



POLICY REVIEW COMMITTEE

Mike McDonough, Deputy Superintendent
Friday, December 9, 2022, 9:30 AM, Central Office

HILLIARD CITY SCHOOL DISTRICT
OPERATIONS DEPARTMENT

Committee Members

Beth Murdoch, Board of Education

Brian Perry, Board of Education

Brian Wilson, Treasurer/CFO

Mike McDonough, Deputy Superintendent

Jill Abraham, Assistant Superintendent

Stacie Raterman, Communications Director

Herb Higginbotham, Director of Elementary Education

Jacob Grantier, Director of Secondary Education

Jamie Lennox, Assistant Special Education Director

Hilary Sloat, Director of Diversity, Equity & Inclusion

Matt Middleton, Principal Hilliard Darby HS

Katherine Hueter, Principal Hilliard Weaver MS

Erin Dooley, Principal Hilliard Station Sixth Grade School

Holly Meister, Principal Scioto Darby Elementary

Stephanie Borlaza, Principal Britton Elementary

AGENDA

Agenda Notes

- White copies are OSBA sample policies
- Blue copies are current HCSD policies
- Yellow copies are proposed revisions
- Item Status: M (Move Forward), T (Tabled), R (Refs Only) & N (No Action)

Section I – Public Participation

- None scheduled for this meeting

Section II – Review of Policies/Regulations/Exhibits – OSBA NOVEMBER 2022 PDQ

Status

November 2022 PDQ
Pages 7-8

1. **GUIDANCE ON PREGNANCY AND RELATED CONDITIONS**

Title IX prohibits discrimination based on sex in education programs or activities that receive federal financial assistance. On Oct. 4, 2022, the U.S. Department of Education's (DOE) Office for Civil Rights (OCR) released [new guidance on discrimination based on pregnancy and related conditions](#), reminding school communities that Title IX protects students and employees from discrimination based on pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery therefrom ([34 CFR 106.57](#) and [34 CFR 106.40](#)).

Employee protections - Districts must treat pregnancy as a temporary disability in the same manner as any other temporary disability for job-related purposes, including commencement, duration and extensions of leave; payment of disability income; accrual of seniority and any other benefits offered to employees by virtue of employment.

Student protections - Districts must not exclude students on the basis of their pregnancy — as defined in law — from education programs or activities, including any class or extracurricular activity.

The new guidance document reiterates these obligations to districts and reviews the full definition of pregnancy for purposes of the law.

JFE- Pregnant Students

- A required policy – HCSD re-adopted May 11, 2015
- OSBA is recommending changes to better align with the federal code provisions. They continuing to monitor the Title IX rulemaking process and will make further updates as necessary in future PDQ issues.
- Add language in **bold type** and remove language with a ~~line drawn through it~~

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2. CHANGE IN FEDERAL LAW REQUIRES DISTRICTS TO MAKE STUDENT EMAIL ADDRESSES AVAILABLE TO MILITARY RECRUITERS

November 2022 PDQ
Pages 8-9

Under existing law, districts that receive funds under the Elementary and Secondary Education Act (ESEA) must provide military recruiters with the names, addresses and telephone listings of secondary school students upon request.

Recently, the William M. (Mac) Thornberry National Defense Authorization Act amended 10 USC 503 to include student school email addresses on the list of information that schools are required to provide to military recruiters.

KKA – Recruiters in the Schools

- Not a required policy – HCSD re-adopted October 8, 2018
- Updated to align with the recent amendment and now includes student email addresses and telephone listings within the list of information to be provided to recruiters.
- Add language in **bold type** and remove language with a line drawn through it

Section III – Review of Policies/Regulations/Exhibits – as Requested by Board of Education/District Administration

Status

1. BF – Board Policy Development and Adoption

- Not a required policy – HCSD re-adopted August 8, 2022
- Review proposed revision submitted by Board Member
- Add language in **bold type**

2. KMA – Parent/Citizen Organizations

- Not a required policy – HCSD re-adopted May 17, 2021
- Review proposed revision submitted by Treasurer
- Add underlined language

Section IV – Additional Information to Review – OSBA NOVEMBER 2022 PDQ (Board Action Not Required)

1. ODPS RELEASES NEW THREAT ASSESSMENT MODEL PLAN

November 2022 PDQ
Pages 1-6

HB 123 requires each school district to establish, no later than March 24, 2023, threat assessment teams and trainings for each school building in the district serving grades six-12. Districts also must establish the requirements related to threat assessment plans as a part of the school's emergency management plan.

- The August 2022 PDQ issue included updates to EBC, Emergency Management and Safety Plans, and no additional updates are necessary.
- The policy already includes references to the new threat assessment teams and plans.

2. HB 110 IMPACTS A DISTRICT'S ABILITY TO CONDUCT RAFFLES

November 2022 PDQ
Pages 6-7

House Bill (HB) 110 contained an amendment to Ohio Revised Code (RC) [2915.092](#), which appears to remove a school district's ability to conduct raffles. Specifically, the bill removed the term "public schools" from the list of entities that are authorized to conduct charitable raffles. The provision now authorizes entities that are exempt from federal income taxes under [26 United States Code \(USC\) 510\(a\)](#) to conduct raffles, which does not encompass public school districts. While it is unclear if the change was intentional, we are recommending that school districts refrain from conducting raffles until there are further changes in the law.

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- A "raffle" is defined in RC [2915.01](#)(CC) as a form of bingo in which one or more prizes are won by one or more persons who have purchased a raffle ticket. State law allows certain entities to conduct raffles without obtaining a bingo license.
- Most booster groups and support organizations remain authorized to conduct raffles without a bingo license as long as they comport with the relevant laws. These groups are usually formed as nonprofit organizations under 26 USC 501(c)(3), meaning they are tax exempt under 501(a). Booster groups and support organizations not formed as 501(c)(3) organizations but formed as another type of tax-exempt entity described in RC 2915.092 may conduct raffles as long as they distribute at least 50% of the net profits to a charitable purpose.

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3. CONCEALED CARRY LAW UPDATE

The May 2022 PDQ issue addressed [Senate Bill \(SB\) 215](#), effective June 13, 2022. The bill impacted several of Ohio's concealed carry gun laws and most significantly removed a license requirement for carrying a concealed handgun in many instances.

Newly enacted Ohio Revised Code (RC) [2923.111](#)(C)(1) states that, "except when the context clearly indicated otherwise," qualifying adults concealing a handgun that is not a restricted firearm will be treated as a person that has been issued a valid concealed handgun license.

Since the time we addressed this topic in the May issue, the Ohio Attorney General's Office released a [guidance document](#) on concealed carry laws and license application. This document clarifies that RC [2923.122](#) does not treat qualifying adults as valid concealed handgun licensees for the purpose of school safety zones and exceptions. The document states permitless carriers are not allowed to bring a firearm into a school safety zone and doing so remains a felony under both federal and state law.

The notes sections of GBCB, Staff Conduct, and KGB, Public Conduct on District Property, have been updated to reflect this guidance.

