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4:10 Fiscal and Business Management

The Superintendent is responsible for the School District's fiscal and business management. This responsibility includes annually preparing and presenting the District's statement of affairs to the School Board and publishing it before December 1 as required by State law.

The Superintendent shall ensure the efficient and cost-effective operation of the District's business management using computers, computer software, data management, communication systems, and electronic networks, including electronic mail, the Internet, and security systems. Each person using the District's electronic network shall complete an *Authorization for Access to the District's Electronic Network*.

Budget Planning

The District's fiscal year is from July 1 until June 30. The Superintendent shall present to the Board, no later than the first regular meeting in August, a tentative budget with appropriate explanation. This budget shall represent the culmination of an ongoing process of planning for the fiscal support needed for the District's educational program. The District's budget shall be entered upon the Ill. State Board of Education's (ISBE) *School District Budget Form*. To the extent possible, the tentative budget shall be balanced as defined by ISBE guidelines. The Superintendent shall complete a tentative deficit reduction plan if one is required by ISBE guidelines.

Preliminary Adoption Procedures

After receiving the Superintendent's proposed budget, the Board sets the date, place, and time for:

1. A public hearing on the proposed budget, and
2. The proposed budget to be available to the public for inspection.

The Board Secretary shall arrange to publish a notice in a local newspaper stating the date, place, and time of the proposed budget's availability for public inspection and the public hearing. The proposed budget shall be available for public inspection at least 30 days before the time of the budget hearing.

At the public hearing, the proposed budget shall be reviewed, including the cash reserve balance of all funds held by the District related to its operational levy and, if applicable, any obligations secured by those funds, and the public shall be invited to comment, question, or advise the Board.

Final Adoption Procedures

The Board adopts a budget before the end of the first quarter of each fiscal year, September 30, or by such alternative procedure as State law may define. To the extent possible, the budget shall be balanced as defined by ISBE; if not balanced, the Board will adopt a deficit reduction plan to balance the District's budget within three years according to ISBE requirements.

The Board adopts the budget by roll call vote. The budget resolution shall be incorporated into the meeting's official minutes. Board members' names voting *yea* and *nay* shall be recorded in the minutes.

The Superintendent or designee shall perform each of the following:

1. Post the District's final annual budget, itemized by receipts and expenditures, on the District's Internet website; notify parents/guardians that it is posted and provide the website's address.
2. File a certified copy of the budget resolution and an estimate of revenues by source anticipated to be received in the following fiscal year, certified by the District's Chief Fiscal Officer, with the County Clerk within 30 days of the budget's adoption.
3. Ensure disclosure to the public of the cash reserve balance of all funds held by the district related to its operational levy and, if applicable, any obligations secured by those funds, at the public hearing at which the Board certifies its operational levy.
4. Present a written report that includes the annual average expenditures of the District's operational funds for the previous three fiscal years at or before the board meeting at which the Board adopts its levy. In the event the District's combined cash reserve balance of its operational funds is more than 2.5 times the annual average expenditures of those funds for the previous three fiscal years, the Board will adopt and file with ISBE a reserve reduction plan by December 31.
5. Make all preparations necessary for the Board to timely file its Certificate of Tax Levy, including preparations to comply with the Truth in Taxation Act; file the Certificate of Tax Levy with the County Clerk on or before the last Tuesday in December. The Certificate lists the amount of property tax money to be provided for the various funds in the budget.
6. Submit the annual budget, a deficit reduction plan if one is required by ISBE guidelines, and other financial information to ISBE according to its requirements.

Any amendments to the budget or Certificate of Tax Levy shall be made as provided in the School Code and Truth in Taxation Act.

Budget Amendments

The Board may amend the budget by the same procedure as provided for in the original adoption.

Implementation

The Superintendent or designee shall implement the District's budget and provide the Board with a monthly financial report that includes all deficit fund balances. The amount budgeted as the expenditure in each fund is the maximum amount that may be expended for that category, except when a transfer of funds is authorized by the Board.

The Board shall act on all interfund loans, interfund transfer, transfers within funds, and transfers from the working cash fund or abatements of it, if one exists.LEGAL REF.:

105 ILCS 5/10-17, 5/10-22.33, 5/17-1, 5/17-1.2, 5/17-1.3, 5/17-1.10, 5/17-2A, 5/17-3.2, 5/17-11, 5/20-5, 5/20-8, and 5/20-10.

35 ILCS 200/18-55 et seq., Truth in Taxation Law.

23 Ill.Admin.Code Part 100.

CROSS REF.: 4:20 (Fund Balances), 4:40 (Incurring Debt), 4:60 (Purchases and Contracts), 6:235 (Access to Electronic Networks)

ADMIN. PROC.: 6:235-AP1, E1 (Student Authorization for Access to the District's Electronic Networks), 6:235-AP1, E2 (Staff Authorization for Access to the District's Electronic Networks)

Adopted 4/9/24

4:15 Identity Protection

The collection, storage, use, and disclosure of social security numbers by the School District shall be consistent with State and federal laws. The goals for managing the District's collection, storage, use, and disclosure of social security numbers are to:

1. Limit all activities involving social security numbers to those circumstances that are authorized by State or federal law.
2. Protect each social security number collected or maintained by the District from unauthorized disclosure.

The Superintendent is responsible for ensuring that the District complies with the Identity Protection Act, 5 ILCS 179/. Compliance measures shall include each of the following:

1. All employees having access to social security numbers in the course of performing their duties shall be trained to protect the confidentiality of social security numbers. Training should include instructions on the proper handling of information containing social security numbers from the time of collection through the destruction of the information.
2. Only employees who are required to use or handle information or documents that contain social security numbers shall have access to such information or documents.
3. Social security numbers requested from an individual shall be provided in a manner that makes the social security number easily redacted if the record is required to be released as part of a public records request.
4. When collecting a social security number or upon request by an individual, a statement of the purpose(s) for which the District is collecting and using the social security number shall be provided. The stated reason for collection of the social security number must be relevant to the documented purpose.
5. All employees must be advised of this policy's existence, and a copy of the policy must be made available to each employee. The policy must also be made available to any member of the public, upon request.
6. If this policy is amended, employees will be advised of the existence of the amended policy and a copy of the amended policy will be made available to each employee.

No District employee shall collect, store, use, or disclose an individual's social security number unless specifically authorized by the Superintendent. This policy shall not be interpreted as a guarantee of the confidentiality of social security numbers and/or other personal information. The District will use best efforts to comply with this policy, but this policy should not be construed to convey any rights to protection of information not otherwise afforded by law.

Treatment of Personally Identifiable Information Under Grant Awards

The Superintendent ensures that the District takes reasonable measures to safeguard: (1) *protected personally identifiable information*, (2) other information that a federal awarding agency, pass-through agency or State awarding agency designates as sensitive, such as *personally identifiable information* (PII) and (3) information that the District considers to be sensitive consistent with applicable laws regarding privacy and confidentiality (collectively, *sensitive information*), when administering federal grant awards and State grant awards governed by the Grant Accountability and Transparency Act (30 ILCS 708/).

The Superintendent shall establish procedures for the identification, handling, storage, access, disposal and overall confidentiality of sensitive information. The Superintendent shall

ensure that employees and contractors responsible for the administration of a federal or State award for the District receive regular training in the safeguarding of sensitive information. Employees mishandling sensitive information are subject to discipline, up to and including dismissal.

LEGAL REF.: 2 C.F.R. §200.303(e).

5 ILCS 179/, Identity Protection Act.

30 ILCS 708/, Grant Accountability and Transparency Act.

50 ILCS 205/3, Local Records Act.

105 ILCS 10/, Illinois School Student Records Act.

CROSS REF: 2:250 (Access to District Public Records), 5:150 (Personnel Records), 7:340 (Student Records), 7:345 (Use of Educational Technologies; Student Data Privacy and Security)

Adopted 2/11/25

4:15-AP1 Administrative Procedure - Protecting the Privacy of Social Security Numbers

Much of the District's collection, storage, use, and disclosure of social security numbers apply to employee records only. But limited exceptions may exist where a school district may need to ask students or their parents/guardians to provide social security numbers. When student social security numbers are involved, consult the Board Attorney about the intersection of the Identity Protection Act (5 ILCS 179/), the Family Educational Rights and Privacy Act (20 U.S.C. §1232g), and the Ill. School Student Records Act (105 ILCS 10/).

Actor	Action
Superintendent and business manager, and their designees	Identify the approved purposes for collecting SSNs, including: 1. Employment matters, e.g., income reporting to IRS and the IL Dept. of Revenue, tax withholding, FICA, and Medicare. 2. Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, and veterans' programs. 3. Filing insurance claims. 4. Internal verification or administrative purposes. 5. Other uses authorized and/or required by State law including, without limitation, in the following circumstances (5 ILCS 179/10(c)): a. Disclosing SSNs to another governmental entity if the disclosure is necessary for the entity to perform its duties and responsibilities; b. Disclosing SSNs pursuant to a court order, warrant, or subpoena; and c. Collecting or using SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, or to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act. Identify a method for documenting the need and purpose for the SSN before its collection. 5 ILCS 179/10(b)(1). Inform all employees of the District's efforts to protect the privacy of SSNs. See exhibit 4:15-E1, *Letter to Employees Regarding Protecting the Privacy of Social Security Numbers.* While State law does not specifically require this step, the law contains mandates applicable to all employees that they need to know. Moreover, this letter provides an opportunity to increase awareness of the confidential nature of SSNs. Maintain a written list of each staff position that allows or requires access to SSNs. The existence of a written list, even though not required, is important for recordkeeping and accountability purposes.

Actor	Action
	Require that employees who have access to SSNs in the course of performing their duties be trained to protect the confidentiality of SSNs. 5 ILCS 179/35(a)(2). Direct that only employees who are required to use or handle information or documents that contain SSNs have access to such information or documents. 5 ILCS 179/35(a)(3). Require that SSNs requested from an individual be provided in a manner that makes the SSN easily redacted if the record is otherwise required to be released as part of a public records request. 5 ILCS 179/35(a)(4). Require that, when collecting SSNs or upon request, a statement of the purpose(s) for which the District is collecting and using the SSNs be provided. 5 ILCS 179/35(a)(5). See exhibit 4:15-E2, *Statement of Purpose for Collecting Social Security Numbers*. Require that, when employees who are required to use or handle information or documents that contain SSNs learn of a breach, they: 1. Notify District administrators immediately, and 2. Ensure that notifications to the proper individuals occur. Enforce the requirements in Board policy 4:15, *Identity Protection*, and this procedure.
Records Custodian and Head of Information Technology (IT)	Develop guidelines for handling social security numbers in electronic systems. These guidelines should address: 3. The display of SSNs on computer terminals, screens, and reports; 4. The security protocol for storing SSNs on a device or system protected by a password or other security system and for accessing SSNs that are included in part of an electronic database; 5. The security protocol for deleting SSNs that are stored in electronic documents or databases; and 6. Alternate mechanisms for integrating data other than the use of SSNs.
Staff Development Head	Design and execute a training program on protecting the confidentiality of SSNs for employees who have access to SSNs in the course of performing their duties. The training should include instructions on the proper handling of information that contains SSNs from the time of collection through the destruction of the information. 5 ILCS 179/35(a)(2).
Assistant Superintendents, Directors, Building Principals, and/or Department Heads	Require each staff member whose position allows or requires access to SSNs to attend training on protecting the confidentiality of SSNs. Instruct staff members whose positions allow or require access to SSNs to: 7. Treat SSNs as confidential information. 8. Never publicly post or display SSNs or require any individual to verbally disclose his or her SSN.

Actor	Action
	9. Dispose of documents containing SSNs in a secure fashion, such as, by shredding paper documents and by deleting electronic documents as instructed by the IT Department. 10. Use SSNs as needed during the execution of their job duties and in accordance with the training and instructions that they received. Instruct staff members whose positions do not require access to SSNs to notify a supervisor and/or the IT Department whenever SSNs are found in a document or other material, whether in paper or electronic form.
Freedom of Information Officer	Redact every SSN before allowing public inspection or copying of records responsive to a FOIA request. 5 ILCS 179/15.
Employees	Do not collect, use, or disclose another individual's SSN unless directed to do so by an administrator. **If the employee is in a position that requires access to SSNs:** Treat SSNs as confidential information and follow the instructions learned during training. **If the employee is *not* in a position that requires access to SSNs:** Notify his or her supervisor and/or the IT Department whenever the employee comes across a document or other material, whether in paper or electronic form, that contain SSNs.

Adopted 2/11/25

NEW

4:15-AP2 Administrative Procedure – Treatment of Personally Identifiable Information Under Grant Awards

This procedure implements identification, handling, storage, access, disposal, and the overall confidentiality of personally identifiable information under grant awards in the subhead **Treatment of Personally Identifiable Information Under Grant Awards** in Board policy 4:15, *Identity Protection*. Use it when the District is a recipient of a federal grant award or State grant award governed by the Grant Accountability and Transparency Act (GATA) (30 ILCS 708/) and, as a result, must handle personally identifiable information (defined below) in its administration of the award.

Definitions

Personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books and public Web sites. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII (or *protected personally identifiable information*) whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual. 2 C.F.R. §200.79.

Protected personally identifiable information (Protected PII) is a subset of PII; it means an individual's first name or first initial and last name in combination with any one or more types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal records, medical records, financial records, or educational transcripts. Protected PII does not include personally identifiable information that is required by law to be disclosed. 2 C.F.R. §200.82.

Safeguarding Requirement

GATA and 2 C.F.R. §200.303(e) require grant recipients to take reasonable measures to safeguard (1) *protected personally identifiable information*, (2) other information that the awarding or pass-through agency designates as sensitive, such as *personally identifiable information*, and (3) information that the District considers to be sensitive consistent with applicable laws regarding privacy and confidentiality (collectively referred to in this Procedure as *sensitive information*).

The Superintendent or designee will ensure that the District:

1. Implements reasonable security measures, such as physical and technological safeguards, for the protection of sensitive information that meets or exceeds industry standards designed to protect such information from unauthorized access, destruction, use, modification, or disclosure.
2. Complies with all applicable laws, such as the Identity Protection Act (5 ILCS 179/) (IPA), Personal Information Protection Act (815 ILCS 530/10) (PIPA) and Student Online Personal Protection Act (105 ILCS 85/27, added by P.A. 101-516, eff. 7-1-21) (SOPPA) in the event of a breach of sensitive information.

3. Notifies, if appropriate, members of the school community impacted by a breach when notification is not specifically required by law.
4. Educates staff members involved in the administration of grants that in addition to federal regulation 2 C.F.R. §200.303(e) and the terms of a specific award, multiple laws may apply to personally identifiable information, depending upon the type of information/record including: IPA (5 ILCS 179/), PIPA (815 ILCS 530/), Family Educational Rights and Privacy Act, (20 U.S.C. 1232g), Ill. School Student Records Act (105 ILCS 10/), SOPPA (105 ILCS 85/, amended by P.A. 101-516, eff. 7-1-21), Personnel Record Review Act (820 ILCS 40/), and Local Records Act (50 ILCS 205/3).
5. Consults with the Board Attorney as needed to ensure compliance.

Relevant Board Policies and Administrative Procedures for Handling of *Sensitive Information*

The following Board policies and procedures also address and govern the District's identification, handling, storage, access, disposal, and overall confidentiality of certain types of sensitive information:

1. 2:220, *School Board Meeting Procedure*, and Exhibit, 2:220-E8, *School Board Records Maintenance Requirements and FAQs*, address storage, access, and destruction of meeting minutes, including closed meeting minutes and verbatim recordings.
2. 2:250, *Access to District Public Records*, addresses providing access to public records in response to Freedom of Information Act requests and the preservation and destruction of public records under the Local Records Act. 2:250-AP2, *Protocols for Record Preservation and Development of Retention Schedules,* also addresses the preservation and destruction of public records under the Local Records Act.
3. 4:15, *Identity Protection,* specifically requires the District to safeguard sensitive information under grant awards.
4. 4:80-AP1, *Internal Controls Checklist*, requires the District to protect assets, including technology and electronic systems from loss or misuse.
5. 5:120-AP2, *Employee Conduct Standards*, requires all District staff members to respect the confidentiality of student and personal records and other information covered by confidentiality agreements.
6. 5:130, *Responsibilities Concerning Internal Information*, requires all District employees to maintain the integrity and security of all internal information and the privacy of confidential records.
7. 5:150, *Personnel Records*, and 5:150-AP1, *Personnel Records*, address the identification, storage, and access to personnel records.
8. 6:235, *Access to Electronic Networks,* requires all users of the District's electronic networks to maintain the confidentiality of student information
9. 6:235-AP1, *Acceptable Use of District's Electronic Networks*, requires all users of the District's electronic networks to take steps to safeguard their integrity and security.
10. 7:340, *Student Records*, along with 7:340-AP1, *School Student Records*, and 7:340-AP2, *Storage and Destruction of School Student Records,* address the District's legal obligations regarding the identification, confidentiality, safeguarding, access, and disposal of school student records.

Disposal of Sensitive Information

When disposal of sensitive information is authorized by law and/or Board policy, the Superintendent or other administrator overseeing the administration of the grant award will ensure the District follows the disposal standard under the Personal Information Protection Act (815 ILCS 530/40) and renders the information unreadable, unusable, and undecipherable.

Training for Employees and Contractors

District employees and contractors responsible for the administration of a federal or State award for the District will receive training on the safeguarding of sensitive information.

The Superintendent or designee will ensure:

1. Employees receive training upon their assignment to perform work under the award and then on a bi-annual basis thereafter, until the award is concluded or an employee's involvement in the award is complete, whichever is earlier. The training shall include education on this procedure and the District's policies and procedures listed above that govern the District's handling of sensitive information for various types of information/records.
2. Documentation of employee training on the handing of personally identifiable information is maintained, including the dates(s) of the training and attendance/completion of the training.
3. District contractors performing work under the grant award regularly receive training from the District or other comparable training on the management of sensitive information.

Resources

Ill. State Board of Education –

Checklist for Protection of Personally Identifiable Information, available at www.isbe.net/Pages/Audit-and-Monitoring-Review-Requirements-and-Tools.aspx.

U.S. Dept. of Education –

Privacy Technical Assistance Center's Protecting Student Privacy Service, at www.studentprivacy.ed.gov.

Ill. Attorney General –

www.illinoisattorneygeneral.gov/consumers/hotline.html#dbreport.

