



REPORT OF THE POLICY AND EQUITY COMMITTEE

The Policy and Equity Committee met on Thursday, December 16, 2021, at 9:00 AM in the Rosa E. Blackwell Interactive Learning Center at the Cincinnati Public Schools Education Center, 2651 Burnet Avenue, 45219.

The public viewed the meeting via Video Conference.

ATTENDEES

Policy and Equity Committee Members

Chairperson Mike Moroski, Eve Bolton, Ben Lindy

Administration

Krista Boyle, Chief Strategic Engagement Communications Officer; Daniel Hoying, General Counsel; Lauren Roberts, Chief Audit Executive; Stephanie Scott, Assistant General Counsel

Open Enrollment

Committee Chair Moroski reported that at the November Policy and Equity Committee meeting, the Committee had an excellent discussion of Open Enrollment and requested additional information. As requested, Dan Hoying, General Counsel presented the following information to the Committee.

Cost

In response to last month’s Action Item (*Mr. Hoying will research if Open Enrollment costs the District money*), Mr. Hoying presented the Ohio Department of Education (ODE) Statement of Settlement – Traditional School District for fiscal years 2021 and 2022. These statements show:

Open Enrollment Adjustment – Positive payments received when students from other districts enroll in CPS
Open Enrollment Adjustment – Negative payments made to other districts when a CPS students enroll there

FY2021

I - Open Enrollment Adjustment - Positive	1227	5,478,499.76	4,793,988.85	684,510.91	228,170.30
Open Enrollment Adjustment - Negative	477	-3,700,342.76	-3,226,037.91	-474,304.85	-158,101.62

FY2022

H - Open Enrollment Adjustment - Positive	3110	5,335,807.78	2,223,253.24	3,112,554.54	222,325.33
Open Enrollment Adjustment - Negative	3110	-3,695,895.64	-1,539,945.97	-2,155,949.67	-153,996.40

The Committee discussed the finance related to Open Enrollment. Committee member Lindy questioned if CPS would be spending more per pupil with no Open Enrollment given that Open Enrollment receiving schools don’t get the local property taxes and only receive the state funding share associated with the student.

Mr. Hoying reported that many districts are having the same conversations to determine their Open Enrollment policies.

Mr. Hoying shared with the Committee the Ohio Revised Code Section 3313.98 – Interdistrict Enrollment Policy section that states the Open Enrollment options from which school districts must choose:

- (B)(1) The board of education of each city, local, and exempted village school district shall adopt a resolution establishing for the school district one of the following policies:*
- (a) A policy that entirely prohibits the enrollment of students from adjacent districts or other districts, other than students for whom tuition is paid in accordance with section [3317.08](#) of the Revised Code;*
 - (b) A policy that permits enrollment of students from all adjacent districts in accordance with policy statements contained in the resolution;*
 - (c) A policy that permits enrollment of students from all other districts in accordance with policy statements contained in the resolution.*

CPS's policy is currently consistent with (B)(1)(c).

In response to last month's Action Item (*The Administration will research if Open Enrollment can be Offered at Cincinnati Digital Academy*), Mr. Hoying reported that yes, CPS can allow Open Enrollment into only one school.

He continued and shared that CPS cannot pick and choose from which districts students are accepted. CPS' policy must be consistent with one of the three choices in 3313.98.

ACTION: For Open Enrollment students enrolled in CPS, the Administration will research and report to the Policy and Equity Committee: (1) the districts the students are from; (2) what schools the students are going to; and (3) how CPS' diversity is impacted.

ACTION: As a part of the minutes, Committee Chair Moroski will debrief the full Board on the Open Enrollment policy and choices in January.

Continued Discussion of Subset Policies for Vaccinations

Committee member Bolton explained that it was a very specific issue of not just for extra-curricular activities, but also for the staff that has to work so closely with medically fragile students. She asked if there is any guidance from anywhere.

