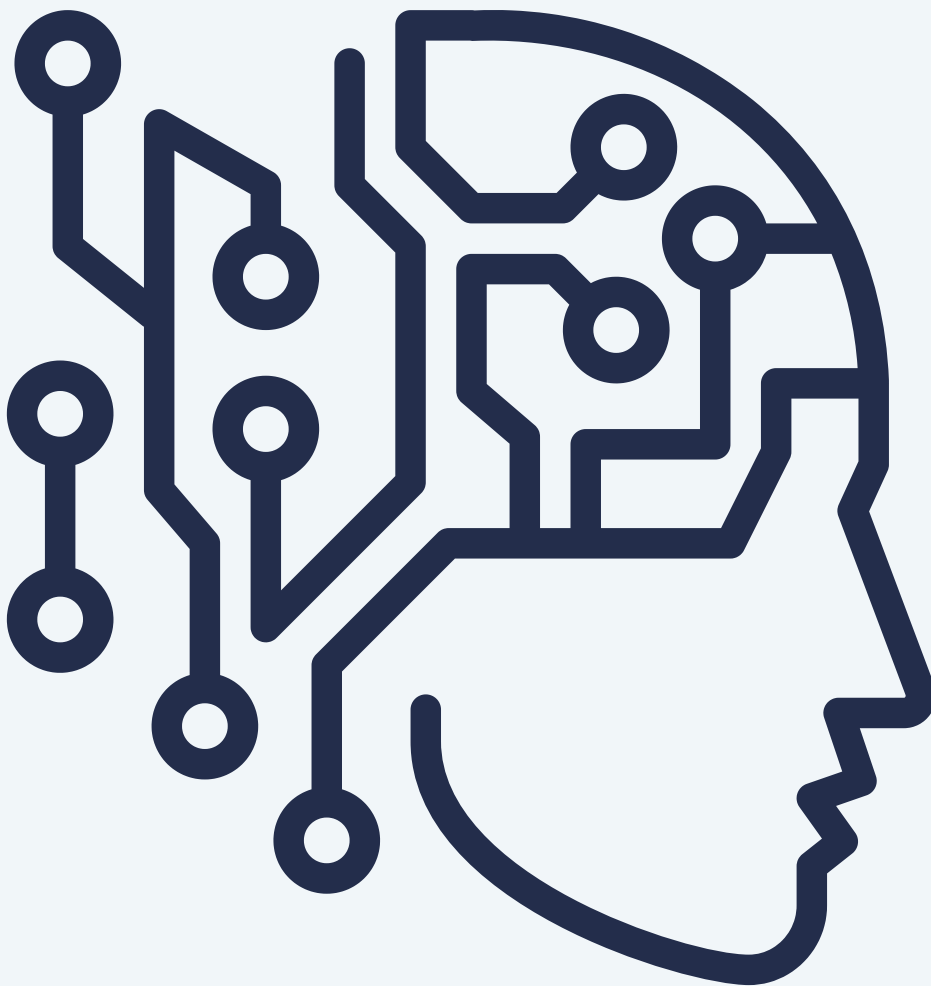




# Generative Artificial Intelligence

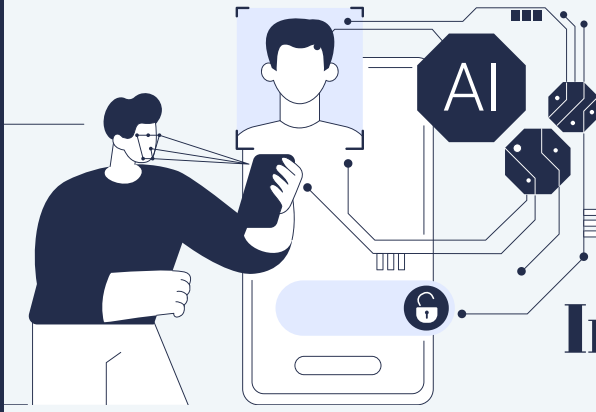
A Guide for Orange County Public Schools



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# Importance of AI

Understanding and effectively using Artificial Intelligence (AI) in Orange County Schools can prepare students for the future while emphasizing critical thinking, creativity, communication, collaboration, and citizenship. AI has the potential to transform education by providing personalized learning experiences tailored to the preferences and needs of each student.

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By generating differentiated learning materials, AI enhances accessibility and engagement. This allows all students to benefit from tailored content that aligns with their unique learning styles. This personalization not only makes learning more effective but also fosters a sense of belonging within the school community.

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## Key Benefits of AI in Education:

- Personalized learning experiences: AI adapts content to meet individual student needs.
  - Real-time feedback: It provides insights into student progress, helping educators intervene when necessary.
  - Improved teaching strategies: Data-driven insights enable teachers to refine their methods for better learning outcomes.
  - Enhanced critical thinking: Students learn to analyze and question information, developing essential skills for the modern world.
- 

Leveraging the analytical capabilities of AI responsibly allows educators to deliver timely, targeted interventions and refine their strategies to support student growth. It also helps students build higher-order thinking skills, equipping them for challenges in an interconnected world.