Adopted 2/11/20

4:15-E1 Exhibit - Letter to Employees Regarding Protecting the Privacy of Social Security Numbers

On District Letterhead

Date

Re: Protecting the Privacy of Social Security Numbers (SSNs)

The Illinois Identity Protection Act, 5 ILCS 179/, contains requirements applicable to school districts and their employees. This letter's purpose is to help you understand the protections and requirements of this law.

In implementing this law and the Board's policy, I am seeking to:

1. Increase the awareness of the confidential nature of the SSN and the risk of identity theft related to unauthorized disclosure;
2. Have every employee understand that he or she is prohibited from collecting, displaying, or using another individual's SSN unless authorized by a member of the District administrative staff; and
3. Ensure the use of consistent protocol regarding SSNs throughout the District.

I have copied below sections of the Identity Protection Act that must be followed by every school employee. I have also attached the School Board's policy 4:15, *Identity Protection*. Please carefully read these documents. You will be contacted if you are scheduled to receive training on the protocol for collecting, using, maintaining, and disclosing SSNs.

An employee who has substantially breached the confidentiality of social security numbers may be subject to disciplinary action or sanctions up to and including dismissal, in accordance with District policy and procedures.

Sincerely,

Superintendent

****

Attachment #1: Relevant Sections from the Identity Protection Act, 5 ILCS 179/

Section 10. Prohibited Activities.

(a) Beginning July 1, 2010, no person or State or local government agency may do any of the following:

(1) Publicly post or publicly display in any manner an individual's social security number.

(2) Print an individual's social security number on any card required for the individual to access products or services provided by the person or entity.

(3) Require an individual to transmit his or her social security number over the Internet, unless the connection is secure or the social security number is encrypted.

(4) Print an individual's social security number on any materials that are mailed to the individual, through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the social security number to be on the document to be mailed. Notwithstanding any provision in this Section to the contrary, social security numbers may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the Unemployment Insurance Act, any

material mailed in connection with any tax administered by the Department of Revenue, and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the social security number. A social security number that may permissibly be mailed under this Section may not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope or be visible on an envelope without the envelope having been opened.

(b) Except as otherwise provided in this Act, beginning July 1, 2010, no person or State or local government agency may do any of the following:

(1) Collect, use, or disclose a social security number from an individual, unless (i) required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the social security number is otherwise necessary for the performance of that agency's duties and responsibilities; (ii) the need and purpose for the social security number is documented before collection of the social security number; and (iii) the social security number collected is relevant to the documented need and purpose.

(2) Require an individual to use his or her social security number to access an Internet website.

(3) Use the social security number for any purpose other than the purpose for which it was collected.

(c) The prohibitions in subsection (b) do not apply in the following circumstances:

(1) The disclosure of social security numbers to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the governmental entity must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under this Act on a governmental entity to protect an individual's social security number will be achieved.

(2) The disclosure of social security numbers pursuant to a court order, warrant, or subpoena.

(3) The collection, use, or disclosure of social security numbers in order to ensure the safety of: State and local government employees; persons committed to correctional facilities, local jails, and other law-enforcement facilities or retention centers; wards of the State; and all persons working in or visiting a State or local government agency facility.

(4) The collection, use, or disclosure of social security numbers for internal verification or administrative purposes.

(5) The disclosure of social security numbers by a State agency to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.

(6) The collection or use of social security numbers to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the federal Gramm-Leach-Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.

(d) If any State or local government agency has adopted standards for the collection, use, or disclosure of social security numbers that are stricter than the standards under this Act with respect to the protection of those social security numbers, then, in the event of any conflict with the provisions of this Act, the stricter standards adopted by the State or local government agency shall control.

Section 15. Public inspection and copying of documents.

Notwithstanding any other provision of this Act to the contrary, a person or State or local government agency must comply with the provisions of any other State law with respect to allowing the public inspection and copying of information or documents containing all or any portion of an individual's social security number. A person or State or local government agency must redact social security numbers from the information or documents before allowing the public inspection or copying of the information or documents.

Section 20. Applicability.

(a) This Act does not apply to the collection, use, or disclosure of a social security number as required by State or federal law, rule, or regulation.

(b) This Act does not apply to documents that are recorded with a county recorder or required to be open to the public under any State or federal law, rule, or regulation, applicable case law, Supreme Court Rule, or the Constitution of the State of Illinois. Notwithstanding this Section, county recorders must comply with Section 35 of this Act.

Section 25. Compliance with federal law.

If a federal law takes effect requiring any federal agency to establish a national unique patient health identifier program, any State or local government agency that complies with the federal law shall be deemed to be in compliance with this Act.

Section 30. Embedded social security numbers.

Beginning December 31, 2009, no person or State or local government agency may encode or embed a social security number in or on a card or document, including, but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology, in place of removing the social security number as required by this Act.

Section 45. Violation.

Any person who intentionally violates the prohibitions in Section 10 of this Act is guilty of a Class B misdemeanor.

Adopted 11/9/21

4:15-E2 Exhibit - Statement of Purpose for Collecting Social Security Numbers

This Statement of Purpose is being given to you because you have been asked by the School District to provide your social security number (SSN) or because you requested a copy of this Statement.

You are being asked for your SSN for one or more of the following reasons:

- ☐ Employment matters, e.g., income reporting to IRS and the IL Department of Revenue, tax withholding, FICA, or Medicare.
- ☐ Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, or veterans' programs.
- ☐ Filing insurance claims.
- ☐ Internal verification or administrative purposes.
- ☐ Other: _____

In addition, State law authorizes and/or requires the District to use or disclose your SSN in specified circumstances including, without limitation, in the following circumstances:

1. Disclosing SSNs to another governmental entity if the disclosure is necessary for the entity to perform its duties and responsibilities;
2. Disclosing SSNs pursuant to a court order, warrant, or subpoena; and
3. Collecting or using SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, or to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act.

If you have questions or concerns, please contact *[insert contact information]*.

Adopted 11/9/21

4:15-E3 Exhibit - Statement for Employee Manual or District Website Describing the District's Purpose for Collecting Social Security Numbers

The School District treats social security numbers (SSNs) confidentially. It uses SSNs for one or more of the following reasons:

1. Employment matters, e.g., income reporting to IRS and the IL Department of Revenue, tax withholding, FICA, or Medicare.
2. Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, or veterans' programs.
3. Filing insurance claims.
4. Internal verification or administrative purposes.

In addition, State law authorizes and/or requires the District to use or disclose SSNs in specified circumstances including, without limitation, in the following circumstances:

4. Disclosing SSNs to another governmental entity if the disclosure is necessary for the entity to perform its duties and responsibilities;
5. Disclosing SSNs pursuant to a court order, warrant, or subpoena; and
6. Collecting or using SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, or to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act.

If you have questions or concerns, please contact *[insert contact information]*.

Adopted 11/9/21

4:20 Fund Balances

The Superintendent or designee shall maintain fund balances adequate to ensure the District's ability to maintain levels of service and pay its obligations in a prompt manner in spite of unforeseen events or unexpected expenses. The Superintendent or designee shall inform the Board whenever it should discuss drawing upon its reserves or borrowing money.

The School District seeks to maintain a year-end fund balance to revenue ratio of no less than 15-20 percent, as calculated under the Ill. State Board of Education's *School District Financial Profile*.

CROSS REF.: 4:10 (Fiscal and Business Management), 4:80 (Accounting and Audits)

Adopted 10/8/24

4:30 Revenue and Investments

Revenue

The Superintendent or designee is responsible for making all claims for property tax revenue, State Aid, special State funds for specific programs, federal funds, and categorical grants.

Investments

The Superintendent shall either appoint a Chief Investment Officer or serve as one. The Chief Investment Officer shall invest money that is not required for current operations, in accordance with this policy and State law.

The Chief Investment Officer and Superintendent shall use the standard of prudence when making investment decisions. They shall use the judgment and care, under circumstances then prevailing, that persons of prudence, discretion, and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the safety of their capital as well as its probable income.

Investment Objectives

The objectives for the School District's investment activities are:

1. Safety of Principal - Every investment is made with safety as the primary and over-riding concern. Each investment transaction shall ensure that capital loss, whether from credit or market risk, is avoided.
2. Liquidity - The investment portfolio shall provide sufficient liquidity to pay District obligations as they become due. In this regard, the maturity and marketability of investments shall be considered.
3. Rate of Return - The highest return on investments is sought, consistent with the preservation of principal and prudent investment principles.
4. Diversification - The investment portfolio is diversified as to materials and investments, as appropriate to the nature, purpose, and amount of the funds.

Authorized Investments

The Chief Investment Officer may invest District funds in one or more of the following:

1. Bonds, notes, certificates of indebtedness, treasury bills, or other securities now or hereafter issued, that are guaranteed by the full faith and credit of the United States of America as to principal and interest.
2. Bonds, notes, debentures, or other similar obligations of the United States of America, its agencies, and its instrumentalities.
   The term "agencies of the United States of America" includes: (a) the federal land banks, federal intermediate credit banks, banks for cooperative, federal farm credit banks, or any other entity authorized to issue debt obligations under the Farm Credit Act of 1971 and Acts amendatory thereto, (b) the federal home loan banks and the federal home loan mortgage corporation, and (c) any other agency created by Act of Congress.

3. Interest-bearing savings accounts, interest-bearing certificates of deposit or interest-bearing time deposits or any other investments constituting direct obligations of any bank as defined by the Illinois Banking Act.
4. Short-term obligations of corporations organized in the United States with assets exceeding $500,000,000 if: (a) such obligations are rated at the time of purchase at one of the three highest classifications established by at least two standard rating services and that mature not later than 270 days from the date of purchase, (b) such purchases do not exceed 10% of the corporation's outstanding obligations, and (c) no more than one-third of the District's funds may be invested in short-term obligations of corporations under this paragraph.
5. Obligations of corporations organized in the United States with assets exceeding $500,000,000 if: (a) such obligations are rated at the time of purchase at one of the three highest classifications established by at least two standard rating services and which mature more than 270 days but less than three years from the date of purchase, (b) such purchases do not exceed 10% of the corporation's outstanding obligations, and (c) no more than one-third of the District's funds may be invested in obligations of corporations under this paragraph.
6. Money market mutual funds registered under the Investment Company Act of 1940, provided that the portfolio of any such money market mutual fund is limited to obligations described in paragraph (1) or (2) and to agreements to repurchase such obligations.
7. Interest-bearing bonds of any county, township, city, village, incorporated town, municipal corporation, school district, the State of Illinois, any other state, or any political subdivision or agency of the State of Illinois or any other state, whether the interest earned is taxable or tax-exempt under federal law. The bonds shall be (a) registered in the name of the municipality, county, or other governmental unit, or held under a custodial agreement at a bank, and (b) rated at the time of purchase within the four highest general classifications established by a rating service of nationally recognized expertise in rating bonds of states and their political subdivisions.
8. Short term discount obligations of the Federal National Mortgage Association or in shares or other forms of securities legally issuable by savings banks or savings and loan associations incorporated under the laws of this State or any other state or under the laws of the United States. Investments may be made only in those savings banks or savings and loan associations, the shares, or investment certificates that are insured by the Federal Deposit Insurance Corporation. Any such securities may be purchased at the offering or market price thereof at the time of such purchase. All such securities so purchased shall mature or be redeemable on a date or dates prior to the time when, in the judgment of the Chief Investment Officer, the public funds so invested will be required for expenditure by the District or its governing authority.
9. Dividend-bearing share accounts, share certificate accounts, or class of share accounts of a credit union chartered under the laws of this State or the laws of the United States; provided, however, the principle office of any such credit union must be located within the State of Illinois. Investments may be made only in those credit unions the accounts of which are insured by applicable law.
10. A Public Treasurers' Investment Pool created under Section 17 of the State Treasurer Act. The District may also invest any public funds in a fund managed, operated, and administered by a bank, subsidiary of a bank, or subsidiary of a bank holding company or use the services of such an entity to hold and invest or advise regarding the investment of any public funds.
11. The Illinois School District Liquid Asset Fund Plus.

12. Repurchase agreements of government securities having the meaning set out in the Government Securities Act of 1986, as now or hereafter amended or succeeded, subject to the provisions of said Act and the regulations issued there under. The government securities, unless registered or inscribed in the name of the District, shall be purchased through banks or trust companies authorized to do business in the State of Illinois.

    Except for repurchase agreements of government securities that are subject to the Government Securities Act of 1986, as now or hereafter amended or succeeded, the District may not purchase or invest in instruments that constitute repurchase agreements, and no financial institution may enter into such an agreement with or on behalf of the District unless the instrument and the transaction meet all of the following requirements:

    a. The securities, unless registered or inscribed in the name of the District, are purchased through banks or trust companies authorized to do business in the State of Illinois.
    b. The Chief Investment Officer, after ascertaining which firm will give the most favorable rate of interest, directs the custodial bank to "purchase" specified securities from a designated institution. The "custodial bank" is the bank or trust company, or agency of government, that acts for the District in connection with repurchase agreements involving the investment of funds by the District. The State Treasurer may act as custodial bank for public agencies executing repurchase agreements.
    c. A custodial bank must be a member bank of the Federal Reserve System or maintain accounts with member banks. All transfers of book-entry securities must be accomplished on a Reserve Bank's computer records through a member bank of the Federal Reserve System. These securities must be credited to the District on the records of the custodial bank and the transaction must be confirmed in writing to the District by the custodial bank.
    d. Trading partners shall be limited to banks or trust companies authorized to do business in the State of Illinois or to registered primary reporting dealers.
    e. The security interest must be perfected.
    f. The District enters into a written master repurchase agreement that outlines the basic responsibilities and liabilities of both buyer and seller.
    g. Agreements shall be for periods of 330 days or less.
    h. The Chief Investment Officer informs the custodial bank in writing of the maturity details of the repurchase agreement.
    i. The custodial bank must take delivery of and maintain the securities in its custody for the account of the District and confirm the transaction in writing to the District. The custodial undertaking shall provide that the custodian takes possession of the securities exclusively for the District; that the securities are free of any claims against the trading partner; and that any claims by the custodian are subordinate to the District's claims to rights to those securities.
    j. The obligations purchased by the District may only be sold or presented for redemption or payment by the fiscal agent bank or trust company holding the obligations upon the written instruction of the Chief Investment Officer.
    k. The custodial bank shall be liable to the District for any monetary loss suffered by the District due to the failure of the custodial bank to take and maintain possession of such securities.

13. Any investment as authorized by the Public Funds Investment Act, and Acts amendatory thereto. Paragraph 13 supersedes paragraphs 1-12 and controls in the event of conflict.

Except as provided herein, investments may be made only in banks, savings banks, savings and loan associations, or credit unions that are insured by the Federal Deposit Insurance Corporation or other approved share insurer.

The Chief Investment Officer and Superintendent shall regularly consider material, relevant, and decision-useful sustainability factors in evaluating investment decisions, within the bounds of financial and fiduciary prudence. Such factors include, but are not limited to: (1) corporate governance and leadership factors, (2) environmental factors, (3) social capital factors, (4) human capital factors, and (5) business model and innovation factors, as provided under the Ill. Sustainable Investing Act, 30 ILCS 238/.

Selection of Depositories, Investment Managers, Dealers, and Brokers

The Chief Investment Officer shall establish a list of authorized depositories, investment managers, dealers and brokers based upon the creditworthiness, reputation, minimum capital requirements, qualifications under State law, as well as a long history of dealing with public fund entities. The Board will review and approve the list at least annually.

In order to be an authorized depository, each institution must submit copies of the last two sworn statements of resources and liabilities or reports of examination that the institution is required to furnish to the appropriate State or federal agency. Each institution designated as a depository shall, while acting as such depository, furnish the District with a copy of all statements of resources and liabilities or all reports of examination that it is required to furnish to the appropriate State or federal agency.

The above eligibility requirements of a bank to receive or hold public deposits do not apply to investments in an interest-bearing savings account, interest-bearing certificate of deposit, or interest-bearing time deposit if: (1) the District initiates the investment at or through a bank located in Illinois, and (2) the invested public funds are at all times fully insured by an agency or instrumentality of the federal government.

The District may consider a financial institution's record and current level of financial commitment to its local community when deciding whether to deposit funds in that financial institution. The District may consider factors including:

1. For financial institutions subject to the federal Community Reinvestment Act of 1977, the current and historical ratings that the financial institution has received, to the extent that those ratings are publicly available, under the federal Community Reinvestment Act of 1977;
2. Any changes in ownership, management, policies, or practices of the financial institution that may affect the level of the financial institution's commitment to its community;
3. The financial impact that the withdrawal or denial of District deposits might have on the financial institution;
4. The financial impact to the District as a result of withdrawing public funds or refusing to deposit additional public funds in the financial institution; and
5. Any additional burden on the District's resources that might result from ceasing to maintain deposits of public funds at the financial institution under consideration.

Collateral Requirements

All amounts deposited or invested with financial institutions in excess of any insurance limit shall be collateralized in accordance with the Public Funds Investment Act, 30 ILCS 235/. The Superintendent or designee shall keep the Board informed of collateral agreements.

Safekeeping and Custody Arrangements

The preferred method for safekeeping is to have securities registered in the District's name and held by a third-party custodian. Safekeeping practices should qualify for the Governmental Accounting Standards Board Statement No. 3, Deposits with Financial Institutions, Investments (including Repurchase Agreements), and Reverse Repurchase Agreements, Category I, the highest recognized safekeeping procedures.

Controls and Report

The Chief Investment Officer shall establish a system of internal controls and written operational procedures to prevent losses arising from fraud, employee error, misrepresentation by third parties, or imprudent employee action.

The Chief Investment Officer shall provide a quarterly investment report to the Board. The report will: (1) assess whether the investment portfolio is meeting the District's investment objectives, (2) identify each security by class or type, book value, income earned, and market value, (3) identify those institutions providing investment services to the District, and (4) include any other relevant information. The investment portfolio's performance shall be measured by appropriate and creditable industry standards for the investment type.

The Board will determine, after receiving the Superintendent's recommendation, which fund is in most need of interest income and the Superintendent shall execute a transfer. This provision does not apply when the use of interest earned on a particular fund is restricted.

Ethics and Conflicts of Interest

The Board and District officials will avoid any investment transaction or practice that in appearance or fact might impair public confidence. Board members are bound by the Board policy 2:100, *Board Member Conflict of Interest*. No District employee having influence on the District's investment decisions shall:

1. Have any interest, directly or indirectly, in any investments in which the District is authorized to invest,
2. Have any interest, directly or indirectly, in the sellers, sponsors, or managers of those investments, or
3. Receive, in any manner, compensation of any kind from any investments in that the agency is authorized to invest.