Section V – Additional Information to Review per Administration/Board of Education (Board Action Not Required)

1. KD (Also BDDH) – Public Participation at Board Meetings
 - A required policy – HCSD re-adopted August 8, 2022
 - Add cross reference to policy KGB – Public Conduct on District Policy

Section VI – Policies for Annual Review

1. IGBJ – Title I Programs
2. IGBL – Parent and Family Involvement in Education
 - Both are required policies – HCSD re-adopted July 5, 2017
 - Annual review – no revisions recommended



POLICY REVIEW COMMITTEE

Mike McDonough, Deputy Superintendent
December 9, 2022, Central Office

HILLIARD CITY SCHOOL DISTRICT
OPERATIONS DEPARTMENT

OHIO SCHOOL BOARDS ASSOCIATION POLICY DEVELOPMENT QUARTERLY

NOVEMBER 2022 ISSUE

ODPS RELEASES NEW THREAT ASSESSMENT MODEL PLAN

by Gamy Narvaez, policy consultant and Kenna S. Haycox, senior policy consultant

The August 2022 PDQ issue provided an update on the phased-in requirements of [House Bill \(HB\) 123](#) (2021), the Safety and Violence Education Students (SAVE Students) Act, which addresses both school security and youth suicide awareness, education and training.

HB 123 requires each school district to establish, no later than March 24, 2023, threat assessment teams and trainings for each school building in the district serving grades six-12. Districts also must establish the requirements related to threat assessment plans as a part of the school's emergency management plan.

Each threat assessment team must be multidisciplinary and may include school administrators, mental health professionals, school resource officers and other necessary personnel. Each team member is required to complete an approved threat assessment training program upon appointment and once every three years thereafter. The Ohio Department of Public Safety (ODPS) has released [a list of approved training programs](#) that meet the bill's statutory requirements.

HB 123 allows existing school safety teams to serve as a threat assessment team provided that each member complies with the new training requirements. Members of an existing safety team who have completed an approved training program in the year before the bill's effective date do not have to complete additional training for another two years. Any new team members, however, must complete an approved training program. Each district must provide proof that the members of every team have current threat assessment certifications when the team's building administrator submits the emergency management plan to the director of public safety.

HB 123 required that ODPS, in consultation with the Ohio Department of Education and Ohio attorney general, develop a model school assessment plan. This model plan must provide detailed guidance as to what schools must address in their plans and must use evidence-based threat assessment processes or best-practice threat assessment guidelines as created by the National Threat Assessment Center. ODPS recently released its model policy on its [Ohio School Safety Center \(OSSC\) website](#).

Now that the model policy has been released, we will review the key plan components and policy considerations. The guide includes much more information than provided here, with references to sources used for developing the plan and the eight steps to establishing a behavioral threat assessment model from the National Threat Assessment Center. These resources were used in the development of the protocols in the model policy.

Each building administrator must incorporate a model school assessment plan into the building's existing emergency management plan. Schools can use the model plan or another plan that meets the bill's requirements.

Threat assessments

The model threat assessment policy released by ODPS was developed to help school safety personnel identify and mitigate "concerning behavior," as defined in the model plan, in students and others. The model policy also

emphasizes that a threat assessment should be used as an early intervention tool to provide appropriate resources to students and other individuals whose behaviors cause concern for their safety or that of others.

In Ohio, behavioral threat assessment teams established under Ohio Revised Code (RC) [3313.669](#) function to conduct such assessments and intervene when needed.

The model policy implies that threat assessments can be conducted on current, former and prospective students and employees; parents or guardians; persons who are or have been in a relationship with students or staff; visitors to the school; and even unaffiliated persons to the extent that they may pose a risk of harm to the school community or themselves. Threat assessment teams focus on identifying areas of concern, gathering information, assessing the likelihood of violence, initiating appropriate interventions and providing ongoing evaluation for individuals whose behavior elicits concern.

In identifying and assessing individuals of concern, the model policy encourages districts to prohibit profiling of any kind based on race, ethnicity, age, physical or mental health conditions, learning abilities, socioeconomic status, gender, sexual orientation or religion. The model also emphasizes the importance of ensuring that the threat assessment process runs concurrently with any relevant Individuals with Disabilities Education Act or Americans with Disabilities Act processes to determine if the student's needs are being met by their current services.

Information sharing and consent

When assessing threats and investigating safety issues, ODPS encourages schools to establish a consistent and positive line of communication with parents. To the extent that schools can maintain such a relationship and obtain parental consent prior to speaking with a child to conduct a threat assessment, they should do so. The model policy suggests making use of "release of information forms" during the information gathering stage of a behavioral threat assessment. These forms would be signed before the risk classification and intervention phases — more on the phases below — and would authorize access to student records, including attendance, personally identifying information, discipline history and schools previously attended.

The model policy also discusses the requirements and exceptions outlined in the Family Educational Rights and Privacy Act (FERPA), [34 CFR 99.36](#), that pertain to information sharing. With very limited exceptions, FERPA prohibits the release of personally identifiable information from students' educational records without the consent of parents or students.

One of those exceptions allows districts to disclose personally identifiable information from education records in connection with an emergency if the information is necessary to protect the health or safety of the student or others. When determining if disclosure of information is necessary to "protect the health and safety of the student or others," the school must find "an articulable and significant threat" after considering the totality of the circumstances.

Another FERPA exception allows the district to disclose personally identifiable information from a student's educational record to "school officials" who have a "legitimate educational interest" in the information. Every school district is required to send home an annual notice of FERPA rights to parents and students. In that notice, the district must include the criteria it uses to determine who is considered a "school official" and what constitutes a "legitimate educational interest." Districts are encouraged to review these notices with their legal counsel to ensure that the designations in their threat assessment plans and protocols align with the definitions as published.

FERPA also distinguishes “directory information” from personally identifiable information contained in a student’s educational records. Such information, as defined by the district, can be disclosed without prior written consent, except when the request is for a profitmaking plan or activity, when the parent or eligible student has informed the board that any or all such information should not be released without their prior written consent or when disclosure is otherwise prohibited by law. Districts should follow their policy’s definition of directory information when considering such requests. Refer to your locally adopted policy JO, Student Records, as well as any FERPA and/or directory information notices you provide annually. Additionally, districts do not need consent to disclose communications about students, such as information about a student reported to staff by another student, personal observations about a student made by staff or social media posts discovered by school personnel.

The model policy suggests that if the school is unable to complete an assessment due to a lack of parental consent or access to a student or their educational records, the district can involve law enforcement to detain and question the student. Child welfare workers can also interview a student without parental consent in response to allegations of child abuse or neglect. Both measures run the risk of seriously damaging a school’s line of communication with the parents and students involved, so these should be used as methods of last resort and in consultation with the district’s legal counsel.

When reviewing the protocols and forms recommended as part of the process, the model policy states that the completed threat assessment form and any accompanying documents should be kept as a part of the student of concern’s permanent record, and the district should share this information with other districts in the case of a transfer by the student to a new school.

OSBA encourages districts to work with their legal counsel to thoroughly review the provisions in their threat assessment plans or protocols that relate to information sharing and retention to ensure compliance with all relevant state and federal requirements.

The protocol

The model policy includes protocols for how to appropriately handle concerning behavior displayed by students and others. It is important to note first that behavioral threat assessments rely on bystanders reporting concerning behavior when they witness it. The guide recommends schools train staff, students, parents and other community members to identify such behavior and encourage them to report concerns. This training should include directions for using the Safer Ohio School Tip Line anonymous reporting system, or other appropriate reporting systems. The actions schools take in response to reported concerns should be documented on the Ohio School Threat Assessment Form. The model policy references many forms, some of which are referred to throughout this article. Schools can request these forms from their OSSC regional liaison or directly from OSSC at ohioschoolsafetycenter@dps.ohio.gov.