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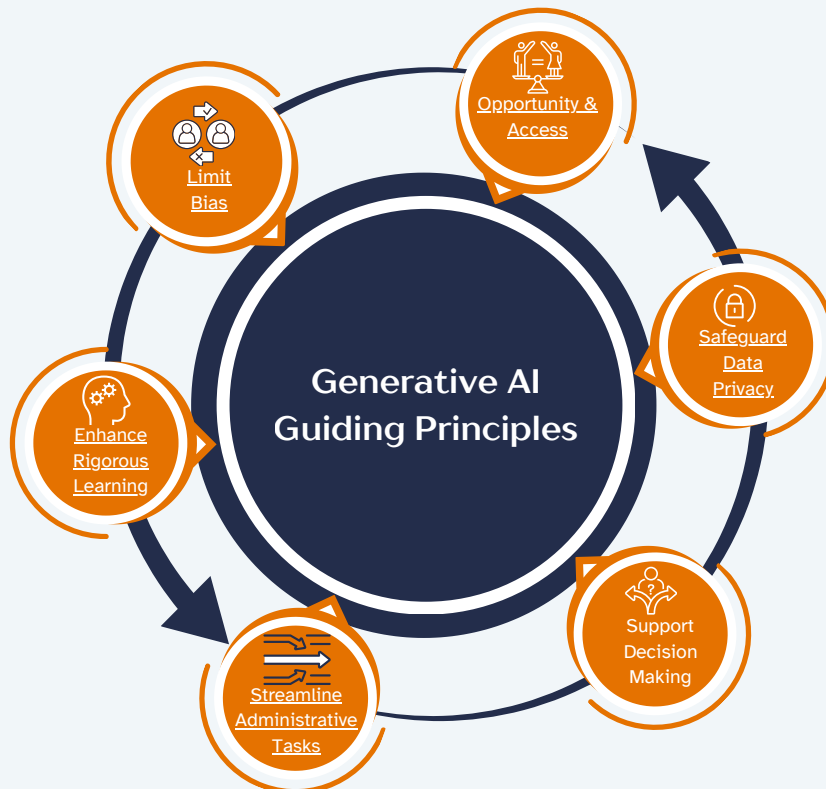
Orange County Schools aim to lead by example in the ethical use of AI. Division leaders will model its humane application, showcasing its benefits for both staff and students. By fostering a culture of innovation and critical thinking, the district is committed to creating a dynamic and engaging learning environment that ensures student success in the digital age.

# Guiding Principles



**Alignment** In alignment with the Orange County Public Schools’ mission to promote a legacy of excellence, this document provides guiding principles to ensure the use of artificial intelligence (AI) is ethical, transparent, and aligned with our mission to help students reach their full potential.

**Future Landscape** AI is a rapidly evolving technology that is changing the landscape of education. AI utilizes computer systems to understand language, recognize patterns, and make decisions – functions that usually require human intelligence. Generative AI is artificial intelligence that can create text, images, and music based on user prompts and existing data. AI can improve educational practices by enhancing rigorous learning, streamlining administrative tasks, and supporting better decision-making processes.



**Continuous Improvement** As part of our mission to empower all students and promote a culture of excellence, we remain committed to continuously evaluating and refining our practices to ensure ethical use. This living document will evolve as advancements in AI and educational insights emerge, empowering and preparing our school community for an increasingly AI-integrated world.

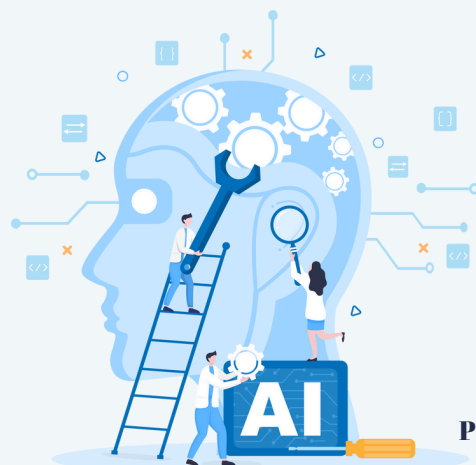
# Enhance Rigorous Learning:

- **Elevate** the rigor of our curriculum and teaching effectiveness by leveraging AI.
- **Support** and **enhance** teaching and learning through the use of Generative AI tools.
- **Recognize** and **nurture** each student's strengths through AI-supported flexible learning pathways that integrate seamlessly with our current instructional framework.
- **Educate** our staff and students on the functionalities and applications of Generative AI and the ethical, social, and safety aspects inherent in all digital technologies.
- **Ensure** our students are life-ready by embracing the transformative power of artificial intelligence.

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# Streamline Administrative Tasks:

- **Improve** efficiency and effectiveness in educational administration.
- **Streamline** complex processes and **optimize** resource allocation across departments.
- **Analyze** budget management, staff allocation, and student attendance trends for data-driven decision-making using AI analytics.
- **Enhance** communication and engagement with families, staff, and the community through personalized interactions.
- **Support** transparent, honest, and consistent communication
- **Improve** collaboration between students, families, educators, and community partners.
- **Manage** routine tasks like scheduling and transportation, freeing resources for strategic initiatives.
- **Focus** on initiatives that support student achievement and well-being.



