RIDGEDALE LOCAL SCHOOL DISTRICT

Draft - Policy Manual

Vol. 45, No. 1 - August 2026

23 policies

October 7, 2026

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VOL. 45, NO. 1 - AUGUST 2026

02 - Policy Disposition Sheet

Vol. 45, No. 1 - August 2026 Policy Disposition Sheet

DISPOSITION OF NEW/REVISED/REPLACEMENT
POLICIES FOR BOARD ADOPTION

VOL. 45, NO. 1 - AUGUST 2026

Coding for District-Specific Edits
*1 = drafted by District staff
*2 = if the material was a work for hire, that is, material the District paid someone else to develop but from whom the District purchased the rights to publish
*3 = if the material is copyrighted to someone else from whom the District has secured permission to publish the material
(No code is needed for accepting Neola's vetted material)

Policy Number	Date Adopted	District-Specific Edits (1, 2, or 3)	Date Tabled	Date Rejected
po0145				
po0146				
po1231				
po2265				
po2431				
po2431.07 New				
po2461 Rescind				
po3231				
po4231				
po5111.01				

Policy Number	Date Adopted	District-Specific Edits (1, 2, or 3)	Date Tabled	Date Rejected
po5224 New				
po5330				
po5463				
po6100 New				
po6423				
po7540.10 New				
po8120				
po8310				
po8330				
po8470				
po9700				

VOL. 45, NO. 1 - AUGUST 2026

po0145

Vol. 45, No. 1 - August 2026 Revised FILLING A BOARD VACANCY

0145 - **FILLING A BOARD VACANCY**

A vacancy occurs on the Board when one (1) of the following events occurs:

A. death

B. nonresidence

C. resignation

D. failure of the person elected or appointed to qualify as an elector residence within the District within ten (10) days after the organization of the Board or of the appointment or election

E. failure of the person elected or appointed to qualify due to acceptance of duties incompatible with those of a Board member

F. removal from the District

G. absence from meetings of the Board for a period of ninety (90) days, if the absence is caused by reasons declared insufficient by a two-thirds (2/3's) vote of the remaining members of the Board and this vote was taken and entered into the record of the Board in no more than forty-five (45) ~~not less than thirty (30)~~ days after the absence

H. removal from office

A member cannot be considered absent for insufficient reasons if that individual is an active or reserve member of the armed forces of the United States or Ohio National Guard and is deployed outside the territory of the District.

Whenever a vacancy occurs, the Board shall fill the vacancy at at any regular or special meeting held within forty-five (45) ~~its next regular or special meeting but not earlier than ten (10)~~ days after the vacancy occurs.

The Board shall take the following steps to fill the vacancy:

A. The Board shall seek qualified and interested candidates from the community through the news media, word of mouth, and contacts with appropriate organizations.

B. All applicants are to submit a notice of their interest, in writing, to the Superintendent.

C. The Board shall interview all interested candidates to ascertain their qualifications.

Appointment by the Board to fill a vacancy shall be by majority vote of the remaining members of the Board.

If the Board fails to appoint a member to its Board within forty-five (45) ~~thirty (30)~~ days after the vacancy occurs, the probate court of the county, upon being advised of the failure to fill the vacancy shall act as the Board and perform the duties imposed upon the Board.

The newly-appointed Board member selected to fill a vacancy shall serve the shorter of the following periods:

A. until completion of the unexpired term, or

B. until the first day of January immediately following the next regular Board of Education election taking place more than ninety (90) days after a person is selected to fill the vacancy. At that election, a special election to fill the vacancy will be held. However, no such special election shall be held if the unexpired term ends on or before the first day of January immediately following that regular Board election.

Whenever there is a need to have a special Board election to fulfill an unexpired term, the Board shall give written notice to the Board of Elections. The term of a member elected at such a special election shall begin the first day of January immediately following the special Board election and shall be for the balance of the unexpired term.

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Legal
R.C. 3.07, 3313.11, 3313.85

VOL. 45, NO. 1 - AUGUST 2026

po0146

Vol. 45, No. 1 - August 2026 Revised RESIGNATION OR REMOVAL

0146 - **RESIGNATION OR REMOVAL**

Whenever a member ceases ~~shall cease~~ to be a bona fide resident of the District, his/her membership shall cease immediately.

The removal of a member who resigns shall become effective upon the presentation of the resignation to the Board duly convened or upon the effective date specified in the resignation, whichever is later.

Any member who fails to attend meetings of the Board for a period of ninety (90) days for reasons determined to be insufficient on the affirmative vote of two-thirds (2/3's) of the remaining members of the Board, and this vote is taken and entered into the record of the Board in no more than forty-five (45) ~~no less than thirty (30)~~ days after the period of absence shall no longer be a member and his/her office shall be vacant.

A member cannot be considered absent for insufficient reasons if that individual is an active or reserve member of the Armed Forces of the United States or Ohio National Guard and is deployed outside the territory of the District.

A member may be removed for misconduct in office in accordance with law.

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Legal
R.C. 3.07 et seq., 3313.11

VOL. 45, NO. 1 - AUGUST 2026

po1231

Vol. 45, No. 1 - August 2026 Revised OUTSIDE ACTIVITIES OF STAFF

Revised Policy - Vol. 45, No. 1

1231 - **OUTSIDE ACTIVITIES OF STAFF ~~ADMINISTRATORS~~**

Staff ~~Administrative staff~~ members should avoid situations in which their personal interests, activities, and associations conflict with the interests of the District. If such situations threaten a staff member's ~~n administrator's~~ effectiveness within the School System, the Superintendent and/or Board of Education shall evaluate the impact of such interest, activity, or association upon the staff member's ~~administrator's~~ responsibilities.

Staff members who hold a license or permit issued by the State Board of Education are expected to adhere to the State Board of Education's Licensure Code of Professional Conduct for Ohio Educators both during and outside of work time.

Staff members ~~Administrators~~ may not dedicate work time to an outside interest, activity, or association.

Staff members ~~Administrators~~ may not use school property or school time to solicit or accept customers for private enterprises.

Staff members may not use school property for personal use that is not in accordance with Board policy, or local, State, or Federal law.

Staff members ~~Administrators~~ may not engage in business transactions on behalf of private enterprises in which a staff member ~~s/he~~ may profit by virtue of the staff member's ~~his/her~~ official position or authority or benefit financially from confidential information that the employee has obtained or may obtain by reason of their ~~his/her~~ position or authority.

Staff members may not engage in nepotism as prohibited by local, State, or Federal law.

Staff members ~~Administrators~~ may not campaign on school property during working hours on behalf of any political issue, or candidate for local, State, or National office, or engage in activities intended to influence the outcome of an election for any political candidate, or for a levy or bond issue. Staff members are prohibited from using school

property to promote or oppose any political candidate, levy or bond, even if such use occurs outside of work time or school hours. The constitutional right to express political and other opinions as citizens is reserved to all employees.

Staff members ~~Administrators~~ should refrain from expressions that disrupt the efficient operation of the school and/or interfere with the maintenance of discipline by school officials. Staff members should not use technology, social media, or other electronic communications to host, post, or distribute improper or inappropriate material that could reasonably be accessed by the school community. This includes, but is not limited to, pornography, obscene material, promotion of drug use or underage consumption of alcohol, promotion of violence, disparagement of students, and disparagement of any individual based on a protected class factor or any other factor in violation of Board policy, local, State, or Federal law. Likewise, staff members should not use inappropriate language, gestures, or signs at school-related activities.

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VOL. 45, NO. 1 - AUGUST 2026

po2265

Vol. 45, No. 1 - August 2026 Revised PROTECTIONS OF INDIVIDUAL BELIEFS, AFFILIATIONS, IDEALS, OR PRINCIPLES OF POLITICAL MOVEMENTS AND IDEOLOGY

2265 - **PROTECTIONS OF INDIVIDUAL BELIEFS, AFFILIATIONS, IDEALS, OR PRINCIPLES OF POLITICAL MOVEMENTS AND IDEOLOGY**

The Board of Education is committed to establishing a school and work environment that supports the free exchange of ideas and allows employees and students to maintain their own beliefs, affiliations, ideals, political opinions, and ideology without fear of repercussion.

To that end, the Board will not solicit or require employees or job applicants to affirmatively ascribe to or express opinions about specific beliefs, affiliations, ideals, principles concerning political movements, or ideology. The Board shall not use statements of commitment or oppostion to specific beliefs, affiliations, ideals, or principles concerning political movements , political issues or candidates, or ideology as part of any evaluation criteria for employees or job applicants, or as a factor in determining an employee's career advancement, assignment, or job benefits. No employment contract shall include a provision that conditions employment or any form of compensation on passage of a levy or bond. Employees will not be asked to contribute funds or support a levy campaign, although payroll deductions for political contributions are permissible in accordance with State law.

Likewise, the Board shall not solicit or require current or prospective students who seek enrollment in the District to affirmatively ascribe to specific beliefs, affiliations, ideals, or principles concerning political movement or ideology, nor will the District use any statements of commitment to specific beliefs, affiliations, ideals, or principles concerning political movements or ideology to evaluate the student's academic performance.

The Board maintains its authority to take disciplinary and other types of action against employees and students who violate State and Federal laws, including anti-discrimination laws, in accordance with Board Policy, administrative guidelines, the provisions of an adopted collective bargaining agreement, and the student code of conduct where applicable.

Nothing in this policy is intended to modify or limit an educator's academic freedom, or an educator's ability to research or write publications about specific beliefs, affiliations, ideals, or principles concerning political movements, ideology, or social actions.

This policy shall not prohibit, limit, or restrict the Board's authority to consider a job applicant's scholarship, teaching, or subject matter expertise in the applicant's given field of study, nor does it limit the Board's authority to offer an established character education program.

The Board shall make all policies, District guidance, and training materials used for students and employees on all matters regarding specific beliefs, affiliations, ideals, or principles concerning political movements or ideology publicly available unless such documents or materials contain protected legal communications or guidance.

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Legal
R.C. 3313.207, .208, .209
R.C. 3319.614
R.C. 5104.0112

VOL. 45, NO. 1 - AUGUST 2026

po2431

Vol. 45, No. 1 - August 2026 Revised INTERSCHOLASTIC ATHLETICS

2431 - **INTERSCHOLASTIC ATHLETICS**

The Board of Education recognizes the value to the students of the District and to the community of a program of interscholastic athletics for students as an integral part of the total school experience.

The program should foster the growth of school loyalty within the student body as a whole and stimulate community interest in athletics.

The game activities and practice sessions should provide many opportunities to teach the values of competition and good sportsmanship.

The program of interscholastic athletics should provide students the opportunity to exercise and test their athletic abilities in a context greater and more varied than that, which can be offered by a school or the School District alone. It should also offer an opportunity for career and educational development.

For purposes of this policy, the program of interscholastic athletics shall include all activities relating to competitive sport contests, games, events, or sport exhibitions involving individual students or teams of students of this District with those of another district.

The Board shall determine the standards of eligibility to be met by all students participating in the interscholastic program. Such standards shall require that each student be in good physical condition, be free of injury, and have fully recovered from illness before participating in any interscholastic athletic event.

Prior to the start of each athletic season, each school operated by the District that offers athletic programs shall hold an informational meeting for students, parents, guardians, other individuals having care or charge of a student, physicians, pediatric cardiologists, athletic trainers, and any other individuals who participate in athletic programs regarding the symptoms and warning signs of sudden cardiac arrest for all ages of students.

No student may practice or compete in interscholastic athletics until the student submits a form signed by the student's parent or guardian, or by a person having care or charge of

the student, affirming that each has received a concussion and head injury information sheet as prepared by the Ohio Department of Health. See Form 2431 F1 and Form 2431 F2.

In addition to the eligibility requirements established by the Ohio High School Athletic Association, to be eligible for any interscholastic extra-curricular activity, a student must have maintained at least a 1.0 grade-point average and may have received a failing grade in a course for the grading period previous to the one in which the student wishes to participate and will include the requirements that a student have the written permission of the parent/guardian, and shall have passed a physical by a licensed physician.

Incoming 9th graders MUST earn passing grades in a minimum of four (4) courses in their final grading period of grade 8 in order to be eligible, with regard to scholarship, during their first grading period of 9th grade. Thereafter, all high school students MUST earn passing grades in a minimum of five (5) one-credit courses (or the equivalent) during the immediately preceding grading period to have continuing eligibility.

Students educated at home or enrolled in a nonpublic school who are permitted to participate on a District interscholastic team must fulfill the same academic, nonacademic, and financial requirements as any other participant. See Policy 9270.

Restoration of an "Incomplete" Grade

If a student's failure to meet the academic eligibility requirements is due to an "incomplete" grade given in one or more courses which the student was taking during the grading period in question, the student may have their eligibility restored once the "incomplete" has been changed to a passing letter grade provided:

A. the failure to complete the required coursework during the grading period was due to calamity day(s), family tragedy, or illness or accident as verified by a physician; and

B. the "incomplete" was given in accordance with Board of Education grading policies and procedures and is applicable to all students in the school; and

C. the previously scheduled work and/or exams is/are completed within the time period provided in Board policy for completing work required to convert an "incomplete" into a letter grade; and

D. there is no evidence that the "incomplete" was given in order to afford the student extended time in order to provide the student tutoring or other educational services simply to avoid a failing grade.

Specific documentation of criteria listed above (Items A-D) must be submitted to the Ohio High School Athletic Association (OHSAA) (See AG 2431) in order to be considered by the Executive Director for such a ruling.

Students identified as disabled under R.C. 3323 and the IDEA are subject to the eligibility standards established by this policy unless specifically exempted by the express terms of their individualized education program (IEP). An IEP can specify the criteria by which a grade will be determined for (a) course(s), given the student's individualized disability.

All students participating in interscholastic athletics must purchase insurance available through the school or must sign a waiver that they have insurance.

Since the primary purpose of the athletic program is to enhance the education of participating students as indicated in this policy, the Board places top priority on maximum student participation and the values of good sportsmanship, team play, and fair competition.

The Board further adopts those eligibility standards set by the Constitution of the Ohio High School Athletic Association (OHSAA) and shall review such standards annually to ascertain that they continue to be in conformity with the objectives of this Board.

No student shall be excused from a class or supervised study for an extended period of time to participate in interscholastic athletics.

The Superintendent shall develop appropriate administrative guidelines for the operation of the Athletic Program and a Code of Conduct for those who participate. Such guidelines should provide for the following safeguards:

A. Prior to enrolling in the sport, each participant shall submit to a thorough physical examination by a licensed physician.

B. Any student who is found to have a health condition which may be life-threatening to self or others shall not be allowed to participate until the situation has been analyzed by a medical review panel that has determined the conditions under which the student may participate. The District shall assume no liability for any student with a health condition who has been authorized to play by the parents and their physician but not by the District.

C. Any student who incurs an injury requiring a physician's care is to have the written approval of a physician prior to the student's return to participation.

Students will be informed that participation in interscholastic sports is a privilege and not a right, and that they may be prohibited from all or part of their participation in such activities by authorized school personnel without further notice, hearing and/or appeal rights (see Policy 5610.05 - Prohibition from Extra-Curricular Activities).

No student will be denied the opportunity to participate in interscholastic athletics offered by a school in the District because the student has or is participating in college credit plus program as long as the student fulfills all academic, nonacademic and financial requirements.

No student will be limited from wearing religious apparel while participating in interscholastic or non-interscholastic extra-curricular activities unless such apparel poses a legitimate danger to participants. If such danger is identified, the student will be offered reasonable accommodations available for the participant wearing religious apparel.

Revised 5/19/14
Revised 5/22/17
Revised 10/21/19
Revised 9/19/20
Revised 10/24/22

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Legal
R.C. 2305.23, 2305.231, 3313.53, 3313.535, 3313.539, 3313.5311, 3313.5312
R.C. 3313.5317, 3313.5314, 3313.752, 3315.062
Ohio High School Athletic Association

VOL. 45, NO. 1 - AUGUST 2026

po2431.07

Vol. 45, No. 1 - August 2026 New EXTRACURRICULAR PARTICIPATION OF NON-ENROLLED PUBLIC HIGH SCHOOL STUDENTS (STUDENT ATHLETE MOBILITY "SAM ACT")

New Policy - Vol. 45, No. 1

2431.07 - **EXTRACURRICULAR PARTICIPATION OF NON-ENROLLED PUBLIC HIGH SCHOOL STUDENTS (STUDENT ATHLETE MOBILITY "SAM Act")**

[DRAFTING NOTE: Effective for the 2026-2027 school year, each public school district board of education that offers an extracurricular activity and is a member school of the Ohio High School Athletic Association or any other organization that regulates interscholastic athletics is required to adopt a policy that permits a public school student enrolled in a neighboring school to petition to participate in an activity not offered by the high school that they are enrolled in.]

Definitions

The term “extracurricular activity” means a student activity program that a school or school district operates and is not included in the school district's graded course of study, including an interscholastic extracurricular activity that a school or school district sponsors or participates in and that has participants from more than one school or school district.

The term “neighboring school” means:

A. A high school operated by the board of education other than the high school in which the student is enrolled;

B. A high school operated by a school district that directly borders the board of education's school district;

C. If the board of education's school district borders Lake Erie, a high school operated by an island school district; and

D. Any other public high school that is located within the territory of either the board of education's school district or a school district that directly borders the board of

education's school district.

Petition for Participation in the District

A student who is enrolled in a public high school that does not offer a particular extracurricular activity may submit a petition seeking to participate in that activity at any high school operated by the District. Girls may petition to participate in an activity that is only offered as a boys' team or coed team at their high school.

Prior to submitting a petition, the student must submit the form developed by the Ohio High School Athletic Association . The form must first be signed by the Superintendent of the school in which the student is enrolled. The Superintendent's signature confirms that 1) the activity is not offered at the student's school of enrollment; 2) the student has not participated in the activity during the current school year; and 3) the Superintendent agrees to permit the student to participate in the District's activity.

The Superintendent, in their sole discretion, may approve the petition and will sign the form. The form will be maintained by the District in the designated file.

Petitions must be submitted no later than three (3) weeks prior to the official start of the season.

District Students Petitioning to Participate in Neighboring District

District students who wish to participate in an extracurricular activity in a neighboring district will be required to complete the forms required by that district and submit them to the Superintendent for review and approval.

