

522.74 – STAFF USE OF EMERGING TECHNOLOGY INCLUDING ARTIFICIAL INTELLIGENCE

I. Foundational Principles and Expectations Related to Staff Use of Generative Artificial Intelligence Tools and Services

A. For All Employees

When making decisions about whether and how to use generative AI tools, **all District employees** are expected to use sound professional judgment that is grounded in District policies and guidelines, responsible use, ethical practices, and legal compliance, specifically applying the following foundational principles:

- Respect for and appropriate protection of (1) personal information relating to any individual and (2) other sensitive District data, recognizing that adhering to legal confidentiality requirements is a necessary, but not always sufficient analysis of relevant data privacy considerations.
- Respect for other parties' legal rights and legal interests. This includes, for example, (1) adhering to the terms of use that apply to an AI tool/application, and (2) adhering to restrictions on the use of copyright-protected content as AI input.
- Personal accountability for (1) the use of AI tools for District purposes, (2) reviewing and validating the output of AI tools (e.g., for accuracy, reliability, the absence of harmful bias, and overall appropriateness), and (3) the ultimate decision to use, or not use, AI-generated information/content.
- Transparency and disclosure. For example, employees are expected to (1) appropriately inform supervisors and other members of the school community of AI use when failing to do so would be materially misleading, (2) give appropriate attribution/acknowledgement to AI sources consistent with prevailing professional standards and the AI tool's terms of use, and (3) not implicitly or explicitly misrepresent AI-generated information/content as the staff member's independent work product.
- Consultation and communication with supervisors, also involving other administrators as needed, as the appropriate way to approach (1) exploring possible new uses of AI tools for job-related purposes, (2) validating appropriate authorization, and (3) raising concerns or resolving questions about AI technology and/or applicable District guidelines, rules, and expectations.

B. Additional Expectations that Apply Primarily to Instructional Staff

The following additional foundational expectations apply primarily to teachers and other staff members with responsibilities that are directly related to student instruction. With support provided through professional development and other resources, the District expects **instructional staff** to:

- Ensure that any use of AI tools for instructional purposes is grounded in the District's academic standards, the District-adopted curriculum, and sound pedagogical practice.
- Model the responsible and ethical use of AI for students.
- Monitor and, as needed, adjust instructional practices so that generative AI tools enhance and support, rather than interfere with or supplant, student learning.
- Develop students' AI literacy as a specific curriculum objective.

- For example, staff who are providing instruction to students on the safe and responsible use of technology are expected to incorporate AI literacy topics into such instruction in a manner that is age and context appropriate. Such instruction is not limited to issues associated with academic integrity, but also extends to (1) issues related to the ethical and appropriate use of AI technology, including identifying known limitations of AI tools; (2) identifying situations in which students directly and indirectly encounter AI technology in varying contexts; and (3) issues related to safety, privacy, misinformation, deception, bias, and fraud that students can encounter across multiple settings when using AI tools or due to the use of AI tools by others.
- In a manner that is appropriate for the age of the students and other situation-specific factors, inform students of expectations and rules surrounding the use of AI for academic work.
- Avoid directing, encouraging, or facilitating student use of generative AI tools when there is any doubt as to whether the specific tool/application/service or the specific use has been sufficiently vetted and authorized.

II. Further Application of the Foundational Principles and Expectations

Overview. The following more detailed rules and guidelines are intended to help employees operationalize the general principles and expectations listed above. In some cases, these additional rules and guidelines eliminate or significantly confine employee discretion, such as by prohibiting certain uses of generative AI or by restricting certain uses to AI tools/applications/services that have been expressly approved by the District.

Requests for Exceptions. If any District employee believes that it may be appropriate for the District to consider allowing an exception to a rule, guideline, or expectation found in this document, the employee may submit a request for an exception to the building principal. Except as otherwise provided in these guidelines, any such exception must be expressly approved by the District Administrator, and decisions will be based on a determination as to whether the requested exception would be (1) lawful, (2) aligned with current District goals and priorities and the foundational principles outlined above, and (3) otherwise in the District's best interests.

A. Prohibited Uses of Generative AI

The table below identifies various uses of generative AI that are generally prohibited, although sometimes limited exceptions may apply. If any one of the prohibited uses applies to a potential use of an AI tool, then the potential use is a prohibited use.