# Support Decision-Making

- **Analyze** large volumes of data to identify trends, patterns, and areas of improvement, supporting informed decision-making.
- **Optimize** the distribution of resources (e.g., staff, budget, materials) based on real-time data and projections.
- **Predict** student performance, attendance, and other key metrics, allowing leaders to address challenges proactively.
- **Provide** detailed analytics to guide financial decisions, ensuring efficient use of funds and identifying cost-saving opportunities.
- **Support** human resources in staffing decisions by analyzing performance data, qualifications, and needs.
- **Assist** educators in tailoring educational strategies based on individual student data, improving outcomes, and addressing diverse needs.
- **Streamline** administrative processes (e.g., scheduling, transportation) to free up resources for strategic priorities.
- **Identify** potential risks (e.g., drop-out rates, underperformance) and **suggest** targeted interventions.
- **Track** progress toward goals and **provide** real-time feedback, helping school divisions refine strategies.

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# Protect Data Privacy

- **Use** AI responsibly while safeguarding sensitive information.
- **Ensure** AI systems comply with all laws governing data collection, usage, and disclosure, respecting privacy and intellectual property rights.
- **Ensure** student data privacy by asking companies to sign the Virginia Schools Data Privacy Agreement or have appropriate Privacy Policies in place.
- **Protect** the school community and **ensure** a secure learning environment for all.



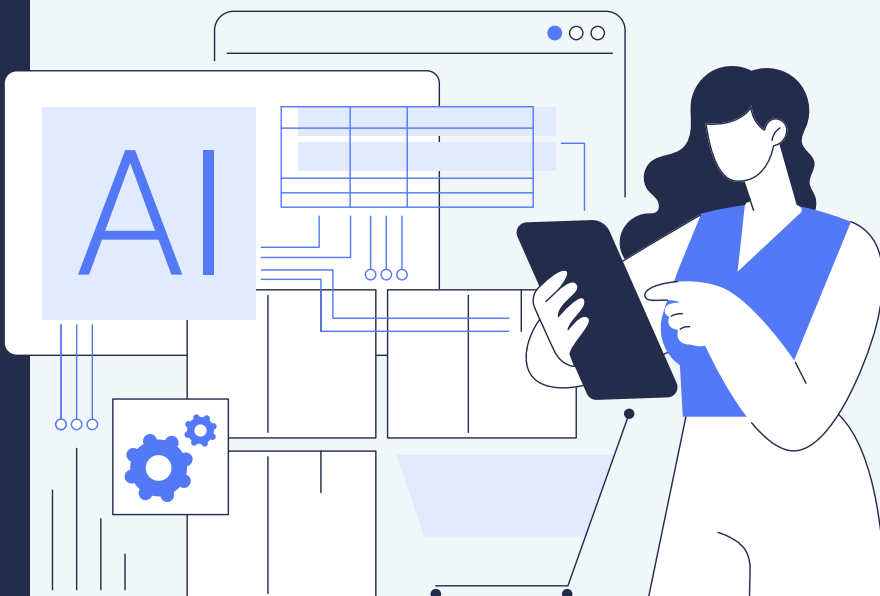
# Ensure Opportunity & Access

- **Promote** access for all learners, ensuring inclusivity of diverse learning needs.
- **Implement** AI with the consideration of various communities to ensure access for all students, which aligns with OCPS's commitment to fairness and meeting the needs of each student.
- **Engage** the public on AI policies, **raise** awareness, **build** trust, and **address** digital divides to ensure that AI's benefits are accessible to every learner.

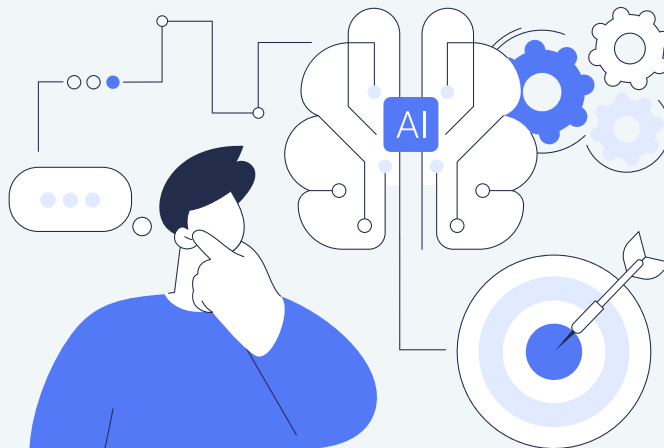
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## Limit Bias

- **Emphasize** fairness and inclusivity, to prevent favoring certain groups or outcomes over others.
- **Train** staff to recognize and mitigate biases in human input or feedback that might influence AI decision-making processes.
- **Ensure** AI systems consider the unique needs of students with disabilities or from marginalized communities, avoiding unintentional disadvantages.
- **Balance** quantitative data with qualitative factors (e.g., student well-being, creativity) to ensure AI systems consider a holistic view of student development.
- **Expand** AI models to include non-traditional learners and those who don't fit conventional achievement measures, ensuring inclusivity.
- **Adapt** AI systems for cultural differences in learning styles, communication, and values, ensuring alignment with diverse student needs.



