

**WAUNAKEE COMMUNITY SCHOOL DISTRICT
BOARD OF EDUCATION POLICY COMMITTEE MEETING**

Thursday, January 15, 2026

7:30 AM

Waunakee Community School District
905 Bethel Circle
Waunakee, WI 53597

Members of the public may attend Board of Education meetings in-person, and will be asked to check in with District personnel when you arrive.

Public comments will be limited to 3 minutes. The Board will allow 30 Minutes for public comments.

Public comments may be sent to Rebecca McDonough at district_administrator@waunakee.k12.wi.us up to one hour before the start of the Board meeting. All comments will be reviewed by the Board members. Emailed comments will be reviewed by the board but not read out loud. Emailed comments sent during any part of the board meeting (Board Development, Closed session, Open session) will be forwarded to the board but may or may not be reviewed by the board until after the board adjourns. Comments must include the commentator's name, address, and must identify their connection to the District (if any) and any group they are representing in order to be considered by the Board.

If you would like to address the Board in-person during the public comments section of the meeting, you will be greeted in the lobby of the building, asked to check in with District personnel when you arrive so that you can be recognized and address the Board when your name is called.

A recording of the meeting will be posted on the District webpage within 24 hours of the meeting time.

AGENDA

I. CALL TO ORDER

II. ROLL CALL

III. APPROVE AGENDA

IV. PUBLIC COMMENTS

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Summers will discuss changes to transportation starting in the fall of 2027.	
VII. <u>OTHER ITEMS FOR DISCUSSION</u>	
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IX. <u>ADJOURN</u>	

“Any person who has a qualifying disability as defined by the Americans with Disabilities Act who requires assistance with access or materials should contact the Waunakee Community School District Office at 849-2000, 905 Bethel Circle Drive Waunakee, WI 53597, at least twenty-four hours prior to the commencement of the meeting so that necessary arrangements can be made to accommodate the request.”

Policy Updates and Additions January 15, 2026

Policy #	Policy Title	WASB & WCSD Administration Review	Administrator
454	Child Abuse/Neglect	Review new WASB policy & Update WCSD policy	Jondle
522.6	Mandatory Reporting Employee DPI	New policy to WCSD	Grabarski
522.74	AI Staff Use	Used in Annual Staff inservice not needed for policy	Franz
527.1	Whistleblower & Fraud Prevention	New Policy to WCSD	Grabarski
527.1 Exhibit	Notice of Employee Whistleblower Rights	New Policy to WCSD	Grabarski
672.1	Methods of Procurement	New Policy to WCSD change WASB # to 672.2 to align	Newton/Summers
683	Asset Management	Review new WASB policy & Update WCSD policy	Newton/Summers
751 Exhibit	Fee Schedule for Transportation to & From Licensed Daycare	Updated per Business Services	Newton/Summers
751 Rule	Student Transportation	Updated per Business Services	Newton/Summers
774	Cyber Security	New Policy to WCSD	Franz
775	Mail and Distribution Services	Renumbered only to realign with WASB policies	

REPORTING OF CHILD ABUSE/NEGLECT

Sample Policy 1

Policy 454

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{This sample policy requires child abuse and neglect reporting by state mandated reporters only. The sample includes general expectations for staff when making such reports and addresses actions that will be taken if the expectations are not met. This policy would be in line with child abuse and neglect reporting language included in the WASB Model Employee Handbook.}

The School Board is concerned with the health, safety and welfare of all children and recognizes the legal and ethical obligations that school employees have to report suspected or threatened child abuse or neglect. State law expressly designates **all school employees** as mandatory reporters of child abuse and neglect, and some District employees serve in specific roles (e.g., as a teacher, school administrator, school counselor, social worker, or nurse) that are likewise expressly deemed mandatory reporters by statute. Therefore, the Board expects school employees to carry out their reporting obligations with due diligence in accordance with state law requirements.

In all circumstances required by state law (including allowing for the limited health care services exception to reporting that is permitted under [subsection 48.981\(2m\)](#) of the state statutes), any school employee having reasonable cause to suspect that a child seen in the course of their professional duties has been abused or neglected **or having reason to believe that a child has been threatened with abuse or neglect** and that abuse or neglect will occur, shall report that suspicion or belief to the appropriate authorities. At all times it shall be the aim of the school employee to make the report to county child protective services or law enforcement personnel as quickly as possible, **in accordance with the statutory standard that such reports shall be made "immediately."** Any delay would not be in the best interests of the child and is not the policy of the District.

A school employee ~~making~~ **who has made** a child abuse or neglect report **to child protective services or to law enforcement** shall inform the **relevant** building principal(s) or his or her ~~designee~~ **or the District Administrator(s)** of the report so ~~they~~ **that the administration is** ~~are~~ aware of the situation. School employees may also consult with student services staff (e.g., the school ~~guidance counselor~~ **social worker**) or with a **supervising administrator** on the reporting process and any necessary follow-up activities. No building principal or other District employee may attempt to delay, modify or prevent any report of suspected or threatened child abuse or neglect. It is not the responsibility of school personnel to investigate child abuse or neglect reports or to prove that abuse or neglect has occurred or will occur. Investigation of child abuse and neglect reports is the legal responsibility of trained county child protective services and/or law enforcement personnel.

All information pertaining to a child abuse or neglect report shall be kept confidential, including the identity of the reporter, and shall only be shared with those individuals specifically authorized by law to have access to that information.

The District shall not take any disciplinary action against a school employee, discriminate against an employee in regard to employment, or threaten an employee with any such treatment for making a child abuse or neglect report in good faith under this policy. School employees may be subject to school disciplinary action, as well as penalties under state law, for failure to report **(or for a failure to promptly report)** suspected or threatened child abuse or neglect of which

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they have knowledge or for divulging confidential child abuse and neglect report information to an unauthorized person.

If a school employee or student is suspected of misconduct under this policy, the District shall conduct its own internal investigation to determine appropriate school disciplinary and other actions.

The District Administrator shall establish any necessary procedures to implement this policy and to comply with state law requirements. To maintain awareness on the part of school employees of their child abuse and neglect reporting responsibilities under this policy and state law, each school employee shall participate in required training in identifying and reporting child abuse and neglect. *[Insert if desired and if consistent with intended practice: "In addition, school employees shall be informed of this policy and its implementing procedures annually through the employee handbook and through any other means that may be deemed appropriate by the District Administrator."]*

{Editor's Note: The WASB recommends that districts include the remainder of this sample (below), which serves to clarify how the district approaches abuse and neglect reporting issues with respect to certain non-employees. However, the two paragraphs are not strictly essential and could be omitted from this employee-focused policy.}

As clarifications regarding the scope and application of this policy:

- 1. Non-employees who are mandatory reporters under section 48.981 in some other capacity.**
In addressing the mandatory obligations of District employees to promptly and appropriately report matters related to child abuse and neglect, this policy in no way affects the obligations of other individuals who are designated as mandatory reporters under state law and who may at times be present in District programs or facilities or working with District students.
- 2. Individuals who are not mandatory reporters under section 48.981.**
State law provides that **any person** who is **not** designated as a mandatory reporter by state statute **may** make a report of suspected or threatened child abuse or neglect **directly** to the applicable county child protective service agency or to an applicable law enforcement authority (i.e., in the same manner that a District employee would make a mandatory report to such authorities). To the extent any person who is **not** a mandatory reporter is serving in a District-authorized role (e.g., certain non-employee school volunteers) and the person encounters a concern regarding possible child abuse or neglect in connection with their District role, the District strongly encourages the individual to promptly discuss the concern with the applicable school principal or with another administrator employed by the District. If the District establishes any more-specific directives or procedures for any such individuals who are not mandatory reporters under state law, those expectations will be established and communicated separately from this employee-focused policy.

Legal References:

Wisconsin Statutes

REPORTING OF CHILD ABUSE/NEGLECT

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Section 48.02	[definitions of child abuse, neglect, and other relevant terms]
Section 48.981	[child abuse and neglect reporting requirements, including confidentiality]
Section 115.31	[reporting certain types of staff misconduct to state superintendent of public instruction]
Section 115.368	[assistance in the development and implementation of protective behavior and anti-offender programs for minor children and parents and guardians, and staff training]
Section 118.01(2)(d)8	[protective behavior instruction]
Section 118.07(5)	[school employee training related to child abuse and neglect reporting]
Section 118.125	[confidentiality of student records]
Section 118.126(1)	[privileged communication regarding student alcohol and drug use and related problems; exception for required child abuse/neglect reporting purposes]
Section 165.68	[address confidentiality program]
Federal Laws	
20 U.S.C. §1232(g)	[Family Educational Rights and Privacy Act; the federal student records law]
34 C.F.R. part 99	[U.S. Department of Education FERPA regulations]

Cross References:

WASB PRG 454 Sample Policy 1
454-Rule, Child Abuse/Neglect Reporting Procedures
882, Relations with Police Authorities

Adoption Date: 4/22/91
Revised: March 1994
March 2002
March 2012
April 2020
February 2024

REPORTING EMPLOYEE MATTERS TO DPI FOR LICENSE/EMPLOYMENT INVESTIGATIONS

Policy 522.6

Sample Policy 1

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{This sample policy addresses school district obligations to report to DPI specific criminal charges, convictions, and other misconduct related to licensed and non-licensed employees. The sample reflects the reporting criteria and procedures defined under section 115.31 of the state statutes.