It is not possible to list and expressly prohibit all inappropriate uses of generative AI tools. (For example, it is not possible to identify all types of private/sensitive data that employees should not use as data input to an AI tool.) Staff are still expected to apply sound professional judgment in all circumstances, as further described in Section I, above.

If a specific exception is not currently included in the "Exceptions" column, that does not prevent an employee from seeking approval for an exception (whether on a one-time basis or for possible inclusion in a future revision of these guidelines). **The process for requesting additional exceptions is described above.**

Prohibited/Restricted Uses Applicable to All Staff	
Generally Prohibited Uses of AI	Exceptions (if any)
Staff may not use generative AI in a manner that violates any state or federal law or applicable District policies or guidelines.	• There are no exceptions to applicable legal requirements. • To the extent a District policy or guideline expressly addresses exceptions and exception-approval authority, an employee may seek such an exception under the relevant policy or guideline.
District employees may not (1) engage in or (2) direct, encourage or facilitate the use of any generative AI tool/application/service in a manner that violates the applicable terms of use/license. This includes an expectation that an employee will not authorize a student to use an AI tool for school-related purposes in a manner that the staff member knows is inconsistent with the terms of use established by the provider of the AI tool/service.	No exceptions
District employees may not use AI tools for malicious purposes, including with the intent or purpose of generating information, images, video, audio, or other content known to be or that a reasonable person should know is deceptive or otherwise harmful.	No exceptions
District employees may not (1) use the image or voice of any person as input to any AI tool, or (2) use AI to reproduce the image or voice of any person as output.	• An employee or other adult may consent to the use of the individual's own image or voice as an AI input and/or output.
As part of a prompt, data upload, or any similar instruction, request, or disclosure that an employee makes to a generative AI tool/service, no District employee may submit information from District records, or information that was obtained in the individual's capacity as a District employee, that is considered confidential due to express legal protections or that is considered sensitive to disclosure as a matter of policy or practice within the District. Examples include: 1. Personally-identifiable information from student education records as input to a generative AI tool. Note: Under applicable student confidentiality laws, records that do not include student names can still be deemed "personally identifiable" through other direct and indirect identifiers that, alone or in combination, can be linked to a specific student with reasonable certainty.	Exceptions applicable to using personally-identifiable student information as input to a generative AI tool: An exception applies to AI tools (if any) that (1) have been reviewed and approved at the District level for purposes that are expected to involve the handling or processing of such student record information that would be submitted or identified as input; (2) are subject to a FERPA-compliant contract/agreement; and (3) are used for the District-approved purpose(s). In some circumstances (e.g., upon being presented with a compelling use case for an AI tool that involves a limited number of students), the District Administrator or an administrative-level designee may approve exceptions that rely on parent consent.

2. Any individual's patient health care records, protected health information records, or any excerpts from such records to the extent the information is or reasonably could be traced or linked to the individual due to direct or indirect identifiers. 3. Certain personally-identifiable information that is included in, or that relates to, District personnel/employment records, generally including (as examples) any such information that the District is prohibited from releasing in response to a request under the Wisconsin Public Records Law or that the District is prohibited from releasing directly to the employee under section 103.13 of the Wisconsin Statutes. 4. Certain data or information that, if disclosed or disseminated in a manner outside of the District's direct control, would constitute an unlawful disclosure, compromise the privileged status of the information (e.g., an attorney-client privilege), unreasonably compromise the safety or privacy of any person, or constitute a security risk for the District.	No other established exceptions.
District employees shall not transmit or otherwise use as input to an AI service/tool content that is the intellectual property of a non-District third party, including material that is subject to copyright protection. Note: <i>Copyright protection attaches automatically once a creative work is "fixed" (e.g., once it is written down, drawn, recorded, etc.). There is no requirement to either register a work or display the copyright symbol on a work in order to establish copyright protection. Much of the content that is available on the public internet is still protected by copyright.</i>	Exceptions apply to: ● Content used with the express permission of the owner/rights holder, including under a license. ● Content that is in the public domain due to the age of the content or because the owner of the rights has dedicated the content to the public domain. ● Official government publications. ● Obtaining advance administrative approval based on a determination by the building principal that both of the following apply: (1) it is substantially more likely than not that the "fair use" exception to infringement applies; and (2) the applicable AI tool's terms of service allow input that is being used under a "fair use" justification.
In place of ultimate human decisions and judgment, District employees shall not defer to AI tools to perform job-related responsibilities that call for the application of considered judgment and that have tangible consequences for others. Examples include relying on AI output in place of human judgment to (1) make certain employment-related decisions, such as	No established exceptions. SPECIFIC EXPECTATION REGARDING DETECTION OF PLAGIARISM/ACADEMIC MISCONDUCT: An employee who believes there is a basis for using an AI tool as a "detector" of possible plagiarism or some other form of possible academic misconduct is expected to first contact and work with the applicable school principal, involving other administrators as