# Educational Applications



Generative AI tools use artificial intelligence to generate new content like text, images, audio, video, and code based on the input or prompts provided by the user. When given a prompt, the AI model predicts the next word, pixel, or other output based on its training data and the context, resulting in the original output each time. (Adapted from [https://go.ncdpi.gov/AI\\_Guidelines](https://go.ncdpi.gov/AI_Guidelines))

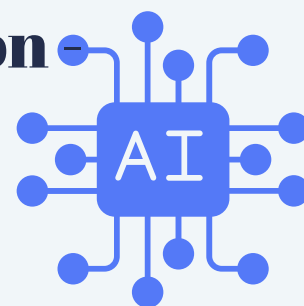
**Benefits:** Generative AI integration cultivates vital 21st-century competencies that better prepare students for future success in an AI-driven workplace and society. These tools promote critical thinking, problem-solving, creativity, communication, collaboration, and technological literacy. They achieve this by making learning more engaging, accessible, and efficient.

Here are some examples:

- **Personalized learning:** AI can tailor experiences to individual student needs and learning styles, fostering more profound understanding and engagement.
- **Teacher efficiency:** By automating specific creation tasks like generating practice problems or creating feedback rubrics. AI frees up valuable teacher time for more one-on-one interaction and personalized instruction.
- **More profound research:** Generative AI can synthesize vast amounts of information, allowing students to explore topics in more depth and develop stronger research skills.
- **Enhanced creativity:** AI can provide thought-starters and inspiration, sparking new ideas and igniting the creative process.
- **Inclusive learning:** Generative AI can support students with diverse abilities and learning differences by offering various learning pathways and materials.
- **Project-based learning:** AI tools can facilitate project-based and interdisciplinary learning, encouraging collaboration and critical thinking.

# Applications of AI in Education

## Integrity of Use



Students must adhere to ethical guidelines across all assignment tiers when using Artificial intelligence (AI) in any capacity. This means avoiding plagiarism and ensuring proper attribution of AI-generated content. Students must also clearly distinguish between their work and AI-generated contributions. Ethical AI use includes the following responsibilities:

- Only used division-approved AI tools
- Always disclose when AI is used in your work.
- Explain how AI was used to support your work.
- Critically review AI sources for validity of information.
- Provide proper citations when necessary.
- Resources
  - [MLA Citation](#)
  - [APA Citation](#)

### Teacher Resource Rubric Example

Tier	Description	Work Expectation	AI Usage Level	Assessment Criteria	Disclosure Requirement	Notes
No AI	Teachers want to assess students' independent thinking without external assistance.	All thinking and work must be the student's own.	No AI - AI use is not allowed.	Independent thinking; no external help.	Not applicable	Best for assignments focusing on assessing student knowledge and skills without external input.
AI as Coach	AI is used to help refine and improve students' original thinking by providing feedback.	Students may use AI to enhance their ideas rather than generate new content.	Limited AI - AI offers feedback, not content generation.	Quality of original thinking; ability to improve based on AI feedback.	Disclose if AI was used for feedback (e.g., "I used AI to get feedback on my product.").	Suitable for draft work or assignments where refinement is expected.
AI as Collaborator	AI assists students like an in-class partner, helping them generate ideas, and refine, and revise their work.	The final product should be a blend of student thinking and AI-generated content.	Moderate AI - AI contributes ideas and refinements.	Balance of student contribution vs. AI input; appropriate use of AI as a collaborator.	Disclose AI collaboration (e.g., "I used AI as a partner to help develop my product.").	Use for brainstorming, revisions, or creative assignments where collaboration is part of the process.
AI as an Essential Tool	AI is necessary for the task of helping students analyze data, generate ideas, or identify patterns.	Students rely on AI to complete the assignments by processing data or generating insights.	Full AI - AI is integral to the work.	Effective use of AI's capabilities to complete the task; understanding the role of AI in producing the final work.	Disclose AI use (e.g., "I used AI as an essential tool to develop my product.").	Best suited for data-heavy assignments, pattern recognition, or tasks requiring significant AI analysis.

### Student Resource Rubric Example

Tier	Description	Work Expectation	Disclosure Requirement	AI Usage Level	My Work Is...
No AI	Your teacher wants to see what you can do independently, without outside help.	All thinking and work should be your own.	Not applicable	No AI - AI use is not allowed.	My thinking
AI as Coach	You can use AI for feedback to improve your work, but the ideas must still be your own.	Use AI to enhance your original ideas, but all content must be yours.	Disclose AI use for feedback (e.g., "I used AI to get feedback on my final product.").	Limited AI - AI provides input, but does not generate new content.	My thinking, supported by AI
AI as Collaborator	AI works like a partner, helping you with ideas, revisions, and refining your work.	Your work should mix your ideas with AI-generated content.	Disclose AI collaboration (e.g., "I used AI as a partner to help develop my product.").	Moderate AI - AI helps generate ideas and improve your work.	A combination of my thinking with AI-generated ideas
AI as an Essential Tool	AI is required to complete this assignment, helping you analyze data or create new ideas.	You need AI to complete the assignment, relying on it to process data or generate insights.	Disclose AI use (e.g., "I used AI as an essential tool to create my product.").	Full AI - AI is crucial to completing the work.	Dependent on AI to produce the work



## Challenges & Considerations

Despite the potential benefits of AI in education, careful consideration of challenges and risks must remain at the forefront. We must balance innovation with concerns such as data privacy and security, fair access to AI tools, academic integrity, information accuracy, and bias.