EMPLOYEE HANDBOOK RECOMMENDATION RELATED TO THIS POLICY: *The WASB recommends that school district employee handbooks include an obligation for all district employees to report certain pending criminal charges and criminal convictions to the school district. The relevant employee internal reporting obligation should include at least all of the charges and convictions that the district has an obligation to report to the DPI under section 115.31 of the state statutes (as further covered, below, within this sample policy). However, the handbook language may also address the reporting of additional legal/law enforcement matters. Adding an express employee internal reporting obligation to this policy would also be an option, but employees are less likely to be aware of such an expectation if it is only established in this policy—which is mainly directed at responsibilities of the district administrator (or, when applicable, the school board president).} **WCSD Already does this***

Definitions

1. In this policy “**administrator**” means the chief administrative officer of the District (i.e., the District Administrator, unless another administrator is temporarily serving in that capacity due to a vacancy or leave of absence affecting the District Administrator’s position). If the chief administrative officer is the subject of a report under this policy, then “administrator” means the presiding officer of the School Board (i.e., the Board President, unless the office of Board President is vacant or an appointee is discharging the duties of the President due to a temporary absence or disability).
2. “**Immoral conduct**” means conduct or behavior that is contrary to commonly accepted moral or ethical standards and that endangers the health, safety, welfare, or education of any student. “Immoral conduct” includes both of the following statutory examples:
 - a. The intentional use of the District’s equipment to download, view, solicit, seek, display, or distribute pornographic material.
 - b. As further described in state law, assisting a school employee, contractor, or agent obtain a new job in a school or with a local educational agency if the individual knows or has a reasonable suspicion to believe that the school employee, contractor, or agent committed a sex offense (as defined in state law), and the victim was a minor or a student.

Situations in Which Reporting is Required: DPI-Licensed Employees

1. Reporting Criteria for Licensed Employees. State law requires the applicable administrator (as defined above) to report to the state superintendent the name of any DPI-licensed person employed by the District if any of the following occurs:

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- a. The person is **charged** with any of the following:
 - i. Any felony with a maximum term of imprisonment of at least 5 years.
 - ii. Any crime in which the victim was a child.
 - iii. Any crime defined under Chapter 948 of the Wisconsin Statutes, which is titled "Crimes Against Children." This includes any crime among the offenses listed in section 948.015.
 - b. The person is **convicted** of any of the crimes covered in the list immediately above (i.e., with respect to reporting charges) **or** 4th degree sexual assault as defined under section 940.225 of the Wisconsin Statutes. (Note: 4th degree sexual assault generally refers to having sexual contact with a person without the consent of that person, whether such contact is direct or through clothing.)
 - c. The person is dismissed or his or her contract is not renewed by the District based in whole or in part on evidence that the person engaged in **immoral conduct**.
 - d. The person resigns and the administrator has a reasonable suspicion that the resignation relates to the person having engaged in **immoral conduct**.
2. Duty to Notify Employee when Administrator Requests Resignation. If an administrator requests a **licensed employee** to resign and the administrator has a reasonable suspicion that the employee engaged in immoral conduct, then the administrator must inform the employee of the administrator's duty to submit a report to the state superintendent.

Situations in Which Reporting is Required: Non-Licensed Employees

State law requires the administrator to report to the state superintendent the name of any **non-licensed** person employed by the District if the person is **convicted** of any crime for which convictions must be reported for licensed employees, as identified in the previous section (i.e., any of the crimes covered under subsection 1.a., above, as well as 4th degree sexual assault).

Reporting Procedures; Deadline for Reporting

With respect to the reports required under section 115.31 of the state statutes and this policy:

1. The applicable administrator **must** make the report to DPI within **15 calendar days** after the administrator becomes aware of the applicable charge, conviction, dismissal, nonrenewal, or resignation.
 - a. The administrator may use the License Review Referral (Form PI-1620), available on the DPI website, when submitting the report.

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- b. When a report to the state superintendent under this policy involves a **DPI-licensed employee**, the administrator's report **shall** include (1) a complete copy of the employee's personnel file, and (2) all records related to any investigation of the employee that was conducted by or on behalf of the District.
2. In all cases, the applicable administrator must send a copy of any report that is made to the state superintendent under this policy **to the employee** who is the subject of the report.

Clarifications of the Scope/Purpose of this Policy

1. **Intent to reflect statutory requirements.** This policy attempts to identify and summarize the reporting obligations created by section 115.31 of the state statutes. This policy is not intended to be interpreted or applied in a manner that (1) creates any new/independent source of liability for the District; or (2) diminishes the limited immunity from civil liability that is provided under section 115.31.
2. **Out-of-state and federal offenses.** Although section 115.31 can be ambiguous on the issue, to the extent the statute requires the reporting of any federal or out-of-state charge(s) or conviction(s), the administrator shall make such reports to the state superintendent. The Board encourages the administrator to make good-faith reports when the specific application of the statute is ambiguous and cannot be clearly resolved on a timely basis.
3. **The administrator remains responsible for other reporting obligations.** This policy does not address separate and additional external reporting obligations that may apply to matters that are also required to be reported to the DPI under section 115.31 and this policy. In all cases, administrators and other District employees remain responsible for meeting those separate and additional external reporting obligations, including but not limited to reporting related to child abuse, threats of school violence, etc.

Legal References:

Wisconsin Statutes

[Section 115.31](#)

[reporting to DPI when school district employees have been charged with or convicted of certain crimes or have engaged in immoral conduct; related DPI investigations and licensing actions]

[Section 118.07\(4p\)](#)

[prohibited employment assistance to persons who are known or who are suspected to have engaged in sexual misconduct]

[Section 301.45\(1d\)\(b\)](#)

[the definition of "sex offense" that is applied in one part of the statutory definition of "immoral conduct" within section 115.31]

[Section 939.12](#)

[statutory definition of a "crime"]

[Section 939.50](#)

[statutory classifications of felonies and potential penalties]

[Section 939.51](#)

[statutory classifications of misdemeanors and potential penalties]

[Section 939.60](#)

[statutory definition of a "felony" and "misdemeanor"]

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[Chapter 948](#)
[Section 948.015](#)

[statutory chapter titled "Crimes Against Children"]
[list of additional offenses against children that are defined in various state statutes outside of Ch. 948, some which are subject to the reporting obligation under section 115.31 (i.e., to the extent the offense is considered a "crime")]

[Section 940.225\(3m\)](#)

[definition of fourth degree sexual assault; see also the definition of "sexual contact" within section 940.225(5)]

Wisconsin Administrative Code

[Subch. XI of Ch. PI 34](#)

[professional misconduct; DPI investigations and license actions]

Federal Law

[20 U.S.C. §7801\(30\)](#)

[definition of local education agency under the Elementary and Secondary Education Act]

Cross References:

[Insert appropriate cross references to the policy as applicable to your district.]

WCSD Policy 522

WASB Policy 522.6 Sample policy 1

Adoption Date:

2025-2026 AI Guidelines for Staff-September 2025

Philosophical Statement

The Waunakee Community School District recognizes that Artificial Intelligence (AI) has the potential to benefit student learning and also teacher learning and productivity. AI is an emerging technology that offers benefits, challenges, and risks. Appropriate use of AI that is effective, transparent, and ethical is encouraged and we should neither shun AI altogether nor use AI indiscriminately.

Ethical and Responsible Use

- Use of AI should be consistent with district guidance and the terms of use for the AI tool. If you are exploring a new tool or resource that uses AI, please consult with your school's Ed Tech Specialist or LMTC Director to be sure we are conforming to district guidelines and the terms of use for the AI tool.
- Students and teachers are responsible for verifying the accuracy of generated content.
- Personal or confidential information relating to students, staff, or the district should not be entered into AI tools **including any student work** with the exception of Brisk (5-12) and Turnitin (9-12), or another formally adopted district resource with recognized student privacy protections.
- Staff should acknowledge, attribute, or cite AI when it is used to create substantially new material for projects or shared products for a broad audience.
- Citing the use of a tool like ChatGPT or Gemini for routine emails or general writing tasks is not expected. Citation is generally required in academic, professional, or formal research contexts, where it is essential to give credit to original authors and sources. Using ChatGPT for generating ideas or help with writing is akin to using a spell-checker, grammar tool, or even just bouncing ideas off a friend. It is more about utilizing a tool for assistance rather than incorporating someone else's original intellectual work.
- AI may be used to draft feedback to students, but AI draft feedback must be reviewed and, as needed, edited before sharing with students. Staff should transparently acknowledge the use of AI in drafting feedback and are ultimately responsible for the feedback.
- For 2025-2026, student handbook language at the middle and high schools contains the following provision. *"Use of generative AI programs such as ChatGPT by students on graded assignments is prohibited, except with the express permission of the teacher, in which case the use of AI must be cited by the student. Unauthorized use of AI on graded assignments by the student will be treated as an academic honesty violation."*
 - The acceptable use of AI in a specific course should be addressed in syllabi.
 - Where use of AI is allowed for specific assignments it is important to clearly state where it is acceptable and where it is not so that there is clarity for everyone, teachers, families, and students alike.
 - Use must conform to the terms of use for the AI tool.
 - Plagiarism detection software should not be used with the exception of Turnitin at the High School and Brisk at the Intermediate, Middle and High Schools. If you have concerns about plagiarism, please contact your principal, Ed Tech Specialist, or LMTC Director.

Considerations and Opportunities

- Good teaching is complex and involves significant work. AI tools offer strong potential for accelerating and optimizing our tasks to improve the day to day quality of professional responsibilities.
- Possible opportunities may include the following. Assisting with routine and tedious tasks. Helping with first drafts of documents and emails. A quick reference or how-to tool. Translation. Personalized tutoring. Differentiating activities or tasks.
- AI tools allow educators and other school staff to experience emerging technologies to understand how they can assist us in our work and also better understand how students might experience them.
- We encourage staff to continue to innovate at an individual level for personal professional productivity, but for use in learning activities with students and in particular with student feedback we recommend that we be consistent within grade or course level teams.

Where to Take Questions

- AI is an emerging technology and understanding of appropriate use in schools and for learning is evolving.
- If you have questions about AI or suggestions, please contact your school's ed tech specialist, library media specialist, instructional coach, or school administration.
- District administrators in technology and educational services can also be a resource.