The Superintendent will review the petition and may approve the student's participation. If participation is denied, the student may then petition to participate in a program operated by a neighboring district. **[END OF OPTION] [DRAFTING NOTE: Select this option if your district operates multiple high schools].**

Student Eligibility Requirements

To be eligible, a non-enrolled student must be of the appropriate age and grade level, as determined by the Superintendent. The student must also fulfill the same academic, nonacademic, and financial requirements as any other participant, including tryouts if required by the activity.

Students are not permitted to petition for participation at a nonpublic high school. A student is prohibited from participating in the same extracurricular activity at more than one high school operated by a school district or other public high school in any one school year. If the student's high school of enrollment participates in any regular season contest for the extracurricular activity but ceases offering it before the conclusion of the season, the student is not eligible to petition for participation until the following school year.

A student may not petition to participate in an extracurricular activity solely because the school in which the student is enrolled does not offer the competition level at which the student wishes to participate, such as varsity, junior varsity, or freshman level teams.

Partnering with Neighboring Schools to Operate an Activity

In accordance with State law, the Board may partner with a neighboring school to establish a single team for an activity if neither school has a sufficient number of students willing to participate in the extracurricular activity. The formula to determine whether there is a sufficient number of students shall be the sum of the minimum number of students required for competition in an extracurricular activity plus half of that number, rounded to the nearest whole.

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Legal
R.C. 3313.5321, 3313.537
The Ohio High School Athletic Association Rules

VOL. 45, NO. 1 - AUGUST 2026

po2461

Vol. 45, No. 1 - August 2026 Rescind RECORDING OF DISTRICT MEETINGS INVOLVING STUDENTS AND/OR PARENTS

Rescind Policy - Vol. 45, No. 1

~~2461 - **RECORDING OF DISTRICT MEETINGS INVOLVING STUDENTS AND/OR PARENTS**~~

~~**Recording of IEP Team and 504 Team Meetings**~~

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

~~**[OPTION #1]**~~

~~**[ ]** In order to facilitate parents' ability to fully participate in the IEP and/or 504 process, parents of students with disabilities are ordinarily permitted to audio record IEP Team meetings and 504 Team meetings in accordance with the following procedures:~~

A. ~~Parents wishing to audio record an IEP Team meeting or 504 Team meeting must utilize their own recording device and provide notice to the District prior to the date of the scheduled IEP Team or 504 Team meeting.~~

B. ~~If parent(s) elects to audio record an IEP Team meeting, the District will also record the meeting.~~

~~**[END OF OPTION #1]**~~

~~[OPTION #2]~~

~~**[ ]** The recording of IEP Team meetings and 504 Team meetings is prohibited unless it is necessary in order for a parent to understand the IEP process or 504 process and/or his/her child's IEP or 504 Plan, or otherwise necessary to implement other parental rights under the IDEIA, Section 504 of the Rehabilitation Act of 1973, as amended, and/or the Americans with Disabilities Act, as amended.~~

A. ~~If a parent believes that audio recording an IEP Team or 504 Team meeting is necessary, s/he should notify _____~~ **[Principal or Director of Pupil Services or Director of Special Education]** ~~in writing, preferably at least two (2)~~

school days before the IEP Team or 504 Team meeting, of his/her desire to audio record the meeting and the reason the recording is required. The _____ will notify the parent at least one (1) school day before the meeting if s/he intends to deny the parent's request to record the meeting.

B. If the District representative denies the request, s/he will state in writing the reasons for the denial. Authorized exceptions to the general prohibition against the audio recording of IEP Team meetings and 504 Team meetings will typically involve situations when a parent or other IEP Team or 504 Team member has a disability recognized under Section 504/ADA or a language barrier that would preclude the individual's ability to understand and/or meaningfully participate in the IEP process or 504 process. The District representative may ask for documentation of the existence of any such disability or language barrier. If a parent is permitted to audio record the meeting, s/he must use his/her own recording device and the District will similarly record the meeting.

[END OF OPTION #2]

Recording of Other District Meetings Involving Students and/or Parents (e.g., Parent-Teacher Conferences)

[SELECT OPTION #3 or OPTION #4]

[OPTION #3]

[ ] Parents are permitted to audio record meetings with the District provided they notify the District prior to the date of the scheduled meeting of their intent to record the meeting. If a parent provides the requisite notice and is permitted to audio record the meeting, s/he must use his/her own recording device and the District will similarly record the meeting.

[OPTION #4]

[ ] Parents are prohibited from audio recording meetings with the District unless a parent or District staff member has a disability recognized under Section 504/ADA or a language barrier that would preclude the individual's ability to understand and/or participate in the meeting. The District representative may ask for documentation of the existence of any such disability or language barrier. If a parent is permitted to audio record the meeting, s/he must use his/her own recording device and the District will similarly record the meeting.

[END OF OPTIONS]

Video recording any District meeting is strictly prohibited.

~~Parents and students are expressly prohibited from using covert means to listen-in or make a recording (audio or video) of any meeting or activity at school. This includes placing recording devices, or other devices with one- or two-way communication technology (i.e., technology that allows a person off-site to listen to live conversations and sounds taking place in the location where the device is located), within a student's book bag or on the student's person without express written consent of the Superintendent. Any requests to place a recording device or other device with one- or two-way audio communication technology within a student's book bag or on a student's person shall be submitted, in writing, to the _____ **[e.g. Principal or Director of Pupil Services]** . The District representative shall notify the parent(s), in writing, whether such request is denied or granted within five (5) days.~~

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

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VOL. 45, NO. 1 - AUGUST 2026

po3231

Vol. 45, No. 1 - August 2026 Revised OUTSIDE ACTIVITIES OF STAFF

Revised Policy - Vol. 45, No. 1

3231 - **OUTSIDE ACTIVITIES OF STAFF**

Staff ~~Professional staff~~ members should avoid situations in which their personal interests, activities, and associations conflict with the interests of the District. If such situations threaten a staff member's effectiveness within the school system, the Superintendent and/or Board of Education shall evaluate the impact of such interest, activity, or association upon the ~~professional~~ staff member's responsibilities.

Staff members who hold a license or permit issued by the State Board of Education are expected to adhere to the State Board of Education's Licensure Code of Professional Conduct for Ohio Educators both during and outside of work time.

Staff members may not dedicate work time to an outside interest, activity, or association.

Staff members may not use school property or school time to solicit or accept customers for private enterprises.

Staff members may not use school property for personal use that is not in accordance with Board policy, or local, State, or Federal law.

Staff members may not engage in business transactions on behalf of private enterprises in which a staff member ~~s/he~~ may profit by virtue of the staff member's ~~his/her~~ official position or authority or benefit financially from confidential information that the employee has obtained or may obtain by reason of their ~~his/her~~ position or authority.

Staff members may not engage in nepotism as prohibited by local, State, or Federal law.

Staff members may not campaign on school property during working hours on behalf of any political issue, or candidate for local, State, or National office, or engage in activities intended to influence the outcome of an election for any political candidate, or for a levy or bond issue. Staff members are prohibited from using school property to promote or oppose any political candidate, levy or bond, even if such use occurs outside of work time

or school hours. The constitutional right to express political and other opinions as citizens is reserved to all employees.

Staff members should refrain from expressions that disrupt the efficient operation of the school and/or interfere with the maintenance of discipline by school officials. Staff members should not use technology, social media, or other electronic communications to host, post, or distribute improper or inappropriate material that could reasonably be accessed by the school community. This includes, but is not limited to, pornography, obscene material, promotion of drug use or underage consumption of alcohol, promotion of violence, disparagement of students, and disparagement of any individual based on a protected class factor or any other factor in violation of Board policy, local, State, or Federal law. Likewise, staff members should not use inappropriate language, gestures, or signs at school-related activities.

Unless expressly approved by the Superintendent, staff members may not accept fees for tutoring when such tutoring is conducted during the normal work day.

Similarly, unless expressly approved by the Superintendent, staff members may not accept fees for remedial tutoring of students currently enrolled in one (1) or more of their classes.

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VOL. 45, NO. 1 - AUGUST 2026

po4231

Vol. 45, No. 1 - August 2026 Revised OUTSIDE ACTIVITIES OF STAFF

4231 - **OUTSIDE ACTIVITIES OF CLASSIFIED STAFF**

Staff members should avoid situations in which their personal interests, activities, and associations may conflict with the interests of the District. If such situations threaten a staff member's effectiveness within the School System, the Superintendent and Board of Education shall evaluate the impact of such interest, activity, or association upon the staff member's responsibilities.

Staff members who hold a license or permit issued by the State Board of Education are expected to adhere to the State Board of Education's Licensure Code of Professional Conduct for Ohio Educators both during and outside of work time.

Staff members may not dedicate work time to an outside interest, activity, or association.

Staff members may not use school property or school time to solicit or accept customers for private enterprises.

Staff members may not use school property for personal use that is not in accordance with Board policy, or local, State, or Federal law.

Staff members may not engage in business transactions on behalf of private enterprises in which the staff member ~~s/he~~ may profit by virtue of the staff member's ~~his/he~~r official position or authority or benefit financially from confidential information that the staff member has obtained or may obtain by reason of theri ~~his/her~~ position or authority.

Staff members may not engage in nepotism as prohibited by local, State, or Federal law.

Staff members may not campaign on school property during working hours on behalf of any political issue, or candidate for local, State, or National office. , or engage in activities intended to influence the outcome of an election for any political candidate, or for a levy or bond issue. Staff members are prohibited from using school property to promote or oppose any political candidate, levy or bond, even if such use occurs outside of work time

or school hours. The constitutional right to express political and other opinions as citizens is reserved to all employees.

Staff members should refrain from expressions that disrupt the efficient operation of the school and/or interfere with the maintenance of discipline by school officials.

Staff members should not use technology, social media, or other electronic communications to host, post, or distribute improper or inappropriate material that could reasonably be accessed by the school community. This includes, but is not limited to, pornography, obscene material, promotion of drug use or underage consumption of alcohol, promotion of violence, disparagement of students, and disparagement of any individual based on a protected class factor or any other factor in violation of board policy, local, State, or Federal law. Likewise, staff members should not use inappropriate language, gestures, or signs at school-related activities.

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Legal
R.C. 3313.20

VOL. 45, NO. 1 - AUGUST 2026

po5111.01

Vol. 45, No. 1 - August 2026 Revised HOMELESS STUDENTS

5111.01 - **HOMELESS STUDENTS**

Definitions

Children who are identified as meeting the Federal definition of "homeless" will be provided a free appropriate public education (FAPE) in the same manner as all other students of the District. To that end, homeless students will not be stigmatized or segregated on the basis of their status as homeless. The District shall establish safeguards that protect homeless students from discrimination on the basis of their homelessness. The District shall regularly review and revise its policies, including school discipline policies that impact homeless students or those who may be a member of any of the Protected Classes (Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity).

Homeless children and youth are defined as individuals who lack a fixed, regular, and adequate nighttime residence, and include children and youth who meet any of the following criteria:

A. share the housing of other persons due to loss of housing, economic hardship, or similar reason

B. live in motels, hotels, trailer parks, or camping grounds due to a lack of alternative adequate accommodations

C. live in emergency or transitional shelters

D. are abandoned in hospitals

E. have a primary night time residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings, or

F. live in a car, park, public space, abandoned building, substandard housing[1], bus or train station, or similar setting

Pursuant to the McKinney-Vento Act, an unaccompanied youth includes a homeless child or youth not in the physical custody of a parent or guardian.

Additionally, pursuant to Federal and State law, migratory children who are living in circumstances described in A-F above are also considered homeless.

Services to Homeless Children and Youth

The District will provide services to homeless students that are comparable to other students in the District, including:

A. transportation services;

B. public preschool programs and other educational programs and services for which the homeless student meets eligibility criteria including:

1. programs for children with disabilities;

2. programs for English Learners (ELs) (i.e., students with Limited English Proficiency (LEP);

3. programs in career and technical education;

4. programs for gifted and talented students;

5. school nutrition programs; and

6. before - and after-school programs.

The Superintendent will appoint a Liaison for Homeless Children who will perform the duties as assigned by the Superintendent. Additionally, the Liaison will coordinate and collaborate with the State Coordinator for the Education of Homeless Children and Youth as well as with community and school personnel responsible for the provision of education and related services to homeless children and youths. The Liaison will also provide unaccompanied homeless youth with verification of independent-student status for FAFSA and student financial aid purposes For more information on the role of the Liaison, refer to AG 5111.01 - Homeless Students (Role of the Local Liaison).

School Stability

Maintaining a stable school environment is crucial to a homeless student's success in school. To ensure stability, the District must make school placement determinations based on the "best interest" of the homeless child or youth based on student-centered factors. The District must:

A. continue the student's education in the school of origin for the duration of homelessness when a family becomes homeless between academic years or during an academic year; and for the remainder of the academic year even if the child or youth becomes permanently housed during an academic year; or

B. enroll the student in any public school that non-homeless students who live in the attendance area in which the child or youth is actually living are eligible to attend

When determining a child or youth's best interest, the District must assume that keeping the homeless student in the school of origin is in that student's best interest, except when doing so is contrary to the request of the student's parent or guardian, or the student if ~~he or she is~~ the student is an unaccompanied youth. The school of origin is the school the student attended or enrolled in when permanently housed, including a public preschool. The school of origin also includes the designated receiving school at the next level for feeder school patterns, when the student completes the final grade level at the school of origin.

When determining the student's best interest, the District must also consider student-centered factors, including the impact of mobility on achievement, education, health, and safety of homeless students and give priority to the request of the student's parent or guardian, or youth (if an unaccompanied youth). The District also considers the school placement of siblings when making this determination.

If the District finds that it is not in the student's best interest to attend the school of origin or the school requested by the parent or guardian, or unaccompanied youth, the District must provide the individual with a written explanation and reason for the determination in a manner and form understandable to the parent, guardian or unaccompanied youth. This written explanation will include appeal rights and be provided in a timely manner.

Immediate Enrollment

The District has an obligation to remove barriers to the enrollment and retention of homeless students. A school chosen on the basis of a best interest determination must immediately enroll the homeless student, even if the student does not have the documentation typically necessary for enrollment, such as immunization and other required health records, proof of residency, proof of guardianship, birth certificate or previous academic records. The homeless student must also be enrolled immediately regardless of whether the student missed application or enrollment deadlines during the period of homelessness or has outstanding fines or fees.

The enrolling school must immediately contact the school last attended by the homeless student to obtain relevant academic or other records. If the student needs immunization or other health records, the enrolling school must immediately refer the parent, guardian or unaccompanied youth to the local liaison, who will help obtain the immunizations,

screenings or other required health records. Records usually maintained by the school must be kept so that they are available in a timely fashion if the child enters a new school or district. These records include immunization or other required health records, academic records, birth certificates, guardianship records, and evaluations for special services or programs. Procedures for inter-State records transfer between schools should be taken into account in order to facilitate immediate enrollment.

In addition, the District will also make sure that, once identified for services, the homeless student is attending classes and not facing barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs (if available). The District will remove barriers to full participation in academic activities. Absence or delay of records will not be used to deny full participation in school activities. The District may use school assessments to determine the student's placement until the District receives student records.

Transportation

The District provides homeless students with transportation services that are comparable to those available to non-homeless students. The District also provides or arranges for transportation to and from the school of origin at the parent or guardian's request, or the liaison's request in the case of an unaccompanied youth. Transportation is arranged promptly to allow for immediate enrollment and will not create barriers to a homeless student's attendance, retention, and success.

A. If the homeless student continues to live in the District, where the school of origin is located, transportation will be provided or arranged for the student's transportation to or from the school of origin.

B. If the homeless student moves to an area served by another district, though continuing the homeless student's ~~his/her~~ education at the school of origin (which is in the District), the District and the district in which the student resides must agree upon a method to apportion responsibility and costs for transportation to the school of origin. If the districts cannot agree upon such a method, the responsibility and costs will be shared equally.

C. When the student obtains permanent housing, transportation shall be provided to and from the school of origin until the end of the school year.

The District determines the mode of transportation in consultation with the parent or guardian and based on the best interest of the student.

In accordance with Federal law, the above transportation requirements still apply during the resolution of any dispute. The District will work with the State to resolve transportation

disputes with other districts. If the disputing district is in another State, the District will turn to the State for assistance as Federal guidance says that both States should try to arrange an agreement for the districts.

Dispute Resolution

Homeless families and youths have the right to challenge placement and enrollment decisions. If a dispute arises between a school and a parent, guardian or unaccompanied youth regarding eligibility, school selection, or enrollment of a homeless student, the District must follow its dispute resolution procedures, consistent with the State's procedures. If such a dispute occurs, the District will immediately enroll the homeless student in the school in which enrollment is sought pending final resolution of the dispute, including all appeals. The student will receive all services for which they are eligible until all disputes and appeals are resolved.

Pursuant to State, District and Board of Education policies, the District will provide the parent, guardian or unaccompanied youth with a written explanation of all decisions regarding school selection and enrollment made by the school, District, or State, along with a written explanation of appeal rights.

The District's notice and written explanation about the reason for its decision will include, at a minimum, an explanation of how the school reached its decision regarding eligibility, school selection, or enrollment, including 1) a description of the proposed or refused action by the school, 2) an explanation of why the action is proposed or refused, 3) a description of other options the school considered and why those options were rejected, 4) a description of any other relevant factors to the school's decision and information related to the eligibility or best interest determination such as the facts, witnesses, and evidence relied upon and their sources, and 5) an appropriate timeline to ensure deadlines are not missed. The District must also include contact information for the Liaison and the State Coordinator, and a brief description of their roles. The District will also refer the parent, guardian or unaccompanied youth to the Liaison, who will carry out the dispute resolution process.

The District ensures that all decisions and notices are drafted in a language and format appropriate for low-literacy, limited vision readers, and individuals with disabilities. For children and youth and/or parents or guardians who are English learners or whose dominant language is not English, the District will provide translation and interpretation services in connection with all phases of the dispute resolution process pursuant to Federal laws. The District will also provide electronic notices via email if the parent, guardian or unaccompanied youth has access to email followed by a written notice provided in person or sent by mail.

Homeless Children in Preschool

Homeless preschool-aged children and their families shall be provided equal access to the educational services for which they are eligible, including preschool programs, including Head Start programs, administered by the District. Additionally, the homeless child must remain in the public preschool of origin, unless a determination is made that it is not in the child's best interest. When making such a decision on the student's best interest, the District takes into account the same factors as it does for any student, regardless of age. It also considers preschool age-specific ~~pre-school age specific~~ factors, such as 1) the child's attachment to preschool teachers and staff; 2) the impact of school climate on the child, including school safety; the quality and availability of services to meet the child's needs, including health, developmental, and social-emotional needs; and 3) travel time to and from school.