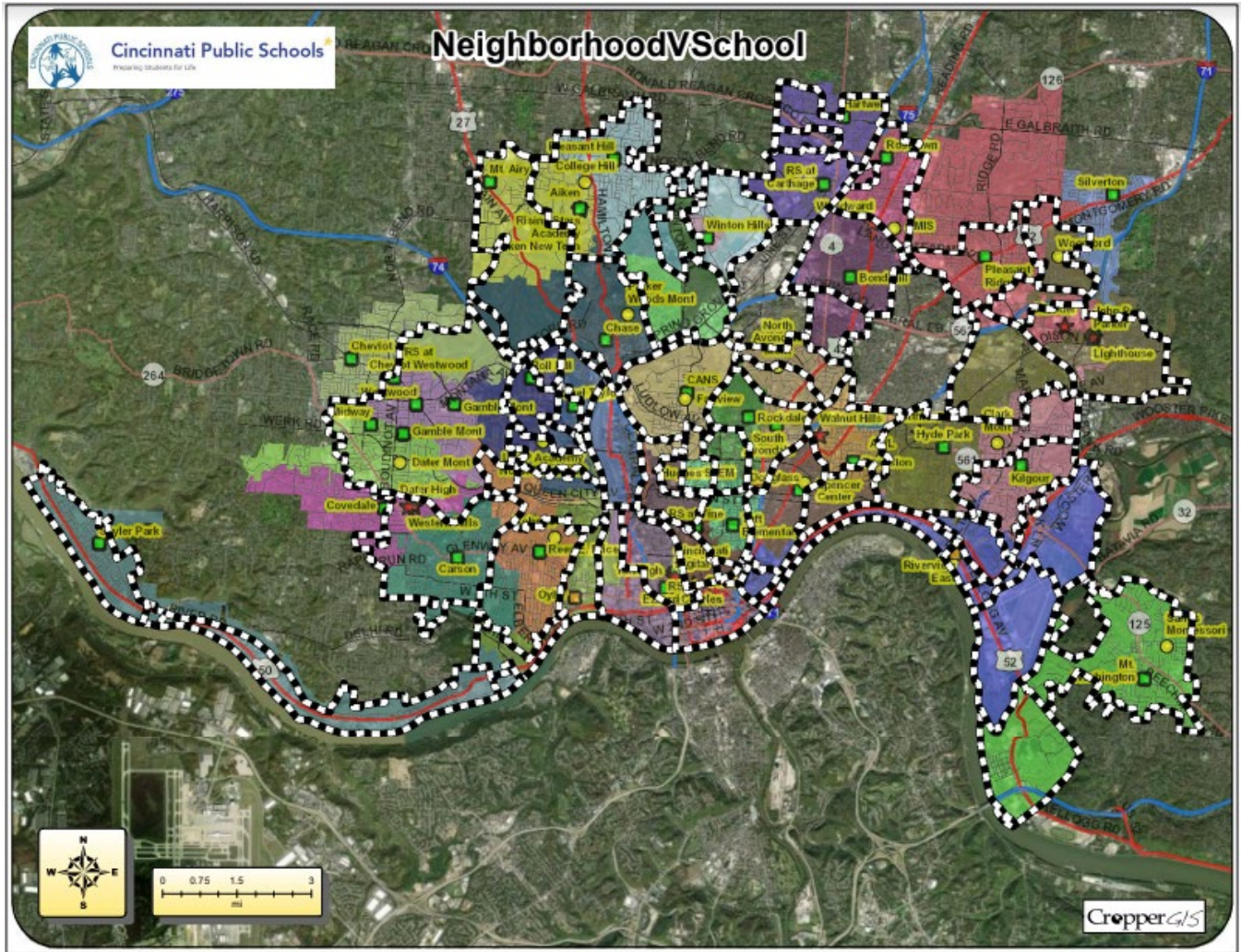
Stephanie Scott, Assistant General Counsel, reported that some of the research from other districts has been shared, and that they do have a subset for athletics and how incidences are monitored. She shared that some students do have internships as part of their work study program, but those students are all vaccinated.

Ms. Bolton clarified that her concern is staff members (instructional leaders and instructional providers) who work closely physically with students who may have issues; yes the staff are working under the CPS vaccination policy, but they can still get infected.

Mr. Moroski appreciated the discussion, and hopes conversations will continue next year. Given the current number of infections, he feels that the student vaccination conversation is not yet finished.

Continued Discussion on Attendance Boundary Line Maps

In response to the request for additional attendance boundary line maps, Mr. Hoying shared that the Budget, Finance and Growth Committee is also looking at them. Several weeks ago, the boundary line maps for each school were prepared by Jeremy Gollihue, Chief Information Officer, and sent to Board members.



Ms. Bolton reported that this will continue to be a topic of discussion. She is interested in visually seeing where the attendance boundary lines are for neighborhood schools and how they match up with the actual recognized neighborhood lines in which the school is located.