EMPLOYEE WHISTLEBLOWER PROTECTIONS

Policy 527.1

Sample Policy 1

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{This sample policy addresses employee protections when they report or participate in the investigation or prosecution of various types of potential violations, improprieties, and safety issues. Various laws expressly protect public employees from being retaliated or discriminated against in these situations, and school boards generally conclude that they also have an independent interest in trying to ensure that employees do not fail to report safety issues or possible wrongdoing due to fear of retaliation.}

Protected Reports and Protected Participation. This policy and various applicable laws provide protection to any employee who, acting reasonably and in good faith, makes a protected report of or participates in an internal investigation, official external investigation, or legal proceeding involving allegations of any of the following in connection with any of the District's programs or operations:

1. Fraud or any gross mismanagement, waste, or abuse of District-controlled funds or other District resources, including federal funds for which the District is responsible as a recipient, subrecipient, contractor, or pass-through entity;
2. Any arbitrary and capricious exercise of authority relating to a federal contract or federal grant that is inconsistent with the mission of the applicable federal agency or with the successful performance of the federal contract or grant;
3. A violation of the federal False Claims Act;
4. Unlawful discrimination, including but not limited to unlawful harassment, that is based on a legally-protected status or characteristic;
5. Any situation which poses a substantial and specific danger to public health or safety, including any recognized hazard that is likely to cause death or serious physical harm to any person;
6. A possible violation of a state or federal safety or health standard (or any variance therefrom), including any occupational safety or health standard or any law or regulation relating to asbestos in schools;
7. A workplace injury, including pursuing a worker's compensation claim;
8. A failure to pay wages as required under law;
9. *Insert either **OPTION 1** or **OPTION 2**:*

OPTION 1:

"A possible violation of any state or federal law (including any state or federal regulation) that is not covered by a more specific item in this list, but for which any state or federal law provides whistleblower/nonretaliation protections to District employees;"

OPTION 2:

~~*"A possible violation of a state or federal law (including any state or federal regulation) that is not covered by a more specific item in this list;"*~~

EMPLOYEE WHISTLEBLOWER PROTECTIONS

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~~{Editor's Note: OPTION 2 for this item offers whistleblower protection for reports of possible violations of any state or federal law or regulation. It exceeds the requirements of any specific state or federal whistleblower protection law of which the WASB is aware, and, therefore, would serve as a policy-based extension of express state and federal whistleblower/nonretaliation protections. Selecting OPTION 2 could help to encourage the reasonable and good-faith reporting of possible legal violations, but could also prompt reports over minor issues and legal ambiguities. OPTION 1 is narrower and addresses only reports/disclosures of possible violations of laws and regulations that are not covered by other items in the list but for which a state or federal law offers express whistleblower/nonretaliation protections. In other words, OPTION 1 serves more as a "catch all" provision that captures existing legal obligations that are not otherwise expressly mentioned.}~~

10. ~~If desired, insert either **OPTION 1** or **OPTION 2**:~~

OPTION 1:

~~"A possible violation of a Board policy, a Board-adopted rule/procedure, or an administratively-adopted rule/procedure of the District for which any state or federal law provides whistleblower/nonretaliation protections to District employees."~~

OPTION 2:

~~"A possible violation of any Board policy, Board-adopted rule/procedure, or administratively-adopted rule/procedure of the District."~~

~~{Editor's Note: OPTION 2 for this item offers whistleblower protection for reports of possible violations of any district policy or district procedure. It would serve as a policy-based extension of express state and federal whistleblower/nonretaliation protections. In comparison, OPTION 1 is substantially narrower and primarily serves to recognize that many district policies and procedures address topics (e.g., nondiscrimination, workplace safety, etc.) that are covered by legal requirements that offer whistleblower/nonretaliation protection. **IMPORTANT:** Do not select OPTION 2 in this item (i.e., covering all district policies and procedures) unless the district also selected OPTION 2 for the previous item (i.e., covering all laws and regulations). That is, it would be somewhat inconsistent for a district to offer broad whistleblower protection for reports and disclosures of possible violations of local policies, but not offer such broad protection for reports and disclosures of possible violations of state or federal law.}~~

A protected report of any situation or allegation covered by this policy includes any report, disclosure, provision of evidence, complaint, or request for an official internal or external investigation that is made:

1. To the employee's immediate supervisor, an administrator who is responsible for the activity, program, or operational area in question, the District Administrator, or the School Board;
2. Using any applicable District-established complaint procedures;
3. To a state or federal agency that has authority or responsibility over the matter;

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4. To a local, state, or federal law enforcement agency (including the U.S. Department of Justice or the Wisconsin Department of Justice);
5. To a member of Congress, a representative of a committee of Congress, the federal Government Accountability Office, or a federal agency's Office of Inspector General in any matter involving federal programs, federal contracts, or federal funds; or
6. To any court or grand jury or in any judicial or administrative proceeding relating to the allegation(s).

Protected reports include the provision of evidence/information as part of a governmental investigation or legal proceeding. A protected report may involve or relate to the conduct of any person, including District employees, Board members, volunteers, consultants, vendors, contractors, or other parties maintaining any business or programmatic relationship with the District.

Retaliation and Discrimination Prohibited. No official, employee, or agent of the District may retaliate or discriminate against any employee because the employee has made a protected report or participated in a protected investigation or proceeding. Prohibited retaliation and discrimination include but are not limited to discharging, demoting, denying benefits to, threatening, coercing, or taking any other materially adverse employment action against an employee because of the employee's protected activity. However, except as otherwise limited by state or federal law, this policy is not intended to prohibit or limit the District from taking any adverse employment action (1) for conduct that is **not** undertaken reasonably and in good faith; or (2) that is based on non-protected reasons and that would have occurred even in the absence of the employee's protected report or protected participation.

Intra-District Reporting Required. The District requires employees to promptly inform an appropriate District official of the circumstances relating to a protected report/disclosure that the employee has made to an external governmental official or entity, including through the employee's participation in an official investigation or legal proceeding, **unless** either of the following exceptions applies:

1. An applicable law or a judicial or governmental order prohibits the employee from disclosing the relevant information to the District; or
2. The employee is exercising a protected legal right not to disclose the relevant information to the District as the individual's employer. Stated another way, this uncommon exception would apply only if a state or federal law grants the employee an affirmative and protected legal right to refrain from disclosing the relevant information to the District in spite of the District's general rule and expectation requiring such disclosure.

In addition, a state law, federal law, or separate District policy may independently require an employee to report some of the circumstances and possible misconduct/violations covered by this policy to an appropriate District official even when the employee has **not** otherwise engaged in protected participation or otherwise made a protected report to an external governmental official or entity.

EMPLOYEE WHISTLEBLOWER PROTECTIONS

Policy 527.1

Sample Policy 1

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In any situation where intra-District reporting is neither (1) prohibited by law nor (2) mandated by any law or any District policy, disclosing information or concerns about potential safety issues or possible violations, misconduct, or improprieties to appropriate District officials is permissible and encouraged.

{Editor's Note: Particularly if the district elects to specify (in the first section of this policy) that it offers whistleblower/nonretaliation protection for reports/disclosures of possible violations of any law or any district policy/procedure, it is probable that the district would not want to mandate that employees must internally report each and every possible violation that arises. Some violations can be very minor and some are easily correctable/remedied. Ultimately, a mandate to report all possible legal and policy violations that an employee becomes aware of is probably impractical to enforce; and, if such a mandate were to be taken literally by every employee, it could even have undesirable consequences in terms of the volume of reports that might be generated. For these reasons, this paragraph of this sample does NOT impose such a mandate. Instead, this paragraph relies on reporting obligations established in laws and in other policies that address specific topics/issues.}

Unless more specific reporting procedures are supplied by law or by a separate District policy or procedure (e.g., in the District's nondiscrimination policies and procedures), the District's expectation is that such intra-District reports will be clearly and directly communicated to the District Administrator or to another administrator who is responsible for the applicable activity, program, or operational area. However, if the report concerns possible misconduct by the District Administrator or if the District Administrator would otherwise be affected by a conflict of interest in the matter, then the report or concern shall be submitted to a different administrator who is responsible for the applicable activity, program, or operational area and/or to the School Board President. It is strongly recommended that the employee make such a report in writing and/or that the employee ensures that he or she receives written confirmation from a District official that the report was made and received as intended. In directing employees to make the intra-District reports referenced in this policy, the District shall in no way prevent or interfere with an employee making a protected report to any external governmental official or entity that has authority or responsibilities regarding the matter in question.

Upon receiving any such intra-District report, District supervisors, administrators, and Board members must evaluate potential legal obligations to report or otherwise disclose information about possible violations or alleged misconduct to relevant state and/or federal authorities.

Assistance of Legal Counsel. *[Insert if desired and if consistent with procedures for engaging legal counsel found in other policies: "With notice to the Board,"]* either the District Administrator or the Board President **Administration Designee** may engage the assistance of District legal counsel in connection with addressing any report, investigation, or legal proceeding related to a report or other allegation of a possible safety issue or any of the violations, misconduct, or other improprieties addressed under this policy. *{Editor's Note: This entire paragraph may be unnecessary if the board has adopted a more general policy that addresses the use of legal counsel and if that policy already grants sufficient authority to the district administrator and board president to use their judgment to engage legal counsel as needed.}*

Other Protections. The failure to expressly list in this policy any activity that is similarly protected from retaliation or discrimination under any state or federal law or under another Board policy is not intended to diminish such separately-established protection. With respect to federal

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programs, federal contracts, and federal funds, this policy is intended and shall be interpreted to provide the full protections required under 41 U.S.C. §4712 and 2 C.F.R. §200.217.

Legal References:

Wisconsin Statutes

[Section 101.055\(8\)](#)

[public employee safety and health; including employee protections]

[Section 102.35\(2\)](#)

[prohibited retaliation and discrimination in connection with respect to workers compensation claims]

Federal Law

[2 C.F.R. §200.113](#)

[in connection with federal funding, mandatory disclosures of credible evidence of the commission of a violation of certain federal criminal laws or the civil False Claims Act]

[2 C.F.R. §200.217](#)

[federal OMB Guidance regulation addressing whistleblower protections]

[31 U.S.C. §3729 et. seq.](#)

[federal False Claims Act]

[41 U.S.C. §4712](#)

[federal whistleblower protections applicable to employees of federal contractors and employees of recipients of federal funding]

Cross References:

[Insert appropriate cross references to the policy as applicable to your district.]