The District must also provide transportation services to the school of origin for a homeless child attending preschool. It is the District's responsibility to provide the child with transportation to the school of origin even if the homeless preschooler who is enrolled in a public preschool in the District moves to another district that does not provide widely available or universal preschool.

Public Notice

In addition to notifying the parent or guardian of the homeless student or the unaccompanied youth of the applicable rights described above, the District shall post public notice of educational rights of children and youth experiencing homelessness in each school. In addition, the District shall post public notice of the McKinney-Vento rights in places that homeless populations frequent, such as shelters, soup kitchens, and libraries in a manner and form understandable to the parents and guardians and unaccompanied youths.

Records

The local liaison will assist the homeless students and their parent(s) or guardian(s) or unaccompanied homeless students in their efforts to provide documentation to meet State and local requirements for entry into school.

All records for homeless students shall be maintained, subject to the protections of the Family Educational Rights and Privacy Act (FERPA) and Policy 8330 Student Records, and in such a manner so that they are available in a timely fashion and can be transferred promptly to the appropriate parties, as required. Pursuant to the McKinney-Vento Act, information regarding a homeless student's living situation is not considered directory information and must be provided the same protections as other non directory personally identifiable information (PII) contained in student education records under FERPA. The District shall incorporate practices to protect student privacy as described in AG 5111.01, - Homeless Students (Role of the Local Liaison AG 8330 - Student Records, and in accordance with the provisions of the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA).

No Board policy, administrative procedure, or practice will be interpreted or applied in such a way as to inhibit the enrollment, attendance, or school success of homeless children.

Note:

Education for Homeless Children and Youth Programs, Non-Regulatory Guidance, U.S. Department of Education (ED), Title VII-B of the McKinney-Vento Homeless Assistance Act, as amended by the Every Student Succeeds Act, at A-3 (July 27, 2016).

[1] According to nonregulatory guidance from the U.S. Department of Education (ED), standards for adequate housing may vary by locality. Please see ED guidance for factors to consider when determining whether a child or youth is living in "substandard housing."

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Legal
42 U.S.C. 11431 et seq. (McKinney - Vento Homeless Act)

VOL. 45, NO. 1 - AUGUST 2026

po5224

Vol. 45, No. 1 - August 2026 New YOUTH MEMBERSHIP ORGANIZATION ACCESS

New Policy - Vol. 45, No. 1

5224 - **YOUTH MEMBERSHIP ORGANIZATION ACCESS**

In accordance with State law, designated youth organizations may request the District to provide representatives of the organization an opportunity to speak to students during the school day and distribute informational materials to encourage participation in the organization and its activities and inform students of how the organization may further the student's educational interests, readiness for the workforce, and civic involvement.

Youth membership organizations are defined to include any "youth membership organization listed in 36 U.S.C. 30101, 30901, 31101, 40301, 70901, 80301, 130501, 140101, and 154101, that serves young people under twenty-one (21) years of age and has an educational purpose that promotes patriotism, workforce readiness, and civic involvement." Federal citations listed in the definition specifically reference the following Federally chartered organizations: Big Brothers, Big Sisters of America; Boy Scouts of America; Boys & Girls Clubs of America; Civil Air Patrol; Future Farmers of America; Girl Scouts of America; Little League Baseball; Marine Corps League; and the Naval Sea Cadet Corps.

Upon request by a youth membership organization, the District shall provide the following:

A. At least one (1) opportunity per school year for the youth to provide displays on school property within the District for student recruitment, including informational flyers and the use of other existing digital communication channels;

B. A specific date and time for the youth organization to speak with students at schools in the District for up to ten (10) consecutive minutes during the school day, but not during instruction for a core curriculum subject; and

C. Notification to parents or guardians of each expected presentation by a youth organization and the option to withhold consent for their child to participate.

The District may deny equal access to an organization that is not designated as a youth membership organization under the statute.

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Legal
R.C. 3313.476, 3313.6022
Attorney General's Opinion 88-001

VOL. 45, NO. 1 - AUGUST 2026

po5330

Vol. 45, No. 1 - August 2026 Revised USE OF MEDICATIONS

5330 - USE OF MEDICATIONS

The Board of Education shall not be responsible for the diagnosis and treatment of student illness. With the exception of diabetes care covered under Policy 5336 - Care of Students with Diabetes, the administration of prescribed medication and/or medically prescribed treatments to a student during school hours will be permitted only when failure to do so would jeopardize the health of the student, the student would not be able to attend school if the medication or treatment were not made available during school hours, or if the child is disabled and requires medication to benefit from his/her educational program.

For purposes of this policy, "medication" shall include all medicines including those prescribed by a licensed health professional authorized to prescribe drugs and any nonprescribed (over-the-counter) drugs, preparations, and/or remedies. "Over-the-counter drug" means a drug, as defined in section 4729.01 of the Revised Code, that may be legally sold without a prescription and that is administered without the instruction of a prescriber. "Prescription drug" means a drug, as defined in section 4729.01 of the Revised Code, that is to be administered pursuant to the instructions of the prescriber, whether or not required by law to be sold only upon a prescription. "Treatment" refers both to the manner in which a medication is administered and to health-care procedures which require special training, such as catheterization.

Before any prescription medication (i.e., a drug) or treatment may be administered to any student during school hours, the Board shall require a written statement from a licensed health professional authorized to prescribe drugs ("prescriber") accompanied by the written authorization of the parent). These documents shall be kept on file in the office of the principal and made available to the persons designated by this policy as authorized to administer medication or treatment. A copy of the parent's written request and authorization and the prescriber's written statement must be given, by the next school day following the District's receipt of the documents, to the person authorized to administer drugs to the student for whom the authorization and statement have been received. No student is allowed to provide or sell any type of over-the-counter medication to another student. Violations of this rule will be considered violations of Policy 5530 - Drug Prevention and of the Student Code of Conduct/Discipline Code.

For prescription drugs, only medication in its original container; labeled with the date, if a prescription; the student's name; and exact dosage will be administered. Over-the-counter drugs must be provided and maintained in the original manufacturer's packaging. The Superintendent shall determine a location in each building where the medications to be administered under this policy shall be stored, which shall be a locked storage place, unless the medications require refrigeration in which case they shall be stored in a refrigerator in a place not commonly used by students, and unless the medication to be administered is seizure or diabetes medication, which may be kept in an easily accessible location as determined by the Principal pursuant to this Policy and/or Policy 5336 - Care of Students with Diabetes.

However, students shall be permitted to carry and use, as necessary, an asthma inhaler, provided the student has prior written permission from his/her parent and physician and has submitted Form 5330 F3, Authorization for the Possession and Use of Asthma Inhalers/Other Emergency Medication(s), to the principal and any school nurse assigned to the building.

Additionally, students shall be permitted to carry and use, as necessary, an epinephrine delivery system ~~autoinjector~~ to treat anaphylaxis, provided the student has prior written approval from the prescriber of the medication and his/her parent/guardian, if the student is a minor, and has submitted written approval (Form 5330 F4, Authorization for the Possession and Use of Epinephrine Delivery System (including an epi-pen, inhaler, or other device that contains a premeasured dose of epinephrine which enables administrator of the drug to prevent or treat a life-threatening allergic reaction) ~~Autoinjector (epi-pen)~~ to the principal and any school nurse assigned to the building. The parent/guardian or the student shall provide a backup dose of the medication to the principal or school nurse. This permission shall extend to any activity, event, or program sponsored by the school or in which the school participates. In the event epinephrine is administered by the student or a school employee at school or at any of the covered events, a school employee shall immediately request assistance from an emergency medical service provider (911). Students with diabetes authorized to attend to their diabetes care and management may do so in accordance with Policy 5336 - Care of Students with Diabetes.

Students may possess a drug prescribed to the student to prevent the onset of a seizure or to alleviate the symptoms of a seizure, provided that the student has prior written approval from the student's physician, and if the student is a minor, the written approval of the student's parent or guardian (Form 5330 F5 - Authorization for the Possession and Use of Seizure Medications). Copies of the written approvals must be provided to the Principal and any school nurse assigned to the building. This permission shall extend to any activity, event, or program sponsored by the school or in which the school participates.

Students shall be permitted to possess and self-administer over-the-counter topical sunscreen products while on school property or at a school-sponsored event.

With the exception of diabetes care covered under Policy 5336 - Care of Students with

Diabetes, provided they have completed the requisite training, the following staff are designated as being authorized to administer prescription and over-the-counter medication and treatment to students:

A. principal

B. teacher

C. school nurse

D. building secretary

E. aide

Individuals who administer medications designed to prevent the onset of seizures or alleviate the symptoms of a seizure will receive training regarding the circumstances under which the drug is to be administered to the student and how it should be administered. They will also receive a copy of the written approval issued by the student's physician.

No employee will be required to administer a drug to a student if the employee objects, on the basis of religious convictions, to administering the drug.

Students who may require administration of an emergency medication may have such medication in their possession upon written authorization of their parent(s) or, such medication, upon being identified as aforenoted, may be stored in the principal's office and administered in accord with this policy and Policy 5336 - Care of Students with Diabetes.

The Superintendent shall prepare administrative guidelines, as needed, to address the proper implementation of this policy.

Revised 5/18/15
Revised 10/16/17

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Legal
R.C. 3313.712, 3313.713, 3313.7110, 3313.716, 3313.718, 4729.01

VOL. 45, NO. 1 - AUGUST 2026

po5463

Vol. 45, No. 1 - August 2026 Revised CREDITS FROM STATE-CHARTERED AND NONCHARTERED NONPUBLIC SCHOOLS

5463 - **CREDITS FROM STATE-CHARTERED, ~~SPECIAL~~, AND NONCHARTERED NONPUBLIC SCHOOLS**

In recognizing its responsibility to uphold the minimum educational standards of the State of Ohio, the Board of Education establishes the following policy and criteria regarding the acceptance of credits from nonpublic schools whether they are ~~be~~ State-chartered, ~~special ,~~ or nonchartered schools.

For credit or course-work to be accepted for courses taken in such schools, either a copy of the charter or other assurance of compliance with minimum requirements established by the State must be provided.

Recognition of credits or course-work shall be granted when the proper assurance and the student's transcript have been received. The District reserves the right to assess such transfer students in order to determine proper placement and to be assured the student can demonstrate the learnings, which are prerequisite to a placement.

High School Transcripts and Issuance of Diplomas for Students who Transfer from Non-Chartered Nonpublic Schools

Students who transfer into high school from a non-chartered nonpublic school shall meet the District and State graduation requirements to qualify for a high school diploma. However, a student who transfers or enrolls after the start of the student's twelfth grade year and fails to attain a competency score on the Algebra I and English language arts II end-of-course examination shall not be required to retake the applicable examination prior to demonstrating competency in the failed subject area under the alternative options permitted in State law.

Although credits from nonchartered nonpublic schools may be granted and placed on a student's transcript, no grades will be entered on the transcript or considered for class ranking. , including the determination of the Top Five Percent (5%) and Top Ten Percent

(10%) for the Governor's Merit Scholarship and Ohio Guaranteed Admission Programs
Only grades awarded for courses taken at the District or at a school approved or chartered by a State education agency , including the Ohio Deparment of Education and Workforce (DEW) shall be considered in class ranking and for entering on the transcript.

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Legal
R.C. 3301.07, 3301.16, 3313.60
A.C. 3301-35, 3301-39

VOL. 45, NO. 1 - AUGUST 2026

po5517

ANTI-HARASSMENT

ADOPTED Feb 25, 2008 · REVISED Apr 26, 2021

5517 - **ANTI-HARASSMENT**

General Policy Statement

It is the policy of the Board of Education to maintain an education and work environment that is free from all forms of unlawful harassment, including sexual harassment. This commitment applies to all School District operations, programs, and activities. All students, administrators, teachers, staff, and all other school personnel share responsibility for avoiding, discouraging, and reporting any form of unlawful harassment. This policy applies to unlawful conduct occurring on school property, or at another location if such conduct occurs during an activity sponsored by the Board.

The Board will vigorously enforce its prohibition against discriminatory harassment based on race, color, national origin, sex (including sexual orientation and gender identity), disability, age (except as authorized by law), religion, ancestry, or genetic information (collectively, "Protected Classes") that are protected by Federal civil rights laws (hereinafter referred to as unlawful harassment), and encourages those within the School District community as well as Third Parties, who feel aggrieved to seek assistance to rectify such problems. The Board will investigate all allegations of unlawful harassment and in those cases where unlawful harassment is substantiated, the Board will take immediate steps to end the harassment, prevent its reoccurrence, and remedy its effects. Individuals who are found to have engaged in unlawful harassment will be subject to appropriate disciplinary action.

Other Violations of the Anti-Harassment Policy

The Board will also take immediate steps to impose disciplinary action on individuals engaging in any of the following prohibited acts:

A. Retaliating against a person who has made a report or filed a complaint alleging unlawful harassment, or who has participated as a witness in a harassment investigation.

B. Filing a malicious or knowingly false report or complaint of unlawful harassment.

C. Disregarding, failing to investigate adequately, or delaying investigation of allegations of unlawful harassment, when responsibility for reporting and/or investigating harassment charges comprises part of one's supervisory duties.

Definitions

Words used in this policy shall have those meanings defined herein; words not defined herein shall be construed according to their plain and ordinary meanings.

Complainant is the individual who alleges, or is alleged, to have been subjected to unlawful harassment, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged harassment.

Respondent is the individual who has been alleged to have engaged in unlawful harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

School District community means students and Board employees (i.e., administrators, and professional and classified staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Day(s): Unless expressly stated otherwise, the term “day” or “days” as used in this policy means business day(s) (i.e., a day(s) that the Board office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Bullying

Bullying rises to the level of unlawful harassment when one (1) or more persons systematically and chronically inflict physical hurt or psychological distress on one (1) or more students or employees and that bullying is based upon one (1) or more Protected Classes, that is, characteristics that are protected by Federal civil rights laws. It is defined as any unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by an adult or student, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational or work environment; cause discomfort or humiliation; or unreasonably interfere with the individual's school or work performance or participation; and may involve:

A. teasing;

B. threats;

C. intimidation;

D. stalking;

E. cyberstalking;

F. cyberbullying;

G. physical violence;

H. theft;

I. sexual, religious, or racial harassment;

J. public humiliation; or

K. destruction of property.

Harassment

Harassment means any threatening, insulting, or dehumanizing gesture, use of technology, or written, verbal or physical conduct directed against a student or school employee that:

A. places a student or school employee in reasonable fear of harm to his/her person or damage to his/her property;

B. has the effect of substantially interfering with a student's educational performance, opportunities, or benefits, or an employee's work performance; or

C. has the effect of substantially disrupting the orderly operation of a school.

Sexual Harassment

For purposes of this policy and consistent with Title VII of the Civil Rights Act of 1964, "sexual harassment" is defined as:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

A. Submission to such conduct is made either implicitly or explicitly a term or condition of an individual's employment, or status in a class, educational program, or activity.

B. Submission or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such an individual.

C. Such conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working, and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity.

Sexual harassment may involve the behavior of a person of any gender against a person of the same or another gender.

Sexual Harassment covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

A. Unwelcome sexual propositions, invitations, solicitations, and flirtations.

B. Unwanted physical and/or sexual contact.

C. Threats or insinuations that a person's employment, wages, academic grade, promotion, classroom work or assignments, academic status, participation in athletics or extra-curricular programs, activities, or events, or other conditions of employment or education may be adversely affected by not submitting to sexual advances.

D. Unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes, or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls.

E. Sexually suggestive objects, pictures, graffiti, videos, posters, audio recordings, or literature, placed in the work or educational environment, that may reasonably embarrass or offend individuals.

F. Unwelcome and inappropriate touching, patting, or pinching; obscene gestures.

G. Asking about, or telling about, sexual fantasies, sexual preferences, or sexual activities.

H. Speculations about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history.

I. Giving unwelcome personal gifts such as lingerie that suggests the desire for a romantic relationship.

J. Leering or staring at someone in a sexual way, such as staring at a person's breasts, buttocks, or groin.

K. A pattern of conduct, which can be subtle in nature, that has sexual overtones and is intended to create or has the effect of creating discomfort and/or humiliation to another.

L. Inappropriate boundary invasions by a District employee or other adult member of the School District community into a student's personal space and personal life.

M. Verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

Not all behavior with sexual connotations constitutes unlawful sexual harassment. Sex-based or gender-based conduct must be sufficiently severe, pervasive, and persistent such that it adversely affects, limits, or denies an individual's employment or education, or such that it creates a hostile or abusive employment or educational environment, or such that it is intended to, or has the effect of, denying or limiting a student's ability to participate in or benefit from the educational program or activities.

Race/Color Harassment

Prohibited racial harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race or color and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working, and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references relative to racial customs.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's disability and when the conduct has the purpose or effect of interfering with the individual's work or educational performance; of creating an intimidating, hostile, or offensive working and/or learning environment; or of interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's disability, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like.

Anti-Harassment Compliance Officers

The following individuals shall serve as the District's Anti-Harassment Compliance Officers (hereinafter, "the Compliance Officers"):

~~SuperintendentS~~ Student Services Supervisor
740-382-6065
3103 Hillman Ford Road
Morral, Ohio 43337

~~Treasurer~~
~~740-382-6065~~
~~3103 Hillman Ford Road~~
~~Morral, Ohio 43337~~

The names, titles, and contact information of these individuals will be published annually on the School District's website.

The Compliance Officers are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

The Compliance Officers will be available during regular school/work hours to discuss concerns related to unlawful harassment, to assist students, other members of the District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct or to intercede informally on behalf of the individual in those instances where concerns have not resulted in the filing of a formal complaint and where all parties are in agreement to participate in an informal process.

The Compliance Officers shall accept reports of unlawful harassment directly from any member of the School District community or a Third Party or receive reports that are initially filed with an administrator, supervisor, or other District-level official. Upon receipt of a report of alleged harassment, the Compliance Officers will contact the Complainant and begin either an informal or formal complaint process (depending on the request of the Complainant or the nature of the alleged harassment), or the Compliance Officers will designate a specific individual to conduct such a process. The Compliance Officers will provide a copy of this policy to the Complainant and Respondent. In the case of a formal complaint, the Compliance Officers will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees must report incidents of harassment that are reported to them to the Compliance Officer within two (2) days of learning of the incident.