ACTION: The Administration will prepare maps showing to the street level how the CPS neighborhood school boundary lines compare to the City’s neighborhood boundary lines.

Board Meeting Assignment Topics – November 22, 2021, Board Meeting

Committee member Bolton reported that two topics were assigned to the Policy and Equity Committee meeting from the November 22, 2021, Board meeting—Public Attending Board Meetings and Hearing of the Public Processes.

The Public Attending Board Meetings has been handled and the Administration determined attendance will be limited to 80.

The process of Hearing the Public has yet to be determined, and will be handed off to the 2022 Policy and Equity Committee.

ACTION: The 2022 Policy and Equity Committee will review the Hearing of the Public Process and update the appropriate policies as necessary.

Policy 6835 – Audit Committee Charter

Lauren Roberts, Chief Audit Executive, presented the recommended changes to Policy 6835 – Audit Committee Charter. She shared that the major changes are to:

- Clearly document and outline process for appointing a chair and vice chair; and
- Include a requirement for all members to reside in the Cincinnati City School District limits.

Committee member Bolton shared that these suggested revisions have been presented to both the Budget, Finance and Growth Committee and Audit Committee and both committees are in agreement with the recommended changes.

ACTION: The Policy and Equity Committee agreed with the changes and will recommend approval of Policy 6835 – Audit Committee Charter at the Board’s Regular Business meeting on January 10, 2022.

Policy Review Memo

Ms. Roberts presented the following memo updating the Committee on the Internal Audit Policy Review.

Background

During the September 24, 2021 meeting, the Policy and Equity Committee directed Internal Audit to perform a review of four Board Policies and report back at the December 16, 2021 meeting. Internal Audit completed a review and documented the feedback over the following policies:

- 2255 Equity and Excellence in Education
- 2256 Anti-Racism
- 2261.01 Parent and Family Engagement in Federal Programs
- 6320 Purchasing of Goods and Services

Internal Audit Approach

Internal Audit performed a limited scope advisory project to address the Policy and Equity Committee’s request. Internal Audit broke out the line items within each policy and requested management complete the following questions for each component:

- Who is the subject matter expert and their Performance Leadership Team (PLT) member?
- Who are the key collaborators and contributors that support this aspect of the policy?
- What is the status of implementation? What has been done so far?
- What needs to be done? Please share your future action items/steps.
- Are there written procedures? If so, please provide them.
- Is this aspect of the policy measurable? If so, how do you currently (or plan to) track this information?
- How do you know if your actions/steps are having the impact the policy intended?
- Are there any recommended changes to this aspect of the policy?

The full list of questions and management responses are contained in *Attachment 1* (available upon request in the Board Office).

Policy Review Summary

The Internal Audit team had very detailed and meaningful conversations with members of management to learn more about the work that has been performed regarding the four selected policies. We are very appreciative of management’s participation in this exercise, as well as their partnership as we worked together to determine the best approach to fulfill the Committee’s request. It is our hope that this project provides the Committee members with insight into the work that management has performed thus far, as well as clear next steps.

After reviewing the information provided in *Attachment 1*, Internal Audit would like to provide high level conclusions and overall recommendations. *Table 1* provides an evaluative score based on Internal Audit’s perception of the extent to which each aspect of the policies have been implemented.

Board Policy	# of Policy Requirements			
	Total	Complete	In Progress	Not Started or Not Auditable
2255	11	-	11	-
2256	27	1	26	-
2261.01	35	-	-	35
6320	13	-	8	5

Board Policies 2255, 2256, and 6320 are similar in the sense that they are predominantly owned by one department/member of management. These three policies were much more straightforward when it came to collecting information as the owner was clearly defined. Internal Audit feels the strong ownership of each aspect of these policies indicates implementation is certainly underway.

Board Policies 2255 and 2256 are led by Dr. Michelle Baltam, DEI Manager, who began this work in June 2021. The status of her work is detailed in *Attachment 1*. If the Policy and Equity Committee would like to learn more about her work and timeline of implementation, Internal Audit recommends Dr. Baltam report to the Committee at a future meeting as she is the subject matter expert.

Board Policy 6320 is led by Trina Levins, Director of Fiscal Services. Ms. Levins reported much work is still needed in terms of the implementation of the policy. Internal Audit recommends Ms. Levins and the Purchasing Department work with General Counsel to update any aspects of the Policy that may need adjusting, and work with PLT to ensure a plan (as well as necessary resources) are in place for each aspect of the policy.