LEGAL REF.: 30 ILCS 235/, Public Funds Investment Act.

30 ILCS 238/, Ill. Sustainable Investing Act.

105 ILCS 5/8-7, 5/10-22.44, 5/17-1, and 5/17-11.

CROSS REF.: 2:100 (Board Member Conflict of Interest), 4:10 (Fiscal and Business Management), 4:80 (Accounting and Audits)

Adopted 4/9/24

4:40 Incurring Debt

The Superintendent shall provide early notice to the School Board of the District's need to borrow money. The Superintendent or designee shall prepare all documents and notices necessary for the Board, at its discretion, to: (1) issue State Aid Anticipation Certificates, tax anticipation warrants, working cash fund bonds, bonds, notes, and other evidence of indebtedness, or (2) establish a line of credit with a bank or other financial institution. The Superintendent shall notify the Ill. State Board of Education before the District issues any form of long-term or short-term debt that will result in outstanding debt that exceeds 75% of the debt limit specified in State law.

Bond Issue Obligations

In connection with the Board's issuance of bonds, the Superintendent shall be responsible for ensuring the District's compliance with federal securities laws, including the anti-fraud provisions of the Securities Act of 1933, as amended and, if applicable, the continuing disclosure obligations under Rule 15c2-12 of the Securities Exchange Act of 1934, as amended.

Additionally, in connection with the Board's issuance of bonds, the interest on which is excludable from *gross income* for federal income tax purposes, or which enable the District or bond holder to receive other federal tax benefits, the Board authorizes the Superintendent to establish written procedures for post-issuance compliance monitoring for such bonds to protect their tax-exempt (or tax-advantaged) status.

The Board may contract with outside professionals, such as bond counsel and/or a qualified financial consulting firm, to assist it in meeting the requirements of this subsection.

LEGAL REF.: 15 U.S.C. §77a et seq., Securities Act of 1933.
15 U.S.C. §78a et seq., Securities Exchange Act of 1934.
17 C.F.R. §240.15c2-12.
30 ILCS 305/2, Bond Authorization Act.
30 ILCS 352/, Bond Issue Notification Act.
30 ILCS 350/, Local Government Debt Reform Act.
50 ILCS 420/, Tax Anticipation Note Act.
105 ILCS 5/17-16, 5/17-17, 5/18-18, and 5/19-1 et seq.

CROSS REF.: 4:10 (Fiscal and Business Management)

ADMIN. PROC.: 4:40-AP (Preparing and Updating Disclosures)

Adopted 2/11/25

4:40-AP Administrative Procedure - Preparing and Updating Disclosures

This sample administrative procedure has been adapted and printed with the express permission of Chapman and Cutler LLP. Chapman and Cutler LLP is pleased to provide this sample procedure as an example of factors issuers should consider under current law in preparing policies and procedures for post-issuance compliance with federal securities laws and regulations. It is intended to provide general guidance with the understanding that the provision of the sample procedure does not constitute the rendering of legal advice by Chapman and Cutler LLP or the establishment of an attorney-client relationship with any user of the sample procedure. Reference to this sample procedure should not be considered a substitute for consultation with your legal advisors. Readers should understand that the application of relevant statutory and regulatory provisions can vary based on specific facts and that changes in law or facts may impact the applicability of the sample procedure. Chapman and Cutler LLP assumes no obligation to update the sample procedure to reflect changes in law or practice.

Pursuant to the District's responsibilities under the securities laws, including its continuing disclosure undertakings (*Undertakings*) under Rule 15c2-12 of the Securities Exchange Act of 1934, as amended, and the Securities and Exchange Commission's statements in enforcement actions, it is necessary and in the District's best interest that the District comply in all material respects with federal securities laws regarding its (i) preliminary and final official statements or offering circulars and any supplements or amendments thereto (collectively, the *Official Statements*), disseminated by the District in connection with any bonds, notes, certificates or other obligations, (ii) Financial Information or Annual Financial Information, as required by and defined in the Undertakings (the *Annual Financial Information*) to be filed with the Municipal Securities Rulemaking Board's (MSRB) Electronic Municipal Market Access (*EMMA*) system, and (iii) notices of Material Events or Reportable Events, each as defined in the Undertakings, and any other required or voluntary disclosures to EMMA (each, an *EMMA Notice*). These procedures are designed to enable the District to create accurate disclosures with respect to its (i) Official Statements, (ii) Annual Financial Information, and (iii) EMMA Notices, which are collectively referred to herein as *Disclosures*.

In response to these interests, the District hereby adopts the following procedures:

- *Disclosure Officer*. Consistent with Board policy 4:40, *Incurring Debt*, the Superintendent (*Disclosure Officer*) is hereby designated as the officer responsible for the procedures related to Disclosures as hereinafter set forth (collectively, *Disclosure Procedures*).
- *Disclosure Procedures*: *Official Statements*. Whenever an Official Statement will be disseminated in connection with the issuance of obligations by the District, the Disclosure Officer will oversee the process of preparing the Official Statement pursuant to the following procedures:
    11. The District shall select (a) the working group for the transaction, which group may include outside professionals such as disclosure counsel, a municipal advisor, and an underwriter (the *Working Group*), and (b) the member of the Working Group responsible for preparing the first draft of the Official Statement.
    12. The Disclosure Officer shall review and make comments on the first draft of the Official Statement. Such review shall be done to determine that the Official Statement does not include any untrue statement of a material fact or omit to state a material fact necessary to make the statements made in the Official Statement not misleading. Particular attention shall be paid to the accuracy of all descriptions, significant information, and financial data regarding the District. Examples include confirming that information relating to the District, including but not limited to demographic changes, the addition or loss of major employers, the addition or loss of major taxpayers or any

other material information within the knowledge of the Disclosure Officer, is included and properly disclosed. The Disclosure Officer shall also be responsible for ensuring that the financial data presented with regard to the District is accurate and corresponds with the financial information in the District's possession, including but not limited to information regarding bonded indebtedness, notes, certificates, outstanding leases, tax rates or any other financial information of the District presented in the Official Statement.

13. After completion of the review set forth in 2, above, the Disclosure Officer shall (a) discuss the first draft of the Official Statement with the members of the Working Group and such staff and officials of the District as the Disclosure Officer deems necessary and appropriate, and (b) provide comments, as appropriate, to the members of the Working Group. The Disclosure Officer shall also consider comments from members of the Working Group and whether any additional changes to the Official Statement are necessary or desirable to make the document compliant with the requirements set forth in 2, above.
14. The Disclosure Officer shall continue to review subsequent drafts of the Official Statement in the manner set forth in 2 and 3, above.
15. If, in the Disclosure Officer's reasonable judgment, the Official Statement does not include any untrue statement of a material fact or omit to state a material fact necessary to make the statements made in the Official Statement not misleading, the Official Statement may, in the reasonable discretion of the Disclosure Officer, be released for dissemination to the public; *provided*, *however*, that the use of the Official Statement must be ratified, approved, and authorized by the Board.

- *Disclosure Procedures: Annual Financial Information*. The Disclosure Officer will oversee the process of preparing the Annual Financial Information pursuant to these procedures:

16. By December 20th of each year (the same being at least 30 days prior to the last date on which the Annual Financial Information is required to be disseminated pursuant to the related Undertaking) the Disclosure Officer shall begin to prepare (or hire an agent to prepare) the Annual Financial Information. The Disclosure Officer shall also review the audited or unaudited financial statements, as applicable, to be filed as part of the Annual Financial Information (*Financial Statements*). In addition to the required updating of the Annual Financial Information, the Disclosure Officer should consider whether additional information needs to be added to the Annual Financial Information to make the Annual Financial Information, including the Financial Statements, taken as a whole, correct and complete in all material respects. For example, if disclosure of events that occurred subsequent to the date of the Financial Statements would be necessary to clarify, enhance or correct information presented in the Financial Statements, in order to make the Annual Financial Information, taken as a whole, correct and complete in all material respects, disclosure of such subsequent events should be made.
17. If, in the Disclosure Officer's reasonable judgment, the Annual Financial Information, including the Financial Statements, is correct and complete in all material respects, the Disclosure Officer shall file the Annual Financial Information with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.

- *Disclosure Procedures: Reportable Events*. The Disclosure Officer will prepare (or hire an agent to prepare) Reportable Event Disclosure and file the same with EMMA (or confirm that such filing is completed by an agent hired by the District for such purpose) in a timely manner (not in excess of 10 business days after the occurrence of the Reportable Event). Incurrence of a Financial Obligation, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation, any of

which affect security holders, if material, is a Reportable Event. Upon the incurrence of any Financial Obligation, as such term is defined in the Undertaking, the Disclosure Officer shall review such Financial Obligation and assess whether such Financial Obligation is material. If, in connection with such Financial Obligation, the District has agreed to any covenant, event of default, remedy, priority right or other similar term which affects security holders, the Disclosure Officer shall further review such term and assess whether the same is material. The Disclosure Officer shall prepare a summary of such review. If, in the Disclosure Officer's reasonable judgment, following consultation with financial or legal professionals as necessary, such Financial Obligation and/or term of such Financial Obligation is deemed material, the Disclosure Officer shall file a summary of such Financial Obligation (or the entire financing document, provided that confidential or sensitive information may be redacted to the extent such redaction does not prevent all material terms from being disclosed) with EMMA not in excess of ten business days after the incurrence of such Financial Obligation. (This paragraph (d) shall only apply if the District has entered into an Undertaking on or after February 27, 2019.)

- *Disclosure Procedures: EMMA Notices*. Whenever the District determines to file an EMMA Notice, or whenever the District decides to make a voluntary filing to EMMA, the Disclosure Officer will oversee the process of preparing the EMMA Notice pursuant to these procedures:
    18. The Disclosure Officer shall prepare (or hire an agent to prepare) the EMMA Notice. The EMMA Notice shall be prepared in the form required by the MSRB.
    19. In the case of a disclosure required by an Undertaking, the Disclosure Officer shall determine whether any changes to the EMMA Notice are necessary to make the document compliant with the Undertaking.
    20. If, in the Disclosure Officer's reasonable judgment, the EMMA Notice is correct and complete and, in the case of a disclosure required by an Undertaking, complies with the Undertaking, the Disclosure Officer shall file the EMMA Notice with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.
- *Additional Responsibilities of the Disclosure Officer*. The Disclosure Officer, in addition to the specific responsibilities outlined above, shall have general oversight of the entire disclosure process, which shall include:
    21. Maintaining appropriate records of compliance with these Disclosure Procedures (including proofs of EMMA filings) and decisions made with respect to issues that have been raised;
    22. Evaluating the effectiveness of the procedures contained in these Disclosure Procedures; and
    23. Informing the Board when substantive revisions or modifications are made to these Disclosure Procedures.
- General Principles.
    24. All participants in the disclosure process should be encouraged to raise potential disclosure items at all times in the process.
    25. The process of revising and updating the Disclosures should not be viewed as a mechanical insertion of current numbers. While it is not anticipated that there will be major changes in the form and content of the Disclosures at the time of each update, the Disclosure Officer should consider whether such changes are necessary or desirable to make sure the Disclosure does not make any untrue statement of a material fact or omit to state a material fact necessary or desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading at the time of each update.

26. Whenever the District releases information, whether in written or spoken form, that may reasonably be expected to reach investors, it is said to be “speaking to the market.” When speaking to the market, District officials must be sure that the released information does not make any untrue statement of a material fact or omit to state a material fact necessary or desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading.
27. While care should be taken not to shortcut or eliminate any steps outlined in these Disclosure Procedures on an ad hoc basis, the review and maintenance of the Disclosures is a fluid process and recommendations for improvement of these Disclosure Procedures should be solicited and regularly considered.
28. The Disclosure Officer is authorized to request and pay for attendance at relevant conferences or presentations or annual training sessions conducted by outside counsel, consultants or experts in order to ensure a sufficient level of knowledge for the effective administration of these Disclosure Procedures.

LEGAL REF.: 15 U.S.C. §77a et seq., Securities Act of 1933.

15 U.S.C. §78a et seq., Securities Exchange Act of 1934.

17 C.F.R. §240.15c2-12.

Adopted 2/11/25

4:45 Insufficient Fund Checks and Debt Recovery

Insufficient Fund Checks

The Superintendent or designee is responsible for collecting up to the maximum fee authorized by State law for returned checks written to the District that are not honored upon presentation to the respective bank or other depository institution for any reason. The Superintendent is authorized to contact the Board Attorney whenever necessary to collect the returned check amount, fee, collection costs and expenses, and interest.

Delinquent Debt Recovery

The Superintendent is authorized to seek collection of delinquent debt owed the District to the fullest extent of the law.

A Local Debt Recovery Program may be available through the Illinois Office of the Comptroller (IOC). To participate in it, an intergovernmental agreement (IGA) between the District and the IOC must be in existence. The IGA establishes the terms under which the District may refer a delinquent debt to the IOC for an offset (deduction). The IOC may execute an offset, in the amount of the delinquent debt owed to the District, from a future payment that the State makes to an individual or entity responsible for paying the delinquent debt.

The Superintendent or designee shall execute the requirements of the IGA. While executing the requirements of the IGA, the Superintendent or designee is responsible, without limitation, for each of the following:

Providing a District-wide, uniform, method of notice and due process to the individual or entity against whom a claim for delinquent debt payment (*claim*) is made. Written notice and an opportunity to be heard must be given to the individual or entity responsible for paying a delinquent debt before the claim is certified to the IOC for offset. The notice must state the claim's amount, the reason for the amount due, the claim's date or time period, and a description of the process to challenge the claim. If reimbursable meals or snacks provided under the Hunger-Free Students' Bill of Rights Act are the basis of the District's delinquent debt claim of no less than $500, the notice must be sent to a student's parent(s)/guardian(s) only after: (a) the student owes the District more than five meals and/or snacks; (b) the Superintendent or designee made: (i) repeated contacts to collect the amounts owed, and (ii) reasonable efforts to collect the amount due for at least one year; and (c) the District requested the student's parent(s)/guardian(s) to apply for meal benefits pursuant to policy 4:130, *Free and Reduced-Price Food Services*, and they either: (i) did not qualify, or (ii) refused to apply.

An individual or entity challenging a claim shall be provided an informal proceeding to refute the claim's existence, amount, or current collectability; the decision following this proceeding shall be reviewable.

If a waiver of student fees is requested as a challenge to paying the claim, and the waiver of student fees is denied, an appeal of the denial of a fee waiver request shall be handled according to 4:140, *Waiver of Student Fees*. If no waiver of student fees is requested, reviews regarding payment of the claim shall be handled according to this policy before certification to the IOC for offset.

If application for meal benefits pursuant to policy 4:130, *Free and Reduced-Price Food Services*, is requested as a challenge to paying the claim, and the request is denied, an appeal of the denial of the request shall be handled according to 4:130, *Free and Reduced-Price Food Services*. If no request for meal benefits is received, review of the claim's payment shall be handled according to this policy before certification to the IOC for offset.

Certifying to the IOC that the debt is past due and legally enforceable, and notifying the IOC of any change in the status of an offset claim for delinquent debt.

Responding to requests for information from the IOC to facilitate the prompt resolution of any administrative review requests received by the IOC.

LEGAL REF.: 15 ILCS 405/10.05 and 10.05d, State Comptroller Act.

105 ILCS 123/, Hunger-Free Students' Bill of Rights Act.

810 ILCS 5/3-806, Uniform Commercial Code.

Adopted 12/12/23

4:45-AP1 Administrative Procedure - Insufficient Fund Checks

The following will occur whenever any individual writes a check to the District that is not honored upon presentation to the respective bank or other depository institution for any reason:

1. The Superintendent or designee will contact the individual by telephone as soon as the check is returned to the District. The individual will be asked to pay the returned check and the $25 returned check fee. **Note:** Some banks have return check fees over $25, but 810 ILCS 5/3-806 continues to state $25. Consult with the Board Attorney about increasing the returned check fee amount.
2. If the amount due is not paid after initial contact, the Superintendent or designee will send a letter by certified mail, return receipt requested, demanding payment within 30 days of mailing the letter, and shall include notice of liability for the costs and expenses. A written demand is necessary to become eligible for any costs and expenses in excess of the amount of the $25.00 collection fee. 810 ILCS 5/3-806.
3. If the amount due is not paid within 30 days of mailing the demand letter, the Superintendent or designee may contact the Board Attorney to discuss further collection action.

Adopted 10/8/24

4:45-AP2 Administrative Procedure - Local Debt Recovery Program Implementation Procedures

The following procedure implements the **Delinquent Debt Recovery** section in policy 4:45, *Insufficient Fund Checks and Debt Recovery*. The Superintendent must ensure that individuals or entities owing money to the District receive notice and due process before the debt is certified to the Illinois Office of the Comptroller (IOC) for an offset. The District cannot use the services of the IOC without first entering into an Intergovernmental Agreement (IGA) with it.

Implementing a uniform District-wide delinquent debt recovery process requires consultation with the Board Attorney. Making determinations about which delinquent debts to recover through the IOC's Local Debt Recovery Program has not been litigated and raises many complex legal and practical issues.

Modify this procedure based upon the District's specific implementation needs. It relies heavily upon Building Principals to (1) be uniformly trained and (2) train their building-level staff members who are responsible for collecting money owed to the school and/or the District.

Actor	Action
Superintendent	Establishes a District-wide Delinquent Debt Recovery Committee to operate as a Superintendent committee and should consider including the following individuals on the Committee: 1. District's School Business Official(s) and District Bookkeeper, 2. Building Principals (Building Principals are mandatory for the successful implementation of notice and due process), and 3. Building-level staff members responsible for managing bills, collection and recording of payments, and fee waiver processing. Consults the Board Attorney about implementing a District-wide process for delinquent debt recovery with the goal of entering into an IGA with, and once entered into, certifying unsatisfied debts to the IOC for offset. Issues to address include, but are not limited to: 1. Aligning the delinquent debt recovery process to the District's policy 4:140, *Waiver of Student Fees*. **Note**: The relevant staff must check the adopted board policy to ensure that this procedure and the student fee waiver policy, procedures and applications for fees are aligned. See f/ns of 4:140-AP, *Fines, Fees, and Charges - Waiver of Student Fees*. 2. Uniform training for Building Principals about the District's procedures for the recovery of delinquent debt.