Any Board employee who directly observes unlawful harassment is obligated, in accordance with this policy, to report such observations to the Compliance Officers within two (2) days. Additionally, any Board employee who observes an act of unlawful harassment is expected to intervene to stop the harassment, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the harassment. Thereafter, the Compliance Officers or designee must contact the Complainant, if age eighteen (18) or older, or Complainant's parents/guardians if the Complainant is under the age eighteen (18), within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Reports and Complaints of Harassing Conduct

Students and all other members of the School District community along with Third Parties are encouraged to promptly report incidents of harassing conduct to a teacher, administrator, supervisor, or other District official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any teacher, administrator, supervisor, or other District employee or official who receives such a report shall file it with the Compliance Officer within two (2) days of receiving the report of harassment.

Members of the School District community and Third Parties, which includes students, who believe they have been unlawfully harassed are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the Complainant's employment or participation in educational or

extra-curricular programs. While there are no time limits for initiating complaints of harassment under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

If, during an investigation of alleged bullying, aggressive behavior, and/or harassment in accordance with Policy 5517.01 - Bullying and Other Forms of Aggressive Behavior, the Principal believes that the reported misconduct may have created a hostile work environment and may have constituted unlawful discriminatory harassment based on a Protected Class, the Principal shall report the act of bullying, aggressive behavior and/or harassment to the Compliance Officers who shall investigate the allegation in accordance with this policy. If the alleged harassment involves Sexual Harassment as defined by Policy 2266, the matter will be handled in accordance with the grievance process and procedures outlined in Policy 2266. While the Compliance Officer investigates the allegation, or the matter is being addressed pursuant to Policy 2266, the Principal shall suspend the Policy 5517.01 investigation to await the Compliance Officer's written report or the determination of responsibility pursuant to Policy 2266. The Compliance Officer shall keep the Principal informed of the status of the Policy 5517 investigation and provide the Principal with a copy of the resulting written report. Likewise, the Title IX Coordinator will provide the Principal with the determination of responsibility that results from the Policy 2266 grievance process.

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, any student who believes that they have been subjected to unlawful harassment may seek resolution of the complaint through the procedures described below. The formal complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated.

Due to the sensitivity surrounding complaints of unlawful harassment or retaliation, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. Once the formal complaint process is begun, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) business days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of a student to pursue a complaint of unlawful harassment or retaliation with the United States Department of Education Office for Civil Rights.

Informal Complaint Procedure

The goal of the informal complaint procedure is promptly to stop inappropriate behavior and to facilitate resolution through an informal means, if possible. The informal complaint procedure is provided as a less formal option for a student who believes s/he has been unlawfully harassed or retaliated against. This informal procedure is not required as a precursor to the filing of a formal complaint. The informal process is only available in those circumstances where the Complainant and the Respondent mutually agree to participate in it.

Students who believe that they have been unlawfully harassed may initiate their complaint through this informal complaint process, but are not required to do so. The informal process is only available in those circumstances where the parties (alleged target of harassment and alleged harasser(s)) agree to participate in the informal process.

The Complainant may proceed immediately to the formal complaint process and individuals who seek resolution through the informal procedure may request that the informal process be terminated at any time to move to the formal complaint process.

All complainants involving a District employee, any other adult member of the School District community, or a Third Party and a student will be formally investigated.

As an initial course of action, if a Complainant feels comfortable and safe in doing so, the individual should tell or otherwise inform the Respondent that the allegedly harassing conduct is unwelcome and must stop. The Complainant should address the allegedly harassing conduct as soon after it occurs as possible. The Compliance Officers are available to support and counsel individuals when taking this initial step or to intervene on behalf of the Complainant if requested to do so. A Complainant who is uncomfortable or unwilling to directly approach the Respondent about the alleged inappropriate conduct may file an informal or a formal complaint. In addition, with regard to certain types of unlawful harassment, such as sexual harassment, the Compliance Officer may advise against the use of the informal complaint process.

A Complainant may make an informal complaint, either orally or in writing: 1) to a teacher, other employee, or building administrator in the school the student attends; 2) to the Superintendent or other District-level employee; and/or 3) directly to one of the Compliance Officers.

All informal complaints must be reported to one of the Compliance Officers who will either facilitate an informal resolution as described below or appoint another individual to facilitate an informal resolution.

The Board's informal complaint procedure is designed to provide students who believe they are being unlawfully harassed with a range of options designed to bring about a resolution of their concerns. Depending upon the nature of the complaint and the wishes of the Complainant, informal resolution may involve, but not be limited to, one (1) or more of the following:

A. Advising the Complainant about how to communicate the unwelcome nature of the behavior to the Respondent.

B. Distributing a copy of this anti-harassment policy as a reminder to the individuals in the school building or office where the Respondent works or attends.

C. If both parties agree, the Compliance Officer may arrange and facilitate a meeting or mediation between the Complainant and the Respondent to work out a mutual resolution.

While there are no set time limits within which an informal complaint must be resolved, the Compliance Officer/designee is directed to attempt to resolve all informal complaints within fifteen (15) business days of receiving the informal complaint. If the Complainant is dissatisfied with the informal complaint process, the Complainant may proceed to file a formal complaint. And, as stated above, either party may request that the informal process be terminated at any time to move to the formal complaint process.

Formal Complaint Procedure

If a complaint is not resolved through the informal complaint process, if one of the parties has requested that the informal complaint process be terminated to move to the formal complaint process, or the Complainant, from the outset, elects to file a formal complaint, or the CO determines the allegations are not appropriate for resolution through the informal process, the formal complaint process shall be implemented.

The Complainant may file a formal complaint, either orally or in writing, with a teacher, principal, or other District employee at the student's school, the Compliance Officer, Superintendent, or another District official who works at another school or at the district level. Due to the sensitivity surrounding complaints of unlawful harassment, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a formal complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a teacher, principal, or other District employee at the student's school, Superintendent, or other District official, either orally or in writing, about any complaint of harassment, that employee must report such information to the Compliance Officer within two (2) business days.

Throughout the course of the process, the Compliance Officer should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All formal complaints must include the following information to the extent known: the identity of the Respondent; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the Compliance Officer shall ask for such details in an oral interview. Thereafter, the Compliance Officer will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a formal complaint, the Compliance Officer will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation, including, but not limited to, a change of work assignment or schedule for the Complainant and/or the Respondent. In making such a determination, the Compliance Officer should consult the Complainant to assess whether the individual agrees with the proposed action. If the Complainant is unwilling to consent to the proposed change, the Compliance Officer may still take whatever actions deemed appropriate in consultation with the Superintendent.

Within two (2) business days of receiving the complaint, the Compliance Officer/designee will initiate a formal investigation to determine whether the Complainant has been subjected to offensive conduct/harassment/retaliation. The Principal will not conduct an investigation unless directed to do so by the Compliance Officer.

Simultaneously, the Compliance Officer will inform the Respondent that a formal complaint has been received. The Respondent will be informed about the nature of the allegations and provided with a copy of any relevant policies and/or administrative guidelines, including the Board's Anti-Harassment policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint within five (5) business days.

Although certain cases may require additional time, the Compliance Officer/designee will attempt to complete an investigation into the allegations of harassment/retaliation within fifteen (15) business days of receiving the formal complaint. The investigation will include:

A. interviews with the Complainant;

B. interviews with the Respondent;

C. interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations;

D. consideration of any documentation or other information presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations.

At the conclusion of the investigation, the Compliance Officer or the designee shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the

definition of unlawful harassment as provided in Board policy and State and Federal law as to whether the Complainant has been subjected to unlawful harassment. The Compliance Officer's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved. In determining if discriminatory harassment or retaliation occurred, a preponderance of evidence standard will be used. The Compliance Officer may consult with the Board's legal counsel before finalizing the report to the Superintendent.

Absent extenuating circumstances, within ten (10) school days of receiving the report of the Compliance Officer/designee, the Superintendent must either issue a written decision regarding whether the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's final decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within ten (10) school days. At the conclusion of the additional investigation, the Superintendent shall issue a written decision as described above.

The decision of the Superintendent shall be final.

The Board reserves the right to investigate and resolve a complaint or report of unlawful harassment/retaliation regardless of whether the student alleging the unlawful harassment/retaliation pursues the complaint. The Board also reserves the right to have the formal complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board or its designee.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint process is not a prerequisite to the pursuit of other remedies.

Privacy/Confidentiality

The District will employ all reasonable efforts to protect the rights of the Complainant, the Respondent, and the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligations. All records generated under the terms of this policy and related administrative guidelines shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of a formal investigation, the Compliance Officer/designee will instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided during the course of the investigation.

Sanctions and Monitoring

The Board shall vigorously enforce its prohibitions against unlawful harassment/retaliation by taking appropriate action reasonably calculated to stop the harassment and prevent further such harassment. While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and the terms of the relevant collective bargaining agreement(s). When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the ages and maturity levels of those involved. In those cases where unlawful harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies, consistent with the terms of the relevant collective bargaining agreement(s).

Where the Board becomes aware that a prior remedial action has been taken against a member of the School District community, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging unlawful harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a report, formal complaint testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person from making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanction/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

The exercise of rights protected under the First Amendment of the United States Constitution does not constitute retaliation prohibited under this policy.

Allegations Constituting Criminal Conduct: Child Abuse/Sexual Misconduct

State law requires any school teacher or school employee who knows or suspects that a child with a disability under the age of twenty-one (21) or that a child under the age of eighteen (18) has suffered or faces a threat of suffering a physical or mental wound, disability or condition of a nature that reasonably indicates abuse or neglect of a child to immediately report that knowledge or suspicion to the county children's services agency. If, during the course of a harassment investigation, the Compliance Officer or a designee has reason to believe or suspect that the alleged conduct reasonably indicates abuse or neglect of the Complainant, a report of such knowledge must be made in accordance with State law and Board Policy.

State law defines certain contact between a teacher and a student as "sexual battery." If the Compliance Officer or a designee has reason to believe that the Complainant has been the victim of criminal conduct as defined in Ohio's Criminal Code, such knowledge should be immediately reported to local law enforcement.

Any reports made to a county children's services agency or to local law enforcement shall not terminate the Compliance Officer or a designee's obligation and responsibility to continue to investigate a complaint of harassment. While the Compliance Officer or a designee may work cooperatively with outside agencies to conduct concurrent investigations, in no event shall the harassment investigation be inhibited by the involvement of outside agencies without good cause after consultation with the Superintendent.

Allegations Involving Conduct Unbecoming the Teaching Profession/Suspension

The Superintendent will report to the Ohio Department of Education, on forms provided for that purpose, matters of misconduct on the part of licensed professional staff members convicted of sexual battery, and will, in accordance with Policy 8141, suspend such employee from all duties that concern or involve the care, custody, or control of a child during the pendency of any criminal action for which that person has been arrested, summoned and/or indicted in that regard.

Education and Training

In support of this Anti-Harassment Policy, the Board promotes preventative educational measures to create greater awareness of unlawful discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District

community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training, as well as all information, provided regarding the Board's policy and harassment in general, will be age and content appropriate.

Retention of Investigatory Records and Materials

The Compliance Officers are responsible for overseeing the retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include but not be limited to:

A. all written reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;

B. any narratives that memorialize oral reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;

C. any documentation that memorializes the actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities related to the investigation and/or the District's response to the alleged violation of this policy;

D. written witness statements;

E. narratives, notes from, or audio, video, or digital recordings of witness interviews/statements;

F. e-mails, texts, or social media posts that directly relate to or constitute evidence pertaining to an alleged violation of this policy (i.e., not after-the-fact commentary about or media coverage of the incident);

G. notes or summaries prepared contemporaneously by the investigator in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.), but not including transitory notes whose content is otherwise memorialized in other documents;

H. written disciplinary sanctions issued to students or employees and other documentation that memorializes oral disciplinary sanctions issued to students or employees for violations of this policy;

I. dated written determinations/reports (including summaries of relevant exculpatory and inculpatory evidence) and other documentation that memorializes oral

notifications to the parties concerning the outcome of the investigation, including any consequences imposed as a result of a violation of this policy;

J. documentation of any supportive measures offered and/or provided to the Complainant and/or the Respondent, including no contact orders issued to both parties, the dates the no contact orders were issued, and the dates the parties acknowledged receipt of the no contact orders;

K. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects;

L. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);

M. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment.

The documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal (e.g., FERPA, ADA) and/or State law (e.g., R.C. 3319.321) – e.g., student records and confidential medical records.

The documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

Revised 5/19/14
Revised 11/19/18

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R.C. 4112.02
20 U.S.C. 1400 et seq., The Individuals with Disabilities Education Improvement Act of 2004 (IDEIA)
20 U.S.C. 1681 et seq.
29 U.S.C. 621 et seq., Age Discrimination in Employment Act of 1967
29 U.S.C. 794, Rehabilitation Act of 1973, as amended
29 U.S.C. 6101, The Age Discrimination Act of 1975
42 U.S.C. 1983
42 U.S.C. 2000d et seq.

42 U.S.C. 2000e et seq.
42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
National School Boards Association Inquiry and Analysis - May, 2008

VOL. 45, NO. 1 - AUGUST 2026

po6100

Vol. 45, No. 1 - August 2026 New PROPER USE OF PUBLIC FUNDS

New Policy - Vol. 45, No. 1

6100 - **PROPER USE OF PUBLIC FUNDS**

The Board of Education recognizes that all expenditures of public funds must be for a proper and allowable public purpose. To ensure the responsible stewardship of public tax dollars by the Board of Education, Board members and employees are expected to comply with the following requirements.

Publication of Information about the District

State law authorizes a political subdivision to publish and distribute newsletters or other forms of communication about the plans, policies, and operations of the political subdivision to members of the public. However, the Board will not approve any expenditure to publish, distribute, or communicate information that:

A. Contains defamatory, libelous, or obscene materials;

B. Promotes alcoholic beverages, tobacco products, or any illegal products, services, or activities:

C. Promotes unlawful discrimination on the basis of any protected class;

D. Supports or opposes a labor organization or any action by, on behalf of, or against a labor organization;

E. Supports or opposes the nomination or election of a candidate for public office, or the investigation, prosecution, or recall of a public official; or

F. Supports or opposes the passage of a levy or bond.

Compensation of Staff Who Communicate Information about the District

The Board shall not compensate any employee of the District to engage in activities intended to influence the outcome of an election for any political candidate, or a levy or bond issue. Additionally, no employment contract shall include a provision that conditions employment or any form of compensation on passage of a levy or bond. Employees will not be asked to contribute funds or support a levy campaign, although payroll deductions for political contributions are permissible in accordance with State law. Students are not permitted to use District funds or Board-owned facilities or equipment to promote or oppose a levy or bond, nor may pro or anti-levy materials be distributed to students during the school day or sent home with students.

However, employees may be compensated for attending a public meeting to present information about the District's finances, activities or operations, even if the election of a public official or a levy or bond issue is discussed or debated at the meeting, provided that the information is not presented in a manner designed to influence the outcome of an election. Information discussed at public meetings related to school finances may include the possible impacts of the passage or failure of a levy or bond issue.

[x] The Superintendent and Treasurer are encouraged to publish information and provide community updates on a regular basis to help inform the public about school operations. **[END OF OPTION]**

Employees may be compensated for compiling, analyzing, and creating reports and other materials that relay factual information related to the District's finances and the need for a levy or bond.

The Board may also compensate employees to attend training or professional development that includes review of permissible and prohibited activities related to levies and bonds.

Nothing in this policy is intended to prohibit or restrict any employee or Board member from speaking in support of or opposition to a candidate or issue on the ballot as a private citizen on their own time, unless such action is otherwise prohibited by law.

[x] Employees and Board members may participate in a levy or other political action committee as long as all activities occur outside of compensated time. **[END OF OPTION]**

Engagement of Third-Party Services Related to Levies and Bonds

The Board may utilize the services of Board-approved third parties such as legal counsel and financial consultants to advise on legal and financial matters and offer guidance related to levies and bonds. Third parties may also be hired to conduct surveys that gather information and gauge the public's perceptions of topics such as school finances, the quality of facilities and programs, the need for additional or elimination of specific facilities

and programs. Publicly funded surveys will not be used to gauge the community's support for a levy or bond or otherwise advocate for the passage or opposition of a levy or bond.

Consultants will not be expected to contribute to or fund a political action group or committee as an explicit or implicit condition of being awarded a contract, nor will public funds be used to compensate a third party for services intended to influence the outcome of a levy or bond issue.

Use of Board-Owned Property

Employees may not use District equipment, including electronic mail and other technology, to support or oppose a candidate, levy, or bond, even if the use is outside of work time. Outside groups will be permitted to use District buildings and facilities in accordance with Board policies, which are applied in a content-neutral manner. Pro or anti-levy campaign signs and other materials will not be stored on school property.

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R.C. 9.03, 3315.07

VOL. 45, NO. 1 - AUGUST 2026

po6423

Vol. 45, No. 1 - August 2026 Revised USE OF CREDIT CARDS

6423 - **USE OF CREDIT CARDS**

The Board of Education recognizes the value of an efficient method of payment and recordkeeping for certain expenses.

The Board, therefore, authorizes the use of District credit cards. The name of the District shall appear on each District credit card and check related to a credit card account held by the District. A "credit card account" shall include any bank-issued credit card account, store-issued credit card account, financial institution-issued credit card account, financial depository-issued credit card account, affinity credit card account, or any other card account allowing the holder to purchase goods or services on credit or otherwise transact with the account, and any debit or gift card account related to the receipt of grant monies. The term expressly excludes any procurement card account, gasoline or telephone credit card account, or any other card account where merchant category codes are in place as a system of control for use of the account.

The authorization, handling, and use of credit cards has been established to provide a convenient and efficient means to purchase goods and services from vendors. Credit cards, however, shall not be used in order to circumvent the general purchasing procedures established by State law and Board policy. The Board affirms that credit cards shall only be used in connection with Board-approved or school-related activities and that only those types of expenses that are for the benefit of the District and serve a valid and proper public purpose shall be paid for by credit card. However, under no circumstances shall credit cards be used for personal purchases or the purchase of alcoholic beverages regardless of whether the purchase of such beverages is made in connection with a meal.

[x] CREDIT CARD CONVENIENCE FEES

Credit card convenience fees are charges, assessed by vendors or service providers, for processing payments made via credit card. These fees are a common and generally unavoidable cost associated with processing electronic payments.