The Ohio School Behavioral Threat Assessment Model Protocol is split into three phases, with the first phase initiated when a school’s threat assessment team receives a report. Under the model protocol, Phase 1 is the initial response and information gathering phase, where the threat assessment team interviews the reporting person — unless they reported anonymously — notifies appropriate parties and assigns an initial risk classification level to the reported situation. If the behavior poses an immediate threat of injury, it should be reported to law enforcement and the threat assessment process should be postponed until it is safe to proceed.

If an interview of the reporting person can be conducted, the model protocol requires threat assessment teams to compile the information gathered during that interview in the Threat or Concerning Behavior Report. Then, under the model protocol, the team would move to the Emergency Operations/Notifications section of the threat assessment form — where parents of the students are contacted — while carefully documenting who

made the initial contact, who was spoken to and the times of the contact for liability purposes. The team then moves to the next section of the form, which outlines interviews that should be conducted to collect information regarding the reported behavior, along with a nonexhaustive list of sample questions for the team to ask of staff members, subjects of concern, potential targets, witnesses and others. See the model policy for further considerations regarding information gathering and tips for interviewing subjects.

Another important part of Phase 1 in the model protocol is using the gathered information to assign a risk classification level to the “concerning behavior.” There are four risk classifications in the model protocol: low, moderate, high and imminent.

A risk is low when the concerning behavior is investigated and determined to be benign; the individual does not pose a threat to themselves or others; and the concerns can be addressed with existing support structures and resources. A risk is moderate when the individual doesn’t pose a threat to themselves or others, but the concerning behavior indicates a need for intervention, such as academic supports, mental health services or mediation. A risk is high when the concerning behavior indicates that the individual does pose a threat to themselves or others, or that they intend to commit an act of violence. Finally, a risk becomes imminent when the individual poses an immediate threat to themselves or others and requires immediate containment to prevent violence, especially where the individual is known to have the present desire and capacity to commit a violent act. For more information on how a district might proceed after assigning a classification to a given risk, the model policy also includes a table containing each risk classification and a detailed Suggested Response Guide for each risk level.

Phase 2 of the model protocol is for additional information gathering and an opportunity for the threat assessment team to adjust risk classification based on their review of the additional information. Note that if Phase 1 results in a moderate, high or imminent risk classification, the model protocols direct the threat assessment team to proceed to Phase 2. If the result is instead a classification of low risk, the model protocols direct the threat assessment team to progress directly to phase 3. If the threat assessment team determines to move to Phase 2, any additional sources of information should be noted, and additional documents gathered should be attached to the behavioral threat assessment paperwork. If additional information is needed, it is the role of the team leader to assign information gathering tasks and ensure that each completed task is documented, along with who completed the task and when.

Any documents related to the student’s consent to release information, memoranda of understanding (MOU) or court orders that exist between relevant entities should also be referenced and attached. When all necessary information has been collected, the model protocols direct the team to complete the Key Observations, Factors of Concern and Protective Factors checklists, all of which can be requested from your OSSC liaisons or OSSC directly.

Lastly, under the model protocols, the team will use the information gathered to assess and revise the risk classification level, if necessary, and determine whether additional resources and supports are needed to respond to the concerning behavior. Classification levels can continue to be amended based upon new information, mitigating or aggravating circumstances, or successful compliance with interventions.

Phase 3 of the model protocol is the intervention and case management phase, when the threat assessment team begins to implement intervention and risk mitigation strategies. This phase should include a case plan to assist with ongoing management of the concerning behavior at issue. An important caveat is that the threat assessment team will only play one part in the final determination of how to respond to the behavior in question. Each school will need to evaluate potential outcomes based on their policy and code of conduct; law enforcement, social services, and other relevant parties may also be involved in the determination.

Once a final determination is reached, the team will complete the Response to Threat or Concerning Behavior Checklist and create a case plan to evaluate whether the individual is complying with the interventions designed to mitigate their concerning behavior. Case plans and accompanying case management strategies should be individualized, consider the individual's classification level and match the level of services, interventions applied and monitoring to the student's needs identified during Phases 1 and 2. Case plans for students should therefore consider their learning style, cognitive ability, social connections, emotional development, disabilities and personality. It is worth clarifying that the work of the threat assessment team does not end once the case plan is created — the teams should be reviewing the plan regularly alongside reports regarding the person's compliance and progress to determine whether the plan should be modified. When the team determines that the person has made significant enough progress, it can decide to discontinue the Case plan.

Practical considerations

As a reminder to districts, each building administrator must incorporate a school threat assessment plan and protocol into the building's existing emergency management plan. Schools can use the model plan and protocol described above, although differing plans may still meet the requirement. Districts also must ensure the threat assessment team training requirements are met by March 24, 2023.

Districts should work with legal counsel to develop and finalize their plans and protocols. OSBA will continue to monitor OSSC updates related to threat assessment plans and trainings and provide any necessary updates.

Policy implications

The August 2022 PDQ issue included updates to EBC, Emergency Management and Safety Plans, and no additional updates are necessary. The policy already includes references to the new threat assessment teams and plans. The details of your locally developed threat assessment plan are to be integrated into your local emergency management and safety plan and developed with all required and applicable parties.

As you are reviewing your protocols and the new model policy available for your consideration as you develop your protocols, it is important to recognize the intersection of these plans with other board policies and procedures, including interrogations and searches, staff-student relations and positive behavioral interventions and supports.

OSBA policy JFG, Interrogations and Searches, and accompanying regulation JFG-R, Interrogations and Searches, outline district requirements for searches and interrogations of students. While no updates are necessary to OSBA samples, districts should review current local policies to see if said policies are in line with these recommendations. When reviewing these policies and implementing your threat assessment plans, make sure you understand the legal parameters for searches for school officials versus law enforcement.

A key component of the model threat assessment policy is its emphasis on supporting students who exhibit "concerning" behaviors. As you work to support students as part of the risk classification and response phases, determine how your policies and practices around positive behavioral interventions and supports (PBIS) can be used to support students. Districts can refer to policy JP, Positive Behavioral Interventions and Supports (Restraint and Seclusion), for more information on your PBIS requirements.

The model also discusses when child welfare workers may be involved if abuse is suspected. Districts must remember their obligations as mandatory reporters of abuse. All employees of the district who know or have reasonable cause to suspect that a child under 18 years of age or a disabled child under 21 years of age has suffered, is suffering or faces a threat of suffering any type of abuse or neglect are required to immediately report such information to the public children's services agency or the local law enforcement agency. Refer to your policy JHG, Reporting Child Abuse and Mandatory Training, for more information.

Schools with a school resource officer also should review the required MOU in place for this program when considering how various threat assessment protocols will be implemented.

HB 110 IMPACTS A DISTRICT'S ABILITY TO CONDUCT RAFFLES

by John Price, staff attorney

House Bill (HB) 110 contained an amendment to Ohio Revised Code (RC) [2915.092](#), which appears to remove a school district's ability to conduct raffles. Specifically, the bill removed the term "public schools" from the list of entities that are authorized to conduct charitable raffles. The provision now authorizes entities that are exempt from federal income taxes under [26 United States Code \(USC\) 510\(a\)](#) to conduct raffles, which does not encompass public school districts. While it is unclear if the change was intentional, we are recommending that school districts refrain from conducting raffles until there are further changes in the law. Most booster groups and support organizations, however, remain authorized to conduct raffles and donate the proceeds to schools.