	Ensures uniform District-wide training with the Board Attorney for the Delinquent Debt Recovery Committee about the requirements of the IOC's debt recovery program. Informs Building Principals when delinquent debt should be referred to the District's Business Office for recovery through the IOC. This includes training about types of debt: student, parent, vendor, school lunch account (105 ILCS 123/, added by P.A. 100-1092), etc., along with training about how to determine whether a particular delinquent debt should be pursued and ultimately recovered through the IOC. **Note**: These determinations may trigger the Constitution's Equal Protection Clause. As a general rule, school officials can avoid constitutional problems and still recover delinquent debt by using uniform rules that do not discriminate against a specific group. Documents training for Building Principals about implementing District-wide delinquent debt recovery procedures.
School Business Official or designee	Manages the process to seek offset from the IOC pursuant to the IGA and District-wide delinquent debt recovery processes.
Building Principal	Requests permission from the Superintendent to consult the Board Attorney about implementing building-specific procedures that align with both (a) the District's IGA with the IOC, (b) policies 4:45, *Insufficient Fund Checks and Debt Recovery*, and 4:140, *Waiver of Student Fees*. Informs individuals or entities owing money to the District that their payments are overdue and need to be paid. Follows the District's procedures and training for the recovery of delinquent debt. Ensures uniform training about the District's procedures for the collection of debt for building-level staff members who manage bills, collection and recording of payments, and fee waiver processes. Documents training(s) about implementing District-wide delinquent debt recovery procedures for building-level staff who manage collection of debt owed to the District. Upon determining further recovery action is necessary, refers delinquent debt to the District's Business Office.

Adopted 11/12/19

4:45-E1 Exhibit - Cover Page Documenting the Process to Seek Offset from the Illinois Office of the Comptroller (IOC)

This cover page documents the steps the District must take before recovering a delinquent debt through an offset (deduction) of a future payment the State makes to an individual responsible for the delinquent debt. An Intergovernmental Agreement (IGA) between the IOC and the District must be in place before the District may seek an offset to satisfy a delinquent debt. Consult the Board Attorney for assistance in implementing a District-wide delinquent debt recovery program that will satisfy the requirements necessary to enter into an IGA with the IOC, e.g., the Superintendent should ensure that the District uses a uniform process to seek offset from the IOC. After completing a step, the responsible staff person must record the date, initial the step, and put all material into the claim folder.

Confidential Inter-Office Information

Definitions

Business Office means the District department that provides the District's fiscal and business management.

Change in status means, without limitation, payments received other than through a successful offset, the filing of a bankruptcy petition, the death of the debtor, or the expiration of the ability for the debt to remain subject to an offset, as provided for in the Intergovernmental Agreement (IGA).

Claim means the demand for payment of a delinquent debt.

Claim folder means the folder containing material for an individual claim; it includes this cover page, the documentation of the Building Principal or designee's notifications of debt and request(s) for payment, the Notice of Claim, relevant supporting information, and any material or explanation received from the Debtor.

Debtor means the person or entity responsible for satisfying a delinquent debt.

IOC means Illinois Office of the Comptroller.

Notice of Claim means Exhibit 4:45-E2, *Notice of Claim and Intent to Seek Debt Recovery; Challenge; and Response to Challenge*.

Offset means a deduction of the amount of a debt owed to the District from a future payment that the State makes to an individual or entity that is responsible to satisfy the debt.

Debtor _____ Contact information _____

When the District enters the IOC Program through an IGA, and the District decides a Claim will be referred to the IOC, the following steps will be documented:

Step	**Date**	**Initials**
Building Principal sent written documentation referring a claim for further recovery proceedings. This documentation is placed in the claim folder.		

Step	Date	Initials
Superintendent or designee inspected the Building Principal's written documentation above (including 105 ILCS 123/, requirements if the debt involves school lunch accounts) and agrees that the claim should be referred for recovery through the IOC. **Note:** Consult the Board Attorney. Treating claims differently, i.e., referring some and not others, may trigger the Constitution's Equal Protection Clause.		
District sent the Notice of Claim; certified mail, return receipt requested. For unpaid meal charges, District staff have followed procedures to prevent meal charges from accumulating and made reasonable efforts to collect all funds due to the District on a regular basis before the end of the school year (105 ILCS 123/). **Note**: While certified mail is not required, it is a best practice to send regular and certified, first-class mail.		
Receipt showing certified delivery of the Notice of Claim on _____ _____.		
Receipt of the Debtor's challenge to the claim. *If no challenge is received by the deadline in the Notice of Claim, send the claim folder to the Superintendent's office for review and continued processing*.		
Receipt of Debtor's written explanation and/or any documentation.		
Arrangements made for informal proceeding with Debtor; scheduled for _____. ☐ Telephone or ☐ In-person		
Informal proceeding held with Debtor. ☐ Telephone or ☐ In-person Attendees:_____ _____		
Decision of the Business Office Business office *[name]*_____, found that the claim should be considered: ☐ Satisfied or ☐ Enforceable for the following reason(s) (*check boxes below that apply*): ☐ Debtor asserted waiver of student fees as a challenge to paying the claim. ☐ 4:140-E1, *Application for Fee Waiver* or 4:140-E2, *Application for Fee Waiver Based on Federal Free Meals Program* was provided to Debtor and documented in the claim folder. ☐ 4:140-E3, *Response to Application for Fee Waiver, Appeal, and Response to Appeal* is placed in folder. ☐ Debtor asserted application for meal benefits as a challenge to paying the claim.		

Step	Date	Initials
☐ 4:130-E, *Free and Reduced-Price Food Services; Meal Charge Notifications* was provided to Debtor and is documented and placed in the claim folder. ☐ Documentation of the student's eligibility for free and reduced-price food services is documented and placed in the claim folder. ☐ Debtor fee waiver request or application for meal benefits request was: ☐ Granted or ☐ Denied. If denied, did Debtor appeal the denial? ☐Yes or ☐No. **Note:** Fee waivers and/or eligibility for free and reduced-price food services satisfy a claim.		
Business office *[name]* _____, forwarded the claim folder to the Superintendent's office.		
If the Business office found that the claim is satisfied, the Superintendent or designee notified the Debtor that the claim is considered satisfied. He or she closed this claim folder and checked the "**claim is satisfied**" box above.		
Review by Superintendent or designee If the Business office found the debt to be enforceable, the Superintendent or designee independently reviewed the claim and made the following finding: ☐ **Satisfied**. Debtor sent a notification on _____ _____. ☐ **Enforceable**. Debtor notified on _____ that the claim must be paid by _____ to avoid further collection efforts.		
Certification of Past Due Debt to the IOC The Superintendent or designee certifies the debt as required in the terms of the IGA between District and the IOC.		
Offset Processing with the IOC The Superintendent or designee updates a Debtor's records as required by the terms of the IGA between the District and the IOC and/or 105 ILCS 123/.		

4:45-E2 Exhibit - Notice of Claim and Intent to Seek Debt Recovery; Challenge; and Response to Challenge

Print on district letterhead or on form with district name and address.

The information in this Notice of Claim is confidential; disclosure is limited to staff members who have a business need to be informed.

Section 1 - Notice of Claim and Intent to Seek Payment of a Delinquent Debt. *The District completes this section and sends the entire Notice of Claim to the person or entity that is the subject of the claim.*

To: _____ _____

Name Address

Our records show that you owe the School District $_____ for: [*Describe the reason for the debt and date(s) incurred*] _____

_____

_____

After attempts at the school-building level to notify you of this debt and obtain payment and/or after reasonable efforts to notify you of your unpaid school lunch fees, your debt has been referred to the District's Business Office. This debt is past due and legally enforceable. Unless this debt is paid on or before _____, the District will seek collection to the fullest extent of the law. That means that you may see a decrease in a future payment(s) that the State makes to you by the amount of the debt that you owe the District, plus a recovery fee until your debt is paid.

You may challenge this claim any time before _____ by completing Section 2 below and returning this *Notice of Claim* to the Superintendent's office. If you challenge the debt, you will be invited to an informal proceeding in which the District Business Office will describe the claim and you can explain why you believe the claim is invalid and/or the amount is wrong. A decision finding the debt enforceable will be automatically reviewed by me or my designee (who is not a subordinate of the individual making the enforceability finding).

_____ _____

Superintendent Date

Section 2 - Challenge. *The individual or entity who wants to challenge the claim must complete this section and return the entire Notice of Claim to the Superintendent's office.*

I am challenging the claim. *Please check all that apply.*

☐ I am submitting with this Notice of Claim a written explanation of why I believe the claim is invalid or the amount is wrong.

☐ I would like to explain why I believe the claim is invalid or the amount is wrong during an informal proceeding by telephone or at a meeting in the District office.

☐ I am requesting a copy of this Challenge to my Notice of Claim.

Individual or entity challenging the claim _____ Date _____

Contact Number _____

Section 3 - Findings. *The Business Office completes this section and forwards the entire Notice of Claim to the Superintendent's office along with relevant supporting information and any material or explanation received from the individual or entity challenging the claim.*

The Business Office finds that this debt should be considered: ☐ **Satisfied.**

☐ **Enforceable.**

Business Office _____ Date _____

Section 4 - Review of Findings and Response to Challenge. T*he Superintendent or designee who reviewed the findings completes this section and sends a copy of the Notice of Claim to the person or entity who challenged the claim.*

☐ **This debt is satisfied.**

☐ **Your challenge is denied.** You must pay the debt by_____to avoid further collection efforts.

Superintendent _____ Date _____

Section 5 - Certification of Past Due Debt to the Ill. Office of the Comptroller (IOC). *The Superintendent or designee who reviewed the findings completes the process of certifying to the IOC Local Debt Recovery Program that the District has provided the Debtor with the due process necessary to begin the IOC Offset process pursuant to an existing Intergovernmental Agreement with the IOC and/or the requirements of 105 ILCS 123/.*

Adopted 10/8/24

4:50 Payment Procedures

The Treasurer shall prepare a list of all due and payable bills, indicating vendor name and amount, and shall present it to the School Board in advance of the Board's first regular monthly meeting or, if necessary, a special meeting. These bills are reviewed by the Board, after which they may be approved for payment by Board order. Approval of all bills shall be given by a roll call vote, and the votes shall be recorded in the minutes. The Treasurer shall pay the bills after receiving a Board order or pertinent portions of the Board minutes, even if the minutes are unapproved, provided the order or minutes are signed by the Board President and Secretary, or a majority of the Board.

The Treasurer is authorized, without further Board approval, to pay Social Security taxes, wages, pension contributions, utility bills, and other recurring bills. These disbursements shall be included in the listing of bills presented to the Board.

The Board authorizes the Superintendent or designee to establish revolving funds and a petty cash fund system for school cafeterias, lunchrooms, athletics, or similar purposes, provided such funds are maintained in accordance with Board policy 4:80, *Accounting and Audits*, and remain in the custody of an employee who is properly bonded according to State law.

LEGAL REF.: 105 ILCS 5/8-16, 5/10-7, and 5/10-20.19.
23 Ill.Admin.Code §100.70.

CROSS REF.: 4:55 (Use of Credit and Procurement Cards), 4:60 (Purchases and Contracts), 4:80 (Accounting and Audits)

Adopted 9/8/20

4:50-E Exhibit - School District Payment Order

This statutory order authorizes the Treasurer to pay a School Board-approved bill or obligation before the meeting minutes are officially approved. Several items may be attached to this form.

Order Date:_____

The Treasurer, _____, of _____ _____ School District in _____County, shall pay to the order of _____ _____ _____ the sum of $_____, for _____ _____ _____.

By order of the _____School Board.

_____ _____
Board President Date

_____ _____
Secretary Date

Adopted 12/12/23

4:55 Use of Credit and Procurement Cards

The Superintendent and employees designated by the Superintendent are authorized to use District credit and procurement cards to simplify the acquisition, receipt, and payment of purchases and travel expenses incurred on the District's behalf. Credit and procurement cards shall only be used for those expenses that are for the District's benefit and serve a valid and proper public purpose; they shall not be used for personal purchases. Cardholders are responsible for exercising due care and judgment and for acting in the District's best interests.

The Superintendent or designee shall manage the use of District credit and procurement cards by employees. It is the Board's responsibility, through the audit and approval process, to determine whether District credit and procurement card use by the Superintendent is appropriate.

In addition to the other limitations contained in this and other Board policies, District credit and procurement cards are governed by the following restrictions:

1. Credit and/or procurement cards may only be used to pay certain job-related expenses or to make purchases on behalf of the Board or District or any student activity fund, or for purposes that would otherwise be addressed through a conventional revolving fund.
2. The Superintendent or designee shall instruct the issuing bank to block the cards' use at unapproved merchants.
3. Each cardholder, other than the Superintendent, may charge no more than $500 in a single purchase and no more than $1000 within a given month without prior authorization from the Superintendent.
4. The Superintendent or designee must approve the use of a District credit or procurement card whenever such use is by telephone, fax, and the Internet. Permission shall be withheld when the use violates any Board policy, is from a vendor whose reputation has not been verified, or would be more expensive than if another available payment method were used.
5. The consequences for unauthorized purchases include, but are not limited to, reimbursing the District for the purchase amount, loss of cardholding privileges, and, if made by an employee, discipline up to and including discharge.
6. All cardholders must sign a statement affirming that they are familiar with this policy.
7. The Superintendent shall implement a process whereby all purchases using a District credit or procurement card are reviewed and approved by someone other than the cardholder or someone under the cardholder's supervision.
8. Cardholders must submit the original, itemized receipt to document all purchases.
9. No individual may use a District credit or procurement card to make purchases in a manner contrary to State law, including, but not limited to, the bidding and other purchasing requirements in 105 ILCS 5/10-20.21, or any Board policy.
10. The Superintendent or designee shall account for any financial or material reward or rebate offered by the company or institution issuing the District credit or procurement card and shall ensure that it is used for the District's benefit.

LEGAL REF.: 105 ILCS 5/10-20.21.
23 Ill.Admin.Code §100.70(d).

CROSS REF.: 4:50 (Payment Procedures), 4:60 (Purchases and Contracts), 4:80 (Accounting and Audits), 4:90 (Student Activity and Fiduciary Funds), 5:60 (Expenses)

Adopted 6/22/21

4:55-E Exhibit - Cardholder's Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards

Cardholder's name

Cardholder's address

Cardholder's position

Name of individual who authorized issuance of card.

I affirm that I am familiar with the Board's policy on using credit and procurement cards, that I understand my responsibilities regarding the use of such cards, and that I agree to adhere to all requirements regarding such cards.

Cardholder's signature Date

I provided a copy of this Statement along with a copy of Board policy 4:55, *Use of Credit and Procurement Cards*, to the cardholder who signed this statement.

Office personnel signature Date

Adopted 12-12-23

4:55-AP Administrative Procedure - Controls for the Use of District Credit and Procurement Cards

This procedure implements, and is subject to, Board policy 4:55, *Use of Credit and Procurement Cards*. The business office shall oversee the following controls:

Issue District credit and/or procurement cards to only authorized individuals.

29. Require prior authorization from the Superintendent or designee before issuing a card to any individual. Review and ensure compliance with Board policy 2:125, *Board Member Compensation; Expenses*, before issuing Board members a card.
30. Have cardholders sign 4:55-E, *Cardholder's Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards*.
31. Instruct cardholders:
    a. In the proper use of cards, and;
    b. How to document purchases, including the need to: (a) present an itemized receipt in addition to a credit or procurement card receipt for each item, (b) indicate the date, purpose, and nature of the charge on the receipt, and (c) identify the names of individuals for whom expenditures were incurred on the receipt.

Monitor that credit and/or procurement cards are being used for appropriate purchases.

32. Prohibit the use of District credit or procurement cards for personal expenses. Two problems prevent personal use pending later reimbursement – there is no guarantee of reimbursement and the practice is a *de facto* loan available only to certain employees.
33. Do not use cards that allow cash advances or cash back from purchases.
34. Establish reasonable credit limits for each purchase, transaction, and/or the balance total on each card. Reduce the limits on existing cards if necessary. Require prior authorization for purchases above these limits.
35. When a card is used for *emergency purposes*, require that the user clearly document the emergency situation that justified the need.
36. Block certain types of vendors or purchases using Merchant Category Codes – these categorize businesses by the products or services they provide. Request that the card issuer prohibit charges from dry cleaners, health or beauty spas, liquor stores, race tracks, casinos, houses of worship, physicians, and other merchant categories the District will never use.
37. Perform scheduled and random analyses of individual cardholders. This includes examining the continued need for the card and the nature of purchases being made.
38. Perform scheduled and random analyses to determine whether Board policy is being followed.

Safeguard District credit and procurement cards.

39. Keep all cards in a secure location.
40. Issue cards only for the time period that they are needed.
41. Issue cards in the names of specific individuals or departments, e.g., athletics, transportation, high school, elementary conferences and/or training, etc., to help maintain accountability.
42. Prohibit a card's use by anyone other than the individual to whom a card is issued.
43. Develop and follow procedures to cancel cards when lost or stolen and when individuals leave employment.
44. Cancel existing cards that are not needed or accounted for.

45. Review and update master credit card lists annually.
    Monitor credit and/or procurement card statements.

46. Review statements and watch for suspicious activity, such as, unusual destinations or items, purchases from a vendor whose reputation has not been verified, or purchases that would have been less expensive if another available payment method had been used.
47. Have billing statements broken down by individual user.
48. Have a reconciliation process and timetable. This includes:
    a. Reconciling credit card statements to itemized receipts and invoices;
    b. Examining the documentation supporting purchases to ensure charges are authorized and reasonable;
    c. Delegating approval, verification, and payment of bills to different individuals; and
    d. Requiring someone other than the cardholder or an individual supervised by the cardholder to review and approve transactions.
49. In exceptional circumstances when the Superintendent approved a charge that would otherwise be disallowed, maintain a record documenting the Superintendent's approval as well as all other pertinent information about the charge.
50. Review all uses of a card via telephone, fax, and the Internet to be sure they were approved by the Superintendent or designee.
51. Establish a way of recouping inappropriate charges.
52. Do not use automatic payment deductions to pay credit or procurement card bills.
53. Pay bills on time to avoid paying fees and late charges.
54. Appropriately follow up on any discrepancies.
55. Verify that the items purchased were actually received.
56. Account for any financial or material reward or rebate offered by the company or institution issuing the District credit or procurement card and verify that it was used for the District's benefit.