Whenever feasible, alternative payment methods that do not include convenience fees – such as ACH transfers, checks, or other direct payment options – should be utilized to minimize costs. In selecting vendors for products and services, consideration will be given to whether convenience fees may apply when remitting payment.

In situations where convenience fees are justified due to operational necessity, efficiency, or timing considerations, convenience fees may be incurred . Convenience fees must be documented on a receipt or bill.

Payment of convenience fees shall not exceed four percent (4%) for any single purchase unless approved in advance by the Treasurer/CFO.

Accrual and use of frequent flyer miles, credit card rewards, hotel points, or other rewards earned during official business is permitted, provided that these rewards are earned the same way as members of the public would earn them, and they do not impose additional costs to the District. Such accrual and use shall be in accordance with Policy 6465 - Public Office Award Program.

Use of credit cards in an unauthorized or illegal manner may result in revocation of credit card privileges, disciplinary action, and/or, where appropriate, may require the user to pay any and all inappropriate charges, including finance charges and interest assessed in connection with the purchase. Additionally, any officer or employee of the District who knowingly misuses a credit card account is guilty of the criminal offense of misuse of credit cards. Violations will be reported to the appropriate law enforcement authorities and any applicable licensure board(s).

Officers and employees are liable in person and upon an official bond for any unauthorized use of credit cards and any officer or employee who suspects the loss, theft, or possibility of unauthorized use of a credit card must notify the Treasurer immediately, who shall notify the Board.

The Treasurer shall be responsible for the initial issuance, reissuance, and cancellation of District credit cards and shall maintain written procedures and all appropriate records and reports regarding the District's credit card account(s). Records and reports will be maintained and made available for review in accordance with this policy and State law.

All officers and employees are required to immediately report lost or stolen credit cards or notice of a possible data breach involving a District credit card to their immediate supervisor and the Treasurer. The Treasurer will notify the entity that issued the credit card and request cancellation of the lost or stolen card as soon as practicable.

The Board prohibits the use of debit card accounts except for the receipt of grant monies. Any officer or employee of the District who uses a debit card account for any other purpose is guilty of the criminal offense of misuse of credit cards.

The aggregate limit for both cards shall not exceed $9500.00.

Use of the District credit card for any cash withdrawal transaction is strictly prohibited.

The Treasurer/CFO shall retain general possession and control of the credit card account or presentation instruments related to an account, such as credit cards and checks.

The Superintendent shall develop administrative guidelines that specify those employees authorized to use credit cards, the types of expenses which can be paid by credit card, and their proper supervision and use. Inappropriate or illegal use of the credit card and/or failure to strictly comply with the limitations and requirements set forth in the administrative guidelines may result in a loss of credit card privileges, disciplinary action, up to and including termination, personal responsibility for any and all inappropriate charges, including finance charges and interest assessed in connection with the purchase, and/or possible referral to law enforcement authorities for prosecution. Violations will also be reported to the applicable licensure board(s).

The Board authorizes anyone who possesses a purchase order to use District credit cards.

Each request for use of a District credit card shall contain:

A. date needed,

B. date to be returned,

C. purpose,

D. authorization.

Upon receipt of a District credit card, employees shall:

A. inform merchants that the purchase is for “official School District business” and is not subject to State or local sales tax;

   However, if the merchant fails to waive the tax, the employee shall pay it. For large purchases where the merchant refuses to waive the tax, the employee shall present a tax exemption form.

B. maintain credit cards in a secure fashion and prevent unauthorized charges to the account;

C. use reasonable care when making purchases online, refrain from providing the credit card number to unknown online merchants, and do not auto-save credit card number for any online account;

D. maintain sufficient documentation of all purchases, including, but not limited to, charge receipts, original cash register slip or other detailed receipts, and invoices;

E. provide documentation of all purchases to the Treasurer in a timely manner to ensure prompt payment;

F. immediately notify his/her immediate supervisor and the Treasurer if the card is lost or stolen, or if s/he becomes aware of a data breach which may involve the card;

G. refrain from allowing anyone else to use the credit card or account number;

H. refrain from splitting the costs of an invoice or purchase in order to circumvent the credit card process and established, pre-approved single purchase limits, monthly spending limits, and/or funds availability.

The officer or employee is liable in person and upon any official bond to reimburse the District the amount for which the officer or employee does not provide itemized receipts in accordance with the credit card policy described herein.

After use, District credit cards are to be returned to the Treasurer along with appropriate receipt copies of all charges within one (1) business day upon completion of any approved use.

Failure to return District credit cards and/or receipts within the above-referenced time period may result in the suspension of credit card privileges and/or charges being deemed unrelated or unsubstantiated.

Employees shall be responsible for any and all unrelated or unsubstantiated purchases and shall be required to make full reimbursement to the District within thirty (30) business days.

If an employee reimburses the District for an unsupported purchase, it shall be documented in the monthly credit card reconciliation.

The Treasurer will keep a record/activity log of all credit card uses and review and approve all purchases to verify that the expenses are incurred in connection with Board-approved or school-related activities, are for the benefit of the District, and serve a valid and proper public purpose prior to disbursing public funds for payment of such expenses.

Upon receipt of the appropriate documentation, credit card expenditures will be paid through the Treasurer’s office.

The Treasurer will monitor the credit card account(s) and reconcile all credit accounts on a monthly basis.

The Treasurer/CFO shall file a report with the Board annually, detailing all rewards received based on the use of the District's credit card account.

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Vol. 45, No. 1 - August 2026 New RECORDING AND AI PROCESSING OF COMMUNICATIONS ON SCHOOL PROPERTY AND AT SCHOOL EVENTS

New Policy - Vol. 45, No. 1

7540.10 - **RECORDING AND AI PROCESSING OF COMMUNICATIONS ON SCHOOL PROPERTY AND AT SCHOOL EVENTS**

Technological advancements in recording devices and artificial intelligence tools — including AI-enabled wearable cameras, AI transcription and summarization devices, and other emerging technologies — present significant legal, privacy, and operational challenges for the school environment.

While these technologies serve many legitimate purposes, including providing accessibility for individuals with disabilities, the Board of Education adopts this policy to:

A. Protect the privacy, safety, and dignity of students, staff, and community members;

B. Ensure compliance with the Family Educational Rights and Privacy Act ("FERPA"); Ohio's student privacy statute (R.C. § 3319.321), the Individuals with Disabilities Education Improvement Act ("IDEA"), Ohio's wiretapping laws; and other applicable Federal and State laws and regulations;

C. Preserve the integrity and confidentiality of educational, disciplinary, and administrative proceedings;

D. Minimize disruption to the learning environment; and

E. Address privacy risks created by devices and technologies capable of passive, covert, AI-enhanced, or biometric recording or processing, while expressly preserving legitimate accessibility, assistive, and personal uses.

From the outset, the Board acknowledges that the right to record public officials performing official duties in public settings implicates First Amendment protections, that parents and community members have legitimate interests in recording public school events, and that employee recording rights in connection with workplace safety and protected concerted activity are protected under applicable law. Consequently, this policy

is narrowly tailored and viewpoint-neutral and does not purport to infringe upon constitutionally or legally protected recording or expression.

SCOPE AND APPLICATION

This policy applies to:

A. All students enrolled in the District, on school property, on school-provided transportation, or at any school-sponsored activity or event;

B. All employees of the District, whether full-time, part-time, substitute, or contracted, during work hours, on school property, or when otherwise engaged in District business;

C. All parents, guardians, and eligible students participating in school meetings including, but not limited to, IEP team meetings, Section 504 team meetings, parent-teacher conferences, and student disciplinary hearings; and

D. All members of the public and community present on school property, attending school events, or participating in Board meetings.

This policy applies to all forms of audio and video recording, livestreaming, and AI Processing of Communications including, but not limited to, capabilities integrated into wearable items, portable devices, or any other technology, whether or not recording or processing is the primary function of the device.

A class, meeting, proceeding, or event otherwise covered by this policy remains subject to this policy when conducted through a virtual or remote platform (e.g., a videoconferencing service), regardless of whether a student, employee, parent, or other participant is physically present on school property at the time.

This policy does not apply to personal photography or recording in outdoor public areas adjacent to school property that are not under the District's control or jurisdiction.

DEFINITIONS

For purposes of this policy:

"Recording" means the audio or video capture and retention of communications, images, or events in a fixed, retrievable medium. The term encompasses audio recording of conversations, video recording of persons or spaces, and the combination of audio and video recording. Depending on context, this policy applies different rules to different forms of recording, as specified below.

"Recording device" means any device, instrument, or technology — regardless of form,

size, or primary function — that can capture, store, transmit, or stream audio, video, or both. The term includes wearable technology, portable devices, and any device in which recording capability is incidental to another primary function.

"AI-enabled recording device" means any device, application, wearable item, or technology that can capture audio, video, images, or communications and uses artificial intelligence to process, convert, summarize, identify, transmit, or store the captured information. This includes, but is not limited to, devices or tools that provide real-time transcription, voice-to-text conversion, automated summaries, facial or voice identification, biometric identification, speaker identification, translation, cloud-based processing, or AI-assisted note-taking. The term applies regardless of whether the device's primary purpose is recording, whether the AI processing occurs on the device or through a cloud-based service, and whether the original audio or video is retained after processing. For the District's broader framework governing the use of AI tools for educational and administrative purposes, see Policy 7540.09 – Artificial Intelligence ("AI").

"AI Wearable Device" means an AI-enabled recording device designed to be worn on the body, including eyewear, headwear, pendants, pins, clips, wrist-worn devices (e.g., smart watches or wristbands), or similar wearable items containing a camera, microphone, computer, or other technology that permits the user to record, transmit, transcribe, summarize, or otherwise process audio, video, images, or communications. The term applies to prescription and non-prescription devices and depends on the device's capabilities rather than its brand name, outward appearance, or primary function. An AI Wearable Device is a subset of "AI-enabled recording device" and "Recording device" as those terms are defined above.

"AI Processing of Communications" means the use of any artificial intelligence system — whether operating on-device, through a cloud service, or through any intermediate processing infrastructure — to analyze, interpret, transcribe, translate, summarize, identify speakers or individuals, or otherwise derive information from the content of an oral, visual, or electronic communication, regardless of whether the underlying communication is stored or retained in its original form following such processing. The term includes, but is not limited to, real-time transcription, on-device language model processing, cloud-based speech-to-text conversion, automated meeting summarization, and biometric identification applied to live or streamed inputs. The relevant privacy interest this policy protects is the unauthorized acquisition and use of the content of communications — not merely their retention — and this definition is therefore to be construed broadly to reach any technological means by which the substance of a communication is acquired and acted upon, whether or not any underlying audio, video, or other primary input is preserved. This policy does not govern the District's use of AI tools for general educational or administrative purposes unrelated to the capture or processing of communications; those uses (e.g., use of speech-to-text software and grammar checkers used for purposes of drafting written communications/documents, lesson planning assistants, or grading software) are governed by Policy 7540.09 – Artificial Intelligence ("AI").

"Biometric identification" means the automated or AI-assisted identification or attempted identification of a specific individual based on physical or behavioral characteristics including, but not limited to, facial recognition, voice recognition used to identify a specific person (as distinguished from voice-to-text transcription), gait analysis, or other biometric markers. This definition does not encompass hearing-assistive technology, voice amplification, or real-time captioning that does not attempt to identify specific individuals. This policy does not apply to any security systems or equipment that the District or authorized staff use on school property.

"Covert recording or processing" means recording or AI Processing of Communications in a manner intended to conceal that recording or processing is occurring, or in violation of a District rule requiring notice, disclosure, and/or authorization. This term expressly encompasses processing-without-retention scenarios in which communications are subjected to real-time AI analysis and a derivative output is generated without the underlying audio or video being stored, and such processing occurs without the knowledge of the persons whose communications are processed. A recording or AI Processing activity may violate this policy even if it does not constitute a criminal offense.

"Livestreaming" means the real-time transmission of audio, video, or both to a remote audience or platform, including transmission to social media platforms, video-sharing sites, or any other internet-accessible destination. Livestreaming is treated as a form of recording for purposes of this policy, with the additional consideration that it constitutes simultaneous public distribution.

"Non-public meeting" means any meeting or conference not open to the general public including, but not limited to, IEP team meetings, Section 504 team meetings, parent-teacher conferences, employee disciplinary proceedings, personnel meetings, and student disciplinary hearings.

"Public meeting" means any meeting open to the public, including Board meetings conducted in compliance with Ohio's Open Meetings Act (i.e., R.C. § 121.22).

"Public school event" means any school-sponsored activity open to or customarily attended by parents, guardians, and members of the community, including athletic competitions, musical and theatrical performances, academic fairs, award ceremonies, and graduation exercises.

"Prohibited Area" means any locker room, restroom, changing area, shower facility, nurse's office or examination area, or any other area where persons have a heightened and objectively reasonable expectation of bodily privacy.

"Student education record" has the meaning set forth in FERPA, 20 U.S.C. § 1232g, and Ohio Revised Code § 3319.321, and includes recordings and AI-generated derivative

outputs that directly relate to an identifiable student and are maintained by the District. See Policy 8330 – Student Records.

"Personally identifiable information ("PII")" has the meaning set forth in 34 C.F.R. § 99.3 and R.C. § 3319.321(B), and includes student names, images, voices, and other information that would allow a reasonable person in the school community to identify a specific student. See Policy 8330 – Student Records.

"Accessibility tool" means a device, application, or technology used by a person with a disability to facilitate equal access to communications, information, or the environment including, but not limited to, hearing-assistive devices, real-time captioning applications, voice amplification devices, screen readers, visual orientation aids for persons with visual impairments, and speech-generating devices. It also applies to devices, applications, or technology used by a person for whom English is a second language to translate/interpret oral or written communications. See below for the safe harbor applicable to accessibility tools.

GENERAL RULES

Differentiated Framework

Recognizing that different forms of recording and AI Processing carry different privacy implications, this policy applies a graduated framework based on modality, setting, and the nature of the conduct involved. The following general principles apply across all settings, with specific rules for particular modalities and environments set forth below:

A. Audio recording of conversations in non-public settings requires advance notice to all parties. In publicly accessible areas during public events, audio recording for personal use does not require individual consent.

B. Video recording of publicly accessible areas during public events is generally permitted for personal, non-commercial use, subject to the restrictions specified below.

C. Video recording in non-public settings — including classrooms during instruction, non-public meetings, and semi-private spaces — is generally prohibited absent express authorization as specified in this policy.

D. Video recording in Prohibited Areas is absolutely prohibited for all persons.

E. Livestreaming is treated as recording for all purposes of this policy. In addition to the restrictions applicable to recording, livestreaming at public school events is subject to copyright laws **(x)** and the copyright advisory set forth below **[END OF OPTION]**.

F. AI transcription and summarization of communications is subject to the same notification requirements as audio recording of the content being processed. The absence of a retained recording does not exempt AI Processing from these requirements.

G. Biometric identification — using technology to identify specific individuals from their images, voices, or other biometric characteristics — is the most restrictive modality under this policy. Its use is prohibited in non-public settings without express written authorization from all individuals subject to identification and is subject to heightened restrictions in public settings.

General Notification Rule — Non-Public Settings

In non-public settings — including classrooms during instructional time, non-public meetings, non-public administrative areas, hallways and common areas during the school day when the school is not open to the general public, and any Prohibited Area — no person shall use a recording device or engage in AI Processing of Communications in a manner that captures the audio or auditory communications of other individuals without first providing clear verbal or written notification to all parties whose communications will be captured or processed that recording or AI Processing is in fact occurring. **[x]** Video recording or AI Processing of visual input in non-public settings is prohibited absent express authorization from the Superintendent. **[END OF OPTION] [DRAFTING NOTE: Neola recommends the inclusion of this option.]**

Notification that a recording device is present or visible does not, standing alone, satisfy this requirement. Notification must affirmatively communicate that recording or AI Processing is actively taking place. The absence of a retained recording does not exempt AI Processing from this notification requirement.

The fact that Ohio is a one-party consent State under R.C. § 2933.52 does not override this Board policy requirement. The District, as a political subdivision, is entitled to impose restrictions more restrictive than State law as a condition of access to non-public school settings and proceedings. This policy articulates such restrictions.

Nothing herein, however, prohibits school security personnel (e.g., School Resource Officers) from using body cameras while fulfilling their responsibilities.

Prohibition on Covert Recording and Covert AI Processing

Covert recording or processing is prohibited for all persons, including students, staff, parents, and community members, at all times on school property, at all school events, and during any virtual or remote meeting or instructional session covered by this policy, except as expressly permitted by law or authorized in writing by the Superintendent.

Any person who engages in covert recording or covert AI Processing may be subject to:

A. A directive to cease the prohibited conduct;

B. Removal from school property;

C. Referral to law enforcement where there is reasonable basis to believe applicable Ohio or Federal criminal law has been violated;

D. For students: disciplinary action pursuant to the Student Code of Conduct; and

E. For employees: disciplinary action consistent with applicable Board policies, employment law, and collective bargaining agreements.

Biometric Identification — Heightened Restrictions

The use of biometric identification technology — including AI-enabled facial recognition and voice-based individual identification — is subject to the following restrictions in addition to all other applicable provisions of this policy:

A. Non-public settings: Biometric identification of any individual is prohibited in non-public meetings, classrooms, and Prohibited Areas without the express prior written consent of each individual who may be identified.

B. Public school events and publicly accessible areas: Active, directed use of biometric identification technology to identify specific students on school property is prohibited, regardless of the setting. This prohibition applies to the deliberate use of such technology to identify named or targeted individuals; it does not apply to general photography or video recording at public events in which facial images are incidentally captured without any identification function being engaged.

C. District use: The District shall not use biometric identification technology to identify students without appropriate notice and compliance with applicable State and Federal law.

Accessibility Tools and Assistive Technology — Safe Harbor

Nothing in this policy shall be construed to deny the use of an accessibility tool required by law or approved as a reasonable accommodation. The District may, however, implement reasonable, nondiscriminatory safeguards concerning confidentiality, cloud upload, retention, redistribution, biometric identification, speaker identification, and access to student or personnel information, provided those safeguards do not deny effective communication or meaningful access. This safe harbor applies to students, employees, parents, and members of the public, and includes:

A. Hearing-assistive devices, including FM systems, loop systems, Bluetooth hearing aid streamers, and remote microphone systems;

B. Real-time captioning applications ("CART") and similar services used by deaf or hard-of-hearing individuals;

C. Translation applications that process spoken language into another language for communication access;

D. Screen readers, visual orientation aids, and navigation assistance tools for persons with visual impairments;

E. Speech-generating devices and augmentative communication technology; and

F. Any other assistive technology documented in a student's IEP or Section 504 plan, or identified as a disability accommodation for an employee or visitor under the ADA.