determining performance evaluations or consequences for job-related misconduct; (2) assign final student grades or assessment outcomes that involve any degree of subjective analysis; or (3) serve as the sole or primary basis for a conclusion that a student engaged in plagiarism or other forms of academic dishonesty (including improperly using AI).	needed, to address the specific situation. At this time, the use of such detector tools is not a favored practice and teachers may not engage in such use of AI tools without supervisory approval and direction.
Employees shall not use AI tools in a manner that directly conflicts with formally-established District procedures or supervisory directives for accomplishing work-related tasks, even if an AI tool has features or capabilities that could be used in place of or as a supplement to such established procedures or directives.	Exceptions may be approved at the discretion of the relevant supervisor.
Restrictions on Staff Directing, Encouraging, or Facilitating Student Use of AI Tools (these will be primarily applicable to instructional staff)	
Generally Prohibited Uses	Exceptions (if any)
District employees shall not direct, encourage, or facilitate the use of any generative AI services by students in a manner that would violate the age restrictions or parent permission requirements established by the service provider.	No exceptions.
District employees shall not direct, encourage, or facilitate the student use, at ANY age or grade level , of ANY account-based generative AI service/tool/application unless an exception applies. <i>Note: An account-based AI service, tool, or application means any AI service that requires the user to establish and use an individual or organizational account with login credentials.</i>	Exceptions apply if: • The tool/service/application has been expressly approved and made available to staff and students by the District for use as part of the District's curriculum, its instructional programs, or other District-sponsored activities for students. – The building principals have authority to evaluate and approve specific AI tools/services and specific uses that serve as an exception to this general prohibition. – Approval may be considered on a District-wide or school-wide basis or for more limited groups (e.g., an individual high school course or a pilot project). – In general, specific approvals are unlikely to be granted for any students who are under 13 years of age. Therefore, specific approvals are most likely to apply to high school grades. – Approval may be subject to specific conditions, such as obtaining parent consent/permission.

	● An AI tool that has been approved as assistive technology for an individual student based on special needs (e.g., assistive technology for a student with a disability, as required by an IEP or Section 504 plan). ● An AI feature is incidental to the main purpose of some other District-approved account-based service used by students.
District employees shall not direct, encourage, or facilitate the use of any generative AI services that are not account-based by students who are under age 13 unless an exception applies.	Exceptions apply if: ● The tool/service has been expressly approved and made available to staff and students by the District for use as part of the District's curriculum, its instructional programs, or other District-sponsored activities for students. ● Employees may direct or allow students to access generative AI features of a more general, age-appropriate website or internet service that a student is reasonably expected to use for school purposes, where the use of the generative AI features is incidental to some other purpose (such as generative AI features of an internet search engine) and the use does not require a service-specific user account or the disclosure of any personal information by the user. ● An AI tool that is approved assistive technology for an individual student based on special needs (e.g., assistive technology for a student with a disability, as required by an IEP or Section 504 plan).
District employees shall not direct, encourage, or facilitate the use of any generative AI services that are not account-based by students who are age 13 or older unless an exception applies.	Exceptions apply if: ● Any of the exceptions applicable to such student use by students under age 13 applies (see above); or ● The employee has received a supervisory administrator's approval at the building/school level or at the District level.

B. Additional Conditions/Expectations that Apply to Staff Use of Generative AI Tools

Assuming that the staff member is applying the foundational principles and exceptions identified in Section I of these guidelines (above) and not engaging in any prohibited use of AI, the employee may have authority to use an AI tool for a work-related purpose. Staff are expected to be aware of and adhere to the additional general conditions and expectations for responsible use of generative AI tools that are listed in the table below.

