX. AI AND RECORDS RETENTION

- A. A document created, received, or maintained through an AI system may constitute a school district record.
- B. AI-generated or AI-assisted data shall be treated as a school district record when the data:
 - 1. documents a school district action, policy, or operation; or
 - 2. is relied upon when making an educational, administrative, or financial decision;
- C. Records described in Paragraph B. above shall be retained pursuant to the school district’s Records Retention schedule.

X. NOTICE

The school district will inform students, parents, and guardians about AI use in the school district, including any significant changes to the AI Use Plan, through annual notification of policy 524, INTERNET, TECHNOLOGY, PERSONAL ELECTRONIC COMMUNICATION DEVICES AND CELL PHONE ACCEPTABLE USE AND SAFETY POLICY

XI. REVIEW

The school district’s administration will regularly review use of AI and recommend safety, privacy, student and staff needs, and other relevant updates to the school board.

Legal References: Minn. Stat. § 13.02 (Definitions)
Minn. Stat. § 13.03 (Access to Government Data)
Minn. Stat. § 13.05 (Duties of Responsible Authority)
Minn. Stat. § 13.32 (Educational Data)
Minn. Stat. § 604.32 (Cause of Action for Nonconsensual Dissemination of a Deep Fake Depicting Intimate Parts or Sexual Acts)
Minn. Stat. § 609.771 (Use of Deep Fake Technology to Influence Election)
Minn. Stat. § 617.262 (Nonconsensual Dissemination of a Deep Fake Depicting Intimate Parts or Sexual Acts)
15 U.S.C. §§ 6501-6506 (Children’s Online Privacy Protection Act)
18 U.S.C. §§ 2510-2523 (Electronic Communications Privacy Act)
18 U.S.C. §§ 2701-2713 (Stored Communications Act)

20 U.S.C. § 1232g (Family Educational Rights and Privacy Act)
20 U.S.C. § 1232h (Protection of Pupil Rights Amendment)
20 U.S.C. §§ 1400-1419 (Individuals with Disabilities Education Act)
29 U.S.C. § 701 et seq. (Rehabilitation Act of 1973)
42 U.S.C. § 2000e et seq. (Title VII of the Civil Rights Act)
42 U.S.C. § 12101 et seq. (Americans with Disabilities Act)
34 C.F.R. Part 99 (Family Educational Rights and Privacy Act)

Cross References: MSBA/MASA Model Policy 406: Public and Private Personnel Data
MSBA/MASA Model Policy 409: Employee Publications, Instructional Materials, Inventions, and Creations
MSBA/MASA Model Policy 506: Student Discipline
MSBA/MASA Model Policy 514: Bullying Prohibition Policy
MSBA/MASA Model Policy 515: Protection and Privacy of Pupil Records
MSBA/MASA Model Policy 524: Internet, Technology, and Cell Phone Acceptable Use and Safety Policy
MSBA/MASA Model Policy 524.5: Personal Electronic Communication Devices
MSBA/MASA Model Policy 601: School District Curriculum and Instruction Goals
MSBA/MASA Model Policy 603: Curriculum Development

Resources: U.S. Department of Education: [Artificial Intelligence and the Future of Teaching and Learning](#) (accessed 11/03/25)
U.S. Department of Education: [Artificial Intelligence \(AI\) Guidance](#)
Minnesota Department of Education: [Artificial Intelligence in Education](#) (accessed 11/03/25)
Minnesota IT Services: [Transparent Artificial Intelligence Governance Alliance](#) (accessed 02/24/26)
Consortium for School Networking (CoSN): [Artificial Intelligence](#) (accessed 12/12/25)
Digital Promise: [Artificial Intelligence in Education](#) (accessed 12/12/25)
International Society for Technology in Education (ISTE): [Artificial Intelligence in Education](#) (accessed 12/12/25)
National AI Literacy Day: [AI Literacy Day Resources](#) (accessed 12/12/25)
National Center on Education and the Economy (NCEE): [Framework for AI-Powered Learning Environments](#) (accessed 11/03/25)
PIPO-AASA: [A District Guide to Data Minimization in the Age of AI](#) (accessed 11/14/25)
Public Interest Privacy Center: [From Data Privacy to Discrimination: Examining the Legal Ramifications of AI in Schools \(April 2024\)](#) (accessed 12/12/25)
TeachAI: [AI Guidance for Schools Toolkit](#) (accessed 11/03/25)