A person using an accessibility tool in a non-public meeting or school setting may be asked to identify the general function of the tool when reasonably necessary to implement confidentiality safeguards, provided the person is not required to disclose a diagnosis or unnecessary medical information. The District shall not deny access to any meeting or event to a person whose accessibility tool is subject to this safe harbor. Building administrators who are uncertain whether a device qualifies as an accessibility tool should consult the Superintendent before taking any action.

This safe harbor does not exempt a device from the restrictions on biometric identification discussed above if the device is used for that purpose.

STUDENT-SPECIFIC PROVISIONS

General Student Prohibition

Students are prohibited from using recording devices to capture audio or video of other students, staff, or individuals on school property, at school events, or during any virtual or remote instructional session or activity provided by or through the District, without the knowledge of the person being recorded, except as provided in this policy. This prohibition applies regardless of whether the student is a party to the conversation being recorded.

Classroom and Educational Settings

Students are prohibited from audio or video recording during instructional time in classrooms, laboratories, gymnasiums, counseling offices, or any instructional space (including a synchronous virtual or remote instructional session), except:

A. When expressly authorized by the classroom teacher or building principal for a specific educational purpose;

B. As a documented accommodation in the student's IEP or Section 504 Plan; or

C. As authorized in writing by the building principal for a specific legitimate purpose.

Authorization under items A. and C. does not authorize recording of other students without their knowledge and does not authorize distribution of any recording beyond the authorized purpose.

Prohibited Areas — Absolute Prohibition

Recording, photographing, livestreaming, or AI Processing of Communications in any Prohibited Area is strictly prohibited for all persons, regardless of consent and regardless of whether any audio or video is retained following processing. Violations involving intentional, knowing, reckless, invasive, or harmful conduct shall result in referral to law enforcement. Other violations shall be addressed consistent with the circumstances, student discipline procedures, and applicable law.

IEP and Section 504 Accommodations

Nothing in this policy prohibits a student from using a recording device or accessibility tool where such use is documented as a necessary accommodation in the student's IEP or Section 504 Plan. The District shall implement all such accommodations consistent with applicable law. Where recording is an IEP or Section 504 accommodation, the building administrator shall notify relevant staff of the accommodation at the beginning of each school year and upon any change in placement.

Student Accessibility Tools

The accessibility tool safe harbor set forth above applies to all students, including students who do not have a formal IEP or Section 504 plan, provided the device is used solely for the accessibility purpose for which it is designed.

Possession of AI Wearable Devices

Except as provided in section *IEP and Section 504 Accommodations* and section *Student Accessibility Tools* above, students are prohibited from possessing, wearing or using an AI-Wearable Device on school property or at school events, and from wearing or using an AI Wearable Device while participating in synchronous virtual or remote instruction, or a virtual or remote meeting or activity, provided by or through the District, regardless of whether the student is physically present on school property at the time. **[x]** This prohibition does not apply to smartwatches when the AI Processing features are not active. **[END OF OPTION]** A device possessed or worn in violation of this provision on school

property or at a school event may be temporarily confiscated consistent with this policy, and any confiscated device shall be released only to the student's parent or guardian. The violation may also be addressed through discipline consistent with the Student Code of Conduct. Where a violation occurs in a virtual or remote setting and the device cannot be physically confiscated, the District may address the violation through discipline consistent with the Student Code of Conduct.

Disciplinary Consequences

Student violations of this policy shall be addressed pursuant to the Student Code of Conduct and State law. Consequences shall be proportionate to the severity of the violation and the student's disciplinary history.

EMPLOYEE-SPECIFIC PROVISIONS

General Employee Recording Standards

Employees shall not use recording devices to record other employees, students, parents, or members of the public in the course of their employment without the knowledge of all parties being recorded, except:

A. As authorized by the Superintendent for legitimate educational, safety, or administrative purposes;

B. When the employee is a party to the communication and recording is made for a purpose protected under applicable law including, but not limited to, documenting workplace safety violations, harassment, discrimination, or other matters constituting protected concerted activity under Ohio law; or

C. As expressly required by the employee's job responsibilities (e.g., security personnel).

Employee Use of AI-Enabled Recording Devices

Employees are prohibited from using AI-enabled recording devices while interacting with students, conducting meetings, or performing District duties, whether on school property or through a virtual or remote platform, without prior authorization from the Superintendent. Authorization shall not be granted solely because a tool does not retain an audio or video file. Any authorized use must comply with FERPA, R.C. § 3319.321, and all other applicable privacy laws.

[x] The District encourages employees who seek to use AI tools for legitimate note-taking or accessibility purposes to contact the Superintendent or Principal to explore District-managed alternatives that incorporate appropriate FERPA and student privacy safeguards.

Employee Investigation and Disciplinary Meetings — Recording Rights and Obligations

Employee investigatory interviews, pre-disciplinary meetings, disciplinary hearings, and grievance proceedings are non-public meetings governed by this policy. Because these proceedings implicate both the District's legitimate interests in confidentiality and the employee's legitimate interests in an accurate record, the following framework applies:

A. Prohibition on Covert Recording. Consistent with the general prohibition on covert recording set forth above, no party — including the District, the employee, or any employee representative — shall covertly record any employee investigatory interview, disciplinary meeting, pre-disciplinary hearing, or grievance proceeding. Any intent to record such a proceeding must be disclosed at the commencement of the meeting.

B. Right to Record with Disclosure. Any party to an employee disciplinary or investigatory proceeding — including the District, the employee, and a union representative who is present — may record the proceeding, provided disclosure of the intent to record is made to all participants at the commencement of the meeting. No party's consent is required to record a meeting in which that party is a participant, provided disclosure is given; however, covert recording by any party is prohibited.

C. District-Made Recordings of Employee Proceedings. Any recording of an employee disciplinary or investigatory proceeding made by the District shall be treated as a personnel record, not a student education record, and shall be handled consistent with Ohio public records law and applicable collective bargaining agreements. Such recordings shall not be commingled with student education records. The employee shall have the right to request a copy of any District-made recording of their own disciplinary or investigatory proceeding, subject to any applicable exemptions or redactions under Ohio public records law, Ohio student privacy law, and any provisions of applicable collective bargaining agreements.

D. Employee Accessibility Accommodations. The accessibility tool safe harbor detailed above applies to all employees. Requests for accessibility accommodations involving recording devices shall be processed through the District's standard ADA/Section 504 accommodation procedures. The accommodation shall be disclosed to the building administrator, who shall notify relevant staff without disclosing protected medical information.

PARENT, GUARDIAN, AND COMMUNITY MEMBER PROVISIONS

Non-Public Meetings

Parents and guardians participating in non-public school meetings — including IEP team meetings, Section 504 team meetings, parent-teacher conferences, and student disciplinary hearings — are expected to provide advance notice to the Principal or meeting coordinator when they intend to audio record the meeting or use a device to AI Process Communications during the meeting. **[x]** Video recording of non-public school meetings is strictly prohibited. **[END OF OPTION] [DRAFTING NOTE: This language is consistent with the language included in Policy 2461.]**

If advance notice is not provided, the District may pause the meeting **(x)** briefly **[END OF OPTION]** to address audio recording procedures, arrange for the District to also audio record, and implement reasonable confidentiality safeguards. Lack of advance notice shall not, by itself, prevent audio recording of an IEP or Section 504 team meeting when audio recording is necessary for meaningful parent participation.

The District shall provide access to District-maintained recordings in accordance with FERPA, R.C. § 3319.321, and other applicable laws. The District may request a copy of any parent-made recording, but the District does not assume responsibility for obtaining, preserving, or maintaining recordings made independently by parents or other non-District participants.

Requests to Place a Recording Device on or With a Student

A parent or guardian who wishes the District to authorize a recording device to be placed on a student's person, in the student's backpack, or otherwise carried or worn by the student during the school day must submit a written request to the building principal.

The District's default position is that it will not authorize such recording. Recording through a device placed on or carried by a student raises significant concerns — including the privacy rights of other students and staff who may be recorded without their knowledge, potential violations of Ohio wiretapping law, the District's independent obligation to investigate any underlying concern about the student's welfare, and the operational and legal complexity of administering student-worn recording in the school environment.

Instead, upon receipt of a written request, the principal shall acknowledge the request promptly and engage with the parent to understand the underlying concern. Where the concern relates to the student's disability or educational program under IDEA or Section 504, the matter shall be referred to the student's IEP or Section 504 team for consideration. In all other cases, the principal shall respond in writing , explaining the basis for the District's decision.

In all cases — and regardless of whether the request is granted, denied, or pending — the District shall address the parent's underlying concern about the student's welfare, safety, or educational experience through the applicable investigatory, disciplinary, or educational support processes without delay.

When a parent or guardian discloses information that reasonably alleges harassment, intimidation, bullying, threats, or similar misconduct involving a student — whether through a recording authorization request or otherwise — the District shall address the issue under applicable anti-harassment, anti-bullying, student discipline, threat assessment, and/or nondiscrimination procedures without delay.

Public School Events — Recording Generally Permitted; Specific Restrictions Apply

Recording at public school events — including athletic competitions, musical and theatrical performances, academic fairs, award ceremonies, and graduation exercises — is generally permitted for parents, guardians, and community members for personal, non-commercial purposes.

The following specific restrictions apply:

A. Prohibited Areas: Recording is absolutely prohibited in locker rooms, restrooms, and other Prohibited Areas at all times, including during public events.

B. Non-disruption: Recording must not interfere with the event, obstruct the view of other attendees, compromise student safety or supervision, or impede the performance or competition.

C. Biometric identification: Active, directed use of biometric identification technology to identify specific students is prohibited at public school events, as stated above. General photography and video recording at public events is not restricted by this provision.

D. Incidental background capture: The incidental appearance of students, staff, or other attendees in the background of a personal recording made at a permitted public event does not itself constitute a policy violation. This policy does not require individuals recording public events to prevent incidental capture of others who are present.

E. Commercial recording: Individuals or organizations seeking to record public school events for commercial purposes, or media organizations seeking to record for broadcast or publication, must obtain advance written permission from the Superintendent.

F. Livestreaming at public events: Livestreaming of public school events for personal, non-commercial purposes is permitted under the same conditions applicable to recording generally. Individuals who livestream public events are solely responsible for ensuring compliance with any terms of service of the platform used and any other applicable laws.

[DRAFTING NOTE: The following optional language is recommended but not required.]

(x) Copyright advisory: Recordings of musical, theatrical, dramatic, or choreographic performances at school events may include content protected by copyright. The District's licenses with performing rights organizations (such as ASCAP, BMI, or SESAC) apply to the District's public performances and do not extend to recordings made by audience members. Individuals who record and publicly distribute such performances — including by posting to social media or video-sharing platforms — do so at their own risk and may be subject to copyright claims by the rights holders of the performed works. The District makes no representation that personal recordings of school performances are authorized under any copyright license held by the District. This advisory is informational only; the District does not assume responsibility for the copyright compliance of recordings made by audience members. **[END OF OPTIONAL LANGUAGE]**

G. Public hallways and common areas during public events: When school facilities are open to the public for a school event, hallways, lobbies, and common areas accessible to the general public during that event are treated as publicly accessible areas for purposes of this policy. Recording in such areas by attendees during the event is subject to the same rules applicable to recording at the event itself.

(x) Distribution and Use of Recordings: The Board encourages parents and community members who record at school events or activities to use such recordings responsibly. Recordings made at school events may capture images and voices of other people's children. While FERPA imposes obligations on educational institutions — not on private individuals — the Board notes that Ohio law provides civil remedies for invasion of privacy, defamation, and intentional infliction of emotional distress, and that the distribution of recordings in a manner designed to harass, embarrass, or harm identifiable individuals may give rise to legal liability independent of this policy. The Board also notes that recordings that constitute harassment of students or staff may implicate the Board's anti-harassment policies and, if directed at students, may implicate Title IX and/or R.C. § 3313.666. This section is advisory only and does not constitute a prohibition on lawful speech or expression.

H. Nothing in this Section authorizes a student to possess, wear, or use an AI-enabled recording device at a public school event.

Public Board Meetings

Members of the public may photograph, audio record, video record, or livestream the open portions of public Board meetings, subject to reasonable, viewpoint-neutral time, place, and manner restrictions necessary to preserve order, safety, accessibility, confidentiality, and the ability of the public to observe the meeting.

Recording equipment must be silent, unobtrusive, self-contained, and positioned so it does not obstruct views, block aisles or exits, interfere with sound systems, capture confidential documents or conversations, or disrupt the meeting.

The presiding officer may direct a person to relocate, adjust, discontinue, or remove recording equipment if the activity disrupts the meeting, interferes with others' ability to observe, creates a safety concern, captures confidential information, or violates meeting rules.

Nothing in this policy authorizes recording of executive sessions or other proceedings lawfully closed to the public.

Where the District livestreams or otherwise broadcasts the open portions of a Board meeting, this section applies equally to any person recording or redistributing that livestream, regardless of the person's physical location. Nothing in this section authorizes virtual attendance for purposes of Board member quorum or voting, which remains governed by R.C. §§ 121.22 and 121.221.

STUDENT PRIVACY — FERPA AND R.C. § 3319.321

FERPA Obligations of the District

The District shall maintain, use, and disclose student education records — including audio and video recordings and AI-generated derivative outputs that constitute education records — in accordance with FERPA and its implementing regulations. Any recording or AI-generated output maintained by the District that directly relates to an identifiable student shall be treated as an education record and handled in accordance with the District's FERPA policies and procedures.

Ohio Student Privacy — R.C. § 3319.321

Independent of FERPA, the District's handling of student information is governed by R.C. § 3319.321, which prohibits the release of, or the permitting of access to, personally identifiable student information without the written consent of the student's parent or guardian (or of a student age eighteen (18) or older), except as specifically authorized by that statute.

R.C. § 3319.321(B) applies to "any person" who would release or permit access to PII of

students attending school in the District, not only to the District itself. Because R.C. § 3319.321 restricts unauthorized release of or access to personally identifiable student information, Board employees shall take reasonable steps, consistent with this policy , to prevent unauthorized recording or AI Processing in settings where confidential student information from District records, special education meetings, disciplinary proceedings, counseling matters, or other non-public school proceedings may be disclosed.

District Measures to Protect Student PII

The District shall take reasonable measures to discourage and respond to the unauthorized capture of student PII by unauthorized recording devices, including AI-enabled devices with biometric identification capabilities. The District shall annually review its technology vendor agreements to ensure that no vendor agreement authorizes the use of student data for commercial AI training or product development without appropriate consent.

AUDIO RECORDING IEP AND SECTION 504 TEAM MEETINGS — SPECIFIC PROVISIONS

The District permits audio recording of IEP Team meetings and Section 504 team meetings by both the District and parents/guardians, subject to the following conditions:

A. The party intending to audio record must notify all other parties at or before the commencement of the meeting.

B. Both the District and the parent/guardian may audio record if either party elects to do so.

C. The District shall provide the parent/guardian with a copy of any District-made audio recording upon written request.

D. Any audio recording made and maintained by the District shall constitute part of the student's education records and shall be subject to FERPA and R.C. § 3319.321.

E. AI-enabled transcription or processing devices used by parent, guardian, or other participant at IEP or Section 504 team meetings must be disclosed to the District in advance or at the commencement of the meeting. The District may impose reasonable safeguards to prevent unauthorized disclosure or processing of student PII, including information concerning students other than the parent's own child**.**

F. The District shall not enforce this policy in a manner that prevents a parent from audio recording an IEP or Section 504 Team meeting when such recording is necessary for the parent to meaningfully participate in and exercise their rights under IDEA or Section 504, as applicable.

(x) Video recording of IEP or Section 504 Team meetings by parents is not a right guaranteed under IDEA, Section 504, or Ohio law.

ENFORCEMENT AND CONSEQUENCES

Enforcement of this policy shall be proportionate to the nature and severity of the violation, the setting in which it occurred, and the circumstances of the individual involved. The District's first response to most violations shall be to direct the individual to cease the prohibited conduct. Law enforcement referral is appropriate where there is reasonable basis to believe a criminal violation has occurred, where an individual refuses to cease prohibited conduct and the District has no other adequate remedy, or where the safety or privacy interests at stake are sufficiently serious to warrant immediate referral. Violations of the Prohibited Area prohibition shall result in referral to law enforcement.

The following consequences apply by category:

Students: Disciplinary action shall be consistent with the Student Code of Conduct and R.C. § 3313.66 and shall be proportionate to the violation. The District may temporarily confiscate a device used to violate this policy. The District may inspect the contents of a confiscated device if it has reasonable suspicion that the device contains evidence of a policy or legal violation; the scope of any inspection shall be reasonably related to that suspicion. No staff members shall search a student's personal device without first notifying the Principal.

Employees: Disciplinary action shall be consistent with applicable employment law, the District's employee conduct standards, and applicable collective bargaining agreements. Serious violations, including covert recording of students or other staff, may result in referral to law enforcement.

Parents and Community Members: The District's primary remedy is to direct the individual to cease the prohibited conduct. If the individual refuses, the District may request that the individual leave school property or, for a virtual meeting, remove the individual from the virtual session. The District will not confiscate personal property from adults who are not employees. Law enforcement shall be contacted where there is reasonable basis to believe a criminal violation has occurred, where an individual refuses to leave school property after being directed to do so, or where the safety of students or staff is at risk.

The District reserves the right to pursue available civil legal remedies, including injunctive relief, in cases of serious or repeated violations that cause harm to the District, its students, or its staff.