Board Policy 2261.01 is very different from the others as it involves a significant number of departments and schools. Internal Audit contacted 30+ members of management for input; while everyone was interested in contributing, it became clear to Internal Audit that the exercise of assigning a sole owner to each aspect of the policy was a time consuming and complex task. In terms of next steps for Policy 2261.01, Internal Audit recommends management utilize *Attachment 1* and begin by appointing a sole owner for each policy requirement. While that sole owner may rely on other employees and departments, having a single person clearly assigned would ensure the item is being addressed.

Recommendations

If future policy reviews are needed, the process would be more effective if management would first provide the information requested in *Attachment 1* and self-report the status of implementation to the Committee. For Internal Audit to perform a more detailed assessment, management must also establish a clear set of criteria and capture/maintain the applicable data for Internal Audit to utilize. This would allow both the Committee members and Internal Audit to determine the extent to which processes and data are available for review. The Internal Audit Department will begin the annual risk assessment and planning process in April 2022 and can include future policy reviews in the fiscal year 2023 Internal Audit Plan, if necessary.

Committee member Lindy stated that the table summary shows there’s a lot of work to do. He suggested coming back in three or six months to check the progress. He believes the Board also needs to be thoughtful about how many policies are created.

The Committee discussed future progress updates and “ownership” of the policies by Administration.

Committee member Bolton suggested it may be not necessary to continue to cycle through all policies for review. Rather, concentrate on the substantive policies as identified by the Policy and Equity Committee in the Spring (available upon request in the Board Office). Those policies were identified as Board work and the procedural policies were identified as work of the Administration.

Mr. Hoying said that years ago Board member Bates wanted to ensure there is someone from the Administration assigned to the Policy Committee who is tasked with making sure the Administration is informed and updating the policies and procedures.

ACTION: Review and progress updates of the Internal Auditor’s review of policies will be added as an agenda item for the Policy and Equity Committee to address in 2022.

Update on COVID-19 Outbreaks for Athletes
List of Close Contact Curriculum

Ms. Scott shared the following chart used to track information and keep students safe.

Cases By Grade - Last 2 weeks				Number of Red Grades (>10%)	1	
				Number of Grades (>5% and <10%)	3	
Grade-Level Cases Relative to Enrollment						
School	GRADE	Axis	Past 14 Days	Grade.Level	TotalEnrolled	% In Grade Positive in Last 2 Weeks
Cheviot	4.00	Cheviot G 4	5	4.00	70	7.14%
Hays/Porter	1.00	Hays/Porter G 1	3	1.00	37	8.11%
Hays/Porter	5.00	Hays/Porter G 5	4	5.00	35	11.43%
Spencer Center	9.00	Spencer Center G 9	3	9.00	37	8.11%

She reported that this was a snapshot of the data available for each school.

The Committee then discussed the following chart for Athletics.

August 1st - Current Date --- FALL SEASON --- COVID REPORT				
Date	Postive SA or Staff	School	Sport	Result
8/10/2021	SA	Aiken	Cheer	Remote - No Pause of Program
8/12/2021	SA	Hughes	Football	Team on Pause
8/20/2021	SA	Hughes	Football	Team on Pause
8/23/2021	SA	Walnut Hills	Golf	No Pause of Program
8/23/2021	SA	Walnut Hills	Tennis	No Pause of Program
8/24/2021	SA	Walnut Hills	Girls Varsity Soccer	No Pause of Program
8/24/2021	SA	Walnut Hills	JV Soccer	No Pause of Program
9/1/2021	STAFF	Withrow	JV Football	5 Close Contacts - No Pause of Program
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause

9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Football	Team On Pause
9/2/2021	SA	Aiken	Cheer	Team On Pause
9/7/2021	SA	Aiken	Cheer	Team on pause
9/7/2021	SA	Aiken	Basketball	No close contacts - No Pause of Program
9/7/2021	SA	Aiken	Cheer	Team on Pause
9/8/2021	SA	Shroder	Football	Team on Pause
9/8/2021	SA	Shroder	Football	Team on Pause
9/8/2021	SA	Shroder	Football	Team on Pause
9/8	SA	Woodward	Cheer	Team on Pause
9/8	SA	Woodward	Cheer	Team on Pause
9/8	SA	Woodward	Cheer	Team on Pause
9/10	SA	Hughes	Football	No close contacts - No Pause of Program
9/10	SA	Woodward	Football	Team on Pause
9/10	SA	Woodward	Football	Team on Pause
9/10	SA	Woodward	Football	Team on Pause
9/13	SA	Hughes	Basketball	Team on Pause
9/13/2021	SA	Western Hills	Boys Soccer	Team on Pause
9/14/21	SA	Woodward	Junior High Football	No close Contacts - No Pause of Program
9/17/21	SA	Evanston	Soccer	Team on Pause
9/20/21	SA	Western Hills	Cheer	Team on Pause
9/21/21	SA	Withrow	JV Football	4 Close Contacts - No Pause of Program
9/24/21	SA	Withrow	Volleyball	Team On Pause
10/1	SA	Clark Montessori	Football	Team On Pause
10/1	SA	Shroder	Football	Team on Pause
10/6	SA	Clark Montessori	Soccer	No Close Contacts - No Pause of Program
10/8	Coach	Hughes	Football	No close contacts - No Pause of Program
10/13	SA	Evanston	Flag Football	Team on Pause
10/15	SA	Walnut Hills	Volleyball	No Pause of Program - Team Vaccinated
10/15	SA	Walnut Hills	Swim	No Close Contacts - No Pause of Program
10/27	SA	Walnut Hills	Softball	No Close Contacts - No Pause of Program
11/2	SA	Riverview East	Boys Basketball	

Mr. Hoying reported that the “mask to stay, test to play” program is working well. Before implementing the program, there was a lot of out-of-school activity due to quarantine requirements and teams were on pause.

Now, if a player has a positive test, CPS tests the players. This has a positive impact by having the student-athletes remain in school and also uncovering more asymptomatic cases.

Committee member Lindy shared he has heard concerns regarding indoor sports at away games and COVID-19 protocol.

Mr. Hoying reported that while CPS does not have control over other districts, CPS mandates that CPS teams follow all CPS protocol even at away games.

Committee member Bolton questioned if an event is held at CPS whether the opposing team is required to follow CPS' protocol.

Mr. Hoying confirmed the expectation that CPS' rules are followed by opposing teams is correct.

Continued Review of Policies

Policies 3130/4130 – Assignment and Transfer

The Committee reviewed the Administration's recommended revisions to Policy 3130 and recommended rescission of 4130.

ACTION: The Committee agreed with the Administration's recommended revisions to *Policy 3130 – Assignment and Transfer* and recommended rescission of *Policy 4130 – Assignment and Transfer* and will recommend the policies to the Board for approval at the Regular Board meeting on January 10, 2022.

Policy 3132 – Vacancies

The Administration reported there are no recommended changes to Policy 3132.

Policies 3139/4139 – Employee Discipline

The Committee reviewed the Administration's recommended revisions to Policy 3139 and recommended rescission of 4139.

ACTION: The Committee agreed with the Administration's recommended revisions to *Policy 3139 – Employee Discipline* and recommended rescission of *Policy 4139 – Employee Discipline* and will recommend the policies to the Board for approval at the Regular Board meeting on January 10, 2022.

Policies 3140/4140 – Termination and Resignation

The Committee reviewed the Administration's recommended revisions to Policy 3140 and recommended rescission of 4140.

ACTION: The Committee agreed with the Administration's recommended revisions to *Policy 3140 – Termination and Resignation* and recommended rescission of *Policy 4140 – Termination and Resignation* and will recommend the policies to the Board for approval at the Regular Board meeting on January 10, 2022.

Transportation Policies Review

Committee member Bolton presented to the Committee the following discussion drafts of policies:

- 8600.01 – Supervision of Transported Students
- 8600.02 – Transportation of Students
- 8650 – Transportation by District Contracted Vans

She reported she shared with the other Policy and Equity Committee members her musings and thoughts about those policies because they come up in the Budget, Finance and Growth Committee, as well as in the Policy and Equity Committee.

For almost 80 years in the District, CPS has only seen Transportation as the regional transportation system and CPS having a private vendor cadre of yellow buses.

Ms. Bolton suggested it may be necessary and would be a good practice to look at being more expansive about what Transportation is and even thinking more environmentally and instructionally.