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Adoption Date:

NOTICE OF EMPLOYEE WHISTLEBLOWER RIGHTS RELATING TO FEDERAL FUNDING

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{Section 4712 of Title 41 of the United States Code requires each school district that receives federal funding (e.g., special education, Title I, child nutrition program, etc.) to inform their employees in writing of the rights and remedies provided under that federal statute. The notice requirement is repeated in 2 C.F.R. §200.217. This exhibit provides sample language for this employee notice. This sample exhibit can be used either with or without also adopting a board policy on the topic of employee whistleblower rights under PRG topic 527.1.}

IMPORTANT: Beyond stating that the notice needs to be in writing, neither the federal statute nor the related federal regulation specifies a particular method or frequency for giving the notice. The WASB recommends including the notice in the district's employee handbook. Other methods (e.g., creating a posting that is placed in all work locations where the district posts other mandatory employment notices) may also be acceptable. By itself, maintaining an exhibit in the district policy manual might not be sufficient.}

NOTICE OF EMPLOYEE WHISTLEBLOWER RIGHTS RELATING TO FEDERAL FUNDING RECEIVED BY THE SCHOOL DISTRICT

Various state and federal laws offer District employees protection from retaliation, discrimination, coercion, or other reprisals for engaging in specific protected activity that advances the public interest in good government, health and safety, and nondiscrimination. These laws are sometimes referred to as whistleblower protections or nonretaliation provisions. The District is committed to adhering to and enforcing all such applicable legal protections.

As a recipient of funding from various federal sources, the District is required to provide employees with notice of whistleblower protections that apply to employees of recipients of federal awards, federal grants, or federal contracts. Specifically, under [section 4712](#) of Title 41 of the United States Code, no District employee may be discharged, demoted, or otherwise discriminated against as a reprisal for making a protected disclosure of information that the employee reasonably believes is (1) evidence of gross mismanagement of a federal contract or grant, (2) a gross waste of federal funds, (3) an abuse of authority relating to a federal contract or grant, (4) a substantial and specific danger to public health or safety, or (5) a violation of a law, rule, or regulation related to a federal grant or a federal contract (including the competition for or negotiation of a contract). Section 4712 expressly covers and protects disclosures of such information to any of the following:

1. A management official or other employee of the School District who has the responsibility to investigate, discover, or address such misconduct. Examples of such management officials include *[insert title(s) of key positions—e.g., “the District Administrator, the Executive Director of Operations, the Director of Business Services, and, within their respective programmatic or operational area, and the Director of Special Education and the Food Services Director.”]* ***{Editor’s Note: The second sentence providing the examples can be treated as optional.}***
2. A federal employee responsible for contract or grant oversight or management at the relevant agency.

NOTICE OF EMPLOYEE WHISTLEBLOWER RIGHTS RELATING TO FEDERAL FUNDING

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3. An authorized official of the U.S., Department of Justice or other law enforcement agency.
4. A member of Congress or a representative of a committee of Congress.
5. A federal Inspector General (e.g., the Inspector General of a federal executive agency).
6. The federal Government Accountability Office.
7. A court or grand jury, including providing evidence of misconduct in any judicial or administrative proceeding relating to waste, fraud, or abuse on a federal contract or grant.

If a District employee believes that they have been subjected to a reprisal prohibited by section 4712, the employee may submit a complaint to the Inspector General of the federal executive agency that is responsible for the relevant federal funding or federal contract. The federal agency and the agency's Inspector General have authority to investigate such complaints and provide appropriate remedies (including but not limited to compensatory damages) for substantiated complaints.

[Insert if desired: "In providing specific notice of the rights and remedies established under section 4712, as described above, the District is in no way diminishing other whistleblower and nonretaliation rights and protections that are provided under other laws and/or under District policies."] [Insert if desired: "For additional information about employee whistleblower protections and nonretaliation rights, refer to the following Board Policies: [Insert a list of relevant local policies]."]

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NOTICE OF EMPLOYEE WHISTLEBLOWER RIGHTS RELATING TO FEDERAL FUNDING

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Exhibit

Sample Exhibit 1

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{Section 4712 of Title 41 of the United States Code requires each school district that receives federal funding (e.g., special education, Title I, child nutrition program, etc.) to inform their employees in writing of the rights and remedies provided under that federal statute. The notice requirement is repeated in 2 C.F.R. §200.217. This exhibit provides sample language for this employee notice. This sample exhibit can be used either with or without also adopting a board policy on the topic of employee whistleblower rights under PRG topic 527.1.}

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1. A management official or other employee of the School District who has the responsibility to investigate, discover, or address such misconduct. Examples of such management officials include *[insert title(s) of key positions—e.g., “the District Administrator, the Executive Director of Operations, the Director of Business Services, and, within their respective programmatic or operational area, and the Director of Special Education and the Food Services Director.”]* **{Editor’s Note: The second sentence providing the examples can be treated as optional.}**
2. A federal employee responsible for contract or grant oversight or management at the relevant agency.

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3. An authorized official of the U.S., Department of Justice or other law enforcement agency.
4. A member of Congress or a representative of a committee of Congress.
5. A federal Inspector General (e.g., the Inspector General of a federal executive agency).
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If a District employee believes that they have been subjected to a reprisal prohibited by section 4712, the employee may submit a complaint to the Inspector General of the federal executive agency that is responsible for the relevant federal funding or federal contract. The federal agency and the agency's Inspector General have authority to investigate such complaints and provide appropriate remedies (including but not limited to compensatory damages) for substantiated complaints.

[Insert if desired: "In providing specific notice of the rights and remedies established under section 4712, as described above, the District is in no way diminishing other whistleblower and nonretaliation rights and protections that are provided under other laws and/or under District policies."] [Insert if desired: "For additional information about employee whistleblower protections and nonretaliation rights, refer to the following Board Policies: [Insert a list of relevant local policies]."]

Adoption Date:

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{The federal government's Uniform Guidance for receiving and using federal grants and awards requires school districts to meet specific procurement requirements when making purchases supported by federal funds and to otherwise make use of the district's own documented procurement procedures. This sample policy establishes authorized methods of procurement based on (1) whether the purchase is supported by federal funds, and (2) certain cost thresholds. The local cost thresholds and authorized procurement methods are based heavily on the federal thresholds and methods. This sample policy is intended to coordinate with PRG 672.1 Sample Rule 1, and the supporting rule (or a modified version of the rule) should be adopted in connection with local use of this sample policy.}

This policy sets forth requirements and expectations related to methods of procurement, including purchases that are made, in whole or in part, using federal funds that have been awarded to the District. The **Director of Business Services** have primary administrative responsibility for directing and overseeing the implementation of this policy as a component of the District's overall procurement procedures and within a system of internal controls that supports the District's processes for budgeting, procurement management, accounting/financial management, and property disposition.

While this policy grants authority for employee or non-employee procurement agents to use relatively informal competitive processes and even noncompetitive methods in some situations, such authority does not:

- Permit any District procurement agent to disaggregate a purchase into multiple transactions in an uneconomical manner with the intent and purpose of avoiding a cost threshold that requires a more demanding procurement method.
- Preclude District procurement agents from lawfully going beyond any minimally-required and minimally-acceptable procurement procedures for the purpose of (1) enabling the District to make a more informed decision, (2) enhancing the District's competitive and bargaining position with respect to a procurement decision, or (3) otherwise increasing the tangible or intangible value that the District can derive from a particular purchase or contract. For example, the District may obtain multiple price quotations for a purchase even in circumstances that are considered "micro-purchases" under this policy.

All persons involved in the procurement of services, supplies, equipment, or other property on behalf of the District are responsible for ensuring that (1) their actions and decisions are within the scope of their authority, and (2) they sufficiently understand and make all reasonable efforts to comply with applicable laws, School Board policy, and established District procedures.

Procurement Supported by Federal Funds

A. Cost Thresholds and Procurement Methods (federally-funded procurement)

When procuring services, supplies, equipment, or other property involving the use of federal funds that are subject to the procurement standards found in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform

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Guidance"), the District shall use a procurement method that (1) at a minimum, is consistent with the Uniform Guidance (including all federally-authorized exemptions from the normal requirements of the Uniform Guidance), as summarized at a general level in the following chart; and (2) implements any additional mandatory procurement procedures/requirements established by state law or by the District that are not in conflict with the Uniform Guidance:

{Editor's Note: The Uniform Guidance for procurement using federal funds requires each school district to establish a micro-purchase threshold and a simplified acquisition threshold that are "based on internal controls, an evaluation of risk, and its documented procurement procedures." IMPORTANT: These thresholds should be set in consultation with the school district's auditor. Locally-determined thresholds cannot exceed the amounts permitted under the Uniform Guidance. School districts should be aware that although the Uniform Guidance does include a procedure under which a school district may establish a "micro-purchase" threshold that is greater than \$10,000 in some circumstances, the chart below does not reflect that option as very few school districts are likely to find it necessary or beneficial to pursue that option. When establishing/re-evaluating the local "micro-purchase" threshold, a factor to consider is the district's asset capitalization thresholds (see PRG topic 683, "Asset Management"). There are advantages to coordinating local capitalization thresholds and the local "micro-purchase" threshold. This is because, under the Uniform Guidance, an item that has a useful life of more than one year and a per-unit acquisition cost at or above the lesser of \$10,000 or the applicable local capitalization threshold will generally be considered "equipment" rather than "supplies," and the distinction between "equipment" and "supplies" has an impact on both procurement procedures and asset use, ownership, and disposition under the Uniform Guidance.}

Cost Threshold	Allowable Federal Procurement Methods
<p>Micro-purchases: In aggregate amount, the purchase does not exceed \$10,000, except that for construction projects subject to the federal Davis-Bacon Act, an amount that does not exceed \$2,000</p>	<p>"Micro-purchases" of supplies or services (as defined in the federal regulations) may be made or awarded without soliciting competitive quotations to the extent any of the following determines that the cost of the purchase/contract is reasonable: Director of Business Services</p> <p>Where multiple qualified suppliers of the same or materially interchangeable products/services have been identified and such suppliers offer effectively equivalent rates/prices and other terms, repeated micro-purchases that are subject to the Uniform Guidance are to be reasonably distributed among different suppliers to the extent practical.</p> <p>A purchase at this micro-purchase tier may also be documented as a noncompetitive purchase there are grounds for doing so as specified under the Uniform Guidance.</p>
<p>Simplified Acquisition: Unless the purchase qualifies as a "micro-purchase," any purchase</p>	<p>Such purchases may be based on any of the following:</p> <ol style="list-style-type: none"> 1. Multiple price or rate quotations obtained in advance from qualified sources, as further detailed in District procurement procedures; {Editor's Note: Ensure that the district has