The following District employees will be issued District credit and/or procurement cards. Other District employees may use a District credit and/or procurement card after receiving specific authorization from the Superintendent.

Employment Position	**Authorized Use and Other Limitations**
Superintendent	Actual and necessary expenses incurred in the performance of the Superintendent's duties. Expenses related to professional development.
Transportation, Maintenance, and/or Building and Grounds Directors	Expenses for maintaining and fueling District vehicles.
Assistant Superintendents	Actual and necessary expenses incurred in the performance of the job duties. Expenses related to professional development.
Building Principals	Purchases of materials and supplies for his or her building that must be made quickly and/or are too small to process through the regular procedure.

Employment Position	Authorized Use and Other Limitations
	Expenses from student activity funds for educational, recreational, or cultural purposes. Expenses related to professional development.
Athletic Directors	Actual and necessary expenses incurred in the performance of the job duties.

Adopted 10/8/24

4:60 Purchases and Contracts

The Superintendent shall manage the District's purchases and contracts in accordance with State law, the standards set forth in this policy, and other applicable School Board policies.

Standards for Purchasing and Contracting

All purchases and contracts shall be entered into in accordance with applicable federal and State law. The Board Attorney shall be consulted as needed regarding the legal requirements for purchases or contracts. All contracts shall be approved or authorized by the Board.

All purchases and contracts should support a recognized District function or purpose as well as provide for good quality products and services at the lowest cost, with consideration for service, reliability, and delivery promptness, and in compliance with State law. No purchase or contract shall be made or entered into as a result of favoritism, extravagance, fraud, or corruption.

Adoption of the annual budget authorizes the Superintendent or designee to purchase budgeted supplies, equipment, and services, provided that State law is followed. Purchases of items outside budget parameters require prior Board approval, except in an emergency.

When presenting a contract or purchase for Board approval, the Superintendent or designee shall ensure that it complies with applicable federal and State law, including but not limited to, those specified below:

1. Supplies, materials, or work involving an expenditure in excess of $35,000 must comply with the State law bidding procedure, 105 ILCS 5/10-20.21, unless specifically exempted.
2. Construction, lease, or purchase of school buildings must comply with State law and Board policy 4:150, *Facility Management and Building Programs*.
3. Guaranteed energy savings must comply with 105 ILCS 5/19b-1 et seq.
4. Third party non-instructional services must comply with 105 ILCS 5/10-22.34c.
5. Goods and services that are intended to generate revenue and other remunerations for the District in excess of $1,000, including without limitation vending machine contracts, sports and other attire, class rings, and photographic services, must comply with 105 ILCS 5/10-20.21(b-5). The Superintendent or designee shall keep a record of: (1) each vendor, product, or service provided, (2) the actual net revenue and non-monetary remuneration from each contract or agreement, and (3) how the revenue was used and to whom the non-monetary remuneration was distributed. The Superintendent or designee shall report this information to the Board by completing the necessary forms that must be attached to the District's annual budget.
6. Any contract to purchase food with a bidder or offeror must comply with 105 ILCS 5/10-20.21(b-10).
7. The purchase of paper and paper products must comply with 105 ILCS 5/10-20.19c and Board policy 4:70, *Resource Conservation*.
8. Each contractor with the District is bound by each of the following:
    a. In accordance with 105 ILCS 5/10-21.9(f): (1) prohibit any of its employees who is or was found guilty of a criminal offense listed in 105 ILCS 5/10-21.9(c) and 5/21B-80(c) to have direct, daily contact at a District school or school-related activity with one or more student(s); (2) prohibit any of the contractor's employees from having direct, daily contact with one or more students if the

employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee's sentence for the criminal offense; and (3) require each of its employees who will have direct, daily contact with student(s) to cooperate during the District's fingerprint-based criminal history records check on him or her.

b. In accordance with 105 ILCS 5/22-94: (1) prohibit any of its employees from having *direct contact with children or students* if the contractor has not performed a sexual misconduct related employment history review (EHR) of the employee or if the District objects to the employee's assignment based on the employee's involvement in an instance of sexual misconduct as provided in 105 ILCS 5/22-94(j)(3), which the contractor is required to disclose; (2) discipline, up to and including termination or denial of employment, any employee who provides false information or willfully fails to disclose information required by the EHR; (3) maintain all records of EHRs and provide the District access to such records upon request; and (4) refrain from entering into any agreements prohibited by 105 ILCS 5/22-94(g).
c. In accordance with 105 ILCS 5/24-5: (1) concerning each new employee of a contractor that provides services to students or in schools, provide the District with evidence of physical fitness to perform the duties assigned and freedom from communicable disease; and (2) require any new or existing employee who provides services to students or in schools to complete additional health examinations as required by the District and be subject to additional health examinations, including tuberculosis screening, as required by the Ill. Dept. of Public Health rules or order of a local health official.

9. Any pavement engineering project using a coal tar-based sealant product or high polycyclic aromatic hydrocarbon sealant product for pavement engineering-related use must comply with the Coal Tar Sealant Disclosure Act.
10. Design-build contracts must comply with 105 ILCS 5/15A-1 et seq.
11. Any new contract for a district-administered assessment must comply with 105 ILCS 5/10-20.85.
12. Purchases made with federal or State awards must comply with 2 C.F.R. Part 200 and 30 ILCS 708/, as applicable, and any terms of the award.

The Superintendent or designee shall: (1) execute the reporting and website posting mandates in State law concerning District contracts, and (2) monitor the discharge of contracts, contractors' performances, and the quality and value of services or products being provided.

LEGAL REF.: 2 C.F.R. Part 200.

105 ILCS 5/10-20.19c, 5/10-20.21, 5/10-20.85, 5/10-21.9, 5/10-22.34c, 5/15A-1 et seq., 5/19b-1 et seq., 5/22-94, and 5/24-5.

30 ILCS 708/, Grant Accountability and Transparency Act.

410 ILCS 170/, Coal Tar Sealant Disclosure Act.

820 ILCS 130/, Prevailing Wage Act.

CROSS REF.: 2:100 (Board Member Conflict of Interest), 4:70 (Resource Conservation), 4:150 (Facility Management and Building Programs), 4:175 (Convicted Child Sex Offender; Screening; Notifications), 5:90 (Abused and Neglected Child Reporting)

Adopted 4/9/24

4:60-AP1 Administrative Procedure - Purchases

The Board Attorney should be consulted, as needed, regarding the legal requirements presented by this administrative procedure as well as before a contract is presented to the Board.

Requirements for Purchases and Contracts

A. Each of the following requirements describes the type of purchase and/or contract to which it applies; requirements in Sections B and C may also apply to a specific purchase or contract.
   1. All purchases of goods or services must be made through the use of contracts or purchase orders, except for those purchases made from petty cash funds or the Imprest Fund, or as otherwise specifically authorized by the Superintendent.
   2. Ill. Use Tax Act compliance (105 ILCS 5/10-20.21(b) and 35 ILCS 105/):
      a. Persons bidding for and awarded a contract, and all affiliates of the person, must collect and remit Ill. Use Tax on all sales of tangible personal property into the State of Illinois in accordance with the provision of the Ill. Use Tax Act.
      b. All bids and contracts must include: (1) a certification that the bidder or contractor is not barred from bidding for or entering into a contract, and (2) an acknowledgment that the Board may declare the contract void if the certification is false.
   3. All entities seeking to enter into a contract with the District must provide written certification to the District that it will provide a drug free workplace by complying with the Ill. Drug Free Workplace Act, 30 ILCS 580/. All contractors must comply with the notification mandates and other requirements in the Ill. Drug Free Workplace Act. "Contractor" is defined in the Ill. Drug Free Workplace Act as "a corporation, partnership, or other entity with 25 or more employees at the time of letting the contract, or a department, division, or unit thereof, directly responsible for the specific performance under a contract of $5,000 or more."
   4. Before soliciting bids or awarding a contract for supplies, materials, equipment, or services, a certified education purchasing contract that is already available through a State education purchasing entity (as defined in the Education Purchasing Program, 105 ILCS 5/28A), may be considered as a bid. 105 ILCS 5/10-20.21(d).
   5. All contracts must include provisions required by State or federal law, as applicable. Topics commonly requiring a provision include equal opportunity employment, prevailing wage, minimum wage, and performance bond.
   6. The procurement of architectural, engineering, and land surveying services is governed by the Local Government Professional Services Selection Act, 50 ILCS 510/, implemented by 2:170-AP, *Qualification Based Selection*.
   7. A list must be posted on the District's website, if any, of all contracts in excess of $25,000 and any contract with an exclusive bargaining representative. 105 ILCS 5/10-20.44(b).
   8. Each contractor with the District must comply with 105 ILCS 5/10-21.9(f) and: (a) not allow any of its employees to have direct, daily contact with one or more students if the employee was found guilty of any offense listed in 105 ILCS 5/10-21.9(c) or 5/21B-80(c); (b) prohibit any of its employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee's sentence for the

criminal offense; (c) require each of its employees who will have direct, daily contact with one or more student(s) to cooperate during the District's fingerprint-based criminal history records check on him or her; and (d) reimburse the District for the cost of the fingerprint-based criminal history records check that the District obtains on each employee of a contractor who will have direct, daily contact with a student(s). See 4:60-AP3, *Criminal History Records Check of Contractor Employees*.

9. For each position involving *direct contact with children or students*, each contractor must perform sexual misconduct related employment history reviews (EHRs) of its employees as required by 105 ILCS 5/22-94, added by P.A. 102-702, and: (a) prohibit any of its employees from having *direct contact with children or students* if the contractor has not performed an EHR; (b) discipline, up to and including termination or denial of employment, any employee who provides false information or willfully fails to disclose information required by an EHR, and prohibit any such employee from having direct contact with children or students; (c) immediately inform the District of any instances of sexual misconduct involving an employee as provided in 105 ILCS 5/22-94(j)(3); (d) prohibit any of its employees from having *direct contact with children or students* if the District objects to the employee's assignment after being informed of an instance of sexual misconduct; (e) maintain all records of EHRs and provide copies of such records upon the District's request; and (f) not enter into any agreements prohibited by 105 ILCS 5/22-94(g). See 4:60-AP4, *Sexual Misconduct Related Employment History Review (EHR) of Contractor Employees*.
10. Each contractor with the District must comply with 105 ILCS 5/24-5 and: (a) concerning each new employee who will provide services to students or in schools, provide the District with evidence of physical fitness to perform the duties assigned and freedom from communicable disease; and (b) require any new or existing employee who provides services to students or in schools to complete additional health examinations as required by the District and be subject to additional health examinations, including tuberculosis screening, as required by the Ill. Dept. of Public Health rules or order of a local health official.
11. Any contract to purchase food with a bidder or offeror must comply with 105 ILCS 5/10-20.21(b-10) (food donations).
12. Any pavement engineering project using a coal tar-based sealant product or high polycyclic aromatic hydrocarbon sealant product for pavement engineering-related use must comply with the Coal Tar Sealant Disclosure Act by (a) requesting a bid with an alternative for asphalt-based or latex-based sealant product, and (b) considering whether an asphalt-based or latex-based sealant product should be used for the project based upon costs and life cycle costs that regard preserving pavements, product warranties, and the benefits to public health and safety.
13. Guaranteed energy savings contracts must comply with 105 ILCS 5/19b-1 et seq.
14. Design-build contracts must comply with 105 ILCS 5/15A-1 et seq.
15. Before the Board approves a new contract for a district-administered assessment: (a) the Superintendent or designee must substantially present the terms of the proposal at a regular board meeting, (b) the public must be afforded the opportunity to comment on the proposal at the meeting, and (c) the Board must hold a public vote on the contract at the meeting. The Superintendent or designee shall ensure the assessment is presented in a manner such that the assessment tool and any other intellectual property of the publisher is not able to be widely disseminated to the public.

B. To the extent feasible, the following govern all purchases and/or the award of contracts for supplies, materials, or work, and/or contracts with private carriers for transporting students, involving: (a) an expenditure of $35,000 or less, or (b) in an emergency, an

expenditure in excess of $35,000, provided such expenditure is approved by three-quarters of the Board. See 105 ILCS 5/10-20.21(a)(xiv) (3/4s of the members of the Board must approve an emergency expenditure in excess of $35,000 when the bidding process is not used) and 5/29-6.1, amended by P.A. 103-460 (time limitations for transportation contracts).

1. Telephone quotations, verbal quotations, or catalog prices are used to purchase materials that are needed urgently, or small quantity orders.
2. Written quotations are used to purchase materials or services when time requirements allow. Whenever possible, quotations should be received from at least two competitors. The Superintendent or designee may negotiate with vendors at any time, including after receiving quotations.

C. The following govern all purchases and/or the award of contracts involving an expenditure in excess of $35,000 for supplies and materials or work. 105 ILCS 5/10-20.21(a).

1. Contracts are awarded to the lowest responsible bidder, considering conformity with specifications, terms of delivery, quality and serviceability, except contracts or purchases for:
    a. Services of individuals possessing a high degree of professional skill where the ability or fitness of the individual plays an important part;
    b. Printing of finance committee reports and departmental reports;
    c. Printing or engraving of bonds, tax warrants, and other evidences of indebtedness;
    d. Perishable foods and perishable beverages;
    e. Materials and work that have been awarded to the lowest responsible bidder after due advertisement, but due to unforeseen revisions, not the fault of the contractor for materials and work, must be revised causing expenditures not in excess of 10% of the contract price;
    f. Maintenance or servicing of, or provision of repair parts for, equipment which are made with the manufacturer or authorized service agent of that equipment where the provision of parts, maintenance, or servicing can best be performed by the manufacturer or authorized service agent;
    g. Use, purchase, delivery, movement, or installation of data processing equipment, software, or services and telecommunications and interconnect equipment, software, and services;
    h. Duplicating machines and supplies;
    i. Fuel, including diesel, gasoline, oil, aviation, natural gas, or propane, lubricants, or other petroleum products;
    j. Equipment previously owned by some entity other than the District itself;
    k. Repair, maintenance, remodeling, renovation, or construction, or a single project involving an expenditure not to exceed $50,000 and not involving a change or increase in the size, type, or extent of an existing facility;
    l. Goods or services procured from another governmental agency;
    m. Goods or services that are economically procurable from only one source, such as for the purchase of magazines, books, periodicals, pamphlets and reports, and for utility services such as water, light, heat, telephone, or telegraph;
    n. Emergency expenditures when such an emergency expenditure is approved by three-quarters of the members of the Board;
    o. Goods procured through an education master contract, as defined in the Education Purchasing Program, 105 ILCS 5/28A; and
    p. Providing for the transportation of students, which contracts must be advertised in the same manner as competitive bids and awarded by first considering the

bidder(s) most able to provide safety and comfort for the students, stability of service, and any other factors set forth in the request for proposal regarding quality of service, and then price.

q. Goods, services, or management in the operation of a school's food service, including a school that participates in any of the U.S. Dept. of Agriculture's (USDA) child nutrition programs if a good faith effort is made on behalf of the District to give preference to contracts that: (a) procure food that promotes the health and well-being of students, in compliance with USDA nutrition standards for school meals, and contracts should also promote the production of scratch-made, minimally processed foods; (b) give a preference to State or regional suppliers that source local food products; (c) utilize producers that adopt hormone and pest management practices recommended by the USDA; (d) give a preference to food suppliers that value animal welfare; and (e) increase opportunities for businesses owned and operated by minorities, women, or persons with disabilities.

When this exemption applies, the bidder shall submit to the District at the time of the bid, to the best of the bidder's ability, and annually thereafter during the term of the contract, the food supplier data required in this Section q. The food supplier data shall also include the name and address of each supplier, distributor, processor, and producer involved in the provision of the products that the bidder is to supply.

2. Competitive bidding process:
   a. An invitation for bids is advertised, where possible, by public notice at least 10 days before the bid date in a newspaper published in the District, or if no newspaper is published in the District, in a newspaper of general circulation in the area of the District. 105 ILCS 5/10-20.21(a).
   b. The following information should be included in the advertisement for bids:
      i. A description of the materials, supplies, or work involved;
      ii. Completion or delivery date requirements;
      iii. Requirements for bids, bonds, and/or deposits;
      iv. Requirements for performance, labor, and material payment bonds;
      v. Date, time, and place of the bid opening;
      vi. The approximate time period between the opening of bids and the award of the contract; and
      vii. Any other useful information.
   c. If specifications are available, the advertisement for bids describes where they may be obtained and/or inspected.
   d. All bids must be sealed by the bidder. 105 ILCS 5/10-20.21(a).
   e. A Board member or District employee opens the bids at a public bid opening at which time the contents are announced. 105 ILCS 5/10-20.21(a). Bids may be communicated, accepted, and opened electronically. The following safeguards apply to an electronic bid opening (105 ILCS 5/10-20.21(a)):
      i. On the date and time of a bid opening, the primary person conducting the electronic bid process shall log onto a specified database using a unique username and password previously assigned to the bidder to allow access to the bidder's specific bid project number.
      ii. The specified electronic database must be on a network that: (i) is in a secure environment behind a firewall; (ii) has specific encryption tools; (iii) maintains specific intrusion detection systems; (iv) has redundant systems architecture with data storage back-up, whether by compact disc or tape; and (v) maintains a disaster recovery plan.

f. Each bidder is given at least three days' notice of the time and place of the bid opening. 105 ILCS 5/10-20.21(a).
g. Conduct that promotes deception and collusion during the bidding process is prohibited and may violate the Ill. Criminal Code, 720 ILCS 5/33E-1 et seq. Examples include interference with public contracting, bid-rigging, and acquisition or disclosure of bidding information by a public official.

3. Following the opening of bids, the Superintendent (and Board Attorney, if needed) determines the lowest responsible bidder and verifies the bidders' qualifications. Contracts are awarded at a properly called open meeting of the Board. If the Superintendent recommends a bidder other than the lowest bidder, the Superintendent must provide the Board with the factual basis for the recommendation in writing. The Board, if it accepts a bid from a bidder other than the lowest, records the factual basis for its decision in its minutes. A contract arises only when the Board votes to accept a bid, although written notice of the award will later be given to the successful bidder.
4. Notwithstanding the foregoing, the District is relieved from bidding when making joint purchases with other public entities in compliance with the Governmental Joint Purchasing Act. 30 ILCS 525/.