She said a new wrinkle may be that there will need to be some kind of CPS fleet—not huge fleet but specialized fleet—for not just quantitative reasons but also for qualitative reasons.

Whatever is done with Transportation, she thinks it will be a very different plan and will require a different policy. She shared that she feels that CPS is being forced by vendors to operate outside of its own policy. As a result, she presented the three discussion draft policies (attached), which are time sensitive.

ACTION: General Counsel will review *Policies 8600.01 – Supervision of Transported Students, 8600.02 – Transportation of Students, and 8650 – Transportation by District Contracted Vans* and the questions to provide advice and work to begin a discussion in the Policy and Equity Committee in 2022.

Hearing the Public

There were no speakers for Hearing the Public.

The meeting adjourned at 10:33 am.

Policy and Equity Committee

Mike Moroski, Chair

Eve Bolton

Ben Lindy

Staff Liaisons

Dan Hoying, General Counsel

Krista Boyle, Chief Communications + Engagement
Officer

DISCUSSION DRAFT – BOLTON – 11/30/2021

Book	Cincinnati City School District Policies
Section	8000 Operations
Title	Supervision Of Transported Students
Code	8600.01
Status	Active
Adopted	August 13, 2007

Cincinnati City School District Policies

A primary concern in the transporting of students is their safety. The Board of Education advises all parents of children being transported that the parents are responsible for their children's safety and well-being until they board the bus or taxi or van for departure and again when they return to their district school or drop-off point. Parental responsibility extends to bus stops and pickup points including those established on school grounds for convenience of students. While being transported, the transportation contractor is responsible until the children reach their destinations.

WHAT'S THE DEFINITION OF SAFETY? DOES THAT INCLUDE CLEANLINESS AND ENVIRONMENTAL HEALTH OF THE BUS? PERSONAL SECURITY?

WHO IS RESPONSIBLE FOR OUR STUDENTS DURING TRANSPORTATION TRANSFERS?

DO THE PUBLICLY DETERMINED AND SUPPORTED BUS STOPS NEED TO RECEIVE THE APPROVAL BY THE DISTRICT BECAUSE THE PASSENGERS FOR WHICH CPS ARE PAYING ARE MINORS?

WHEN ROUTES ARE RUN LATE AND STUDENTS ARE TARDY TO SCHOOL OR LATE HOME DURING THEIR TRANSPORTATION BY THE CONTRACTOR, WHO IS RESPONSIBLE FOR THEIR SAFETY AS THEY WAIT FOR THE NEXT BUS?

IF STUDENTS ARE UNACCOUNTED FOR DURING THEIR TRANSPORTATION BY THE CONTRACTOR, WHO IS RESPONSIBLE FOR THEIR SAFETY?

DISCUSSION DRAFT – BOLTON – 12/07/2021

Book Cincinnati City School District Policies

Section 8000 Operations

Title Transportation Of Students

Code 8600.02

Status Active

Adopted July 10, 1944

Last Revised June 28, 2010

Cincinnati City School District Policies

The District's primary transportation policy will address all forms of transportation available to families and students. When addressing transportation, students' and schools' instructional needs must be the first two priorities followed by district financial capacity, rational and market influenced district growth, and the community's environmental sustainability and carbon footprint.

The organization of equitable District transportation services will begin at the school campus site rather than student addresses. A transportation plan will contemplate walkability, cycling, carpooling, privately-owned small vehicle fleets, large extensive yellow bus transportation, participation in regional public transportation, and as needed and as feasible a district-direct transportation service.

A. This policy sets forth transportation services to be provided for students residing within the Cincinnati City School District attending schools for which the State Board of Education prescribes minimum services (THE STATE MINIMUM SHOULD BE LISTED).

1. In accordance with ORC 3327.015, upon authorizing transportation services for an ineligible student, transportation services must remain in effect for the full duration of the current school year. (IS THAT BECAUSE CPS GOES ABOVE

AND BEYOND? DOES ELIGIBLE AND INELEGIBLE IN THAT REFERENCE REFER TO STATE ELIGIBILITY VS. DISTRICT ELIGIBILITY?