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<p>that does not exceed \$250,000, which serves as the District's federal "simplified acquisition threshold"</p>	<p><i>procedures that define expectations for obtaining price/rate quotations. For an example, see PRG 672.1 Sample Rule 1.</i></p> <ol style="list-style-type: none"> 2. Noncompetitive ("single source") procurement to the extent there are grounds for doing so as specified under the Uniform Guidance; or 3. The District's discretionary election to use a more formal competitive bid or request for proposal process. <p>The Director of Business Services is responsible for ensuring that the District evaluates the appropriateness of making any purchase at this tier on the basis of life-cycle cost estimates as further detailed in District internal controls. <i>{Editor's Note: See PRG 672.1 Sample Rule 1 for provisions that address the state statutory requirements regarding life-cycle cost estimates.}</i></p>
<p>Formal Procurement: A purchase in an amount that exceeds \$250,000</p>	<p>Such purchases may be based on any of the following:</p> <ol style="list-style-type: none"> 1. Sealed bids using procedures that comply with the Uniform Guidance, including that the invitation for bids must be publicly advertised; 2. Formal competitive proposals using procedures that comply with the Uniform Guidance, including that there is public notice of the request for proposals; or 3. Noncompetitive procurement to the extent there are grounds for doing so as specified under the federal Uniform Guidance. <p>In addition:</p> <ol style="list-style-type: none"> 1. The District shall conduct a cost or price analysis for these purchases that, at a minimum, shall include making an independent estimate before receiving bids or proposals (including noncompetitive proposals). 2. The Director of Business Services is responsible for ensuring that the District evaluates the appropriateness of making any purchase at this tier on the basis of life-cycle cost estimates as further detailed in District internal controls. <i>{Editor's Note: See PRG 672.1 Sample Rule 1 for provisions that address the state statutory requirements regarding life-cycle cost estimates.}</i> 3.

The above chart represents a starting point for identifying an appropriate and lawful procurement method for purchasing that is subject to the Uniform Guidance. Many

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additional details, requirements, restrictions, exemptions, and procedures are established in the federal regulations. In certain cases, other federal laws and regulations establish additional requirements and/or affect the specific application of the Uniform Guidance.

{Editor's Note: PRG 672.1 Sample Rule 1 could be part of such additional procedures.}

B. Federally-Authorized Grounds for Noncompetitive Procurement

In connection with purchases made using, in whole or in part, federal funds that are subject to the requirements of the Uniform Guidance, noncompetitive procurement may be used only if the Director of Business Services determines and documents that one or more of the following circumstances apply:

1. The procurement involves the acquisition of property or services, the aggregate dollar amount of which does not exceed the District's micro-purchase threshold for purchases made, in whole or in part, using federal funds.
2. The item is available only from a single source.
3. A public exigency or emergency exists and does not permit a delay resulting from publicizing a competitive solicitation.
4. The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the District.
5. After solicitation of a number of sources, the District determines that competition is inadequate.

Methods of Procurement for Purchases that do NOT Involve the Use of Federal Funds Subject to the Uniform Guidance Regulations

A. Cost Thresholds and Procurement Methods (non-federal procurement)

The following parameters for methods of procurement apply when the District procures services, supplies, equipment, or other property and the expenditure does NOT involve the use of any federal funds that are subject to the Uniform Guidance procurement regulations:

1. The District shall adhere to any other state or federal requirements that dictate the use of a certain procurement method for a particular purchase or contract.
2. When no separate state or federal requirement applies and the Board has not directed or approved a more specific procurement method for a particular purchase or contract, the Board directs its authorized employee and non-employee procurement agents to utilize the following procurement methods:

{Editor's Note: As a default within this sample policy, the cost thresholds in the next table mirror the federal funds cost thresholds in the previous table. As a general rule, a school district may use cost thresholds for state or locally-funded procurement that are equal to or greater than the

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corresponding cost thresholds that the district establishes for purchases made, in whole or in part, using federal funding. A district should seek legal counsel prior to establishing any cost thresholds for non-federal procurement that would be lower in dollar value than the corresponding thresholds that the district establishes for federal procurement. Assuming equivalent purchases, requiring more formal and rigorous procurement methods for non-federal procurement (i.e., purchase made using revenues obtained from non-federal sources) may violate the Uniform Guidance for federally-funded procurement.}

Cost Threshold	District-Authorized Procurement Method(s)
<p>A purchase that, in an aggregate amount, does not exceed the dollar amount of the District's non-construction "micro-purchase threshold," for federal procurement (see above)</p>	<p>Such purchases may be made or awarded under a reasonable business judgment standard without soliciting quotations, bids, or proposals. The Board will consider this standard satisfied to the extent that any of the following has determined that the cost of the purchase/contract was reasonable: Director of Business Services.</p> <p>A purchase at this tier may also be pursued as a noncompetitive purchase to the extent there are grounds for doing so as specified under the federal Uniform Guidance or as separately authorized or approved by the Board.</p>
<p>Unless the purchase qualifies as a "micro-purchase" under the previous tier, a purchase that does not exceed the District's "simplified acquisition threshold" for federal procurement (see above)</p>	<p>Such purchases may be based on any of the following:</p> <ol style="list-style-type: none"> 1. Multiple price or rate quotations obtained in advance from qualified sources, as further detailed in District procurement procedures; {Editor's Note: Ensure that the district has procedures that define expectations for obtaining price/rate quotations. For an example, see PRG 672.1 Sample Rule 1.} 2. Noncompetitive ("single source") procurement to the extent there are grounds for doing so as specified under the federal Uniform Guidance or as separately authorized or approved by the Board; or 3. The District's discretionary election to use a more formal competitive bid or request for proposal process. <p>The Director of Business Services is responsible for ensuring that the District evaluates the appropriateness of making any purchase at this tier on the basis of life-cycle cost estimates as further detailed in District internal controls. {Editor's Note: See PRG 672.1 Sample Rule 1 for provisions that address the state statutory requirements regarding life-cycle cost estimates.}</p>
<p>Purchases of an amount that exceeds the District's "simplified acquisition</p>	<p>{Editor's Note: For greater flexibility in the procurement methods used at this tier, a district could choose to replace the provisions shown below with the following alternative, "For non-federal procurement at this cost tier, the District follows the requirements</p>

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threshold" for federal procurement	<p><i>of the preceding tier (immediately above) except as otherwise required by law.”}</i></p> <p>Such purchases may be based on any of the following:</p> <ol style="list-style-type: none">1. Competitive bids;2. Competitive proposals;3. Noncompetitive procurement to the extent there are grounds for doing so as specified under the federal Uniform Guidance or as separately authorized or approved by the Board. <p>The Director of Business Services is responsible for ensuring that the District evaluates the appropriateness of making any purchase at this tier on the basis of life-cycle cost estimates as further detailed in District internal controls. {Editor’s Note: See PRG 672.1 Sample Rule 1 for provisions that address the state statutory requirements regarding life-cycle cost estimates.}</p>
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B. Noncompetitive Procurement (for non-federal procurement)

The Board authorizes noncompetitive procurement for **non-federal** purchases if at least one of the following justifications has been verified and documented by **the Director of Business Services**:

1. Any of the circumstances is present under which noncompetitive procurement would be allowable under the federal Uniform Guidance (see list above).
2. The purchase involves the District's choice to exercise a renewal or extension option found in an existing license or other contracting arrangement where the underlying contract was either previously approved by the Board or procured via the solicitation of competitive price quotations, competitive bids, or competitive proposals.
3. The District is choosing to continue to use (or expand the use of) a specific product or service (such as a specific curriculum element or computer application or software system) that is already in use in the District and in which a significant investment of time and/or money has already been made. In such a situation, the District may consider a particular brand or particularly proprietary version of a product to be a "single source," and may further consider a specific vendor or contractor to be "single source" when such vendor or contractor has exclusive rights to purvey the goods or services in question.
4. The District makes the purchase from another unit of government or the procurement is pursuant to a contract or other agreement with a Cooperative Educational Service Agency or via an intergovernmental agreement.
5. The procurement is pursuant to pre-negotiated state contract pricing.

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6. Grant monies are involved and the grant mandates the participation of expressly-identified grant partners, subcontractors, or vendors.
7. The Board has otherwise expressly authorized or approved a noncompetitive procurement process.

C. Procurement of Professional Services (for non-federal procurement)

The Board acknowledges that the procurement of professional services, such as legal services, can present unique situations such that a contract or other service agreement may not be readily amenable to the typical procurement methods and procedures outlined in this policy. Accordingly, whenever such procurement decisions are legally left to the District's discretion, the Board relies heavily on its own oversight function, and the following apply to the procurement of such services:

1. Except as otherwise required by law, the Board's direct approval of a contract or service agreement for professional services, or of any disbursements for such services, may be used to satisfy the requirements of this policy as it relates to procurement that is **not** subject to the federal Uniform Guidance.
2. To minimize the potential for disruption that might occur if the Board were to decline to approve a proposed/recommended contract, service agreement, or disbursement for such services, the Board expects the District Administrator to work jointly with the Board to define:
 - a. A situation-appropriate procurement or selection process for such services, in at least those situations where (1) there is more than one reasonably available source for the service(s); (2) the known or reasonably projected aggregate annual costs for the service(s) either are expected to necessitate a Board-approved amendment to the current year's annual budget or, in any fiscal year, are likely to exceed **the District's micro-purchase threshold for non-construction federal procurement**; and (3) there are no emergency or other exigent circumstances that reasonably require the administration to use an administratively-defined expedited process;
 - b. The scope of any current or potential future professional services the Board is being asked to approve or authorize; and
 - c. The scope of any District agent's authority, if different from standard policy-based purchasing authority, to engage a pre-approved provider of professional services in the future without obtaining advance approval from the Board for the specific engagement.