LEGAL REF.: 105 ILCS 5/10-20.21, 5/10-20.44, 5/10-20.85, 5/10-21.9, 5/19A-1 et seq., 5/21B-80, 5/22-94, and 5/24-5.
30 ILCS 580/, Ill. Drug Free Workplace Act.
35 ILCS 105/, Ill. Use Tax Act.
50 ILCS 510/, Local Government Professional Services Selection Act.
410 ILCS 170/10, Coal Tar Sealant Disclosure Act.

Adopted 4/9/24

4:60-AP2 Administrative Procedure - Third Party Non-Instructional Contracts

When completed, this procedure documents that the requirements in 105 ILCS 5/10-22.34c have been fulfilled, thereby allowing the School Board to approve a contract for third party non-instructional services currently performed by any employee or bargaining unit member (such as, but not limited to, custodial services, student transportation, and school meal services). However, these conditions are not mandatory for the Board to enter into a contract, of no longer than three months in duration, with a third party for non-instructional services currently performed by an employee or bargaining unit member for the purpose of augmenting the current workforce in an emergency situation that threatens the safety or health of the District's students or staff, provided that the Board meets all of its obligations under the Ill. Educational Labor Relations Act.

Name of proposed contractor: _____

Name and description of proposed contract for third party non-instructional services: _____

Effective date of proposed contract: _____

Each of the following conditions must be checked to document that it was present or fulfilled:

☐ Any lay-off resulting from entering into the contract for third party non-instructional services will comply with the applicable collective bargaining agreement and/or Board policy 5:290, *Employment Terminations and Suspensions*.

☐ The proposed contract will not be entered into or become effective during the term of an applicable collective bargaining agreement covering any employees who perform the non-instructional services.

☐ The proposed contract will take effect upon or after the expiration of an existing collective bargaining agreement.

☐ The proposed contractor has submitted a bid that includes the following:

A. Evidence of liability insurance in scope and amount equivalent to the liability insurance provided by the Board pursuant to 105 ILCS 5/10-22.3;

B. A benefits package for the third party's employees who will perform the non-instructional services comparable to the benefits package provided to District employees who perform those services;

C. A list of the number of employees who will provide the non-instructional services, the job classifications of those employees, and the wages the proposed contractor will pay those employees;

D. A minimum three-year cost projection, using generally accepted accounting principles, and which the proposed contractor is prohibited from increasing if the bid is accepted by the Board, for each and every expenditure category and account for performing the non-instructional services;

E. Composite information about the criminal and disciplinary records, including alcohol or other substance abuse, Ill. Dept. of Children and Family Services complaints and investigations, traffic violations, and license revocations or any other licensure problems,

of any employees who may perform the non-instructional services, provided that the individual names and other identifying information of employees need not be provided with the submission of the bid, but must be made available upon request of the Board; and

F. An affidavit, notarized by the president or chief executive officer of the proposed contractor, that each of its employees has completed a criminal background check as required by 105 ILCS 5/10-21.9 within three months prior to submission of the bid, provided that the results of such background checks need not be provided with the submission of the bid, but must be made available upon request of the Board.

☐ The following is attached or otherwise available: a cost comparison, using generally accepted accounting principles, of each and every expenditure category and account that the District projects it would incur over the term of the contract if it continued to perform the non-instructional services using its own employees with each and every expenditure category and account that is projected the proposed contractor would incur if it performed the non-instructional services.

☐ The Board reviewed and considered all bids by third parties to perform the non-instructional services in open session of a regularly scheduled Board meeting, unless the exclusive bargaining representative of the employees who perform the non-instructional services, if any such exclusive bargaining representative exists, agreed in writing that such review and consideration could take place in open session at a specially scheduled Board meeting.

Date of Board meeting:_____

☐ Each of the following occurred:

1. A minimum of one public hearing, conducted by the Board prior to a regularly scheduled Board meeting, to discuss the proposed contract was held before the Board entered such contract.

   Date of hearing:_____

2. The Board provided notice to the public of the date, time, and location of the first public hearing on or before the initial date that bids to provide the non-instructional services are solicited or a minimum of 30 days prior to entering into such a contract, whichever provides a greater period of notice.

   Date and manner of notice:_____

☐ The proposed contract contains provisions requiring the proposed contractor to offer available employee positions pursuant to the contract to qualified School District employees whose employment is terminated because of the contract.

☐ The proposed contract contains provisions requiring the proposed contractor to comply with a policy of nondiscrimination and equal employment opportunity for all persons and to take affirmative steps to provide equal opportunity for all persons.

4:60-AP3 Administrative Procedure - Criminal History Records Check of Contractor Employees

Use this procedure to implement the *complete criminal history records check* referenced in 5:30-AP2, *Investigations*, that is required when an employee of a contractor will have direct, daily contact with one or more students.

Actor	Action
Firm contracting with the District, referred to herein as "contractor"	Prohibits any of the contractor's employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 105 ILCS 5/10-21.9(c) or 5/21B-80(c), amended by P.A. 102-552. Prohibits any of the contractor's employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee's sentence for the criminal offense. Requires each employee who will have direct, daily contact with student(s) to cooperate during the District's fingerprint-based criminal history records check on him or her. 105 ILCS 5/10-21.9(f). Reimburses the District for the cost of the fingerprint-based criminal history records check that the District obtains on each employee of a contractor who will have direct, daily contact with student(s). Follows 4:60-AP4, *Sexual Misconduct Related Employment History Review (EHR) of Contractor Employees*, if the contractor's employees will have *direct contact with children or students*, as defined by 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23.
Superintendent, Business Manager, or designee	To ensure that a contractor complies with the fingerprint-based criminal history records check under 105 ILCS 5/10-21.9, may require that the following sample language or similar language be included in each contract with any firm whenever any employee of the firm will have direct, daily contact with one or more students. The contractor shall not send to any school building or school property any employee or agent who has been convicted of a crime listed in 105 ILCS 5/10-21.9(c) and/or 5/21B-80(c), as amended from time to time, or who is listed in the Ill. Sex Offender Registry or the Ill. Murderer and Violent Offender Against Youth Registry. The contractor

Actor	Action
Superintendent, Business Manager, or designee, cont'd	shall not send to any school building or school property any employee or agent who has been convicted of a crime listed in 105 ILCS 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee's sentence for the criminal offense. The contractor shall make every employee who will have direct, daily contact with one or more students available to the District for the purpose of submitting to a fingerprint-based criminal history records check. The check shall occur before any employee or agent is sent to any school building or school property. The contractor will reimburse the District for the cost of each check. The District must also provide a copy of the report to the individual employee of the contractor, but is not authorized to release it to the contractor. Additionally, at least quarterly, the contractor shall check if any of its employees or agents having direct, daily contact with one or more students is listed on the Ill. Sex Offender Registry or the Ill. Murderer and Violent Offender Against Youth Registry. Completes the required forms to request a fingerprint-based criminal history record check on each contractor's employee who will have direct, daily contact with one or more students. 105 ILCS 5/10-21.9(f). See 5:30-AP2, *Investigations*. Screens the individual's name and address against the: (1) Ill. Sex Offender Registry, www.isp.illinois.gov/Sor/Disclaimer, and (2) the Violent Offender Against Youth Registry maintained by the Ill. State Police (ISP), www.isp.illinois.gov/MVOAY/Disclaimer. The fingerprint-based criminal history record check and two registry screens constitute the complete criminal history background check that must be conducted under 105 ILCS 5/10-21.9(f), as described in 5:30-AP2, *Investigations*. Whenever a contractor sends an employee who will have direct, daily contact with a student(s) to the District for the first time, ASKS the contractor: Will this employee be assigned to more than one school district? IF YES, may request the applicable Regional Superintendent to be responsible for obtaining a fingerprint-based criminal history records check and checking the Statewide Sex Offender Database for each such employee. The Regional Superintendent is required to promptly report to the District any information concerning the employee's record of conviction and identification as a sex offender. 105 ILCS 5/10-21.9(f). Has another Illinois school district already conducted a fingerprint-based criminal history records check on the

Actor	Action
	employee within the last year? IF YES, may request a copy of it for that contractor's employee from the school district where the contractor's employee worked or works. The District may rely on a check done by another district within the last year. 105 ILCS 5/10-21.9(f-5). Note: State law does not define "within the last year." Upon a request from any school, school district, community college district, or private school for a copy of a fingerprint-based criminal history records check for an employee of a contractor, FIRST determines if the District conducted the check within the last year. IF YES, provides a copy of it to the requesting entity. 105 ILCS 5/10-21.9(f-5).Note: An immunity provision, contained in 20 ILCS 2635/7(A)(3), makes the District not liable to an individual for its reasonable actions taken in reliance on the individual's Criminal History Records Information (CHRI) report. The District will lose the immunity if it was notified by the individual or by the ISP that the CHRI report is inaccurate or incomplete. Follows 4:60-AP4, *Sexual Misconduct Related Employment History Review (EHR) of Contractor Employees*, if the contractor's employees will have *direct contact with children or students*, as defined by 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23.

Adopted 8/8/23

4:60-AP4 Administrative Procedure - Federal and State Award Procurement Procedures

Use this procedure to implement the sexual misconduct related employment history review (EHR) required by 105 ILCS 5/22-94 when an employee of a contractor will have direct contact with children or students. A copy of this procedure may be provided to a contractor to inform or remind the contractor of its legal obligations.

Glossary of Terms

Contractor - A firm holding a contract with any school including, but not limited to, food service workers, school bus drivers, and other transportation employees who have direct contact with children or students. 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23.

Direct contact with children or students - The possibility of care, supervision, guidance, or control of children or students or routine interaction with children or students. 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23.

School - A public or nonpublic elementary or secondary school. 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23.

Sexual misconduct - Any act, including but not limited to, any verbal, nonverbal, written, or electronic communication or physical activity, by an employee with direct contact with a student, that is directed toward or with a student to establish a romantic or sexual relationship with the student. Examples include but are not limited to: 1) a sexual or romantic invitation, 2) dating or soliciting a date, 3) engaging in sexualized or romantic dialog, 4) making sexually suggestive comments that are directed toward or with a student, 5) self-disclosure or physical exposure of a sexual, romantic, or erotic nature, 6) a sexual, indecent, romantic, or erotic contact with the student. 105 ILCS 5/22-94(b), added by P.A. 102-702, eff. 7-1-23; 105 ILCS 5/22-85.5(c), added by P.A. 102-676.

EHR of Contractor Employees

Actor	Action
Contractor	At the time of initial hiring of an employee or prior to the assignment of an employee to perform work involving *direct contact with children or students*, conducts an EHR of the employee, in accordance with 105 ILCS 5/22-94, added by P.A. 102-702, eff. 7-1-23, specifically: Provides the employee with: (a) a *Sexual Misconduct Disclosure* form, using the Ill. State Board of Education's (ISBE) *Sexual Misconduct Disclosure Template for Applicant* at www.isbe.net/Documents/Temp1-ISBE-Sexual-Misconduct-Disclosure-Form-Applicant.pdf and (b) copies of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form, using ISBE's *Authorization for Release of Sexual Misconduct-Related Information and*

Actor	Action
	Current/Former Employer Response Template at www.isbe.net/Documents/Temp2-Auth-Release-Sexual-Misconduct-Related-Info.pdf for the applicant to complete for each current employer and for each former employer where the applicant worked in direct contact with children or students. The Contractor cannot hire an applicant for a position involving direct contact with children or students who does not provide the information required by the forms (105 ILCS 5/22-94(f), added by P.A. 102-702, eff. 7-1-23). Reviews the applicant's completed *Sexual Misconduct Disclosure* form and *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form(s). Provides to all employers identified by the applicant in Section 3 of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form a copy of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form (105 ILCS 5/22-94(c)(4), added by P.A. 102-702, eff. 7-1-23). The employer(s) must return the completed form(s) to the Contractor within 20 calendar days (105 ILCS 5/22-94(e), added by P.A. 102-702, eff. 7-1-23) after receipt. Informs the District of any instance known to the Contractor in which the employee: (a) has been the subject of a sexual misconduct allegation unless a subsequent investigation resulted in a finding that the allegation was false, unfounded, or unsubstantiated; (b) has ever been discharged, been asked to resign from, resigned from, or otherwise been separated from any employment, been removed from a substitute list, been disciplined by an employer, or had an employment contract not renewed due to an adjudication or finding of sexual misconduct or while an allegation of sexual misconduct was pending or under investigation, unless the investigation was false, unfounded, or unsubstantiated; or (c) has ever had a license or certificate suspended, surrendered, or revoked due to an adjudication or finding of sexual misconduct or while an allegation of sexual misconduct was pending or under investigation, unless the investigation resulted in a finding that the allegation was false, unfounded, or unsubstantiated. 105 ILCS 5/22-94(j)(3)(A-C), added by P.A. 102-702, eff. 7-1-23.

Actor	Action
Superintendent, Business Manager, or designee	Confirms that the Contractor has performed or will perform an EHR for each of its employees who will perform work involving direct contact with children or students. The EHR remains valid as long as the employee remains employed by Contractor, even if the employee is assigned to perform work for another school. 105 ILCS 5/22-94(j)(1), added by P.A. 102-702, eff. 7-1-23. To ensure the EHR is performed, may require the following sample language or similar language be included in each contract with the Contractor: Either at the time of initial hiring or prior to assigning any employee to perform work in the District involving direct contact with children or students, the Contractor will perform an Employment History Review (EHR) for the employee, in accordance with the requirements of 105 ILCS 5/22-94, as it may be amended from time to time. Notwithstanding the foregoing, if Contractor is furnishing substitute staffing services, Contractor shall perform the EHR upon initial hiring of the substitute employee. In performing the EHR, the Contractor agrees it will provide the employee with: (1) a *Sexual Misconduct Disclosure* form, using the Ill. State Board of Education's (ISBE) *Sexual Misconduct Disclosure Template for Applicant* at www.isbe.net/Documents/Temp1-ISBE-Sexual-Misconduct-Disclosure-Form-Applicant.pdf and (2) copies of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form, using ISBE's *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response Template* at www.isbe.net/Documents/Temp2-Auth-Release-Sexual-Misconduct-Related-Info.pdf for the employee to complete for each current employer and for each former employer where the employee worked in direct contact with children or students. The Contractor shall provide to all employers identified by the employee in Section 3 of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form a copy of the *Authorization for Release of Sexual Misconduct-Related Information and Current/Former Employer Response* form (105 ILCS 5/22-94(c)(4), added by P.A. 102-702, eff. 7-1-23). The Contractor will instruct the identified

Actor	Action
	employer(s) to return the completed form(s) to the Contractor within 20 calendar days after receipt. The Contractor shall immediately inform the District of any instances of sexual misconduct involving the employee as set forth in 105 ILCS 5/22-94(j)(3). The Contractor shall maintain all records of EHRs and upon the District's request shall provide the District with access to and copies of records pertaining to the EHRs of Contractor employees. The Contractor shall not send to any school building or other District property: (1) any employee for whom an EHR has not been performed, (2) any employee who provides false information or willingly fails to disclose information required by the EHR, or (3) any employee to whom the District objects after the Contractor informs it of an instance of sexual misconduct involving the employee as set forth in 105 ILCS 5/22-94(j)(3). 105 ILCS 5/22-94(e) provides that a "contractor who provides information or records about a current or former employee or applicant under this Section [105 ILCS 5/22-94] is immune from criminal and civil liability for the disclosure of the information or records, unless the information or records provided were knowingly false." For the duration of this Agreement, and in accordance with 105 ILCS 5/22-94(g), the Contractor agrees it will not enter into any collective bargaining agreement, employment contract, agreement for resignation or termination, severance agreement, or any other contract or agreement that: (1) has the effect of suppressing information concerning a pending investigation or a completed investigation in which an allegation was substantiated related to a report of suspected sexual misconduct by a current or former employee, (2) affects the ability of the Contractor to report suspected sexual misconduct to the appropriate authorities, or (3) requires the Contractor to expunge information about allegations or findings of suspected sexual misconduct from any documents maintained by the Contractor, unless, after an investigation, an allegation is found to be false, unfounded, or unsubstantiated. Whenever a Contractor sends an employee who will have direct contact with children or students to the District for the first time, requests that the Contractor provide the District with copies of the records pertaining to the EHR of any

Actor	Action
	employee involved in an instance of sexual misconduct as set forth in 105 ILCS 5/22-94(j)(3).

Following the EHR of Contractor Employees

Actor	Action
Contractor	Maintains records documenting EHRs as required by law and upon the District's request, provides the District access to records pertaining to the employment history reviews of employees. 105 ILCS 5/22-94(j)(2), added by P.A. 102-702, eff. 7-1-23. Prohibits the assignment of an employee to a position at the District involving direct contact with children or students if: (1) the employee does not provide the information required by 105 ILCS 5/22-94(c) or provides false information or willfully fails to disclose information required by the EHR (2) the Contractor determines the employee is unfit for the position, or (3) the District objects to the assignment after the Contractor informs it of an instance of sexual misconduct as listed in the section above. 105 ILCS 5/22-94(f) and j(4), added by P.A. 102-702, eff. 7-1-23. Disciplines, up to and including termination or denial of employment, any employee who provides false information or willfully fails to disclose information required by the EHR. 105 ILCS 5/22-94(d), added by P.A. 102-702, eff. 7-1-23. As appropriate, reports responses received from an applicant's employer(s) to ISBE, a state licensing agency, a law enforcement agency, a child protective services agency, another school or contractor, or a prospective employer. **Note:** A contractor or district that reports information or records about a current or former employee or applicant under 105 ILCS 5/22-94 is immune from criminal and civil liability for the disclosure of the information or records unless the information or records provided were knowingly false. 105 ILCS 5/22-94(e), added by P.A. 102-702, eff. 7-1-23.
Superintendent, Business Manager, or designee	Reviews all EHR records provided by the Contractor to evaluate the employee's fitness to be assigned to work in the District. As appropriate, reports responses received from an applicant's employers to ISBE, a state licensing agency, a law enforcement agency, a child protective services

Actor	Action
	agency, another school or contractor, or a prospective employer. If a Contractor employee is alleged to have engaged in sexual misconduct with an enrolled student, ensures notice to the student and parent(s)/guardian(s) of the student is provided and the allegations are investigated in accordance with administrative procedure 5:90-AP2, *Parent/Guardian Notification of Sexual Misconduct*, see the **Notification of Alleged Sexual Misconduct** subhead. If any of the Contractor's employees will have direct, daily contact with one or more students, conducts a *complete criminal history records check* of the Contractor employees under 105 ILCS 5/10-21.9(f) by following 4:60-AP3, *Criminal History Records Check of Contractor Employees*.