A "raffle" is defined in RC [2915.01\(CC\)](#) as a form of bingo in which one or more prizes are won by one or more persons who have purchased a raffle ticket. State law allows certain entities to conduct raffles without obtaining a bingo license. Prior to the passage of HB 110, RC 2915.092 specifically listed "public school[s]", along with charitable entities, chartered nonpublic schools, community schools, veteran's organizations, fraternal organizations and sporting organizations, as being authorized to conduct a raffle without a license. HB 110 removed this list of the types of organizations permitted to conduct a raffle. RC 2915.092 now states that "a person or entity that is exempt from federal income taxation under subsection 501(a) and is described in subsection 501(c)(3), 501(c)(4), 501(c)(6), 501(c)(7), 501(c)(8), 501(c)(10), or 501(c)(19) of the Internal Revenue Code may conduct a raffle to raise money for the person or entity."

Because public school districts are not exempt from federal taxation under subsection 501(a), this new definition apparently excludes schools. Any person or entity not encompassed within this new definition who conducts a raffle runs the risk of committing the criminal offense of "illegal conduct of a raffle," a first-degree misdemeanor. Thus, school district officials should refrain from conducting raffles under the current wording of RC 2915.092.

The good news is that most booster groups and support organizations remain authorized to conduct raffles without a bingo license as long as they comport with the relevant laws. These groups are usually formed as nonprofit organizations under 26 USC 501(c)(3), meaning they are tax exempt under 501(a). Booster groups and support organizations not formed as 501(c)(3) organizations but formed as another type of tax-exempt entity described in RC 2915.092 may conduct raffles as long as they distribute at least 50% of the net profits to a charitable purpose. If there are booster groups or support organizations affiliated with your district conducting raffles to raise money for donation to the district, please ensure that the district and booster group/support organization are complying with applicable rules and regulations regarding raffles, fundraising and donating to the district.

OSBA is in communication with policymakers about this issue and is investigating the possibility of whether future legislation may restore schools' ability to conduct these raffles. We recognize that this is an important fundraising activity for many of our members and may represent a disruption in your district's activities. We will continue to provide updates as we obtain additional information. If you have any questions, please contact the legal division at (855) OSBA-LAW.

Policy implications

After review of our model policies, no modifications are necessary to reflect this change. Districts should review local policies and procedures, particularly on fundraisers, to determine if any language allows for the use of

raffles. If districts have language authorizing raffles, such language should be removed until such a time when raffles are authorized again for school districts.

GUIDANCE ON PREGNANCY AND RELATED CONDITIONS

by Kenna S. Haycox, senior policy consultant

Title IX prohibits discrimination based on sex in education programs or activities that receive federal financial assistance. On Oct. 4, 2022, the U.S. Department of Education's (DOE) Office for Civil Rights (OCR) released [new guidance on discrimination based on pregnancy and related conditions](#), reminding school communities that Title IX protects students and employees from discrimination based on pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery therefrom ([34 CFR 106.57](#) and [34 CFR 106.40](#)).

Pregnancy definition

Under Title IX, districts are prohibited from discriminating against employees or students based on their marital or parental status. This prohibition includes discrimination or exclusion on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery therefrom.

Employee protections

Districts must treat pregnancy as a temporary disability in the same manner as any other temporary disability for job-related purposes, including commencement, duration and extensions of leave; payment of disability income; accrual of seniority and any other benefits offered to employees by virtue of employment.

If the district does not maintain a leave policy for employees or if the employee has insufficient leave or accrued employment time to qualify for leave, the regulations outline requirements for considerations for unpaid leave and return to position. At the conclusion of a leave the employee also must be reinstated to the status held when the leave began or a comparable position without decrease in compensation or loss of promotional opportunities or employment privileges.

The new guidance document reiterates these obligations to districts and reviews the full definition of pregnancy for purposes of the law.

Student protections

Districts must not exclude students on the basis of their pregnancy — as defined in law — from education programs or activities, including any class or extracurricular activity. If the district offers a separate program for these students, a student can voluntarily participate in such a program but cannot be required to. If the district offers a separate program for pregnant students, it must be comparable to programs offered to nonpregnant students.

Districts may require a student to obtain a physician's certification that they are physically and emotionally able to continue to participate if and only if the district also requires such certification from any student with a physical or emotional condition requiring the attention of a physician. Districts also must treat pregnant students in the same manner as nonpregnant students for leaves, benefits and participation and must grant leaves when necessary.

The new guidance document provides specific examples of what this equal access for students looks like. For example, a teacher may not refuse to allow a student to submit work after missing a deadline because of absences due to pregnancy or childbirth. If a teacher's grading is based in part on class attendance or participation, the student should be allowed to earn the missed credits and be reinstated to the student's preleave status.

Additional considerations

The guidance document references past OCR pamphlets and guidance on discrimination on the basis of pregnancy and related conditions. Also included is information on how to file a complaint on the basis of pregnancy discrimination.

In July 2022, DOE published a notice of proposed rulemaking that includes [proposed amendments](#) to some of the Title IX regulations discussed in DOE's resource. Among other things, these proposed amendments would redefine "pregnancy" and "pregnancy-related conditions" under Title IX; recognize lactation as a pregnancy-related condition; require schools to provide information to pregnant students on their rights, require the Title IX coordinator to ensure reasonable modifications are provided to pregnant students who need them; and limit requirements on students to provide medical clearance to continue their studies. These rules are still in the rulemaking process and are not effective. Any final changes to the Title IX regulations will be published in a subsequent final rule in the Federal Register.

Policy implications

In our review of the guidance and evaluation of our current policy JFE, Pregnant Students, we are recommending some changes to better align with the federal code provisions. The updated policy is available with this PDQ issue. We also are continuing to monitor the Title IX rulemaking process and will make further updates as necessary in future PDQ issues.

CHANGE IN FEDERAL LAW REQUIRES DISTRICTS TO MAKE STUDENT EMAIL ADDRESSES AVAILABLE TO MILITARY RECRUITERS

by Sara C. Clark, chief legal counsel

Under existing law, districts that receive funds under the Elementary and Secondary Education Act (ESEA) must provide military recruiters with the names, addresses and telephone listings of secondary school students upon request. This requirement is contained in two federal statutes, [10 United States Code \(USC\) 503](#) and [20 USC 7908](#); together, the "military recruitment statutes."

Recently, the William M. (Mac) Thornberry National Defense Authorization Act amended 10 USC 503 to include student school email addresses on the list of information that schools are required to provide to military recruiters. Interestingly, the amendment was not made to 20 USC 7908, which still only requires districts to provide students' names, addresses and telephone listings to military recruiters. Under either statute, schools that do not comply with the provisions risk losing federal funding under ESEA.

Policy implications

OSBA's Model Policy KKA, Recruiters in Schools, has been updated to align with the recent amendment and now includes student email addresses and telephone listings within the list of information to be provided to recruiters.

Districts should also review their annual Family Educational Rights and Privacy Act (FERPA) notices.

Under FERPA, districts must provide notice to parents of the types of student information that it releases publicly. This type of student information, commonly referred to as "directory information," includes items such as names, addresses and telephone numbers and is information generally not considered harmful or an invasion of privacy if disclosed. The notice must include an explanation of a parent's right to request that the information not be disclosed without prior written consent.

The military recruitment statutes also require districts to notify parents that the school discloses student names, addresses, telephone numbers — and now email addresses — to military recruiters upon request and allow a parent to opt out of such disclosures. Many districts use a single annual notice to satisfy the parental notification requirements of both FERPA and the military recruitment statutes.