Legal References:

Wisconsin Statutes

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Section 16.73	[cooperative purchasing]
Section 77.54(9a)	[state sales tax exemption for purchases by school districts; see also section 77.54(9m)]
Section 66.0131	[local government purchasing, including intergovernmental purchases without bids, recycled and recyclable content of procured goods, and life-cycle cost estimates]
Section 66.0133	[energy savings performance contracting; procedures and bidding]
Section 66.0135	[contracts and orders, receipt of invoices, and payments]
Section 66.0301	[intergovernmental agreements]
Section 66.0903	[prevailing wage requirements and the related suspension and debarment requirements]
Section 118.03	[board requirement to adopt all textbooks necessary for use in the schools]
Section 120.10	[powers of the annual meeting, including authorizing or directing the district to purchase/provide certain property or services] <i>{Editor's Note: This statute applies only to common and union high school districts. Unified school districts should delete this legal reference.}</i>
Section 120.12(24)	[school board duty to solicit sealed bids prior to selecting provider of group health care benefits]
Section 120.13(3)	[school board power to enter into certain intergovernmental agreements]
Section 120.13(5)	[school board power to purchase books, materials and equipment for use in the schools]
Section 779.14	[performance bonds, payment bonds, and other contract requirements in connection with public improvements or public works]
Federal Law	
2 C.F.R. Part 180	[federal suspension and debarment requirements]
2 C.F.R. §200.214	[Uniform Guidance regulation that applies federal suspension and debarment requirements to non-federal entities that spend federal funds]
2 C.F.R. §200.318	[general standards for procurement supported by federal funds]
2 C.F.R. §200.319	[competition in procurement supported by federal funds; written procurement standards required]
2 C.F.R. §200.320	[methods of procurement to be followed for purchases supported by federal funds; includes specific requirements for competitive bids and proposals and the list of circumstances under which noncompetitive procurement is allowable for federally-supported purchases]
2 C.F.R. §200.321	[federal funds contracting with small and minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms]
2 C.F.R. §200.322	[domestic preferences for federal procurements]
2 C.F.R. §200.323	[procurement of products containing recovered materials and recycled or recyclable content, that can be reused, and that are energy and water efficient; compliance with the federal Solid Waste

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2 C.F.R. §200.324	Disposal Act, as amended by the Resource Conservation and Recovery Act]
2 C.F.R. §200.326	[cost or price analysis requirements for procurement in excess of the simplified acquisition threshold]
2 C.F.R. §200.327	[bid guarantee, performance bond, and payment bond requirements for construction or facility improvement contracts or subcontracts exceeding the simplified acquisition threshold]
2 C.F.R. App. II to Pt 200	[contract provisions for non-federal entity contracts under federal awards]
2 C.F.R. Part 3474	[contract provisions for non-federal entity contracts under federal awards]
2 C.F.R. Part 400	[additional federal regulations applicable to awards administered by the U.S. Department of Education]
7 C.F.R. Parts 210 to 226	[additional federal regulations applicable to awards administered by the U.S. Department of Agriculture]
34 C.F.R. §75.135	[child nutrition program regulations; including allowances of geographic preference in the procurement of certain unprocessed locally grown or locally raised agricultural products and contracting for the participation of food service management company in connection with school meal programs]
48 C.F.R. §2.101	[U.S. Department of Education direct grant competition exception for proposed implementation sites, implementation partners, or service providers]
	[Federal Acquisition Regulation definitions] <i>{Editor's Note: Adjustments to the federal micro-purchase and simplified acquisition thresholds are generally reflected in this regulation, although the federal Office of Management and Budget sometimes announces and implements adjustments to the thresholds prior to the actual modification of the regulation.}</i>

Cross References:

[Insert appropriate cross references to the policy as applicable to your district.]

Adoption Date:

683 Asset*{This sample policy is intended to provide guidance related to requirements for reporting the value of certain assets in financial statements as required by Governmental Accounting Standards Board Statement 34 (GASB 34). While establishing some minimum parameters that must be met, this sample delegates the task of establishing a comprehensive schedule of capitalization thresholds to the administration. Under this sample, the administration has substantial flexibility to create and adopt the final schedule. School districts should consult with their auditor when considering this policy, determining local asset capitalization thresholds, and establishing systems, procedures, and additional internal controls related to capital asset management and inventory control.}*

The District's capital assets include, but are not necessarily limited to, land, land improvements, buildings, building improvements, and infrastructure, as well as vehicles and certain machinery, equipment, software, works of art, and other tangible or intangible assets that are used in operations and that have initial useful lives extending beyond one fiscal year. Capital assets also include certain improvements, modifications, replacements, or renovations to capital assets that materially increase their value or useful life. The School Board's expectation for the District's capital asset management and accounting process is to ensure that the District's procedures are sufficiently formalized and implemented to allow for adequate financial reporting, as assessed by the District's auditors.

The **Director of Business Services**, in consultation with the District's financial auditors, shall be responsible for establishing a written schedule of capitalization thresholds applicable to particular capital asset classes. Subject to the expectation that the schedule shall be structured to capture at least 80% of the value of the District's total assets, the threshold established for single items within any of the asset classes need not be less than **\$5,000**. *{Editor's Note: The dollar amounts inserted in this paragraph, as well as the thresholds for specific asset classes that are identified in the local schedule referenced in this policy, should be established with input from the district's auditor. There are practical reasons to consider the interplay between local asset capitalization thresholds and the definitions that distinguish between "equipment" and "supplies" under the federal regulations (2 C.F.R. Part 200) that govern the procurement, management, and disposition of property paid for in whole or in part with federal funds. Although the federal funds regulations permit a local capitalization threshold as high as \$10,000 before a purchased item must be considered "equipment," the district's auditor may identify and recommend capitalization thresholds that are less \$10,000 based on current practices, the size of the annual operating budget, or other district-specific considerations.}*

Capital assets having an acquisition cost (or other relevant valuation) above the capitalization threshold of the applicable asset class shall be valued, inventoried, depreciated for financial accounting purposes when appropriate, and regularly tracked over time through the point of retirement, sale, or other disposition.

District procedures related to capital asset management shall also account for the appropriate identification, recording, and tracking of capital assets that are acquired using (1) federal funds, (2) capital borrowing, or (3) referendum funds that are subject to specific restrictions on use.

Nothing in this policy prevents the District from otherwise inventorying (recording, counting, and tracking) supplies, equipment, and other items that are not capitalized and depreciated for financial reporting purposes. Further, even if not capitalized, the District shall inventory the following capital assets:

{Editor's Note: In consultation with the district's auditor and upon review of desired practices, list any non-capitalized items that the board wishes to ensure are consistently inventoried. The items in the sample list below are intended only as possible examples that might be considered. They do not represent auditor recommendations.}

1. [Computing devices, computer peripherals, and any instructional technology capital assets with an individual item value in excess of [insert dollar amount];
2. Textbooks;
3. Other non-capitalized items when required by law or by the terms of any grant or contract.]

Legal References:

Wisconsin Statutes

[Section 120.14](#) [annual school district audit required]

State Guidance

[Department of Public Instruction School District Audit Manual Index](#)

[Wisconsin Uniform Financial Accounting Requirements](#) (WUFAR)

Federal Law

[2 C.F.R. §200.1](#) [definitions of key terms, such as "supplies" and "equipment," that are tied to local capitalization thresholds within the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)]

[2 C.F.R. part 200 subpt. D](#) [post-award requirements under the federal Uniform Guidance; includes requirements related to tracking and disposition of property, supplies, and equipment paid for with federal funds]

[2 C.F.R. part 200 subpt. F](#) [audit requirements under the federal Uniform Guidance]

Accounting Standards

[Governmental Accounting Standards Board – GASB Statement No. 34](#)

Cross References:

741, Maintenance and Control of Instructional Materials

WASB Policy 683 Sample policy 1

Adoption Date: 10/11/82

Revised: March 1994

April 2002

June 2024

Fee Schedule For Transportation To & From Babysitters Licensed Daycare

Policy #751
Exhibit

Waunakee Community School District

Page 1 of 2

Parents/guardians of children in grades ~~K-6~~ Pre-K-6 who would like their children to be transported by bus to and/or from a ~~babysitter or~~ licensed daycare center ~~who lives beyond the 1.0 mile range, but within the District boundaries,~~ shall be charged a fee as follows:

\$125.00 per year per student – 1-way transportation

\$250.00 per year per family – 1-way transportation

\$250.00 per year per student - 2-way transportation

\$500.00 per year per family - 2-way transportation

~~Parents/guardians of children in grades PreK-6 who would like their children to be transported by bus to and/or from a licensed daycare provider within the 1.0 mile range shall be charged based on the fee schedule listed above.~~

There will be no overloading of buses.

This service will be provided only as long as space is available on the bus.

Should the transporting of a student to a babysitter create an overload of a bus, this service will be discontinued and a pro-rated refund will be made to the parent/guardian.

For safety reasons, the district can only allow for one consistent pick-up point in the morning and one drop-off point in the afternoon. **For students who reside in two (2) households, each of the two (2) households are considered one (1) consistent pick-up/drop-off locations.** The district's Executive Director of Operations may approve a second pick-up or drop-off point if it is consistent every week.

Alternate Transportation for Private School Students

The Waunakee Community School District does not provide alternate transportation for private school students who are non-residents of the district.

Adoption Date: 4/14/86

Revised: 5/11/87
March 1994
September 1994
12/11/95
June 2002
November 2003
May 2006
August 2007

**Fee Schedule For Transportation To
& From Babysitters Licensed
Daycare**

**Policy #751
Exhibit**

Waunakee Community School District

Page **2** of **2**

July 2024

1. Drivers may, after consulting with the bus transportation supervisor, refuse to enter roads which may endanger the safety of the riders or cause the District unusual expenses.
2. Buses will not deviate from assigned routes unless permission is granted by the Executive Director of Operations.
3. Students must be let off at assigned locations and no one shall be allowed to ride a bus other than the assigned passengers without the permission of the building principal.
Procedure for obtaining permission:
 - a. A note signed by a parent or guardian must be provided to the building principal no less than 24 hours before the student may ride on the bus.
 - b. The building principal will approve or deny the request.
 - c. The building principal will notify the driver if the request is approved.
 - d. No bus will be allowed to transport more students than what the law allows to be transported by that bus.
 - e. Regularly assigned students take precedence.
4. Students are to be assigned pick-up locations at the time designated by the bus driver, and no driver is to wait more than one minute for students not at assigned locations unless they receive permission from the Executive Director of Operations. This may be done by way of the two-way radios. For safety reasons, ~~only two (2) pick-up/drop-off locations (including home)~~ the district can only allow for one consistent pick-up point in the morning and one drop-off point in the afternoon per student. That schedule must be consistent week to week. Two (2) parent/guardian households are each considered one (1) consistent pick-up/drop-off location. Varying schedules will not be allowed, (i.e. one week Mon., Wed., Friday drop-off/pick-up and following week Mon., Tues., Thurs., etc.) except in emergencies as approved by the Executive Director of Operations.