Additionally, the ethical implications of improper AI use and the need for ongoing staff training present challenges. To support effective implementation, professional development will be provided to equip educators with the knowledge needed to integrate approved AI tools responsibly.

OCPS will establish stakeholder feedback loops for gathering ongoing input from parents, students, and teachers. Additionally, school staff will monitor over-reliance on AI and reinforce the importance of human judgment in high-stakes decisions and day-to-day classroom interactions.

## Protect Data Privacy

FERPA, *the Family Educational Rights and Privacy Act*, is the primary federal statute guiding student data privacy. It requires that schools protect the confidentiality of education records and give parents access to them. FERPA protects student privacy by “defining what information schools can collect, maintain, and disclose with and without a student’s or their parents’ or guardians’ consent.

Staff must prioritize protecting student data privacy and ensure that AI-generated content does not reveal sensitive information about individual students. All student data used for generative AI shall comply with state and federal data protection laws and school board policy.

Orange County Public Schools is a participating member of the *Virginia Student Privacy Alliance*. As part of the Alliance, we work with vendors and ask them to adopt the *Virginia School Data Privacy Agreement v.1*, or we sign on to existing agreements from other School Districts.

This [letter](#) (see Appendix) is sent to vendors to ask if they use AI technology with student data and how AI is used.

Resource requests for instructional use are submitted to the district using the form available [here](#) to review the Terms of Service and Privacy Agreement and the purpose and use of student data. Through these measures, we remain committed to fostering innovation while upholding the highest standards of student privacy, equity, and academic integrity.



# Accessibility Best Practices

Generative Artificial Intelligence (AI) technologies are evolving rapidly and have the potential to greatly enhance educational experiences. However, ensuring Using these tools responsibly and inclusively is essential. This document outlines guidelines for using AI in education to ensure accessibility for all learners.

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## Accessibility and Universal Design for Learning (UDL)

Universal Design for Learning (UDL) is a research-based framework designed to meet the diverse needs of all learners by proactively removing barriers and offering multiple pathways to learning. Accessibility ensures that all learners, including those with disabilities or other challenges, can fully engage with course materials, activities, and assessments. UDL enhances accessibility by providing a flexible teaching approach that accommodates varying abilities and needs, minimizing barriers to the learning process (UDL Guidelines, 2022). Generative AI offers new opportunities to reimagine and redesign course elements, addressing academic integrity concerns while preserving the flexibility and variety that UDL emphasizes.

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## Follow Accessibility Guidelines

To ensure inclusivity, adhere to these accessibility principles when integrating Generative AI:

- Content Design:
  - Add alternative text for images.
  - Use headings to structure text and clear, concise language.
- Tool Accessibility:
  - Ensure AI tools are keyboard navigable and compatible with screen readers.
  - Provide captions for all live and pre-recorded audio content.
- Visual Accessibility:
  - Use bold and high-contrast colors for readability.

Orange County Public Schools will conduct annual reviews for AI-generated platforms for accuracy, fairness, and inclusivity (ADA Compliance, 2023).

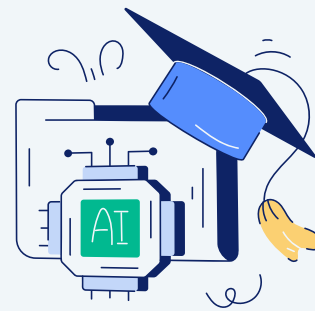
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## Use Generative AI to Expand, Not Restrict

Restricting classroom activities due to concerns about academic dishonesty could unintentionally harm marginalized learners and undermine UDL principles. Instead, Generative AI can:

- Enhance creative expression with prompts and project ideas.
- Provide personalized feedback and guidance.
- Encourage critical thinking by analyzing AI-generated content.

# Accessibility Best Practices



## Compliance with ADA Rules

The new ADA rule requires that web content and mobile apps provided by public entities meet Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards. To comply:

- Ensure digital materials meet accessibility standards.
- Offer alternative formats, like transcripts and captions, for multimedia content.
- Regularly audit digital materials utilizing an accessibility checklist
- Offer professional development on how to adapt AI features for students with specific learning needs or disabilities.

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## Implementation Best Practices for Educators

Guideline	Example
<b>Accessibility and UDL</b>	Generate text, audio, or visual content to accommodate different learning styles.
	Use AI for interactive simulations or activities that cater to varied learning preferences.
<b>Following Accessibility Guidelines</b>	Add descriptive text to images, structure content with headings, and use clear language.
<b>Reviewing AI-Generated Content</b>	Verify accuracy, eliminate biased language, and ensure diverse representation.
<b>Using AI to Expand, Not Restrict</b>	Foster creativity, provide detailed feedback, and encourage evaluation of AI-generated content.
<b>Compliance with ADA Rule</b>	Apply WCAG 2.1 standards, provide alternative content formats, and conduct regular accessibility audits.

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The shift toward flexible online assignments and assessments has improved accessibility and aligns with the UDL framework. These approaches benefit many learners, including:

- Those using assistive technologies.
- Students who need fewer distractions or more time to process materials.
- English-language learners and students with limited physical attendance options.