NON-WAIVER/LEGAL COMPLIANCE

Nothing in this policy shall be construed to:

A. Authorize any recording or AI Processing of Communications that violates Ohio or Federal law, or prohibit any recording or AI Processing expressly authorized by Ohio or Federal law;

B. Infringe upon First Amendment rights, including the right to record public officials performing official duties in public settings, the right to engage in personal photography or video recording at public school events for personal, non-commercial purposes, subject to the specific restrictions specified above, or the right to record public Board of Education meetings (see Bylaw 0169.01);

C. Restrict or prohibit the use of an accessibility tool as defined above and protected by the ADA, Section 504, IDEA, or other applicable laws;

D. Infringe upon the rights of public employees protected by Ohio's Public Employees' Collective Bargaining Act (i.e., R.C. Chapter 4117), or applicable collective bargaining agreements – including an employee's right to request the presence of a union representative before or during an investigatory interview that the employee reasonably believes may result in discipline;

E. Prohibit parents from audio recording IEP or Section 504 team meetings in circumstances required by IDEA and/or Section 504; or

F. Supersede, limit, or substitute for the District's mandatory obligation to investigate reports of harassment, intimidation, and bullying under R.C. § 3313.666, or to address any other concerns about student welfare through applicable District processes.

POLICY REVIEW

The Board will review this policy not less than every two (2) years, or more frequently as necessitated by changes in technology, applicable law, or District experience. Given the rapid evolution of AI-enabled recording technologies, the Superintendent is directed to advise the Board of significant technological or legal developments that may require policy revision between scheduled reviews.

Cross-References:
Bylaw 0169.1 – Public Participation at Board Meetings
Policy 2260.01 – Section 504/ADA Prohibition Against Discrimination Based on Disability
Policy 2460 – Special Education
Policy 3122/4122/1422 – Nondiscrimination, Equal Employment Opportunity, and Anti-Harassment

Policy 3139/4139 – Staff Discipline
Policy 5136 – Personal Communication Devices
Policy 5136.01 – Electronic Equipment
Policy 5500 – Student Conduct
Policy 5517 – Anti-Harassment
Policy 5517.01 – Bullying and Other Forms of Aggressive Behavior
Policy 5600 – Student Discipline
Policy 5610 – Removal, Suspension, Expulsion, and Permanent Exclusion of Students
Policy 7530.02 – Staff Use of Personal Communication Devices
Policy 7540.03 – Student Technology Acceptable Use and Safety
Policy 7540.04 – Staff Technology Acceptable Use and Safety
Policy 7540.09 – Artificial Intelligence ("AI")
Policy 8310 – Public Records
Policy 8330 – Student Records
Policy 8350 - Confidentiality
Policy 9150 – School Visitors
Policy 9160 – Public Attendance at School Events

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Legal
R.C. §§ 121.22, 2907.08, 2933.51–2933.66, 3301.24, 3313.20, 3313.29, 3313.66, 3313.666, 3313.753, 3319.321, 4117.01–4117.24
18 U.S.C. §§ 2510–2523
20 U.S.C. § 1232g (FERPA); 34 C.F.R. Part 99
20 U.S.C. § 1400 et seq. (IDEA); 34 C.F.R. Part 300
29 U.S.C. § 794 (Section 504);
42 U.S.C. § 12101 et seq. (ADA)
U.S. Const. amends. I, IV
OSEP Policy Guidance (2003) (reaffirmed in subsequent guidance)
New Jersey v. T.L.O., 469 U.S. 325 (1985)

VOL. 45, NO. 1 - AUGUST 2026

po8120

Vol. 45, No. 1 - August 2026 Revised VOLUNTEERS

8120 - **VOLUNTEERS**

The Board of Education recognizes that certain programs and activities can be enhanced through the use of volunteers who have particular knowledge or skills that will be helpful to members of the professional staff responsible for the conduct of those programs and activities.

The Superintendent shall be responsible for recruiting community volunteers, reviewing their capabilities, and making appropriate placements. The District shall not be obligated to make use of volunteers whose abilities are not in accord with District needs.

Volunteers for Athletic Activities

Volunteers who direct, supervise, or coach a student activity program that involves athletics, routine or regular physical activity, or activities with health and safety considerations may be required to obtain a pupil activity permit issued by the Ohio Department of Education (ODE). As provided in ODE guidance, the District shall determine which staff members need to have a permit. However, in accordance with OHSAA General Regulations, coaches, paid and/or volunteer, in grades seven (7) through twelve (12) who do not possess the Pupil Activity Program/Coaching Permit shall not be permitted to coach at any level at an OHSAA member school. Such qualifications shall include completion of a sudden cardiac arrest training course approved by the Department of Health, in accordance with R.C. 3319.303. The qualifications shall also include completion of a student mental health training course approved by the Department of Mental Health and Addiction Services. The mental health training course may be combined with or part of another training course. Such training must be completed each time the individual applies for or renews a Pupil Activity Program Permit. Individuals who have applied for a Permit but who have not yet been issued a valid credential shall not be permitted to interact with athletes, even under the supervision of a credentialed coach, until the Pupil Activity Permit number is formally issued.

These volunteers will submit to a background check and take courses as may be required by the Ohio Department of Education.

The cost of obtaining the permit will be at the volunteer's expense.

General Requirements

The Superintendent is to inform each volunteer that they:

A. are required to abide by all Board policies and District guidelines while on duty as a volunteer (including, but not limited to, the volunteer's obligation to keep confidential and not release or permit access to any and all student personally identifiable information to which they are exposed except as authorized by law);

B. will be covered under the District's liability policy but the District can not provide any type of health insurance to cover illness or accident incurred while serving as a volunteer, nor is the person eligible for workers' compensation;

C. will be asked to sign a form releasing the District of any obligation should the volunteer become ill or receive an injury as a result of their volunteer services;

D. may not accept compensation from any third party or source including, but not limited to, booster, parent, or other District support organizations for the performance of their official duties as a volunteer on behalf of the Board.

Furthermore, the Superintendent shall inform all volunteers who work or apply to work unsupervised with children on a regular basis of the need to display appropriate behavior at all times, and that they will have to provide a set of fingerprints so that a criminal records check can be conducted and that they will have to pay the costs associated with the criminal records check either before they can begin their duties or as a condition of continued service as a volunteer at the discretion of the Board. ~~they may be required to provide a set of fingerprints at any time so that a criminal records check can be conducted. If a criminal records check is then conducted, it will be done as a condition of continued service as a volunteer and will be at the volunteer's expense.~~

If a criminal records check indicates that a volunteer has been convicted of or pleaded guilty to any of the offenses listed below and/or described in R.C. 109.572 (A)(1), the volunteer will be informed either that the Board is no longer interested in maintaining their volunteer service or that the volunteer will be assigned to duties for which they will not work unsupervised with children.

State law prohibits any person who is in a restricted sex offender category from serving as a volunteer with any person, group, or organization, including a school, in a capacity that affords them extensive contact with minor children. Extensive contact with minor children is defined by law to include working directly and in an unaccompanied setting with minor children on more than an incidental or occasional basis, or having supervision or disciplinary power over minor children. A violation of State law is considered a criminal offense. District staff will immediately notify law enforcement upon discovering that a registered sex offender may have violated the law.

The Superintendent shall inform each volunteer of the District's appreciation for their time and efforts in assisting in the operation of the schools and for their understanding with regard to the need for all volunteers to be subject to possible criminal records check.

Offenses

No person is to be accepted or maintained as a volunteer if they have been convicted of any of the following offenses:

A. aggravated murder, murder, voluntary manslaughter, involuntary manslaughter

B. felonious assault, aggravated assault, assault

C. failing to provide for a functionally impaired person

D. aggravated menacing

E. patient abuse or neglect

F. kidnapping, abduction, child stealing, criminal child enticement

G. rape, sexual battery, corruption of a minor, gross sexual imposition, sexual imposition, importuning, voyeurism, public indecency, felonious sexual penetration, compelling prostitution, promoting prostitution, procuring prostitution, disseminating matter harmful to juveniles, pandering obscenity, pandering obscenity involving a minor, pandering sexually oriented matter involving a minor, illegal use of minor in nudity-oriented material or performance

H. aggravated robbery, robbery

I. aggravated burglary, burglary

J. abortion without informed consent

K. endangering children

L. contributing to the delinquency of children

M. domestic violence

N. carrying concealed weapons, having weapons while under disability, improperly discharging firearm at or into a habitation or school

O. corrupting another with drugs

P. trafficking in drugs

Q. illegal manufacture of drugs or cultivation of marijuana

R. funding of drug or marijuana trafficking

S. illegal administration or distribution of anabolic steroids

T. drug possession offenses (that are not a minor drug possession offense)

U. placing harmful objects in or adulterating food or confection

Revised 4/24/23

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Legal
A.C. 3301-27-01
R.C. 109.572, 109.574-7, 121.401-2, Chapter 2950, 3313.203, 3319.321, 3327.16
20 U.S.C. 1232g
34 C.F.R. Part 99
OHSAA Bylaw 6-1-2; General Regulation 4

VOL. 45, NO. 1 - AUGUST 2026

po8310

Vol. 45, No. 1 - August 2026 Revised PUBLIC RECORDS

8310 - **PUBLIC RECORDS**

The Board of Education is responsible for maintaining the public records of this District and to make such records available to residents of Ohio for inspection and reproduction.

The Board will utilize the following procedures regarding the availability of public records. "Public records" are defined as any document, device, or item, regardless of physical form or characteristic, including an electronic record created or received by or coming under the jurisdiction of the Board or its employees, which serves to document the organization, functions, policies, decisions, procedures, operations, or other activities of the District. "Electronic record" is defined as a record created, generated, sent, communicated, received, or stored by electronic means. "Public records" do not include medical records, documents containing genetic information, trial preparation records, confidential law enforcement investigatory records, educational support services data as defined by R.C. 3319.32 records the release of which is prohibited by State or Federal law, and any other exceptions set forth in R.C. 149.43. Confidential law enforcement investigatory records, medical records, and trial preparation records are as defined in R.C. 149.43. No public records, including, but not limited to personnel records, personnel files, staff directories and/or student records shall include the actual/confidential addresses of students, parents, or employees who are participating in the Safe at Home/Address Confidentiality Program administered by the Secretary of State. Such public records and student records shall only contain the address designated by the Secretary of State to serve as the student's, parent's or employee's address.

The District's public records shall be organized and maintained so that they are readily available for inspection and copying. As such, public records will be available for inspection during regular business hours, with the exception of published holidays. The District's public records shall be promptly prepared and made available for inspection. A reasonable period of time may be necessary due to the volume of records requested, the proximity of the location where the records are stored, and/or for the District to review and redact non-public/confidential information contained in the record. Upon request, a person may receive copies of public records, at cost, within a reasonable period of time.

Each request for public records shall be evaluated for a response at the time it is made. Although no specific language is required to make a request, the requester must minimally

identify the record(s) requested with sufficient clarity to allow the District to identify, retrieve, and review the record(s). If a requestor makes an ambiguous or overly broad request or has difficulty in making a request for inspection or copies of public records such that the District's Record Officer cannot reasonably identify what public records are being requested, the District Record Officer or designee may deny the request but shall provide the requestor with an opportunity to revise the request by informing the requestor of the manner in which records are maintained by the District and accessed in the ordinary course of business. The request for records need not be in writing. The requestor shall not be required to provide his/her identity or the intended use of the requested public record(s).

At the time of the request, the records custodian shall inform the person making the request of the estimated length of time required to gather the records. All requests for public records shall be satisfied or acknowledged by the District promptly following the receipt of the request. If the request for records was in writing, the acknowledgement by the District shall also be in writing.

The Superintendent is authorized to grant or refuse access to the records of this District in accordance with the law. Any denial, in whole or in part, of a public records request must include an explanation, including legal authority. If portions of a record are public and portions are exempt, the exempt portions are to be redacted and the rest released. If there are redactions, the requester must be notified of the redaction and/or the redaction must be plainly visible, and each redaction must be accompanied by a supporting explanation, including legal authority. If the request for records was in writing, the explanation shall also be in writing.

A person may obtain copies of the District's public records upon payment of a fee. A person who requests a copy of a public record may request to have said record duplicated on paper, on the same medium on which the District keeps the record, or on any other medium in which the custodian of records determines that said record reasonably can be duplicated as an integral part of normal operations. A person who requests a copy of a public record may choose to have that record sent to him/her by United States mail or by other means of delivery or transmission provided the person making the request pays in advance for said record as well as the costs for postage and the mailing supplies.

Those seeking public records will be charged only the actual cost of making copies.

Documents in electronic mail format are records as defined by the Ohio Revised Code when their content relates to the business of the District (i.e., they serve to document the organization, functions, policies, decisions, procedures, operations, or other activities of the District). E-mail shall be treated in the same fashion as records in other formats and shall follow the same retention schedule.

Records in private e-mail accounts are subject to disclosure if their content relates to public business, and all employees or representatives of the District are responsible for retaining

e-mails that meet the definition of public records and copying them to their District e-mail account(s) and/or to the records custodian.

The records custodian shall treat such e-mail/records from private accounts as records of the District. These records shall be filed appropriately, retained in accordance with the established schedules, and made available for inspection and copying in accordance with the Public Records Act.

Private e-mail, electronic documents, and documents ("private records") that do not serve to document the District's organization, functions, policies, decisions, procedures, operations or other activities are not public records. Although private records do not fall under Policy 8310 or AG 8310A, they may fall under Policy 8315 - "Information Management" and/or AG 8315 - "Litigation Hold Procedure".

No public record may be removed from the office in which it is maintained except by a Board officer or employee in the course of the performance of his/her duties.

Nothing in this policy shall be construed as preventing a Board member, in the performance of his/her official duties, from inspecting any record of this District, except student records and certain confidential portions of personnel records.

Records Commission

A School District Records Commission shall be established consisting of the Board President, Treasurer/CFO, and Superintendent of Schools, or their designee(s) in accordance with law to judge the advisability of destroying District records. Record retention schedules shall be updated regularly and posted prominently. The Commission shall meet at least once every twelve (12) months.

The Superintendent shall provide for the inspection, reproduction, and release of public records in accordance with this policy and with the Public Records Law. Administrative guidelines shall be developed to provide guidance to District employees in responding to public records requests. The Superintendent shall require the posting and distribution of this policy in accordance with statute.

Revised 5/22/17

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Legal
R.C. 9.01, 102.03(B), 111.41, 111.42, 111.43, 111.46, 111.47, 111.99
R.C. 149.011, 149.41, 149.43, 1306.01, 1347 et seq., 3313.26
R.C.3319.32, 3319.321
20 U.S.C. 1232g

29 C.F.R. Part 1635
42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act

VOL. 45, NO. 1 - AUGUST 2026

po8330

Vol. 45, No. 1 - August 2026 Revised STUDENT RECORDS

8330 - **STUDENT RECORDS**

In order to provide appropriate educational services and programming, the Board of Education must collect, retain, and use information about individual students. Simultaneously, the Board recognizes the need to safeguard students' privacy and restrict access to students' personally identifiable information.

Student personally identifiable information (PII) includes, but is not limited to: the student's name; the name of the student's parent or other family members; the address of the student or student's family; a personal identifier, such as the student's social security number, student number, or biometric record; other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the District reasonably believes knows the identity of the student to whom the education record relates.

The Board is responsible for the records of all students who attend or have attended schools in this District. Only records mandated by the State or Federal government and/or necessary and relevant to the function of the School District or specifically permitted by this Board will be compiled by Board employees.

In all cases, permitted, narrative information in student records shall be objectively based on the personal observation or knowledge of the originator.

Student records shall be available only to students and their parents, eligible students, designated school officials who have a legitimate educational interest in the information, or other individuals or organizations as permitted by law.

The term 'parents' includes natural parents, as well as legal guardians or other persons standing in loco parentis (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the welfare of the child). The term 'eligible student' refers to a student who is eighteen (18) years of age or older, or a student of any age who is enrolled in a postsecondary institution.

Both parents shall have equal access to student records unless stipulated otherwise by court order or law. In the case of eligible students, parents may be allowed access to the records without the student's consent, provided the student is considered a dependent under section 152 of the Internal Revenue Code.

A school official is a person employed by the Board as an administrator, supervisor, teacher/instructor (including substitutes), or support staff member (including health or medical staff and law enforcement unit personnel); and a person serving on the Board. The Board further designates the following individuals and entities as school officials for the purpose of FERPA:

A. persons or companies with whom the Board has contracted to perform a specific task (such as an attorney, auditor, insurance representative, or medical consultant); and

B. contractors, consultants, volunteers, or other parties to whom the Board has outsourced a service or function otherwise performed by the Board employees (e.g. a therapist, authorized information technology (IT) staff, and approved online educational service providers).

The above-identified outside parties must (a) perform institutional services or functions for which the Board would otherwise use its employees, (b) be under the direct control of the Board with respect to the use and maintenance of education records, and (c) be subject to the requirements of 34 C.F.R. 99.33(a) governing the use and re-disclosure of PII from education records.

Finally, a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing the school official's tasks (including volunteers) is also considered a school official for purposes of FERPA provided the parent or student meets the above-referenced criteria applicable to other outside parties.

Legitimate educational interest is defined as a direct or delegated responsibility for helping the student achieve one (1) or more of the educational goals of the District or if the record is necessary in order for the school official to perform an administrative, supervisory, or instructional task or to perform a service or benefit for the student or the student's family. The Board directs that reasonable and appropriate methods (including, but not limited to, physical and/or technological access controls) are utilized to control access to student records and to make certain that school officials obtain access to only those education records in which they have legitimate educational interest.

The Board authorizes the administration to:

A. forward student records, including academic records, student assessment data ~~date~~, and disciplinary records including records pertaining to suspensions and expulsions, upon request to a private or public school or school district in which a student of this District is enrolled, seeks or intends to enroll, or is instructed to enroll, on a full-time or part-time basis, or alternatively send written notice to the requesting school if there is no record of the student's attendance. Records will be released upon condition that:

1. a reasonable attempt is made to notify the student's parent or eligible student of the transfer (unless the disclosure is initiated by the parent or eligible student; there is no record of the student having attended school in the District or the Board's annual notification - Form 8330 F9 - includes a notice that the Board will forward education records to other agencies or institutions that have requested the records and in which the student seeks or intends to enroll or is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer);

2. within five (5) school days after receiving the request, either the student records shall be transmitted or a written notice will be provided if there is no record of the student's attendance;

3. except as when expressly prohibited by law, the District is authorized to withhold grades and credits to enforce payment of outstanding fees and charges, and further, may withhold all of a student's school records if there is $2,500 or more of outstanding debt attributed to the student, and will only release the records once the debt has been paid;

4. the parent or eligible student, upon request, receives a copy of the record; and

5. the parent or eligible student, upon request, has an opportunity for a hearing to challenge the content of the record;

B. forward student records, including disciplinary records ~~including records~~ pertaining to suspensions and expulsions, upon request to a juvenile detention facility in which the student has been placed, or a juvenile court that has taken jurisdiction of the student;

C. forward student records, including disciplinary records ~~including records~~ pertaining to suspensions and expulsions, upon request to a public school or school district in which a student in foster care is enrolled;

Such records shall be transferred within one (1) school day of the enrolling school's request.