2. State eligible transportation students will receive transportation provided by the District. State ineligible/District eligible students needing transportation will have transportation provided by the District based on the criteria and procedures set forth below by the Board of Education. Exceptions and certain accommodations in specific cases can be determined by the Transportation Director with the approval of the responsible Assistant Superintendent. ~~Transportation services will be provided to ineligible student based on the criteria and procedures set forth by the Transportation Director and or designee.~~
- B. Students in grades K–8, attending elementary schools whose residence is one mile or farther from the school of attendance will be offered transportation services as follows:
1. Transportation will be offered for students in grades K-8 by yellow school bus, if ~~practicable~~practical.
 2. Students attending CPS elementary schools meeting the minimum distance criteria must also live within the approved attendance area of the school or specified attendance area of the magnet school to receive transportation service, if ~~practicable~~practical.
 3. Students residing within the District boundaries attending non-public or community elementary schools meeting the minimum distance criteria must also comply with the thirty (30) minute eligibility test as set by state law to receive transportation service, if ~~practicable~~practical (WHAT IS THE 30-MINUTE ELIGIBILITY TEST?). Eligible students in grades K-8 attending non-CPS schools will be provided a viable mode of service in accordance with Ohio Administrative Code 3301-83-19 (WHAT IS THE DEFINITION OF THAT CODE?).
 4. Cincinnati Public Schools students residing within the attendance area of a CPS elementary school (K-8) that must be relocated to "swing space" during construction of a new or remodeled school building or during a public calamity causing a school closure will be temporarily offered transportation without regard to distance until completion or clearance to return.
- C. Students in grades 7 – 12 attending a ~~high~~-school whose residence is one and one quarter miles from the school of attendance will be offered transportation as follows (IS IT TIME TO JUST SAY ALL 7-8 GRADERS WILL BE TRANSPORTED BY YELLOW BUS AND CHANGE 7-12 TO 9-12? IF WE MOVE TO DOING ONLY 9-12. IS IT TIME TO CHANGE THE 1.25 MILES TO 1.5 MILES? IS IT TIME TO ALLOW FAMILIES WHO HAVE CHILDREN IN GRADES 7-12 ATTENDING THE SAME SCHOOL TO CHOOSE TO HAVE THEIR 7-8 CHILDREN ON PUBLIC TRANSPORTATION WITH THEIR 9-12 SIBLINGS?)

1. Transportation services will be offered to eligible students and provided by an authorized transportation provider in compliance with Ohio Administrative Code 3301-83-19 (WHAT IS THE DEFINITION OF THAT CODE?). Any request for alternative transportation service shall be reviewed and approved by the Director of Transportation and approved by the responsible Assistant Superintendent and/or designee prior to the commencement of service.
2. Students in grades 9-12 who benefit from the contractual arrangement between CPS and Southwest Ohio Regional Transit Authority (SORTA) subset Student Transportation Program will be ~~are~~ issued appropriate and individualized passes based upon needs assessment and instructional program requirements. Students issued such passes will, with the District's assistance, be responsible for the replacement of lost passes and/or additional passes required throughout the year. Metro Smartcards are subject to replacement fees after issuance of a Smartcard.
3. Students involved in extra-curricular activities in grades 7 – 12 who are actively transported on public transit will be issued appropriate and individualized passes based upon needs assessment and instructional program requirements for extended hours use.
- ~~2.4.~~ Starting and ending times for all schools will be determined and coordinated based upon transportation quadrants/regions and within responsible, healthy arrival and dismissal times.

~~D.~~ Students attending a K-12 school whose residence is one mile or farther from the school, will be offered transportation services as follows:

- ~~1.~~ Transportation will be offered by yellow school bus, if practical.
- ~~2.~~ Metro Pass may be used for students in grades 7—12 when yellow bus is impractical.
- ~~3.~~ Students who are issued Metro Smartcards are subject to replacement fees after issuance of a Smartcard.
- ~~4.~~ Students involved in extra-curricular activities in grades 7—12 who are actively transported on public transit will be issued an Extracurricular Smartcard to be used in conjunction with their Metro Smartcard for extended hours use.

~~E.D.~~ The District will determine the safest, least restrictive, most viable and greenest method of service available in providing transportation to eligible students prior to deeming it impractical to provide service. If transportation is offered but not used, the District has no further obligation to provide transportation.