By following these guidelines, educators can use Generative AI to create an equitable and inclusive learning environment for all students.



## Defining Original Work in the AI Era

While AI technologies can support students throughout the creative and research process—helping to generate ideas, conduct research, or refine drafts—the ultimate responsibility for creating original work rests with each student. Educators play a pivotal role in this process by guiding students and equipping them with the skills necessary to produce authentic, meaningful work.

The traditional concept of "original work" is evolving. Creativity now emerges through a dynamic, iterative partnership between humans and AI, transforming the notion of independent creation. The student's role in this partnership will be to refine, synthesize, and add a unique perspective to AI-generated content. In this evolving landscape, originality resides in the process. Critical questions arise: How effectively did the student refine the AI's contributions? Did they infuse it with a distinct perspective? The true measure of a work's value lies in its contribution to the student's learning, creativity, or problem-solving, not originality as it's traditionally been defined.

Defining original work in this AI era requires a shift in the focus from merely who authored the content to how effectively the student engaged with, transformed, and integrated AI inputs into a cohesive, thoughtful assignment submission.

Teachers should utilize innovative assessment methods—such as structured debates, presentations, and collaborative projects—that reveal how well students grasp and refine AI-generated content to achieve understanding. In the AI era, traditional measures of learning, like essays, serve only as artifacts documenting a step along the learning journey; they are no longer evidence of learning.

- 
- **Creativity and Innovation:** Original work typically involves the creation of new ideas, concepts, or solutions that are not derived directly from existing sources. While AI can assist in generating ideas or providing suggestions, original work requires human creativity and innovation.
  - **Independent Thought and Expression:** Original work reflects individual students' unique perspectives, insights, and interpretations. It is not merely a replication or reiteration of existing information but demonstrates independent thought and expression. (continued)

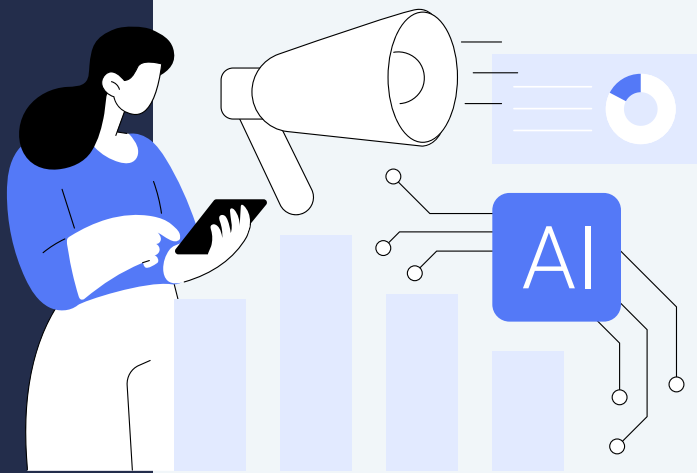
# Defining Original Work in the AI Era

- **Critical Thinking and Problem-Solving:** Original work involves the application of critical thinking skills to analyze, evaluate, and solve problems in novel ways. Students must demonstrate their ability to engage with complex issues and develop reasoned arguments or solutions.
- **Evidence of Research and Scholarship:** Original work should be supported by evidence from credible sources and demonstrate a thorough understanding of the relevant literature or field of study. Students should be able to integrate and synthesize existing knowledge with their contributions effectively.
- **Ethical Considerations:** Students should adhere to ethical standards and academic integrity principles when creating original work. These standards include correctly citing sources, avoiding plagiarism, and respecting the intellectual property rights of others.
- **Expression of Originality:** The work should bear the unique stamp or signature of the creator's style, voice, or vision, distinguishing it from the work of others.
- **Transformation:** In some cases, original work may involve transforming or adapting existing ideas or materials. However, the resulting work should exhibit sufficient originality and creative input to be considered distinct from its sources.

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Following these expectations will result in students' ability to create work that demonstrates mastery of content and upholds the values of honesty, fairness, and responsibility in their academic endeavors.





# Implementation Strategy

Implementing Generative AI within OCPS requires thoughtful consideration of both policy frameworks and community involvement. This section outlines practical approaches and steps

for developing comprehensive AI policies while fostering meaningful stakeholder engagement. Through established guidelines for original work attribution and AI citation, along with structured processes for addressing ethical concerns, OCPS can create a foundation for responsible AI use. The framework presented here emphasizes interdisciplinary collaboration, ensuring that AI integration aligns with organizational and community values while supporting innovation across different domains.