When Using AI for a Work-Related Purpose:	
Do This...	But ...
Use Sound Judgement Grounded in the Foundational Principles Identified in Subsections I.A and I.B. of these Guidelines. This includes the principles of (1) respect for and proper treatment of confidential or otherwise private or sensitive data/information; (2) respect for other parties' legal rights and legal interests; (3) accountability for both AI inputs and outputs (e.g., evaluating accuracy, reliability, and overall appropriateness); (4) transparency and disclosure; and (5) supervisory consultation and communication.	Do not engage in a use that is identified as a prohibited use within these guidelines (see above) without obtaining express approval of an exception in advance.
Obtain and Use a Work-Based User Account. For account-based AI services, work with an appropriate supervisor to obtain permission to establish or obtain a user account for job-related purposes that uses District credentials and District contact information (e.g., the employee's district email address, school/office address, etc.). If the District has an organizational/business account for a tool, staff user accounts should be created and maintained as sub-accounts under the District account to the extent available.	Do not: ● Share individual account credentials with another person. ● Delete a work-based account for an AI tool without appropriate permission/authority. ● Use a personal/home account for an AI service/application for work-related purposes. ● Use a work-based AI account for personal/home purposes. ● Create an organization-level account (i.e., business account) for the District without the approval of the District Administrator or his/her administrative-level designee.
Obtain Authorization for Use of AI Tools/Services that Involve Fees/Subscriptions/Charges. Obtain appropriate approval before establishing a user account for or using an AI service/tool/application for which the District will incur any costs (e.g., fees, subscriptions, etc.) that have not already been authorized.	
Address Records Retention. Evaluate and address the need to retain relevant records of AI-generated information/content that has been used for an official, job-related purpose.	Do not: ● Assume that the AI tool or service will adequately retain relevant records for a sufficient period of time. ● Delete/destroy any records associated with an AI tool that are subject to District retention requirements. ● Delete accounts associated with an AI tool that will result in the destruction or loss of access to the records associated with that account.

C. Generally Allowable Staff Uses of Generative AI

Assuming that the staff member is applying the foundational principles and expectations identified in Section I of these guidelines, not engaging in any use of AI prohibited under subsection II.A., and adhering to the additional conditions specified in subsection II.B., the table in this subsection identifies multiple examples of staff uses of generative AI tools that are considered **generally allowable**. The list is not intended to be exhaustive. If an employee has a suggestion for an addition to the list, please contact the building principal.

Identification of Required or Preferred Tools:

- When an item in the table below is accompanied by identification of one or more “**required**” AI tools, the only option is to use one of the required tools.
- When an item in the table below is accompanied by identification of one or more “**preferred**” AI tools, it means that prior to using a different AI tool in place of any such District-approved tool for the relevant purpose(s), an employee is expected to seek and obtain advance District approval from an administrative-level supervisor. There should be a reasonably compelling reason to support the use of a non-preferred AI tool in place of a vetted, preferred tool.
- When **neither** any required tools **nor** any preferred tools have been identified, then an employee has discretion to select and use a tool, subject to the remainder of this guidance document. Employees may always seek supervisory input and direction rather than making the decision on their own.

Generally Allowable Uses Applicable to All Staff	
Description of Use	Required or Preferred AI Tool(s) (if any); Other Notes
Assisting with general research needs.	No Required or Preferred tool(s) have been identified.
Brainstorming/idea generation.	No Required or Preferred tool(s) have been identified.
Assisting with the drafting, refining, and formatting of general class/school/district communications, including emails, newsletters, school announcements, website content, social media content, presentation slides, etc.	No Required or Preferred tool(s) have been identified.
Creating graphics, images, and video to use with district communications, publications, internet sites, or similar purposes.	No Required or Preferred tool(s) have been identified.
Language translation, with particular attention given to (1) the foundational principle of accountability for accuracy/reliability, and (2) restrictions that may apply due to copyright protection.	No Required or Preferred tool(s) have been identified.
Summarizing lengthy or complex material, with particular attention to restrictions that may apply due to copyright protection.	No Required or Preferred tool(s) have been identified.
Generating computer code or checking code for errors.	No Required or Preferred tool(s) have been identified.
Conducting data analysis (assuming de-identified, non-sensitive data sets)	No Required or Preferred tool(s) have been identified.