If your district does not currently designate student names, addresses, telephone numbers or email addresses as “directory information” in your annual FERPA notice, it still must provide this information to military recruiters upon request. In addition, the district must notify parents that they may opt out of this disclosure. In other words, a district that does not disclose student names, addresses, telephone numbers or email addresses as directory information must nonetheless provide a notice that it discloses this information to military recruiters. This may require an update to the district’s annual notice or may require the district to send a separate disclosure statement to parents.

CONCEALED CARRY LAW UPDATE

by Gamy Narvaez, policy consultant

The May 2022 PDQ issue addressed [Senate Bill \(SB\) 215](#), effective June 13, 2022. The bill impacted several of Ohio’s concealed carry gun laws and most significantly removed a license requirement for carrying a concealed handgun in many instances.

Newly enacted Ohio Revised Code (RC) [2923.111\(C\)\(1\)](#) states that, “except when the context clearly indicated otherwise,” qualifying adults concealing a handgun that is not a restricted firearm will be treated as a person that has been issued a valid concealed handgun license.

Since the time we addressed this topic in the May issue, the Ohio Attorney General’s Office released a [guidance document](#) on concealed carry laws and license application. This document clarifies that RC [2923.122](#) does not treat qualifying adults as valid concealed handgun licensees for the purpose of school safety zones and exceptions. The document states permitless carriers are not allowed to bring a firearm into a school safety zone and doing so remains a felony under both federal and state law.

Policy implications

The notes sections of GBCB, Staff Conduct, and KGB, Public Conduct on District Property, have been updated to reflect this guidance.

Both policies are available in the “other policies” section with this PDQ issue. The change to the notes section is a nonsubstantive change, and therefore your board does not need to readopt this policy unless you determine the substantive content of your policy is inconsistent with our sample and current law.

Cross References

GBCB - **OSBA Sample** Staff Conduct

KGB - **OSBA Sample** Public Conduct on District Property

JFE - **OSBA Sample** Student Pregnancy and Related Conditions

KKA - **OSBA Sample** Recruiters in the Schools

November 2022 - Update Review Form

Updating Quick Reference - Checklist



Book	Policy Manual
Section	Issue 4 of 2022 November PDQ (Revised)
Title	**OSBA Sample** Student Pregnancy and Related Conditions
Code	JFE
Status	From OSBA

****This is the OSBA sample policy.****

~~Pregnant Students~~ Student Pregnancy and Related Conditions

The District does not discriminate against or exclude any student from school programs or activities on the basis of the student's pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery therefrom (herein after referred to as "pregnancy" or "pregnant"). The District affirms the right of such students to continue participation in the education programs and activities of the District including extracurricular activities.

Efforts are made to ensure that the educational program of the student is disrupted as little as possible. Students under the age of 18 are still subject to compulsory education requirements. Students 18 or older are encouraged to return to school after pregnancy and complete requirements for graduation.

The District works with students to determine the educational options available for students if alternate educational methods are needed. If the District provides an alternate program for pregnant students, participation in such program is voluntary based on an individual student's request. Such programs are comparable to programs offered to non-pregnant students.

The District will not require a pregnant student to obtain a physician's certification that the student is physically and emotionally able to continue participation in programs of the District unless such a certification is required of all students for other physical or emotional conditions requiring the attention of a physician.

The District treats pregnancy in the same manner as other temporary disabilities, including but not limited to policies for absences and grading.

~~The Board affirms the right of a pregnant student to continue her participation in the educational program.~~

~~As soon as the pregnancy is medically confirmed, the Board recommends that the student consult with a member of the student personnel staff or the principal to plan her educational program.~~

~~With the staff member involved, the student may elect any of the following educational plans or suggest alternatives.~~

- ~~1. She may remain in her present school program, with modifications as necessary until the birth of her baby is imminent or until her physician states that continued participation would be detrimental to her health or that of the baby.~~
- ~~2. When information has been obtained from the student's physician indicating that the student is unable to attend school, homebound instruction is available at school expense until her physician states that she is physically able to return to school.~~
- ~~3. With Board approval, she may temporarily withdraw from school and enroll in an approved educational program in which she can continue her education.~~

~~Efforts are made to ensure that the educational program of the student is disrupted as little as possible and that she receives health and counseling services, as well as instruction. Students under the age of 18 are still subject to compulsory education requirements. Students 18 or older are encouraged to return to school after delivery and complete requirements for graduation.~~

Legal References

Education Amendments of 1972, Title IX; 20 USC 1681 et seq.

34 CFR 106.40

ORC 3321.01

ORC 3321.04

Cross References

JB, Equal Educational Opportunities

JEA, Compulsory Attendance Ages

NOTE: THIS IS A REQUIRED POLICY

Legal

Education Amendments of 1972, Title IX; 20 USC 1681 et seq.

34 CFR 106.40

ORC 3321.01

ORC 3321.04



Book	Policy Manual
Section	Section J: Student
Title	Pregnant Students
Code	JFE
Status	Active
Adopted	August 14, 2001
Last Revised	May 11, 2015
Prior Revised Dates	04/28/2014

Pregnant Students

The Board affirms the right of a pregnant student to continue her participation in the educational program.

As soon as the pregnancy is medically confirmed, the Board recommends that the student consult with a member of the student personnel staff or the principal to plan her educational program.

With the assistance of staff, the student may elect any of the following educational plans or suggest alternatives.

1. She may remain in her present school program, with modifications as necessary, until the birth of her baby is imminent or until her physician states that continued participation would be detrimental to her health or that of the baby.
2. When information has been obtained from the student's physician indicating that the student is unable to attend school, alternate educational experiences will be made available at school expense until her physician states that she is physically able to return to school.

Efforts are made to ensure that the educational program of the student is disrupted as little as possible and that she receives health and counseling services, as well as instruction. Students under the age of 18 are still subject to compulsory education requirements. Students 18 or older are encouraged to return to school after delivery and complete requirements for graduation.

Legal	Education Amendments of 1972, Title IX; 20 USC 1681 et seq. ORC 3321.01 ORC 3321.04
Cross References	JB - Equal Educational Opportunities JEA - Compulsory Attendance Ages



Book	Policy Manual
Section	Issue 4 of 2022 November PDQ (Revised)
Title	**OSBA Sample** Recruiters in the Schools
Code	KKA
Status	From OSBA

****This is the OSBA sample policy.****

Recruiters in the Schools

The Board will not impose any restriction on the presentation of career information to students that is not uniformly imposed on representatives of the armed forces, skilled trades, institutions of higher education, career-technical education providers, business, industry, charitable institutions, and other employers or prohibit the presentation of information or recruitment of students by those representatives for employment, employment training, or education on the District's campus. The Board provides equal access to any of the District's employment or placement services to all of the entities described in this policy. ~~All recruiters, military, employment, charitable and educational, are treated uniformly in the conduct of on-campus student recruitment.~~ Scheduling of recruiting visits to the District is announced to the student body in advance. The District provides at least two opportunities per school year for recruiters to present information in person to all students in grades nine through 12, individually or in a group setting.

All group meetings are scheduled through the principal's office. Classroom teachers who schedule recruiters as a career awareness activity should coordinate these activities through the principal's office.