All Eligible students in grades K-12 residing within the District will receive transportation services; however, as stipulated by Ohio Revised Code 3327.02 certain requests may not be practicable for the following reasons: ~~and requesting transportation services to and~~

~~from their school of attendance will be reviewed by the Director of Transportation and/or designee to determine the mode of service which may result in the request being deemed impractical based on one or more of the following factors in Ohio Revised Code 3327.02:~~

1. The time and distance required to provide transportation;
2. The number of students to be transported;
3. The cost of providing transportation in terms of equipment, maintenance, personnel, and administration;
4. Whether similar or equivalent services are provided to other students eligible for transportation;
5. Whether and to what extent the additional service unavoidably disrupts current transportation schedules;
6. Whether other reimbursable types of transportation are available.

~~F.~~ Transportation will be offered to students attending a District school Cincinnati Public Schools that have "transportation as a related service" required by their individualized education plan in accordance with such plan. (WHAT ABOUT NON-CPS STUDENTS WITH IEPs? ARE WE REQUIRED TO ACKNOWLEDGE AND MEET THE IEP REQUIREMENTS?)

~~G.~~ ~~The District will determine the safest, least restrictive, viable method of service available in providing transportation to eligible students prior to deeming it impractical to provide service. Parents do not have the choice of type of service offered. If transportation is offered but not used, the District has no further obligation to provide transportation.~~

~~H.~~ F. It is the goal of the Board of Education and the commitment of the Administration to implement a transportation program that ~~where practical,~~ transportation service shall meet the following objectives:

1. Yellow bus student ride time shall be less than fifty-five (55) ~~seventy-five (75)~~ minutes one way.
2. School day starting times and dismissal times shall be such as to Accommodate at least two routes per bus.
3. Transportation vehicles shall arrive and depart school within fifteen (15) Minutes of start and completion of the school program.
4. Yellow bus stops shall be within one-half (1/2) mile of residence.
5. Students transported via public transit vehicles will access the nearest public transit stops established by the public transit authority (DO THE PUBLICLY DETERMINED AND SUPPORTED BUS STOPS NEED TO RECEIVE THE APPROVAL BY THE DISTRICT BECAUSE THE PASSENGERS FOR WHICH CPS ARE PAYING ARE MINORS?).

~~5-6~~ For arrival and dismissal, students transported via public transport vehicles will be released and picked up not more than 1/8 of a mile from the school.

Adopted 7/10/44
Revised 7/1/48
Revised 9/8/52
Revised 2/21/55
Revised 6/22/64
Revised 1/24/72
Revised 11/13/72
Revised 1/14/74
Revised 11/25/74
Revised 10/13/75
Revised 9/12/77
Revised 9/11/78
Revised 5/14/84
Revised 5/13/85
Revised 6/26/06
Rescinded 9/13/07
Reinstated 11/7/07
Revised 12/8/08
Revised 6/28/10

DISCUSSION DRAFT – BOLTON – 11/30/2021

Book	Cincinnati City School District Policies
Section	8000 Operations
Title	Transportation By District Contracted Vans
Code	8650
Status	Active
Legal	R.C. 3327.10 R.C. 4511.01 A.C. 3301-83-19
Adopted	August 13, 2007

Cincinnati City School District Policies

It is the policy of the Board of Education to provide a portion of the District's transportation to students via District-contracted vans designated for nine (9) passengers or less, when the use of buses is not practicable/reasonable. Vans shall only be used for the transportation of nine (9) or fewer passengers, not including the driver, in accordance with the original design and construction of the vehicle. Students shall not be transported in larger passenger vans (e.g., non-conforming extended van-type vehicles) carrying ten (10) passengers or more (particularly 12-15 passenger vans) (12-15 BY LAW?).

Similar to school buses, vans shall be used by the Board for the transportation of resident students between their home areas and the schools of the District to which the students are assigned or to their nonpublic or community schools. However, such use shall generally be limited to preschool disability children, special needs children, and students experiencing homelessness, students placed in foster care, children inaccessible to buses, and students placed in alternative schools, and other students as determined necessary. Vans may also be used to transport students to and from field trips and/or other Board-approved school-related activities.

Students who are transported by van are expected to conduct themselves in the same manner required of students transported by bus and shall be subject to all applicable disciplinary rules and District behavior expectations.

All van drivers shall complete the required Ohio School Van Driver training program prior to transporting students, meet all other qualification requirements (WHAT QUALIFICATIONS BY LAW?), and comply with the Ohio Pupil Transportation and Safety Rules and applicable Board policies and guidelines relative to student transportation.

The Superintendent or the Superintendent's designee at no less than the administrative level of the Assistant Superintendent is responsible for developing and implementing the appropriate administrative guidelines for this policy.