D. provide personally identifiable information to appropriate parties, including parents of an eligible student, whose knowledge of the information is necessary to protect the health or safety of the student or other individuals, if there is an articulable and significant threat to the health or safety of a student or other individuals, considering the totality of the circumstances;

E. report a crime committed by a child to appropriate authorities, and with respect to reporting a crime committed by a student with a disability, to transmit copies of the student's special education and disciplinary records to the authorities for their consideration;

F. release de-identified records and information in accordance with Federal regulations;

G. disclose personally identifiable information from education records, without consent, to organizations conducting studies for, or on behalf of, the District for purposes of developing, validating or administering predictive tests, administering student aid programs, or improving instruction;

Information disclosed under this exception must be protected so that students and parents cannot be personally identified by anyone other than a representative of the organization conducting the study, and must be destroyed when no longer needed for the study. In order to release information under this provision, the District will enter into a written agreement with the recipient organization that specifies the purpose of the study. (See Form 8330 F14) Further, the following personally identifiable information will not be disclosed to any entity: a student or the student's family member's social security number(s); religion; political party affiliation; voting history; or biometric information.

H. disclose personally identifiable information from education records without consent, to authorized representatives of the Comptroller General, the Attorney General, and the Secretary of Education, as well as State and local educational authorities;

The disclosed records must be used to audit or evaluate a Federal or State-supported education program or to enforce or comply with Federal requirements related to those education programs. A written agreement between the parties is required under this exception. (See Form 8330 F16)

The District will verify that the authorized representative complies with FERPA regulations.

I. request each person or party requesting access to a student's record to abide by Federal regulations and State laws concerning the disclosure of information.

The Board will comply with a legitimate request for access to a student's records within a reasonable period of time but not more than forty-five (45) days after receiving the request or within such shorter period as may be applicable to students with disabilities. Upon the request of the viewer, a record shall be reproduced unless said record is copyrighted or otherwise restricted, and the viewer may be charged a fee equivalent to the cost of handling and reproduction. Based upon reasonable requests, viewers of education records will receive explanation and interpretation of the records.

The Board shall maintain a record of each request for access and each disclosure of personally identifiable information. Such disclosure records will indicate the student, person viewing the record, their legitimate interest in the information, information disclosed, date of disclosure, and date parental/eligible student consent was obtained (if required).

Only directory information regarding a student shall be released to any person or party, other than the student or the student's parent, without the written consent of the parent or, if the student is an eligible student, without the written consent of the student, except to those persons or parties stipulated by the Board's policy and administrative guidelines and/or those specified in the law.

DIRECTORY INFORMATION

Each year, the Superintendent shall provide public notice to students and their parents of the District's intent to make available, upon request, certain information known as directory information. The Board designates as student directory information: a student's name; address; telephone number; date and place of birth; major field of study; participation in officially-recognized activities and sports; height and weight, if a member of an athletic team; dates of attendance; date of graduation; and/or awards received.

The Board designates school-assigned e-mail accounts as directory information for the limited purpose of facilitating students' registration for access to various online educational services, including mobile applications/apps that will be utilized by the student for educational purposes and for inclusion in internal e-mail address books.

School-assigned e-mail accounts shall not be released as directory information beyond this/these limited purpose(s) and to any person or entity but the specific online educational service provider and internal users of the District's Education Technology.

Directory information shall not be provided to any organization for profit-making purposes.

Parents and eligible students may refuse to allow the Board to disclose any or all of such directory information upon written notification to the Board within five (5) days after receipt of the Superintendent's annual public notice.

In accordance with Federal and State law, the Board shall release the names, addresses, District-assigned e-mail addresses (if available), and telephone listings of secondary students to a recruiting officer for any branch of the United States Armed Forces or an institution of higher education who requests such information. A secondary school student or parent of the student may request in writing that the student's name, address, District-assigned e-mail address (if available), and telephone listing not be released without prior consent of the parent(s)/eligible student. The recruiting officer is to sign a form indicating that any information received by the recruiting officer shall be used solely for the purpose of informing students about military service and shall not be released to any person other than individuals within the recruiting services of the Armed Forces. The Superintendent is authorized to charge mailing fees for providing this information to a recruiting officer.

Whenever consent of the parent(s)/eligible student is required for the inspection and/or release of a student's health or education records or for the release of directory information, either parent may provide such consent unless agreed to otherwise in writing by both parents or specifically stated by court order. If the student is under the guardianship of an institution, the Superintendent shall appoint a person who has no conflicting interest to provide such written consent.

The Board may disclose directory information of former students, without student or parental consent, unless the parent or eligible student previously submitted a request that such information not be disclosed without their prior written consent.

The Board shall not permit the collection, disclosure, or use of personal information collected from students for the purpose of marketing or for selling that information (or otherwise providing that information to others for that purpose).

INSPECTION OF INFORMATION COLLECTION INSTRUMENT

The parent of a student or an eligible student has the right to inspect upon request any instrument used in the collection of personal information before the instrument is administered or distributed to a student. Personal information for this section is defined as individually identifiable information including a student's or parent's first and last name, a home or other physical address (including street name and the name of the city or town), a telephone number, or a Social Security identification number. In order to review the instrument, the parent or eligible student must submit a written request to the building principal before the scheduled date of the activity. The instrument will be provided to the parent or eligible student within days of the principal receiving the request.

The Superintendent shall directly notify the parent(s) of a student and eligible students, at least annually at the beginning of the school year, of the specific or approximate dates during the school year when such activities are scheduled or expected to be scheduled.

This section does not apply to the collection, disclosure, or use of personal information collected from students for the exclusive purpose of developing, evaluating, or providing

educational products or services for, or to, students or educational institutions, such as the following:

A. college or other postsecondary education recruitment, or military recruitment

B. book clubs, magazines, and programs providing access to low-cost literary products

C. curriculum and instructional materials used by elementary and secondary schools

D. tests and assessments used by elementary and secondary schools to provide cognitive, evaluative, diagnostic, clinical, aptitude, or achievement information about students (or to generate other statistically useful data for the purpose of securing such tests and assessments) and the subsequent analysis and public release of the aggregate data from such tests and assessments

E. the sale by students of products or services to raise funds for school-related or education-related activities

F. student recognition programs

The Superintendent is directed to prepare administrative guidelines so that students and parents are adequately informed each year regarding their rights to:

A. inspect and review the student's education records;

B. request amendments if the parent believes the record is inaccurate, misleading, or violates the student's privacy rights;

C. consent to disclosures of personally identifiable information contained in the student's education records, except to those disclosures allowed by the law;

D. challenge Board noncompliance with a parent's request to amend the records through a hearing;

E. file a complaint with the United States Department of Education;

F. obtain a copy of the Board's policy and administrative guidelines on student records.

The Superintendent shall also develop procedural guidelines for:

A. the proper storage and retention of records including a list of the type and location of records;

B. informing Board employees of the Federal and State laws concerning student records.

The Board authorizes the use of the microfilm process or electromagnetic processes of reproduction for the recording, filing, maintaining, and preserving of records.

No liability shall attach to any member, officer, or employee of this Board as a consequence of permitting access or furnishing student records in accordance with this policy and regulations.

Any entity receiving personally identifiable information pursuant to a study, audit, evaluation, or enforcement/compliance activity must comply with all FERPA regulations. Further, such an entity must enter into a written contract with the Board of Education delineating its responsibilities in safeguarding the disclosed information. Specifically, the entity must demonstrate the existence of a sound data security plan or data stewardship program, and must also provide assurances that the personally identifiable information will not be redisclosed without prior authorization from the Board. Further, the entity conducting the study, audit, evaluation, or enforcement/compliance activity is required to destroy the disclosed information once it is no longer needed or when the timeframe for the activity has ended, as specified in its written agreement with the Board of Education. See Form 8330 F14 and Form 8330 F16 for additional contract requirements.

SAFE AT HOME/ADDRESS CONFIDENTIALITY PROGRAM

If a parent (or adult student) presents to the District a valid program authorization card issued by the Secretary of State certifying that the parent (or adult student), the parent's child, or a member of the parent's household is a participant in the Safe at Home/Address Confidentiality Program, the Board shall refrain from including the student's actual/confidential residential address in any student records or files (including electronic records and files) or disclosing the student's actual/confidential residential address when releasing student records. Since student records are available to non-custodial parents, designated school officials who have a legitimate educational interest in the information, and other individuals or organizations as permitted by law (including the public in some situations), the Board shall only list the address designated by the Secretary of State to serve as the student's address in any student records or files, including electronic records and files. Further, the Board shall use the student's designated address for any and all communications and correspondence between the Board and the parent(s) of the student (or adult student). The student's actual/confidential residential address shall be maintained in a separate confidential file that is not accessible to the public or any employees without a legitimate purpose.

Although the student's actual/confidential address will not be available for release as directory information, the parent (or adult student) may also request that the student's name and telephone number be withheld from any release of directory information. Additionally, if applicable, the student's parent's school, institution of higher

education, business, or place of employment (as specified on an application to be a program participant or on a notice of change of name or address) shall be maintained in a confidential manner.

If a non-custodial parent presents a subpoena or court order stating that the non-custodial parent should be provided with copies or access to a student's records, the District will redact the student's confidential address and telephone number from the student's records before complying with the order or subpoena. The District will also notify the custodial/residential parent of the release of student records in accordance with the order or subpoena.

The intentional disclosure of a student's actual/confidential residential address is prohibited. Any violations could result in disciplinary action or criminal prosecution.

TECHNOLOGY PROVIDER USE OF EDUCATIONAL RECORDS

The Board contracts with third parties to provide school-issued devices, which include hardware, software, devices, and accounts that the District by itself or with assistance from a technology provider provides to individual students for their dedicated use.

Under State law, technology providers are defined to include a person or company that contracts with the Board to provide school-issued devices and creates, receives, or maintains educational records (as defined by the Family Educational Rights and Privacy Act of 1974 and R.C. 3319.325) pursuant or incidental to its contract with the Board. The term does not include county board of developmental disabilities, educational service centers, information technology centers, assessment providers, curriculum providers, or other public schools that enter into service contracts with the Board.

At all times, education records created, received, maintained, or disseminated by a technology provider as part of their contracted services shall remain the sole property of the District. Technology providers will not electronically access or monitor location-tracking features of a school-issued device, audio or visual receiving, transmitting, or recording features of said devices, or student interactions with school issued devices (including keystrokes and web-browsing activities) except in accordance with the law and Board policy.

Technology providers are required to notify the Board when it is discovered that education records are subject to a breach of the security of the data. Technology providers are

prohibited by law from selling, sharing, or disseminating education records except as delegated or assigned to do so through the contract with the Board, and are further prohibited from using education records for any commercial purpose, including marketing or advertising to students or parents.

Contracts with technology providers will ensure that appropriate security measures are put in place to protect education records. Restrictions will be placed on unauthorized access to education records by the technology provider's employees, contractors or agents, and technology providers will ensure that records will only be accessed as necessary to fulfill official duties. Contracts will specify that within ninety (90) days after the expiration of the contract, the technology provider will either destroy or return education records in its possession unless renewal of the contract is anticipated.

Annually, by August 1st, the District will provide notice to parents and students regarding any curriculum, testing or assessment technology provider contract affecting the student's education records. The notice shall:

1. identify each curriculum, testing or assessment technology provider with access to education records;

2. identify the education records affected by the provider contract;

3. include information about the right to, upon request, inspect a complete copy of technology provider contracts; and

4. provide contact information for the school department to which a parent or student may direct questions or concerns regarding any program or activity that allows a curriculum, testing or assessment technology provider to access a student's education records.

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R.C. 9.01, 111.41, 111.42, 111.43, 111.46, 111.47, 111.99
R.C. 149.41, 149.43, 1347 et seq., 3313.33, 3313.642, 3313.672, 3319.321, 3319.324 R.C. 3319.325, 3319.326, 3319.327
34 C.F.R. Part 99
20 U.S.C., Section 1232f through 1232i (FERPA)
26 U.S.C. 152
20 U.S.C. 1400 et seq., Individuals with Disabilities Education Improvement Act
20 U.S.C. 7165(b)
20 U.S.C. 7908
2021 Solomon Amendment: Subtitle C- General Service Authorities and Correction of Military Records SEC. 521

VOL. 45, NO. 1 - AUGUST 2026

po8470

Vol. 45, No. 1 - August 2026 Revised SEX OFFENDER NOTIFICATION

8470 - **SEX OFFENDER NOTIFICATION**

Ohio's "Sex Offender Registration and Community Notification" law requires all "habitual sex offenders" and adjudicated "sexual predators" (hereinafter "offenders") to register with the sheriff of the county in which they reside. The sheriff must then notify certain community members including the Superintendent of the School District in which such an offender resides. The Board of Education is committed to assisting the sheriff and local law enforcement agencies with their responsibility for Community Notification of offenders as required by law.

When the Superintendent receives information from the sheriff concerning an offender subject to Community Notification, the Superintendent shall disseminate the information to all District employees whose duties include the supervision of and/or responsibility for students.

Employees who receive said information shall promptly notify the Superintendent if a person subject to Community Notification is observed in the vicinity of the school or a bus stop area. The Superintendent shall notify the local law enforcement agency if, in the judgment of the Superintendent, the presence of the person subject to Community Notification appears to be without a legitimate purpose or otherwise creates concern for the safety of children. The Superintendent shall cooperate with the local law enforcement agency if any additional action is to be taken.

When the Superintendent receives information from the sheriff concerning an offender subject to Community Notification, the Superintendent shall not release any information concerning such offender to any person other than those employees whose duties include the supervision of and/or responsibility for students. The Superintendent shall refer any and all persons who wish to receive information regarding sex offender to the sheriff.

State law prohibits any person who is in a restricted sex offender category from serving as a volunteer with any person, group, or organization, including a school, in a capacity that affords them extensive contact with minor children. Extensive contact with minor children is defined by law to include working directly and in an unaccompanied setting with minor children on more than an incidental or occasional basis, or having supervision or disciplinary power over minor children. A violation of State law is considered a criminal

offense. Individuals who are known sex offenders will not be permitted to volunteer for school activities that involve work with minors. District staff will immediately notify law enforcement upon discovering that a registered sex offender may have violated the law.

The Superintendent shall develop administrative guidelines necessary for the implementation of this policy.

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R.C. Chapter 2950
A.C. 109:5-2

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po9700

Vol. 45, No. 1 - August 2026 Revised RELATIONS WITH SPECIAL INTEREST GROUPS

9700 - **RELATIONS WITH SPECIAL INTEREST GROUPS**

Any request from civic institutions, charitable organizations, or special interest groups which involve such activities as patriotic functions, contests, exhibits, sales of products to and by students, sending promotional materials home with students, graduation prizes, fund raising, and free teaching materials must be carefully reviewed to ensure that such activities promote student interests.

It is the policy of the Board of Education that students, staff members, and District facilities not be used for promoting the interests of any nonschool agency or organization, public or private, without the approval of the Board or its designee; and any such approval, granted for whatever cause or group, shall not be construed as an endorsement of said cause or group by this Board.

A. **Political Interests**

All materials or activities proposed by outside political sources for student or staff use or participation shall be reviewed by the Superintendent and no such approval shall have the primary purpose of advancing the special interest of the proposing group.
[x] School facilities or equipment may not be used as a means of producing or disseminating to the community any materials that advertises or promotes a political party, a political cause including a levy or bond issue, or the candidacy of an individual for public office. Students and employees of the Board shall not be used to distribute campaign literature within the schools or on school grounds.

The Board shall permit the use of educational materials, programs, and equipment which contains commercial messages providing the content of such messages and the manner of presentation has been approved by the Superintendent and is in compliance with the District's administrative guidelines.

In addition, the Board shall permit school organizations and/or school-affiliated groups to sell space in District facilities, on District property, or in District publications for the express purpose of advertising the products or services of a commercial organization, provided that ~~providing the~~ content of such

advertisements and the manner of their presentation has been approved by the Superintendent and is in compliance with the District's administrative guidelines.

B. **Contests/Exhibits**

The Board recognizes that contests, exhibits, and the like may benefit individual students or the District as a whole, but participation in such special activities may not:

1. have the primary effect of advancing a special product, group, or company;

2. make unreasonable demands upon the time and energies of staff or students or upon the resources of the District;

3. involve any direct cost to the District;

4. interrupt the regular school program unless the student body as a whole derives benefit from such activities;

5. cause the participants to leave the School District.

C. **Distribution/Posting of Literature**

No outside organization or staff member or student representing an outside organization may distribute or post literature on that organization's behalf on District property either during or after school hours without the permission and prior review of the Superintendent.

D. **Solicitation of Funds**

Any outside organization or staff member representing an outside organization desiring to solicit funds on school property must receive permission to do so from the Superintendent.

Permission to solicit funds will be granted only to those organizations, individuals, or staff members who meet the permission criteria established in the District's administrative guidelines. Solicitation must take place at such times and places and in such a manner as specified in the administrative guidelines. In accordance with Board Policy 5830, no District student may participate in the solicitation without the Superintendent's approval.

The Board disclaims all responsibility for the protection of, or accounting for, such funds.

Solicited funds are not to be deposited in any regular or special accounts of the District.

A copy of this policy as well as the relevant administrative guidelines shall be given to any individual granted permission to solicit funds on District property.

This policy does not apply to the raising of funds for District-sponsored or school-sponsored activities.

Use of the name, logo, or any assets of the District, including, but not limited to facilities, technology, or communication networks, is prohibited without the specific permission of the Superintendent.

E. **Surveys and Questionnaires**

Neither District-related nor nondistrict-related organizations shall be allowed to administer a survey or questionnaire to students or staff unless the instrument and the proposed plan is submitted, in advance, to the Superintendent. If approved, a copy of the results and the proposed manner of their communication are to be provided to him/her for review and approval before they are released.

Students shall not be required to complete surveys to provide marketing information to vendors, or distribute to vendors any personal information of students, including but not limited to names, addresses, and telephone numbers, except as may be required by law. In addition, the District shall not enter into any contract for products or services, including electronic media services, where personal information will be collected from the students by the providers of the services.

See also Policy 2416 and AG 2416.

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