~~In order to maintain the privacy of students, the Board prohibits the disclosure of any student list to any commercial organization that intends to use the list for commercial purposes. "Student list" is defined as Board-approved directory information. "Commercial organization" is defined as any entity that is a for-profit organization. "Commercial purpose" is defined as any activity that is an attempt to solicit business for profit.~~

Names, ~~and~~ addresses, **school email addresses and telephone listings** of **secondary school** students ~~in grades 10 through 12~~ must be released to a recruiting officer of the armed forces unless a parent or student (age 18 or older) submits a written request not to release the information. **The District notifies parents and students (age 18 or older) of their right to submit a written request not to release such information.**

All recruiters are expected to abide by all applicable laws, local ordinances, Board policies and District and building regulations pertaining to public conduct on District property.

Legal References

Elementary and Secondary Education Act; 20 USC 1221 et seq.

20 USC 7908

Family Educational Rights and Privacy Act; 20 USC 1232g

National Defense Authorization Act; 10 USC 503: (P.L. No. 107)

William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021: 10 USC 503 (P.L. No. 116-283)

~~ORC 149.41~~

~~ORC 149.43~~

~~ORC 137.01 et seq.~~

ORC 3313.471

~~ORC 3317.031~~

~~ORC 3319.32~~

ORC 3319.321

~~ORC 3321.12~~~~ORC 3321.13~~~~ORC 3331.13~~

Cross References

JO, Student Records

JOA, Student Surveys

KBA, Public's Right to Know

NOTE: House Bill 98 (2018) amended Ohio Revised Code 3313.471 to state that no school district board of education shall impose any restriction on the presentation of career information to students that is not uniformly imposed on representatives of the armed forces, skilled trades, institution of higher education, career-technical education providers, business, industry, charitable institutions, and other employers.

To the extent permitted by law, the Board may develop an application process and standards of conduct related to the presentation of career information.

Legal

Elementary and Secondary Education Act; 20 USC 1221 et seq.

20 USC 7908

Family Educational Rights and Privacy Act; 20 USC 1232g

National Defense Authorization Act: 10 USC 503: (P.L. No. 107)

William M. (Mac) Thornberry National Defence Authorization Act for Fiscal Year 2021: 10 USC 503 (P.L. No. 116-283)

ORC 3313.471

ORC 3319.321



Book	Policy Manual
Section	Section K: School-Community Relations
Title	Recruiters in the Schools
Code	KKA
Status	Active
Adopted	November 11, 2003
Last Revised	October 8, 2018
Prior Revised Dates	05/11/2015

Recruiters in the Schools

All recruiters, military, nonmilitary, commercial, charitable and educational, are treated uniformly in the conduct of on-campus student recruitment. Scheduling of recruiting visits to the District is announced to the student body in advance. The District provides at least two opportunities per school year for recruiters to present information in person to all students in grades nine through 12, individually or in a group setting.

All group meetings are to be scheduled through the principal's office or designee. Classroom teachers who schedule recruiters as a career awareness activity should coordinate these activities through the appropriate building administrator.

In order to maintain the privacy of its students, the Board prohibits the disclosure of any student list to any commercial organization which intends to use the list for commercial purposes. "Student list" is defined as Board-approved directory information. "Commercial organization" is defined as any entity which is a for-profit organization. "Commercial purpose" is defined as any activity which is an attempt to solicit business for profit. The Superintendent shall establish a procedure to be followed by all corporation employees when a request for a student list is made by a commercial organization.

All recruiters are expected to abide by all applicable laws, local ordinances, Board policies and District and building regulations pertaining to public conduct on District property.

Legal

Elementary and Secondary Education Act; 20 USC 1221 et seq.
Family Educational Rights and Privacy Act; 20 USC 1232g
National Defense Authorization Act: 10 USC 503: (P.L. No. 107)
ORC 149.41
ORC 149.43
ORC 1347.01 et seq.
ORC 3313.471
ORC 3317.031
ORC 3319.32
ORC 3319.321
ORC 3319.33
ORC 3321.12
ORC 3321.13
ORC 3331.13

Cross References

JO - Student Records
JOA - Student Surveys
KBA - Public's Right to Know



Book	Policy Manual
Section	Section B: School Board Governance And Operations
Title	Board Policy Development and Adoption
Code	BF
Status	Active
Adopted	August 14, 2001
Last Revised	August 8, 2022
Prior Revised Dates	07/12/2005, 05/11/2015

Board Policy Development and Adoption

The formulation and adoption of written policies constitute the basic method by which the Board exercises its leadership in the operation of the District. The study and evaluation of reports concerning the execution of its written policies constitute the basic method by which the Board exercises its control over District operations.

The formal adoption of policies is recorded in the minutes of the Board. Only those written statements so adopted and recorded are regarded as official Board policy.

Proposals regarding Board policies and operations may originate at any of several sources, including students, parents, community residents, employees, Board members, the Superintendent, the policy service provider, consultants, or civic groups. Regardless of where the proposal originated, the Superintendent/designee shall share the proposal with all Board members.

All proposed new policies, revisions of current policies or additions to current policies shall be reviewed by the Policy Review Committee prior to being presented to the Board for adoption unless there is an emergency as described herein. The Policy Review Committee shall be composed of two Board members, representation of building and District level administrators and others as appointed by the Board President or the Superintendent/designee.

The agenda for the Policy Review Committee will be set by the Superintendent/designee in consultation with the Board members on the Policy Review Committee. A proposal will automatically be placed on the agenda at the written request of any two Board members or when the proposal has been made by the Board's policy service provider.

The Policy Review Committee will review and discuss all proposals placed on the agenda and will make recommendations to the Board to accept, modify or reject proposals made. The Committee's recommendations will be made by consensus. If consensus cannot be reached, any differing recommendations will be recorded in the Committee's minutes. The Superintendent/designee will provide the minutes to all Board members. After considering the work of the Committee, the Superintendent, in consultation with the Board President, will determine what policies will be placed on the Board agenda per Board policy BDDC. Final action on proposals, whatever their sources, is by the Board in accordance with this policy.

Two readings at two separate meetings shall normally be required before a new policy or a policy amendment can be adopted. Action to adopt will take place at a subsequent or third meeting of the Board. The Board does have the option, however, of voting for adoption at the second meeting.

Unless otherwise specified, a new policy or policy amendment shall be effective upon the date of adoption by the Board and shall supersede all previous policies in that area. Unless otherwise specified, the repeal of a policy shall be effective on the date the Board takes such action.

When the superintendent determines there is an emergency, policies may be adopted or amended at a single meeting of the Board without review by the Policy Review Committee. An emergency shall be defined for the purposes of this policy as any situation or set of circumstances which the Superintendent has reason to believe that the education or operations of the District will be substantially disrupted or the safety or welfare of the students, employees or school community will be jeopardized.

Legal ORC 3313.20

Cross References AD - Development of Philosophy of Education
 BDDG - Minutes
 BFCA (Also CHB) - Board Review of Regulations
 BFD - Policy Dissemination
 BFE (Also CHD) - Administration in Policy Absence
 BFF - Suspension of Policies
 BFG - Policy Review and Evaluation
 CH - Policy Implementation

Board Policy Development and Adoption

The formulation and adoption of written policies constitute the basic method by which the Board exercises its leadership in the operation of the District. The study and evaluation of reports concerning the execution of its written policies constitute the basic method by which the Board exercises its control over District operations.

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The agenda for the Policy Review Committee will be set by the Superintendent/designee in consultation with the Board members on the Policy Review Committee. A proposal will automatically be placed on the agenda at the written request of any two Board members or when the proposal has been made by the Board's policy service provider.