## Acceptable Use & Communication

01

District AI Advisory Team

02

Superintendent Advisory Committees

03

School Board Retreat

04

School Board Presentation

05

Website Development

## Academic Integrity, Ethical Use & Teacher Resources

01

Professional Development Planning

02

Staff Training

## Infrastructure, Access, Cybersecurity & Data Governance

01

Review Privacy Agreements of All Vendors

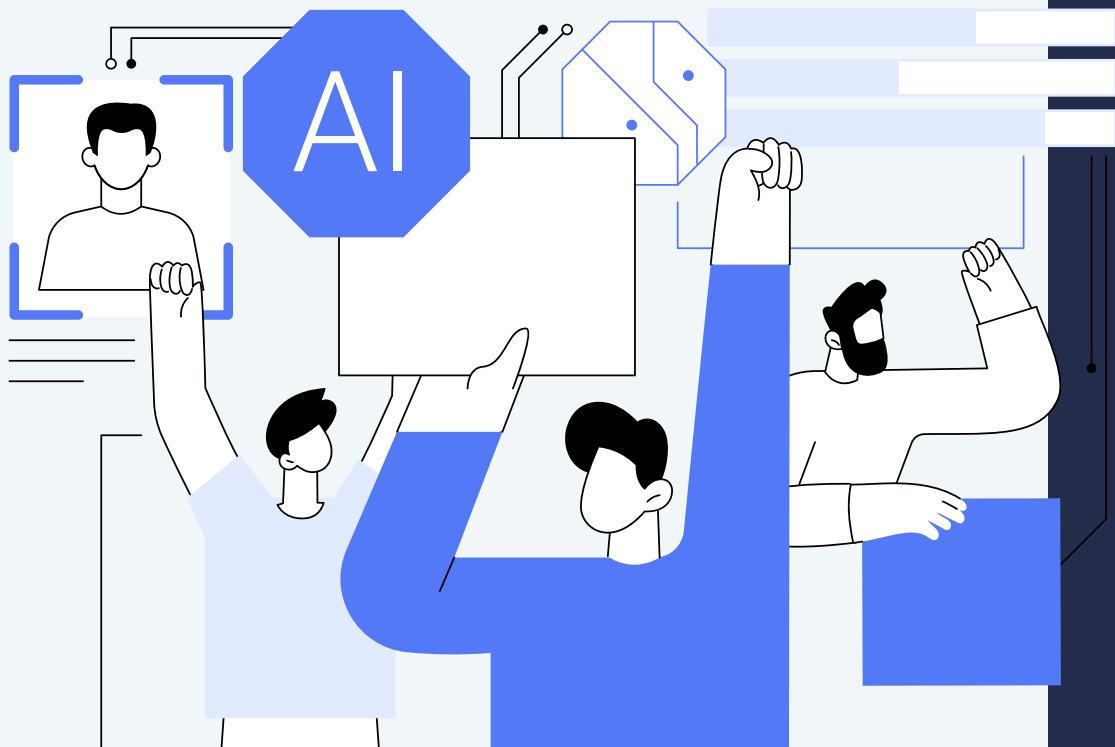
02

Review AI Products

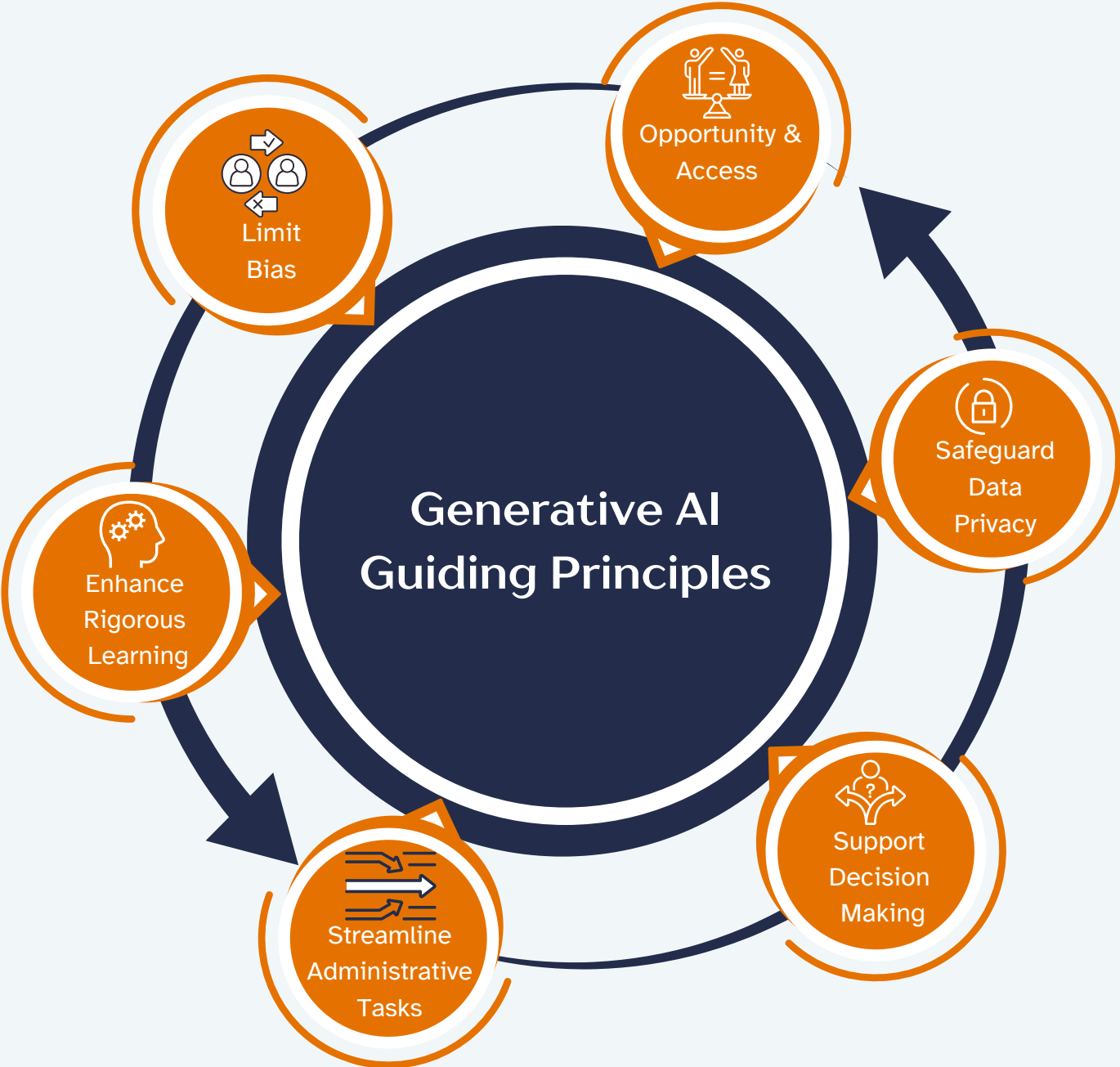
# Conclusion

The successful integration of Generative AI within Orange County Public Schools depends not only on a robust policy framework but also on the active engagement of all stakeholders. Teachers, administrators, students, families, and community partners each play a vital role in shaping an environment where AI tools are used ethically and effectively. By fostering open communication, encouraging collaboration, and addressing concerns proactively, stakeholders can collectively navigate the opportunities and challenges posed by AI in education.

This collaborative approach ensures that AI is harnessed to enhance learning experiences, streamline processes, and support data-driven decision-making while safeguarding equity, accessibility, and privacy. Together, we can build a dynamic and inclusive educational ecosystem that prepares students for the future while honoring the values and aspirations of our school community.



# Appendix



MEMO

To: All Vendors

From: Daniel Hornick, K-12 Superintendent

Subject: Notice of District Expectations Regarding Integrated Generative AI in Vendor Products

Dear Vendors,

I hope this message finds you well. As the K-12 Superintendent at Orange County Public Schools, I am writing to outline my District's expectations to ensure compliance with student data privacy laws and contractual obligations. This is a crucial matter concerning the possibility of integrating Generative Artificial Intelligence (AI) into your current digital resources. We value the partnerships we have established with our vendors and believe that technological advancements can significantly enhance the learning experiences of our students. However, before any further steps are taken, we must confirm your services align with the expectations listed in this notice.

It has come to our attention that some vendors are exploring the incorporation of generative AI into their products, even though the existing contracts with our school district were based on the understanding that such technology was not present. As the custodians of our students' data, we must be vigilant in safeguarding their privacy and adhering to the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and the Children's Internet Protection Act (CIPA).

Student information collected under FERPA is only permitted for educational purposes within the scope of the services covered in an agreement between a school district and a vendor. Given the nature of generative AI, information collected may be used to enhance its knowledge base and develop a stronger product. This use goes beyond what is permitted under FERPA and therefore, may require the District to obtain parental consent before allowing any student to use technology with generative AI.