For safety reasons, pick-up or drop-off locations other than home must be requested in writing by parents/guardians via a district form. This request must be submitted to the bus contractor before the routes are finalized for the school year or summer session. The routes are finalized no later than ~~five business days~~ 2 weeks prior to the start of the school year or summer session. Bus routes and pick-up/drop-off locations will not change during the first two weeks of the school year or summer sessions.

Requests received after the bus routes are finalized will be reviewed for consideration after the first week of the school year or summer session is finished.

5. Maximum Riding Time - Regular Route

The maximum riding time for any one student shall not exceed two (2) hours each day. There could be an occasion where the riding time of some students may exceed this time depending on the weather. Any other exceptions need to be approved by the Board.

6. Non-Resident Transportation

A. The district shall not provide transportation of nonresident students who are accepted under the open enrollment program with the exception of CWD students as outlined in their IEP. and for students who qualify for and follow the procedures and approvals outlined in paragraph 6B of this policy. Transportation shall be provided by the parent to and from the assigned school. Parents may contract with the district for transportation services from a scheduled district bus stop.

B. A non-resident open enrolled student may request in writing a transportation contract to pay for services to the district administrator or designee and may be granted approval, if:

- The residence is located on an existing Waunakee Community School District bus route.
- Approval is granted by the resident school board for the non-resident district to provide transportation to and/or from the designated residence. (Per Wisconsin State Statute 121.54(10))
- If the residence is located in a location that is approved as a safe pick-up and drop-off location, as determined by the non-resident district bus company.

7. Extra-Curricular Trips

a. Students are to ride to and from a field trip location or a co-curricular event in school district provided vehicles with the exception that they may be transported by their own parent/guardians with a written request provided to the principal. The principal may make alternative arrangements, with parent approval, for unique or unusual circumstances. High school students may drive to activity sites within the Village of Waunakee with the permission of the principal. Students and their parents/guardians will be required to enter into an Agreement with the District in order to transport themselves.

b. Only parents/guardians/volunteers serving as chaperones may ride on school provided vehicles in addition to staff members and the students involved with the trip.

c. Parent chaperones may not bring other children on school-sponsored trips. Chaperones are expected to assist with supervision of the students on the trip and caring for other children can interfere with that responsibility.

- d. Parent chaperones may drive their own vehicles on school trips if sufficient supervision is provided on school vehicles. However, they may only transport other parent chaperones or their own child involved in the group activity.
- e. Only students, staff, and designated chaperones are part of the official field trip/co-curricular group. Others attending the same event on their own initiative are not part of the official group.

The District's Executive Director of Operations may make exceptions to the above guidelines after consultation with the bus contractor and the district's insurance carrier. A possible exception would be to transport students from another district along with Waunakee students to a regional or national conference. Others might include allowing a child of a driver, a sibling of a student, or parents of team members to ride school buses in unique or unusual circumstances.

Chaperones of all extracurricular trips are responsible to help the driver with discipline of students on the bus and be concerned with the general safety of students.

8. Shuttle Service

The district shall provide a shuttle service between elementary schools. Only students who are approved for shuttle service and appearing on the shuttle roster shall ride the shuttle bus. This service shall be provided for the following students: students with disabilities, intra-district transfer students, and students whose approved child care provider is in another attendance area or other students as approved by the Executive Director of Operations.

- a. Shuttle service is not to be used as a "taxi" service for transporting non-shuttle students to after school meetings or to a friend's house.
- b. Should a student not be eligible for transportation in his/her attendance area the approved shuttle service will transport that student to the "home" attendance area school and the student shall walk to his/her home.
- c. Should a student be eligible for transportation in his/her attendance area the student will be transferred from his/her shuttle bus to his/her regular bus for transportation home.

9. Child Care Transportation Fees

If a student is not eligible for transportation in his/her transportation area a fee shall be charged, as approved by the Board, for transporting that student to or from his/her child ~~care provider~~ on regular bus routes. However, no fee would be charged for the shuttle service should its use be necessary.

Student Transportation Services

**Policy #751
Rule (1)**

Waunakee Community School District

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Adoption Date: 2/13/84
5/14/84
4/14/86

Revised: 9/9/85
March 1994
September 1994
12/11/95
6/8/98
June 2002
May 2006
May 2007
February 2010
April, 2020
September 2024

CYBERSECURITY MANAGEMENT AND PLANNING

Policy 774

Sample Policy 2

Page 1 of 4

{This sample policy assigns primary administrative responsibility for various cybersecurity-related duties to a designated staff member. Chief among those responsibilities is the duty to develop and maintain a district cybersecurity plan. This sample establishes an approach to cybersecurity management that draws from two key resources:

- The [Cybersecurity Framework \(CSF\), version 2.0](#), which is published and maintained by National Institute of Standards and Technology within the U.S. Department of Commerce. The abstract to the framework indicates that the CSF offers a “taxonomy of high-level cybersecurity outcomes that can help any organization manage its cybersecurity risks ... to better understand, assess, prioritize, and communicate its cybersecurity efforts.” The taxonomy is organized around six core functions: (1) govern, (2) identify, (3) protect, (4) detect, (5) respond, and (6) recover.
- The [Cybersecurity Performance Goals \(CPGs\)](#) published and maintained by the Cybersecurity and Infrastructure Security Agency (CISA). According to CISA, “By implementing these CPGs, organizations can undertake prioritized and targeted investment to address the most significant cybersecurity risks. Each CPG was selected to (1) significantly and directly reduce the risk or impact caused by commonly observed, cross-sector threats and adversary tactics, techniques, and procedures; (2) be clear, actionable, and easily definable; and (3) be reasonably straightforward and not cost-prohibitive for even small and medium-sized entities to successfully implement. In addition, the CPGs are accompanied by a CPGs Checklist that allows organizations to prioritize their utilization of each goal based upon cost, complexity, and impact, making the CPGs uniquely useful for organizations with limited resources. To start, school districts should prioritize high-impact, low-cost CPGs.” See “[Protecting Our Future: Partnering To Safeguard K–12 Organizations From Cybersecurity Threats](#),” CISA, U.S. Dept. of Homeland Security (Jan. 2023) at 15. See also the CISA resources for schools found at <https://www.cisa.gov/K12Cybersecurity>, <https://www.cisa.gov/cyber-hygiene-services> and <https://www.cisa.gov/protecting-our-future-cybersecurity-k-12>

IMPORTANT: The commitment to create and maintain the district cybersecurity plan envisioned by this sample is a significant commitment. Compared to PRG 774 Sample Policy 1, this sample offers only a general outline for the local cybersecurity management plan that is envisioned by the board. For example, unlike 774 Sample Policy 1, this sample does not identify specific cybersecurity measures/practices or specific goals/initiatives that the board requires the plan to expressly address and monitor. However, both samples share the same fundamental approach to cybersecurity management and accountability.

The actual sample policy begins on the next page.}

The School Board directs the creation, implementation, monitoring, and periodic updating of a District plan ("Plan") concerning the identification, prevention, detection, and response to cybersecurity threats and any actual cybersecurity incidents affecting the District. The Plan shall be consistent with this policy, which is focused on (1) fostering continuous improvement in the area cybersecurity; (2) identifying and using benchmark-informed and risk-informed practices; and (3) establishing evaluation and accountability mechanisms in the area of cybersecurity management.

Key Administrative Responsibilities

The Director of Technology shall have primary administrative responsibility for the District's cybersecurity Plan, including all of the following:

1. Establishing an initial version of the Plan by no later than August 3, 2026.
2. Notifying the Board of substantive updates/modifications to the Plan and presenting the plan.
3. Providing recommendations to the regarding funding in the District's annual budgets and regarding other resources that are identified as necessary for the District to be able to maintain current cybersecurity measures, implement additional near-term priority items, and make progress on longer-term initiatives and goals. The Board acknowledges that resource limitations can affect the District's ability to make desired progress toward achieving specific cybersecurity priorities and goals.
4. Participating in the District's periodic evaluation of cybersecurity insurance options that may be available to the District and offering relevant recommendations.

Expectations for the District Cybersecurity Plan

The Board expects the District's cybersecurity Plan to:

1. In all iterations, address significant cybersecurity risks in a risk-informed manner that considers the goals, measures, and strategies set forth in the following:
 - a. The Cybersecurity Framework (CSF) published and maintained by the National Institute of Standards and Technology (NIST), using version 2.0 or later. The Plan shall address each of the core functions of the framework.
 - b. The Cross-Sector Cybersecurity Performance Goals (CPGs) published and maintained by the federal Cybersecurity and Infrastructure Security Agency (CISA).
2. Prioritize the timely near-term implementation and/or ongoing monitoring and enhancement of cybersecurity measures that are considered to be high-impact measures relative to the applicable resource requirements (i.e., not cost-prohibitive), as validated within the NIST Cybersecurity Framework, the CISA Cybersecurity Performance Goals, and/or other expert resources. Such measures should address the key cybersecurity functions of identifying threats and vulnerabilities, protecting against threats and vulnerabilities (i.e., incident prevention), incident detection, and incident mitigation (i.e., response and recovery).