Adopted 8/8/23

4:60-AP4, E1 Exhibit - Internal Procedures for Procurement Transactions

Actor	Action
Staff Member	Identifies a procurement need and makes a written request to the appropriate department head and/or Building Principal.
Building Principal, appropriate department head or designee	Evaluates staff member's request by conducting a needs analysis, determining a funding source, and determining if request should be sent to the Business Manager and/or designee for further analysis. **Note:** The Principal's procurement role likely varies based upon each district and type of expense.
Business Manager and/or designee	Upon request of the Building Principal, conducts further analysis of staff member's request in order to verify information and determine if funds are available. Provides Building Principal with results of further analysis.
Building Principal, appropriate department head or designee	Provides Superintendent and/or designee with staff member's written procurement request, his/her analysis of the staff member's request, and, if applicable, any further analysis conducted by the Business Manager and/or designee.
Superintendent and/or designee	Reviews staff member's request and analyses of same; evaluates educational value of procurement requested. Superintendent and/or designee may then: • Approve procurement request if below amount set by the School Board and/or State law (105 ILCS 5/10-20.21); • Deny procurement request; or • If procurement request amount exceeds the Superintendent's authority, seeks Board permission for procurement. See policy 4:60, *Purchases and Contracts*, for the amount designated by the Board. When presenting a contract or purchase for Board approval, the Superintendent and/or designee shall ensure it complies with applicable State and federal law, consulting with the Board Attorney as needed. See policies 4:60, *Purchases and Contracts* and 7:345, *Use of Educational Technologies; Student Data Privacy and Security*.
School Board	Considers any procurement requests submitted by the Superintendent and/or designee. Considers any contract requests submitted by the Superintendent and/or designee.

Actor	Action
Superintendent and/or designee	Identifies appropriate method of procurement and ensures appropriate method is followed.

Adopted 10/11/22

4:60-AP5 Administrative Procedure - Federal and State Award Procurement Procedures

In addition to the State legal requirements for purchases and contracts set forth in Board policy 4:60, *Purchases and Contracts*, and 4:60-AP1, *Purchases*, the following procedures apply to District procurement under federal awards and State awards governed by the Grant Accountability and Transparency Act (GATA). The District maintains oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Consult the Board Attorney regarding the legal requirements presented by this administrative procedure as well as before a contract is presented to the Board.

Code of Conduct

Board policies 2:100, *Board Member Conflict of Interest*, and 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*, contain standards of conduct covering conflicts of interest and governing the actions of board members and employees engaged in the selection, award, and administration of contracts.

General Procurement Standards

A. The District shall avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. **Note:** A conflict between this regulation's requirements and the Ill. Criminal Code of 2012 may exist. See 720 ILCS 5/33E-2(i-5) and 5/33E-18 (defines and prohibits bid stringing, a Class 4 felony) and 720 ILCS 5/33E-3 (prohibits bid rigging, a Class 3 felony).

B. To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.

C. The District may use federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

D. The District may use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost. **Note:** A conflict between this regulation's requirements and the Ill. Criminal Code of 2012 may exist. See 720 ILCS 5/33E-2(i-5) and 5/33E-18 (defines and prohibits bid stringing, a Class 4 felony).

E. The District shall only award contracts to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. **Note:** State law requires award to the "lowest responsible bidder."

F. The District shall maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

G. The District may use a time and materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Note: The Ill. Criminal Code of 2012 (720 ILCS 5/33E-9) requires approval of the Board or designee when a contract cost increases or decreases by $25,000, a/k/a *change orders*. If a change order will exceed the original contract price by 10%, it must be rebid.

H. The District shall be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

Competition

A. All procurement transactions for the acquisition of property or services required under an award shall be conducted in a manner providing full and open competition consistent with the standards of State law (105 ILCS 5/10-20.21), policy 4:60, *Purchases and Contracts*, and this section. To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Situations considered to be restrictive of competition include, but are not limited to:

   1. Placing unreasonable requirements on firms in order for them to qualify to do business;
   2. Requiring unnecessary experience and excessive bonding;
   3. Noncompetitive pricing practices between firms or between affiliated companies;
   4. Noncompetitive contracts to consultants that are on retainer contracts;
   5. Organizational conflicts of interest;
   6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
   7. Any arbitrary action in the procurement process.

B. The District shall conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographic preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. **Note:** State law may also encourage or discourage these preferences. Discuss these with the Board Attorney. See also Doyle Plumbing & Heating Co. v. Bd. of Educ., Quincy Pub. Sch. Dist. No. 172, 291 Ill.App.3d 221 (4th Dist. 1997); Cardinal Glass Co. v. Bd. of Educ. of Mendota Comm. Consol. Sch. Dist. 289, 113 Ill.App.3d 442 (3rd Dist. 1983). Nothing in this section preempts State licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract. **Note:** The Board must also follow the Local Government Professional Services Selection Act. 50 ILCS 510/.

C. Procurement Transactions. All solicitations will:

1. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.
    a. Such description must not, in competitive procurements, contain features which unduly restrict competition.
    b. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
    c. Detailed product specifications should be avoided if at all possible.
    d. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated.
2. Identify all requirements which offerors must fulfill and all other factors to be used in evaluating bids and proposals.

D. The District shall ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. **Note:** State laws may conflict with this provision. See 105 ILCS 5/10-20.21 and 50 ILCS 510/.

E. The District shall not preclude potential bidders from qualifying during the solicitation period.

F. Noncompetitive procurements can only be awarded in accordance with the requirements detailed in paragraph E of the **Methods of Procurement** subhead below.

Methods of Procurement

The District shall use one of the following methods of procurement:

A. Micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold of $10,000, as may be amended from time to time. To the extent practicable, the District shall distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the Board considers the price to be reasonable based on research, experience, purchase history, or other information and documents it maintains. **Note:** See 105 ILCS 5/10-20.21 and policy 4:60, *Purchases and Contracts*.

B. Small purchase procedures. Small purchase procedures may be used for the acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the Simplified Acquisition Threshold of $250,000, as may be amended from time to time. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources, as determined appropriate by the District.

C. Sealed bids. Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. **Note:** 105 ILCS 5/10-20.21 requires "lowest responsible bidder." The sealed bid method is the preferred method for procuring construction, if the conditions in 2 C.F.R. §200.320(b)(1)(i) apply. If

sealed bids are used, the requirements in 2 C.F.R. §200.320(b)(1)(ii) apply. **Note:** 105 ILCS 5/10-20.21 requires sealed bids.

D. Proposals. The use of proposals is a procurement method in which either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. Proposals must be solicited from an adequate number of qualified offerors. If this method is used, the requirements in 2 C.F.R. §200.320(b)(2) apply. **Note:** 105 ILCS 5/10-20.21 requires sealed bids.

E. Noncompetitive procurement. Noncompetitive procurement may be used only when one or more of the circumstances in §200.320(c) apply: (1) the cost does not exceed the micro-purchase threshold; (2) the item is available only from a single source; (3) public exigency or emergency will not permit a delay resulting from publicizing a competitive solicitation; (4) the awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the District; or (5) after solicitation of a number of sources, the District determines competition is inadequate. **Note:** 50 ILCS 510/ may conflict with this regulation.

Procurement of Recovered Materials

When the District procures items designated by the Environmental Protection Agency (EPA) as capable of being produced with recovered materials, and the purchase of the items exceeds $10,000 or the quantity of the items (or functionally equivalent items) purchased in the preceding fiscal year exceeded $10,000, the District shall:

A. Ensure the items contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition. The decision not to procure such items must be based on a determination that the items: (1) are not reasonably available within a reasonable period of time, (2) fail to meet the performance standards in the applicable specifications, or (3) are only available at an unreasonable price.

B. Procure solid waste management services in a manner that maximizes energy and resource recovery.

C. Establish an affirmative procurement program for procurement of recovered materials identified in EPA guidelines. The program must contain the following elements:
    1. Preference program for purchasing the designated items;
    2. Promotion program;
    3. Procedures for obtaining estimates and certifications of recovered materials content and for verifying the estimates and certifications; and
    4. Annual review and monitoring of the effectiveness of the program.

Contracting with Small and Minority Businesses, Women's Business Enterprises, and Labor Surplus Area Firms

The District shall take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps shall include:

A. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

B. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

C. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
D. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
E. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Dept. of Commerce; and
F. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (A) through (E) of this section.

Contract Cost and Price

A. The District shall perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non–federal entity must make independent estimates before receiving bids or proposals.
B. The District shall negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographic area for similar work.
C. Costs or prices based on estimated costs for contracts under the federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the District under Subpart E, Cost Principles, of 2 C.F.R. Part 200.
D. The cost plus a percentage of cost and percentage of construction cost methods of contracting shall not be used.

Federal Awarding Agency or Pass-Through Entity Review

The District shall make available, upon request of the federal awarding agency or pass-through entity (Ill. State Board of Education):

A. Technical specifications on proposed procurements where the federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition; and
B. Procurement documents (such as requests for proposals or invitations for bids, or independent cost estimates) for pre-procurement review when one or more of the circumstances in §200.325(b) apply.

Bonding Requirements

A. For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, the federal awarding agency or pass-through entity may accept the bonding policy and requirements of the District provided that the federal

awarding agency or pass-through entity has made a determination that the federal interest is adequately protected.

B. If such a determination has not been made, the minimum requirements shall be as follows:
   1. A bid guarantee from each bidder equivalent to five percent of the bid price. The *bid guarantee* must consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute such contractual documents as may be required within the time specified.
   2. A performance bond on the part of the contractor for 100 percent of the contract price. A *performance bond* is one executed in connection with a contract to secure fulfillment of all the contractor's requirements under such contract.
   3. A payment bond on the part of the contractor for 100 percent of the contract price. A *payment bond* is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

Contract Provisions

The District's contracts shall contain the applicable provisions described in Appendix II to 2 C.F.R. Part 200, *Contract Provisions for non-Federal Entity Contracts Under Federal Awards*.

Adopted 8/8/23

4:60-AP5, E Exhibit - Internal Procedures for Procurement Transactions

Actor	Action
Staff Member	Identifies a procurement need and makes a written request to the appropriate department head and/or Building Principal.
Building Principal, appropriate department head or designee	Evaluates the staff member's request by conducting a needs analysis, determining a funding source, and determining if the request should be sent to the Business Manager and/or designee for further analysis. **Note:** The Principal's procurement role likely varies based upon each district and type of expense.
Business Manager and/or designee	Upon request of the Building Principal, conducts further analysis of the staff member's request in order to verify information and determine if funds are available. Provides the Building Principal with results of further analysis.
Building Principal, appropriate department head or designee	Provides the Superintendent and/or designee with the staff member's written procurement request, his/her analysis of the staff member's request, and, if applicable, any further analysis conducted by the Business Manager and/or designee.
Superintendent and/or designee	Reviews the staff member's request and analyses of same; evaluates the educational value of procurement requested. The Superintendent and/or designee may then: • Approve the procurement request if it is below the amount set by the School Board and/or State law (105 ILCS 5/10-20.21); • Deny the procurement request; or • If the procurement request amount exceeds the Superintendent's authority, seek Board permission for procurement. See policy 4:60, *Purchases and Contracts*, for the amount designated by the Board. When presenting a contract or purchase for Board approval, the Superintendent and/or designee shall ensure it complies with applicable State and federal law, consulting with the Board Attorney as needed. See policies 4:60, *Purchases and Contracts* and 7:345, *Use of Educational Technologies; Student Data Privacy and Security*.

Actor	Action
School Board	Considers any procurement requests submitted by the Superintendent and/or designee. Considers an4y contract requests submitted by the Superintendent and/or designee.
Superintendent and/or designee	Identifies appropriate method of procurement and ensures appropriate method is followed.

Adopted 8/8/23

4:60-E Exhibit - Notice to Contractors

On District letterhead.

Date

Notice to contractor:

You are receiving this notice because you may or will be performing *public works* for the School District as that term is defined in the Illinois Prevailing Wage Act (IPWA). 820 ILCS 130/2.

This notice applies to the public works described as:_____.

The IPWA requires contractors and subcontractors to pay laborers, workers, and mechanics performing services on public works projects no less than the *prevailing rate of wages* (hourly cash wages plus fringe benefits) in the county where the work is performed. Any prevailing rate of wages as they are revised by the Ill. Dept. of Labor (IDOL) shall apply to this contract. You are notified that any rate changes to the prevailing wage rate are available on IDOL's official website. For information regarding current prevailing wage rates, please see the IDOL's website at: https://labor.illinois.gov/laws-rules/conmed/prevailing-wage-rates.html.

All contractors and subcontractors rendering services for the public works must comply with all requirements of the IPWA, including but not limited to, all wage, notice, and recordkeeping duties.

The above paragraph was or will be included in the project specifications and the contract. 820 ILCS 130/4(e). If the work is awarded without a public bid, contract, or project specification, the notice was or will be included in the purchase order related to the work or in a separate document, such as this notification. 820 ILCS 130/4(f).

Adopted 12/12/23

4:70 Resource Conservation

The Superintendent or designee shall manage a program of energy and resource conservation for the District that includes:

1. Periodic review of procurement procedures and specifications to ensure that purchased products and supplies are reusable, durable, or made from recycled materials, if economically and practically feasible.
2. Purchasing recycled paper and paper products in amounts that will, at a minimum, meet the specifications in the School Code, if economically and practically feasible.
3. Periodic review of procedures on the reduction of solid waste generated by academic, administrative, and other institutional functions. These procedures shall: (a) require recycling the District's waste stream, including landscape waste, computer paper, and white office paper, if economically and practically feasible; (b) include investigation of the feasibility of potential markets for other recyclable materials that are present in the District's waste stream; and (c) establish a goal for the reduction in the amount of solid waste generated by the District, when it is economically and practically feasible to do so.
4. Energy conservation measures.

LEGAL REF.: 105 ILCS 5/10-20.19c and 5/19b.

CROSS REF.: 4:60 (Purchases and Contracts), 4:150 (Facility Management and Building Programs)

2/11/25

4:70-AP Administrative Procedure - Resource Conservation

Definitions

De-inked stock — Paper that has been processed to remove inks, clays, coatings, binders, and other contaminants.

High grade printing and writing papers — Includes offset-printing paper, duplicator paper, writing paper (stationery), tablet paper, office paper, note pads, xerographic paper, envelopes, form bond including computer paper and carbonless forms, book papers, bond papers, ledger paper, book stock, and cotton fiber papers.

Paper and paper products — High-grade printing and writing papers, tissue products, newsprint, unbleached packaging, and recycled paperboard.

Postconsumer material — Only those products generated by a business or consumer, that have served their intended end uses, and that have been separated or diverted from solid waste; wastes generated during the production of an end product are excluded. Postconsumer material includes:

- Paper, paperboard, and fibrous waste from retail stores, office buildings, homes and so forth, after the waste has passed through its end usage as a consumer item, including used corrugated boxes, old newspapers, mixed-waste paper, tabulating cards, and used cordage; and
- All paper, paperboard, and fibrous wastes that are diverted or separated from the municipal waste stream.

Recovered paper material — Paper waste generated after the completion of the papermaking process, such as postconsumer material, envelope cuttings, bindery trimmings, printing waste, cutting and other converting waste, butt rolls, and mill wrappers, obsolete inventories, and rejected unused stock. “Recovered paper material,” however, does not include fibrous waste generated during the manufacturing process such as fibers recovered from waste water or trimmings of paper machine rolls (mill broke), or fibrous by-products of harvesting, extraction or woodcutting processes, or forest residues such as bark. Recovered paper material includes:

- Postconsumer material;
- Dry paper and paperboard waste generated after completion of the papermaking process (that is, those manufacturing operations up to and including the cutting and trimming of the paper machine reel into smaller rolls or rough sheets), including envelope cuttings, bindery trimmings, and other paper and paperboard waste resulting from printing, cutting, forming and other converting operations, or from bag, box, and carton manufacturing, and butt rolls, mill wrappers, and rejected unused stock; and
- Finished paper and paperboard from obsolete inventories of paper and paperboard manufacturers, merchants, wholesalers, dealers, printers, converters or others.

Recycled paperboard — Includes paperboard products, folding cartons and pad backings.

Tissue products — Includes toilet tissue, paper towels, paper napkins, facial tissue, paper doilies, industrial wipers, paper bags, and brown papers. These products shall also be unscented and shall not be colored.

Unbleached packaging — Includes corrugated and fiber storage boxes.

Procurement Procedures and Specifications for Products and Supplies

Procurement procedures and specifications for products and supplies shall be periodically reviewed to ensure that the District is: (a) purchasing products and supplies that are reusable, durable, or made from or contain recycled materials, if economically and practically feasible, and (b) giving preference to products and supplies containing the highest amount of recycled material and that are consistent with the effective use of the product or supply, if economically and practically feasible.

Recycled Paper and Paper Products Purchases

I. Whenever economically and practically feasible, at least 75% of the total dollar value of paper and paper products purchased by the District will be recycled paper and paper products.

   All paper purchased for publishing student newspapers must be recycled newsprint. Paper and paper products purchased from private sector vendors pursuant to printing contracts are exempted from this requirement.

II. Wherever economically and practically feasible, recycled paper and paper products shall contain postconsumer or recovered paper materials as follows:

- Recycled high grade printing and writing paper shall contain at least 50% recovered paper material and shall consist of at least 50% de-inked stock or postconsumer material.
- Recycled tissue products shall contain at least 45% postconsumer material.
- Recycled newsprint shall contain at least 80% postconsumer material.
- Recycled unbleached packaging shall contain at least 55% postconsumer material.
- Recycled paperboard shall contain at least 95% postconsumer material.

These regulations do not apply to art materials, nor to any newspapers, magazines, textbooks, library books or other copyrighted publications that are purchased or used by the District or any school or attendance center within the District, or that are sold in any school supply store operated by or within any such school or attendance center.

Solid Waste Reduction

The Superintendent will appoint a team of interested individuals representing various District departments to:

57. Periodically review methods and procedures to reduce solid waste generated by academic, administrative, and other institutional functions. These procedures must be designed to, when economically and practically feasible, recycle the District's waste stream, including without limitation landscape waste, computer paper, and white office paper.
58. Establish a goal for reduction in the amount of solid waste generated by the District, when it is economically and practically feasible to do so.
59. Identify indicators to monitor the District's progress toward achieving any established solid waste reduction goal. As necessary, the procedures and methods shall be adjusted and refined.
60. Make periodic progress reports to the Superintendent or designee.