In light of this, we require the following actions from all vendors who have entered contracts with Orange County Public Schools for the provision of digital resources:

- **Advance Notice of Intent:** Any vendors contemplating the introduction of generative AI into their products must provide written notice of their intentions to our office. This notification should be given as early as possible in the development process. Updating Terms and Conditions is not sufficient notice. The District must inform parents of a service that utilizes, or plans to utilize, generative AI and therefore requires vendors to provide direct notice to the District.
- **Details of Integration:** Vendors must furnish a clear description of how generative AI will be integrated into their solutions, outlining its intended purpose, functionality, and potential benefits for our students and educators. This is necessary for the District to obtain informed consent from parents for their children to use services with generative AI.

- **Data Privacy and Security:** Comprehensive details of the data privacy and security measures implemented to protect student information must be provided. These measures must align with FERPA, COPPA, and CIPA requirements.
- **Opt-out Mechanism:** Vendors should incorporate an opt-out mechanism within their generative AI features, allowing students or parents to choose not to participate in any activities involving this technology.
- **Data Retention Policy:** A clearly defined data retention policy, specifying the duration for which student data will be stored and the eventual deletion or anonymization process, must be made available.
- **Privacy Impact Assessment:** Vendors are required to conduct a Privacy Impact Assessment (PIA) to identify potential risks to student data privacy and the steps taken to mitigate these risks.

We emphasize that this is a notice of our District's expectations, and we expect full cooperation from all vendors. Failure to comply with these requirements may result in a reevaluation of our partnership with your company. We are committed to fostering positive relationships with vendors who share our dedication to protecting student data and privacy. This letter is intended to clarify and inform the district as to your use of AI technologies now, and moving forward. We respectfully request that this not be used to generate sales calls for new or developing products.

Please submit compliance reports within two weeks of receipt of this letter.

Direct any inquiries or compliance reports to our Director of Technology, Brandon Bennett at [bbennett@ocss-va.org](mailto:bbennett@ocss-va.org). Your timely response is essential, and we appreciate your understanding of the significance of this matter.

Thank you for your attention to this important issue and for your ongoing commitment to providing high-quality educational resources to our students.

Sincerely,

Dan Hornick, Ed.D.  
K-12 Superintendent  
Orange County Public Schools