Generally Allowable Uses Applicable Especially to Instructional Staff	
Description of Use	Required or Preferred AI Tool(s); Other Notes
To assist with the development of curricular materials and/or supplemental instructional materials (e.g., practice sets, exemplars, quizzes and other assessments, and content review tools) in a manner consistent with district policies and procedures for the selection, evaluation, and approval of such materials. This includes creating materials used to assist the teacher in providing differentiated instruction that meets the needs of individual learners.	No Required or Preferred tool(s) have been identified. Note: <i>All educational materials created through generative AI tools must be reviewed by a qualified staff member before use/distribution to ensure accuracy, validity, overall appropriateness, and alignment with the District's curriculum and academic standards.</i>
To assist with creating lesson plans, unit plans, substitute teacher plans, rubrics, and identifying and structuring instructional activities within lesson plans	No Required or Preferred tool(s) have been identified.
To conduct in-class activities or demonstrations that involve a staff member using an AI application in "real time" with a student audience, provided that the staff member has (1) reviewed the AI tool and previewed/tested the intended use for appropriateness in advance; and (2) addressed records retention procedures (e.g., for instructional materials).	No Required or Preferred tool(s) have been identified.
Using an AI tool to assist with the evaluation of student work, provided that either Option 1 or Option 2 is satisfied: ● OPTION 1: All of the following apply: (1) students and parents have been informed in advance that the teacher intends to use AI to help evaluate and provide feedback on certain academic work; (2) students and parents have been informed of procedures they can use to opt-out of the use of AI to provide feedback; and (3) unless the District expressly identifies a specific AI tool for which it is unnecessary to do so, the staff member removes personal identifiers from the student's work prior to using the work as input to the AI tool. ● OPTION 2: The District identifies a specific AI tool that has been vetted for data privacy and non-disclosure limitations that are sufficient to allow teachers to use the tool to assist with the evaluation of student work, subject to any conditions that the District may identify when using the tool for such purposes.	No Required or Preferred tool(s) have been identified. SPECIFIC EXPECTATION REGARDING DETECTION OF PLAGIARISM/ACADEMIC MISCONDUCT: An employee who believes there is a basis for using an AI tool as a "detector" of possible plagiarism or some other form of possible academic misconduct is expected to first contact and work with the applicable school principal, involving other administrators as needed, to address the specific situation. At this time, the use of such detector tools is not a favored practice and teachers may not engage in such use of AI tools without supervisory approval and direction.

III. Other General Provisions and Clarifications Regarding the Scope and Intent of this Document

1. Subject to any other general District policies and rules that may apply (e.g., academic integrity standards, student record confidentiality policies, anti-harassment policies, and rules related to the responsible use of technology) the expectations, rules, and procedures found in this document:
 - a. Are not intended to prevent or unreasonably interfere with staff or student use of standard internet search tools or web browsers that, even when a user is not authenticated through individual account credentials, incorporate some AI-enabled functions, features, or services. For example, the disclosure obligations established in this document related to an employee's use of content obtained from a generative AI tool shall not be interpreted to apply to conducting general internet searches or to the use of internet search results. (Note: Accountability for content review and for citation or attribution to source material may still be necessary or appropriate under prevailing professional or academic standards.)
 - b. Are not intended to prevent staff or students from using District-approved online learning platforms that may incorporate some AI-enabled functions, features, or services in connection with providing or performing the educational function(s) for which such platforms have been approved and implemented by the District.
 - c. Are not intended to require staff to respond to or prohibit a student's use of AI tools, at the student's independent initiative, in a manner that supplements the student's learning and that does not violate the rules/expectations/instructions for a particular assignment, project, activity, or assessment.
2. The District reserves the right to monitor and investigate staff use of generative AI tools for work-related purposes. To the extent consistent with applicable law:
 - a. Staff do not have an expectation of privacy in connection with any District-issued accounts for AI services or any accounts created under District credentials. Unless prohibited by the AI tool provider's terms of use, any such account shall be considered an account created in an employment capacity on behalf of the District for the employee's employment-related use, rather than a personal internet account. The District may control, use, or require the employee to relinquish his or her access to such accounts.
 - b. The District reserves all lawful discretion to investigate any use of generative AI technology by an employee that has a sufficient work-related nexus.
3. Violations of the rules, expectations, and guidelines established in this document are subject to supervisory evaluation and possible disciplinary consequences.

Approved: February 18, 2026