The Policy Review Committee will review and discuss all proposals placed on the agenda and will make recommendations to the Board to accept, modify or reject proposals made. The Committee's recommendations will be made by consensus. If consensus cannot be reached, any differing recommendations will be recorded in the Committee's minutes. The Superintendent/designee will provide the minutes to all Board members. After considering the work of the Committee, the Superintendent, in consultation with the Board President, will determine what policies will be placed on the Board agenda per Board policy BDDC. Final action on proposals, whatever their sources, is by the Board in accordance with this policy.

Two readings at two separate meetings shall normally be required before a new policy or a policy amendment can be adopted. Action to adopt will take place at a subsequent or third meeting of the Board. The Board does have the option, however, of voting for adoption at the second meeting.

All policy proposals that come before the Board for a third reading, or that come before the Board for a second reading if the board intends to vote for adoption at a second reading, shall be included in full with the publicly released agenda. Once the agenda

including the full policy language has been released, the Board may not move to amend the language prior to a vote, except to correct spelling or grammatical errors, or to add a citation. If the Board wishes to amend proposed policy language that would change the substance, source, or effect of the policy, it may do so, however the policy vote must then be tabled to a subsequent meeting.

Unless otherwise specified, a new policy or policy amendment shall be effective upon the date of adoption by the Board and shall supersede all previous policies in that area. Unless otherwise specified, the repeal of a policy shall be effective on the date the Board takes such action.

When the superintendent determines there is an emergency, policies may be adopted or amended at a single meeting of the Board without review by the Policy Review Committee. An emergency shall be defined for the purposes of this policy as any situation or set of circumstances which the Superintendent has reason to believe that the education or operations of the District will be substantially disrupted or the safety or welfare of the students, employees or school community will be jeopardized.

Legal

ORC 3313.20

Cross References

AD - Development of Philosophy of Education

BDDG - Minutes

BFCA (Also CHB) - Board Review of Regulations

BFD - Policy Dissemination

BFE (Also CHD) - Administration in Policy Absence

BFF - Suspension of Policies

BFG - Policy Review and Evaluation

CH - Policy Implementation



Book	Policy Manual
Section	Section K: School-Community Relations
Title	Parent/Citizen Organizations
Code	KMA
Status	Active
Adopted	August 14, 2001
Last Revised	May 17, 2021
Prior Revised Dates	01/22/2007, 07/09/2013, 05/11/2015

Parent/Citizen Organizations

The Board recognizes and appreciates the efforts of all organizations whose objectives are to enhance the educational, extracurricular and athletic experiences of District students.

All support organizations shall have equal access to District facilities used in fundraising activities (i.e., concessions areas, advertising, etc.). Guidelines will determine use of District facilities, including, but not limited to, building, property, athletic facilities, buses, name, trademarks, copyrights, etc. Each organization shall abide by the policies and guidelines established for the use of District facilities and grounds.

Representatives and members of approved support organizations shall in all circumstances be treated by District employees as interested friends of the schools and as supporters of public education in the District.

Staff members are encouraged to join such organization(s) in their related area(s) of specialization or interest, but not hold the position of treasurer or handle funds belonging to the organization.

Any new support organization desiring to use the name, logo or good offices of the District must first obtain the approval of the Treasurer/designee as a prerequisite to organizing. The Board requires any authorized support organization to purchase coverage under the District's liability insurance program at cost to the organization to protect the entity against legal claims resulting from damage or injury resulting from any act or omission.

At cost to the support organization, the District will purchase an employee dishonesty bond for officers of the organization to protect the funds in the event of a covered loss.

In accordance with Board policy, all District-support organizations are to abide by the following guidelines:

1. Each District-support organization must:

- A. clearly communicate in their fundraising activities that they do not represent the District but do support a particular District activity.
- B. understand that student participation on athletic teams or in cocurricular activities is completely independent of any fundraising activities. Parents, students and interested parties participation in fundraising activities cannot be used in any way to adversely impact student participation.
- C. appoint a District administrator or faculty member to be included on the organization's advisory board. Any student involvement in the conduct of the organization's activities is subject to the approval of the bylaws.

- D. expend funds in ways that are consistent with the stated purpose of the organization. At least 70% of all collected funds are spent on student activities directly related to the express purpose of their bylaws.
 - E. not make purchases represented as District expenditures and not use identification numbers of the District such as tax I.D. number, purchase order numbers, sales tax exemption forms or any other District tax status designations.
 - F. make donations to the District in accordance with Board Policy KH (Public Gifts to the District) and the accompanying guidelines.
2. Bylaws of the organization must clearly state:
- A. the purpose of the organization, which must be to benefit the students of the District in an activity the support group is promoting;
 - B. the name of the support organization;
 - C. the procedure for the election of officers and the length of terms and
 - D. that there will be at least a president, secretary and treasurer of the organization elected.
3. Annually, each District-support organization must provide the Treasurer/designee with a:
- A. copy of its most recent Form 990 or Form 990EZ;
 - B. a certificate indicating that filing requirements with the Ohio Attorney General have been met;
 - C. list of current officers and contact information;
 - D. list of proposed fundraising activities for the ensuing school year and
 - E. copy of their most recent charter documents (if they have been changed).
4. Each organization agrees to abide by the following minimum good accounting and internal control practices:
- A. Monies collected by or remitted to the Treasurer shall be deposited
 - i. If more than \$1,000, monies should be deposited on the next business day after the day of receipt.
 - ii. If less than \$1,000 monies should be deposited no more than three business days after the day of receipt.
 - B. The organization shall have a written guideline indicating which officers are authorized to draw checks and that a monthly accounting to the Treasurer is required for any officer drawing checks for the organization.
 - C. The organization shall prepare a monthly financial statement that is in balance with the bank. A copy of the reconciled bank statement and the financial report indicating that the organization is in balance must be provided to the officers of the organization on a monthly basis.
5. On or before December 1st, the Treasurer/designee shall approve and notify each District-support organization that meets all the above criteria. Any District-support organization, which fails to comply with all requirements as stated herein will have their Board support rescinded.

Legal

- ORC 3313.17
- ORC 3313.20
- ORC 3313.36
- ORC 3313.47
- OAC 109:1-1-02

Cross References

AE - School District Goals and Objectives
KG - Community Use of School Premises (Equal Access)
KGB - Public Conduct on District Property
KH - Public Gifts to the District
KI - Public Solicitations in the Schools
KJ - Advertising in the Schools



Book	Policy Manual
Section	Section K: School-Community Relations
Title	Copy of Parent/Citizen Organizations
Code	KMA
Status	
Adopted	August 14, 2001
Last Revised	May 17, 2021
Prior Revised Dates	01/22/2007, 07/09/2013, 05/11/2015

Parent/Citizen Organizations

The Board recognizes and appreciates the efforts of all organizations whose objectives are to enhance the educational, extracurricular and athletic experiences of District students.

All support organizations shall have equal access to District facilities used in fundraising activities (i.e., concessions areas, advertising, etc.). Guidelines will determine use of District facilities, including, but not limited to, building, property, athletic facilities, buses, name, trademarks, copyrights, etc. Each organization shall abide by the policies and guidelines established for the use of District facilities and grounds.

Representatives and members of approved support organizations shall in all circumstances be treated by District employees as interested friends of the schools and as supporters of public education in the District.