3. Include, as soon as reasonably practicable, cyber incident response procedures, initially prioritizing response procedures that address at least (1) data breaches, (2) ransomware attacks, and (3) loss of access to operationally critical systems. ***{Editor's Note: The three types of incidents that are given express priority in this item may be modified at district discretion.}***
4. Identify additional cybersecurity measures that, even if not currently in place or planned for imminent implementation, the District should pursue during a [*"1-year to 3-year"*] time horizon. The Plan shall track the District's current status and future progress with respect to such measures, including identifying any evaluation, planning, or implementation steps that are being taken, as well as any barriers that may be inhibiting or preventing progress.
5. Identify longer-term goals and initiatives that will enhance the District's position with respect to cybersecurity management and cybersecurity practices. The Plan shall track the District's current status and future progress with respect to such longer-term goals and initiatives.
6. Continuously evolve over time to increase the Plan's alignment with relevant portions of the NIST Cybersecurity Framework and the CISA Cybersecurity Performance Goals.

To summarize, the Board's expectation is that, under a locally-driven Plan, the administration will operationalize the management of the District's approach to cybersecurity in a manner that (1) identifies, prioritizes, and invests in the near-term implementation, monitoring, and enhancement of the most impactful cybersecurity measures, within applicable resource constraints; and (2) builds, over time, to demonstrate an increasingly more sophisticated, comprehensive, integrated, and effective strategic approach to cybersecurity management.

Legal References:

Wisconsin Statutes

[Section 19.65](#)

[mandate to establish rules of conduct and training for employees involved in the management of personally identifiable information]

[Section 134.98](#)

[a state "data breach" statute that requires certain covered entities to provide notice of unauthorized acquisition of certain personal information] ***{Editor's Note: There is some arguable ambiguity as to whether section 134.98 applies directly to school districts.}***

Federal Laws

[34 C.F.R. Part 99](#)

[regulations implementing the Family Educational Rights and Privacy Act (FERPA), including the expectation found in 34 C.F.R. §[99.31\(a\)\(1\)\(ii\)](#) that schools must use reasonable methods (e.g., physical controls, technological controls, and/or administrative policies) to ensure that school officials obtain access to only those education records in which they have legitimate educational interests]

[34 C.F.R. §300.623](#)

[confidentiality safeguards regarding IDEA-related records]

Other Federal Resources

- The [Cybersecurity Framework](#) (CSF), version 2.0 (released Feb. 2024), as published and maintained by National Institute of Standards and Technology

CYBERSECURITY MANAGEMENT AND PLANNING

Policy 774

Sample Policy 2

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- [Cybersecurity Performance Goals](#) (CPGs), as published and maintained by the Cybersecurity and Infrastructure Security Agency (CISA)
- Other CISA [resources](#), including those created pursuant to the K-12 Cybersecurity Act of 2021, [Public Law 117-47](#), codified in part in a note added to [6 U.S.C. § 652](#)

Cross References:

[Insert appropriate cross references to the policy as applicable to your district.]

Adoption Date:

A mail service system shall be maintained within the District in order that in-district communications and communications from outside sources may be delivered to the intended recipient in the most practical way.

The use of District mail facilities and personnel for the distribution of materials and communications shall be restricted mainly to those materials and communications that further the educational purposes of the district. The superintendent may, by regulation, authorize certain exceptions without defeating the intent of this policy.

Political materials shall not be distributed through District mailboxes or school mail systems unless received through the United States mail.

Adoption Date: 1/10/83

Revised: March 1994
June 2002
October 2024

STUDENT TRANSPORTATION SERVICES

Policy 751

Waunakee Community School District

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The District will meet its legal obligations to provide mandated student transportation services to public school students and private school students using the method(s) that the District deems most appropriate to the particular circumstances. To the extent consistent with applicable law and Board policy, the District may provide student transportation services by contracting with third-party entities, or by using District employees, contracts with parents, or other lawful methods.

In addition to providing legally-mandated student transportation, the District shall also provide student transportation services in other situations where permitted by state law and where such transportation has been appropriately authorized by (a) a Board policy; or (b) a motion or resolution of the Board or (c) the school district annual meeting, whichever may be applicable. To the extent permitted by law, the District may charge fees related to such additional transportation.

The Board, at its discretion, has determined that the district shall provide transportation to students in grades Kindergarten through fourth grade who reside more than 1.0 miles from their assigned school. The 1.0 mile is measured from the intersection of the bus loop and the nearest public road. The district shall provide transportation to students in grades 5-6 who live more than 1.75 miles from the intersection of Aldora Lane and Woodland Drive in the Village of Waunakee. The district shall provide transportation to students in grades 7-12 who live more than 1.75 miles from the intersection of Knightsbridge and South Street in the Village of Waunakee.

The District Administrator may approve the transportation of students within the mileage limits above. The approval shall only be granted upon parent/guardian request for an extenuating circumstance which may include factors such as: financial hardship, medical hardship, language barriers, etc. Documentation of the extenuating circumstance must be provided to the District Administrator. Students will be required to walk to the nearest existing bus stop location.

The Executive Director of Operations shall direct and manage the transportation services the District provides to public and private school students and coordinate such services among relevant parties in the interest of the students' safety and welfare. The Executive Director of Operations may delegate responsibility for the oversight of operational issues related to transportation services to another administrator or supervisory employee. The Executive Director of Operations shall also ensure that the District develops any administrative guidelines that may be necessary or advisable for the implementation of the School Board's transportation policies, and the Board of Education shall approve such guidelines and any revisions thereto.

At this time, the District neither owns nor leases any school busses, and no District employee operates a District owned school bus as part of his/her regular duties. Accordingly, all student transportation via school bus involves a contracted service provider. The following provisions concern contracted service providers (not including individual parent contracts) that provide student transportation services for the District:

1. For daily student transportation to and from school using school busses, the District will contract with one or more service providers as the Board determines is in the best interests of the District. The contracting process will involve the periodic solicitation of bids or requests for proposals.

STUDENT TRANSPORTATION SERVICES

Policy 751

Waunakee Community School District

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2. Each contract shall require the service provider to ensure that the drivers and vehicles used for student transportation meet the requirements established under state or federal law, Board policy, or the contract itself. Such requirements shall include but are not limited to ensuring proper licensure, verifying all aspects of operator eligibility, providing operator training, maintaining appropriate insurance, conducting vehicle inspections, and monitoring vehicle operation.
3. Subject to approval of the Executive Director of Operations, the contracted provider shall initially determine and schedule regular bus routes and bus stops, taking into account factors such as the number and location of children, the safety of students, and the cost efficiency of the route. Changes to routes and schedules may be required during the school year, and the contracted provider shall provide advance notification of District-approved changes to affected families.
 - a. The Executive Director of Operations shall obtain Board approval if he/she and the contractor's representative determine that it may be necessary for any student to spend more than 60 minutes on the bus on the way to or from school. There could be an occasion where the riding time of some students may exceed this time depending on the weather.
 - b. In connection with formulating routes and schedules, the contracted provider may designate pick-up/drop-off points along a proposed route that require one or more students to walk to the common pick-up/drop-off points.
4. A contracted provider (via the contracted party, the contractor's driver, and/or any other employee of the contractor who may be assigned to provide services under the contract) shall have responsibility to supervise the students who are being transported and shall have the authority to enforce rules and directives and to monitor and appropriately respond to student conduct, except that the contractor is not delegated final authority to suspend or revoke a student's ability to receive/use District-provided transportation services. Further, nothing in this paragraph prevents the District from choosing to exercise concurrent supervisory authority through its officers or employees in any situation.
5. If a student or parent or guardian has a concern about a third-party contractor or any other individual involved in the provision of student transportation services who is not a District employee, the student/parent/guardian is expected to notify and work with the building principal, the District business official, or the Executive Director of Operations to resolve the concern with the third-party contractor or individual.

Student Conduct

To the fullest extent that state law considers a student who is utilizing the District's transportation services to be (1) at school; (2) under the supervision of a school authority; or (3) otherwise subject to the District's disciplinary jurisdiction or oversight or control, the student must abide by all applicable policies, procedures, rules, and directives that govern student conduct. Rules and directives may be established and enforced that are specific to the context of transportation and/or transportation-related safety. Students using transportation services are subject to

STUDENT TRANSPORTATION SERVICES

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Waunakee Community School District

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appropriate discipline or other consequences or interventions related to their conduct, up to and including loss of transportation services, suspension or expulsion from school.

Legal References:

Wisconsin Statutes

Section 115.76	[students with disabilities; definitions]
Section 118.15(2)(d)	[technical college attendance for children at risk of not graduating from high school; transportation requirement]
Section 118.51(14)	[full-time public school open enrollment; transportation provisions]
Subchapter IV of Chapter 121	[student transportation and transportation aid]
Section 340.01(56)	[state law definition of school bus]
Section 345.05	[municipal liability for motor vehicle accidents]

Wisconsin Administrative Code

PI 7	[unusually hazardous areas; parent contracts]
TRANS 300	[state rules governing the transportation of school children, including driver and passenger requirements]

Federal Law

Section 504 of the Rehabilitation Act of 1973	[programs/services for handicapped students]
20 U.S.C. Chapter 33	[Individuals with Disabilities Education Act (IDEA); programs and services for students with disabilities; IDEA regulations at 34 C.F.R. Part 300]
McKinney-Vento Homeless Assistance Act	[equal access for homeless students; includes transportation provisions]
Omnibus Transportation Employee Testing Act of 1991	[alcohol and controlled substances use and testing requirements for individuals holding commercial drivers' licenses]
49 C.F.R. Part 40	[federal procedures for transportation workplace drug and alcohol testing programs]
49 C.F.R. Part 382	[federal regulations governing controlled substances and alcohol use by drivers and related testing]

Cross References:

WASB PRG 751 Sample Policy 2
423, Admission of Full-time Open Enrollment Students
423.1, Admission of Part-time Open Enrollment Students
751-Rule (1), Student Transportation Services
751-Rule (2), Bus Discipline Procedures
751-Exhibit, Fee Schedule for Transportation to and from Babysitters
751.1, Bus Routes and Schedules
751.2, Bus Contractors
751.3, Bus Safety Program

STUDENT TRANSPORTATION SERVICES

Waunakee Community School District

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751.4, Parent Contracts to Transport Students

Adoption Date: January 1993

Revised: April 1996
March 1994
April 2000
June 2002
May 2005
May 2007
September 2017
October 2024