Staff members are encouraged to join such organization(s) in their related area(s) of specialization or interest, but not hold the position of treasurer or handle funds belonging to the organization.

Any new support organization desiring to use the name, logo or good offices of the District must first obtain the approval of the Treasurer/designee as a prerequisite to organizing. The Board requires any authorized support organization to purchase coverage under the District's liability insurance program at cost to the organization to protect the entity against legal claims resulting from damage or injury resulting from any act or omission.

At cost to the support organization, the District will purchase an employee dishonesty bond for officers of the organization to protect the funds in the event of a covered loss.

In accordance with Board policy, all District-support organizations are to abide by the following guidelines:

1. Each District-support organization must:

- A. clearly communicate in their fundraising activities that they do not represent the District but do support a particular District activity.
- B. understand that student participation on athletic teams or in cocurricular activities is completely independent of any fundraising activities. Parents, students and interested parties participation in fundraising activities cannot be used in any way to adversely impact student participation.
- C. appoint a District administrator or faculty member to be included on the organization's advisory board. Any student involvement in the conduct of the organization's activities is subject to the approval of the bylaws.

- D. expend funds in ways that are consistent with the stated purpose of the organization. At least 70% of all collected funds are spent on student activities directly related to the express purpose of their bylaws.
 - E. not make purchases represented as District expenditures and not use identification numbers of the District such as tax I.D. number, purchase order numbers, sales tax exemption forms or any other District tax status designations.
 - F. make donations to the District in accordance with Board Policy KH (Public Gifts to the District) and the accompanying guidelines.
2. Bylaws of the organization must clearly state:
- A. the purpose of the organization, which must be to benefit the students of the District in an activity the support group is promoting;
 - B. the name of the support organization;
 - C. the procedure for the election of officers and the length of terms and
 - D. that there will be at least a president, secretary and treasurer of the organization elected.
3. Annually, each District-support organization must provide the Treasurer/designee with a:
- A. copy of its most recent Form 990 or Form 990EZ;
 - B. a certificate indicating that filing requirements with the Ohio Attorney General have been met;
 - C. list of current officers and contact information;
 - D. list of proposed fundraising activities for the ensuing school year and
 - E. copy of their most recent charter documents (if they have been changed).
4. Each organization agrees to abide by the following minimum good accounting and internal control practices:
- A. Monies collected by or remitted to the Treasurer shall be deposited
 - i. If more than \$1,000, monies should be deposited on the next business day after the day of receipt.
 - ii. If less than \$1,000 monies should be deposited no more than three business days after the day of receipt.
 - B. The organization shall have a written guideline indicating which officers are authorized to draw checks and that a monthly accounting to the Treasurer is required for any officer drawing checks for the organization.
 - C. The organization shall prepare a monthly financial statement that is in balance with the bank. A copy of the reconciled bank statement and the financial report indicating that the organization is in balance must be provided to the officers of the organization on a monthly basis.
 - D. **The organization will develop a records retention schedule, at a minimum for all financial records, that will maintain these records for at least five years. This will include a copy of IRS filings, State Attorney General filings, and monthly financial statements.**
5. On or before December 1st, the Treasurer/designee shall approve and notify each District-support organization that meets all the above criteria. Any District-support organization, which fails to comply with all requirements as stated herein will have their Board support rescinded.

Legal

ORC 3313.17

ORC 3313.20

ORC 3313.36

ORC 3313.47

OAC 109:1-1-02

Cross References

AE - School District Goals and Objectives

KG - Community Use of School Premises (Equal Access)

KGB - Public Conduct on District Property

KH - Public Gifts to the District

KI - Public Solicitations in the Schools

KJ - Advertising in the Schools



Book	Policy Manual
Section	Section I: Instruction
Title	Title I Programs
Code	IGBJ
Status	Active
Adopted	August 14, 2001
Last Revised	July 5, 2017
Prior Revised Dates	09/23/2002, 07/26/2004, 10/13/2008, 01/14/2013, 05/11/2015

Title I Programs

The Title I program is based on an annual assessment of educational needs. This assessment includes identification of educationally deprived children in the public and private schools in this District. Title I services are provided to all eligible, educationally deprived students.

The Board believes parent and family involvement is a vital part of the Title I program. The Superintendent/designee jointly develops with and distributes to parents of children participating in Title I programs within the District a written parent and family involvement policy and guidelines. The written parent and family involvement policy includes a School-Parent Compact jointly developed by the school and the parents. The requirements of the policy, compact and guidelines are consistent with Federal and State law.

Parent and family involvement includes, but is not limited to, parent and family contribution to the design and implementation of programs under this title, development of support and improvement plans, participation by parents and family members in school activities and programs, and training and materials that build parents' and family members' capacity to improve their children's learning in both the home and the school. To build a partnership between home and school, the District:

1. informs the parents and family members of the program, the reasons for their children's participation and the specific instructional objectives;
2. trains parents and family members to work with their children to attain instructional objectives;
3. trains teachers and other staff involved in programs under this title to work effectively with the parents and family members of participating students;
4. develops partnerships by consulting with parents and family members regularly;
5. provides opportunities for parents and family members to be involved in the design, operation and evaluation of the program and
6. provides opportunities for the full participation of parents and family members who lack literacy skills or whose native language is not English.

Title I funds are used only to augment, not to replace, state and local funds. The Board uses these funds to provide equivalent or comparable educational services in all schools receiving Title I assistance.

Legal Elementary and Secondary Education Act; 20 USC 1221 et seq.
 OAC 3301-35-04
 OAC 3301-35-05
 OAC 3301-35-06
 OAC 3301-35-07

Cross References AC - Nondiscrimination
 IE - Organization of Facilities for Instruction
 IGBA - Programs for Students With Disabilities
 IGBI - English Learners
 IGBL - Parent and Family Involvement in Education
 JB - Equal Educational Opportunities



Book	Policy Manual
Section	Section I: Instruction
Title	Parent and Family Involvement in Education
Code	IGBL
Status	Active
Adopted	August 14, 2001
Last Revised	July 5, 2017
Prior Revised Dates	10/13/2008, 05/11/2015

Parent and Family Involvement in Education

The Board believes that parent and family involvement is an important part of the educational program. Current research indicates that a home-school partnership and greater involvement on the part of parents and families in the education of their children generally result in higher achievement scores, improved student behavior and reduced absenteeism. All parents/guardians, family members and foster caregivers are encouraged to take an active role in the education of their children or foster children.

The Board directs the administration to develop along with parents/guardians, family members and foster caregivers the necessary regulations to ensure that this policy is followed and that parent and family involvement is encouraged. The regulations are to:

1. encourage strong home-school partnerships;
2. provide for consistent and effective communication between parents/guardians and family members or foster caregivers and school officials;
3. offer parents/guardians and family members or foster caregivers ways to assist and encourage their children or foster children to do their best and
4. offer ways parents/guardians and family members or foster caregivers can support classroom learning activities.

In addition, building administrators/designees of schools receiving Title I funds will jointly develop with and distribute to parents of children participating in Title I programs a parent and family involvement policy and guidelines. The requirements of the policy and guidelines are consistent with Federal and State law.

CROSS REFS.: Student Handbooks

Legal

Elementary and Secondary Education Act; 20 USC 1221 et seq.

ORC 3313.472

ORC 3313.48

OAC 3301-35-02

OAC 3301-35-04

OAC 3301-35-06

Cross References

IGBI - English Learners

IGBJ - Title I Programs