The team shall devise and oversee methods for making the following activities part of the District culture:

61. Staff members actively pursue waste reduction and prevention activities. Examples include:

a. Printing and copying individual documents on both sides of the page.
b. Setting computer software for default two-sided printing including word processing, spreadsheets, electronic mail, and others.
c. Printing or copying only the pages needed.
d. Routing memos and newsletters.
e. Providing trays to collect and reuse one-sided paper.
f. Reducing unwanted mail and eliminate excess mailings.

62. Staff members and students seek to reuse or recycle materials to divert them from the waste stream whenever possible.
63. A training plan instructs staff members and students in waste reduction and recycling practices.
64. The District's solid waste reduction program is publicized and its benefits are emphasized, including cost savings by lowering supply acquisition and disposal costs.
65. An incentive program to reduce solid waste exists, e.g., through school recognition programs.
66. Staff and students are encouraged to be innovative and suggest improvements to procedures and practices.

LEGAL REF.: 105 ILCS 5/10-20.19c.

Adopted 2/11/25

4:80 Accounting and Audits

The School District's accounting and audit services shall comply with the *Requirements for Accounting, Budgeting, Financial Reporting, and Auditing*, as adopted by the Ill. State Board of Education (ISBE), State and federal laws and regulations, and generally accepted accounting principles. Determination of liabilities and assets, prioritization of expenditures of governmental funds, and provisions for accounting disclosures shall be made in accordance with government accounting standards as directed by the auditor designated by the Board. The Superintendent, in addition to other assigned financial responsibilities, shall report monthly on the District's financial performance, both income and expense, in relation to the financial plan represented in the budget.

Annual Audit

At the close of each fiscal year, the Superintendent shall arrange an audit of the District funds, accounts, statements, and other financial matters. The audit shall be performed by an independent certified public accountant designated by the Board and be conducted in conformance with prescribed standards and legal requirements. A complete and detailed written audit report shall be provided to each Board member and to the Superintendent. The Superintendent shall annually, on or before October 15, submit an original and one copy of the audit to the Regional Superintendent of Schools.

Annual Financial Report

The Superintendent or designee shall annually prepare and submit the Annual Financial Report on a timely basis using the form adopted by the ISBE. The Superintendent shall review and discuss the Annual Financial Report with the Board before it is submitted.

Inventories

The Superintendent or designee is responsible for establishing and maintaining accurate inventory records. The inventory record of supplies and equipment shall include a description of each item, quantity, location, purchase date, and cost or estimated replacement cost, unless the supplies and equipment are acquired by the District pursuant to a federal or State grant award, in which case the inventory record shall also include the information required by 2 C.F.R. §200.313, if applicable. The Superintendent shall establish procedures for the management of property acquired by the District under grant awards that comply with federal and State law.

Capitalization Threshold

To be considered a capital asset for financial reporting purposes, a capital item must be at or above a capitalization threshold of $5,000 and have an estimated useful life greater than one year.

Disposition of District Property

The Superintendent or designee shall notify the Board, as necessary, of the following so that the Board may consider its disposition: (1) District personal property (property other than buildings and land) that is no longer needed for school purposes, and (2) school site, building, or other real estate that is unnecessary, unsuitable, or inconvenient. Notwithstanding the above, the

Superintendent or designee may unilaterally dispose of personal property of a diminutive value. The Superintendent shall establish procedures for the disposition of property acquired by the District under grant awards that comply with federal and State law.

Taxable Fringe Benefits

The Superintendent or designee shall: (1) require that all use of District property or equipment by employees is for the District's convenience and best interests unless it is a Board-approved fringe benefit, and (2) ensure compliance with the Internal Revenue Service regulations regarding when to report an employee's personal use of District property or equipment as taxable compensation.

Controls for Revolving Funds and Petty Cash

Revolving funds and the petty cash system are established in Board policy 4:50, *Payment Procedures*. The Superintendent shall: (1) designate a custodian for each revolving fund and petty cash fund, (2) obtain a bond for each fund custodian, and (3) maintain the funds in compliance with this policy, State law, and ISBE rules. A check for the petty cash fund may be drawn payable to the designated petty cash custodian. Bank accounts for revolving funds are limited to a maximum balance of $1,000. All expenditures from these bank accounts must be directly related to the purpose for which the account was established and supported with documentation, including signed invoices or receipts. All deposits into these bank accounts must be accompanied with a clear description of their intended purpose. The Superintendent or designee shall include checks written to reimburse revolving funds on the Board's monthly listing of bills indicating the recipient and including an explanation.

Control Requirements for Checks

The Board must approve all bank accounts opened or established in the District's or a District school's name or with the District's Federal Employer Identification Number. All checks issued by the School District must be signed by either the Treasurer or Board President, except that checks from accounts containing student activity funds or fiduciary funds and checks from revolving accounts may be signed by their respective account custodians.

Internal Controls

The Superintendent is primarily responsible for establishing and implementing a system of internal controls for safeguarding the District's financial condition; the Board, however, will oversee these safeguards. The control objectives are to ensure efficient business and financial practices, reliable financial reporting, and compliance with State law and Board policies, and to prevent losses from fraud, waste, and abuse, as well as employee error, misrepresentation by third parties, or other imprudent employee action.

The Superintendent or designee shall annually audit the District's financial and business operations for compliance with established internal controls and provide the results to the Board. The Board may from time-to-time engage a third party to audit internal controls in addition to the annual audit.

LEGAL REF.: 2 C.F.R. §200 et seq.

30 ILCS 708/, Grant Accountability and Transparency Act, implemented by 44 Ill.Admin.Code 7000 et seq.

105 ILCS 5/2-3.27, 5/2-3.28, 5/3-7, 5/3-15.1, 5/5-22, 5/10-21.4, 5/10-20.19, 5/10-22.8, and 5/17-1 et seq.

23 Ill.Admin.Code Part 100.

CROSS REF.: 4:10 (Fiscal and Business Management), 4:50 (Payment Procedures), 4:55 (Use of Credit and Procurement Cards), 4:90 (Student Activity and Fiduciary Funds)

Adopted 2/11/25

4:80-AP1 Administrative Procedure - Checklist for Internal Controls

The District's system of internal controls shall include the following:

67. All financial transactions must be properly authorized and documented. This includes:
    - □ No check is issued without pre-approved documentation for the expenditure pursuant to the Local Government Travel Expense Control Act, 50 ILCS 150/10, e.g., 2:125-E1, *Board Member Expense Reimbursement Form*; 2:125-E2, *Board Member Estimated Expense Approval Form*; 5:60-E1, *Employee Expense Reimbursement Form*; and 5:60-E2, *Employee Estimated Expense Approval Form*.
    - □ No bank account is opened or established in the District's or a District school's name or with the District's Federal Employer Identification Number without pre-approved documentation.
    - □ No credit or procurement card is assigned to an individual without pre-approved documentation. All use of a credit or procurement card must be in compliance with Board policy 4:55, *Use of Credit and Procurement Cards*, and administrative procedure 4:55-AP, *Controls for the Use of District Credit and Procurement Cards*.
    - □ Every receipt to and expenditure from a revolving fund and a petty cash fund are supported with clear documentation and otherwise comply with Board policies 4:50, *Payment Procedures*, and 4:80, *Accounting and Audits*.
    - □ A record is made of all checks issued and all payments made by credit or procurement cards that includes descriptive information sufficient to allow assignment of the appropriate code.
68. Financial records and data must be accurate and complete. This includes:
    - □ Data entries are timely made.
    - □ Cash handling is properly recorded.
    - □ Checks are sequentially numbered and missing checks are accounted for.
    - □ Financial reporting deadlines are followed.
69. Accounts payable must be accurate and punctual. This includes:
    - □ Payments are made on a timely basis.
    - □ A thorough explanation is provided for any over/underpayments.
    - □ Payroll and benefits are reviewed and continually updated.
70. District assets must be protected from loss or misuse.
    - □ The District implements a Fraud, Waste, and Abuse Awareness Program. See 4:80-AP2, *Fraud, Waste and Abuse Awareness Program*.
    - □ Valuable technology assets are safeguarded from theft or loss.
    - □ A backup and recovery system is developed for electronic systems.
    - □ Only authorized individuals have access to various systems.
    - □ Passwords are kept secure and frequently changed.
    - □ Keys are kept secure and accounted for.
    - □ District property is not *borrowed* or otherwise used for private purposes.
    - □ District personal property having a monetary value (excluding, for example, trash, out-dated equipment, consumed consumables, and spoilage) is discarded only with the Board's prior approval.
71. Incompatible duties should be segregated, if possible. This includes:

- □ Transaction approval is separated from disbursement approval duties, as well as record-keeping duties so that no single individual or two individuals control all phases of the claim payment process.
- □ Reconciliation of checking accounts and credit cards is performed by an individual who does not have check-writing authority, and if possible, by someone who does not record checks and credit card payments in the District's books.
- □ Other controls are used if segregation of duties is impossible.

72. Accounting records are periodically reconciled. This includes:
    - □ All accounts are balanced monthly.
    - □ All statements from checking accounts and credit cards are reconciled monthly.
    - □ Expenses are verified against receipts.
    - □ Out-of-balance conditions are investigated.
73. Equipment and supplies must be safeguarded. This includes:
    - □ Inventories are periodically taken and inspections are frequently made.
    - □ A reliable record is kept identifying what technology assets have been provided to specific employees.
    - □ Access to supplies is limited and controlled.
74. Staff members with financial or business responsibilities must be properly trained and supervised, and must perform their responsibilities with utmost care and competence.
    - □ Responsibilities match job descriptions.
    - □ If required by State law, staff members are appropriately bonded.
    - □ Staff members are held accountable for complying with Board policies and administrative processes or procedures that have been established to safeguard the District's financial condition.
    - □ Staff members are appropriately trained and evaluated.
    - □ Staff members are encouraged to notify their supervisors or the Superintendent of risks, losses, and/or concerns.
75. Any unnecessary weaknesses or financial risks must be promptly corrected. This includes:
    - □ Internal control concerns raised by the District's independent auditor in connection with the annual financial audit or by the Ill. State Board of Education in connection with its administration of the Grant Accountability and Transparency Act or a monitoring visit are properly addressed.
    - □ Internal or external auditors are annually engaged to assess risk and/or test existing internal controls for those areas not included within the scope of the annual financial audit; concerns are promptly addressed.

Adopted 12/12/23

4:80-AP2 Administrative Procedure - Fraud, Waste, and Abuse Awareness Program

The Grant Accountability and Transparency Act (GATA) (30 ILCS 708/) and federal regulations (2 C.F.R. §200.113) require grant fund recipients to timely disclose, in writing, all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal awarding agency or pass-through entity, e.g., Ill. State Board of Education (ISBE).

In alignment with best practices contained in ISBE's *Fiscal Procedures Handbook*, the District has a Fraud, Waste, and Abuse Awareness Program, which includes employee reporting procedures for suspected fraud, waste, or abuse. The District will take all appropriate measures to deter fraud, waste, and abuse.

Reporting

The District encourages all District employees to be vigilant and report suspicions of fraud, waste, or abuse. Employees who make good faith reports of suspected violations of law, public corruption or wrongdoing are protected from retaliation by the provisions of the Ill. Whistleblower Act (740 ILCS 174/). See the chart below for details on how to make a report.

Enforcement

Staff members found to have engaged in fraud, waste, or abuse will be disciplined, up to and including discharge. The District will also seek to recover any wrongfully obtained assets from the employee.

Definitions

Fraud is defined as: (1) fraudulent financial reporting, (2) misappropriation of assets, and/or (3) corruption (bribery and other illegal acts). Examples of *fraud* include:

- Embezzlement, e.g., theft of cash, use of entity credit card or accounts payable systems to purchase personal items
- Collusion with others to circumvent internal controls
- Forgery or alteration of documents, e.g., checks, time cards, receipts, contracts, purchase orders, expense reimbursement paperwork, student bills, electronic files, bids, or other financial documents
- Fraudulent reporting of expenditures or other District financial information
- Misappropriation or misuse of resources, e.g., cash, securities, inventory, facilities, equipment, services, supplies, or other assets
- Impropriety in the handling or reporting of cash or financial transactions
- Unless properly authorized, accepting or seeking anything of material value from contractors, vendors, or persons providing services or materials
- Authorization or receipt of payment for goods not received or services not performed, e.g., payments to fictitious employees or vendors
- Submitting multiple vouchers for the same expense reimbursement
- Using the District's tax exempt status for purchase of personal items
- Authorization or receipt of unearned wages or benefits
- Personal use of District property in commercial business activities
- Identity theft
- Conflict of interest or other ethics violations

- Destruction, removal, or inappropriate use of records, buildings, furniture, fixtures, or equipment
- Any similar or related irregularity to those listed

Waste is the act of using or expending resources carelessly, extravagantly, or to no purpose.

Abuse is behavior that is deficient or improper compared to the behavior that a prudent person would consider reasonable and necessary operational practice given the facts and circumstances.

The terms *fraud, waste*, and *abuse* are not mutually exclusive; certain conduct may constitute fraud, waste, and/or abuse.

Roles, Responsibilities, and Reporting Procedures

Actor	Action
Any Staff Member	Staff members who suspect fraud, waste, and/or abuse should do the following: 1. Make an oral or written report to the Superintendent that describes the factual basis of the suspicion, including any employees involved, a description of the alleged misconduct, and any supporting evidence. Oral reports shall be followed up in writing by the staff member or Superintendent. 2. If the staff member does not feel comfortable identifying himself/herself in making a report, the employee may deliver the report anonymously to the attention of the Superintendent or make an anonymous call to the Superintendent. 3. If the report concerns alleged misconduct by the Superintendent, the report may be either be made to a Complaint Manager identified in Board Policy 2:260, *Uniform Grievance Procedure*, who will notify the Board President of the report, or directly to the Board President. 4. If the reporting staff member has evidence of fraud, waste, and/or abuse, he/she must preserve the evidence and provide it to the Superintendent or designee (or designated Complaint Manager or Board President, if the report concerns the Superintendent) charged with investigating the suspected fraud, waste, or abuse.
Superintendent and/or Designee (or Complaint Manager/Board President, for cases concerning the Superintendent)	Manages actual or suspected fraud, waste, or abuse in the District. With respect to any investigation, the Superintendent and/or designee (or Complaint Manager/Board President, for cases concerning the Superintendent) shall: 1. Ensure all reported instances of fraud, waste, or abuse are investigated by the District, and, if appropriate, reported to the proper authorities for further investigation and potential prosecution. 2. Consult with the board attorney as needed regarding any investigation. 3. Keep the Board informed of any ongoing investigations.

Actor	Action
	4. Ensure the District cooperates with law enforcement in any criminal fraud investigations. 5. Make all reasonable efforts to ensure the preservation of evidence relevant to an investigation. 6. Effectuate (or recommend to the Board) discipline of employees who engage in fraud, waste, or abuse in accordance with Board policies and any applicable collective bargaining agreement(s). 7. Manage communications with the media regarding investigations, as needed. 8. Manage District efforts to seek recovery of wrongfully obtained assets, as appropriate.
Superintendent and/or Designee	1. Manage annual communication of the District's Fraud, Waste, and Abuse Awareness Program to staff and grant sub-recipients/subcontractors, including how employees should report suspected fraud, waste, or abuse. 2. Manage ethics and standards of conduct training for all District employees. 3. Periodically review the District's Fraud, Waste, and Abuse Awareness Program and related reporting procedures.

Adopted 4/9/24

4:80-AP3 Administrative Procedure - Inventory Management for Federal and State Awards

This procedure applies to property acquired by the District under federal grant awards or State grant awards governed by the Grant Accountability and Transparency Act (GATA) (30 ILCS 708/).

Definitions

Property - real or personal property. 2 C.F.R. §200.1.

Equipment - Tangible personal property (including information technology systems) having a useful life of more than one year and per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the District for financial statement purposes, or $5,000. 2 C.F.R. §200.1

Supplies - All tangible personal property other than equipment. 2 C.F.R. §200.1

Acquisition Cost - The cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Acquisition costs for software includes those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the District's regular accounting practices. 2 C.F.R. §200.1

Roles and Responsibilities

Actor	Responsibility
Business Manager and/or Designee	Recordkeeping – 2 C.F.R. §200.313(d)(1) and (2) 1. Ensures all equipment purchased with grant funds is identified and marked as such. 2. Maintains an inventory list that includes the following: a. a description of the property b. a serial number or other identification number c. the source of funding for the property (including the Federal Award Identification Number (FAIN), if applicable) d. who holds title e. the acquisition date f. cost of the property g. percentage of federal or State participation in the cost of the property h. the location, use and condition of the property i. any ultimate disposition data including the date of disposal and sale price of the property. 3. Takes a physical inventory of the property and reconciles the results with the records at least once every two years.

Actor	Responsibility
	Maintenance and Safeguarding – 2 C.F.R. §200.313(d)(4) 1. Budgets for and schedules regular maintenance of the equipment when it is recommended by the manufacturer and arranges for repair of equipment when economically feasible. 2. Oversees implementation of the internal controls for the safeguarding of equipment and supplies required by administrative procedure 4:80-AP1, *Checklist for Internal Controls*. 3. Reports (or receives reports, if so designated) any fraud, waste, or abuse of property in accordance with administrative procedure 4:80-AP2, *Fraud, Waste, and Abuse Awareness Program*. 4. Investigates reports of property loss, damage, or theft. If appropriate, and in consultation with the Superintendent, makes a report to law enforcement for further investigation. Title and Use – 2 C.F.R. §200.313(a) and (c) 1. Ensures the equipment is used for the authorized purposes of the grant during the period of the grant, or until the property is no longer needed for the purposes of the project. 2. During the time that equipment is used on the project or program for which it was acquired, designates equipment available for use on other projects or programs currently or previously supported by the federal or State government, provided such use will not interfere with the work for which it was originally acquired, in the following order of priority: a. First preference is given to other programs or projects supported by the awarding agency that financed the equipment. b. Second preference is given to programs or projects under awards from other awarding agencies (in the case of federal awards, to activities under federal awards from other federal awarding agencies; this includes consolidated equipment for information technology systems). 3. If the equipment is to be used for non-federally or non-State-funded programs or projects, considers charging user fees. Any fees charged for equipment services acquired under an award must be equal to or greater than what private companies charge for equivalent services, unless specifically authorized by statute, for as long as the government retains an interest in the equipment. 4. Ensures that title to the property is not encumbered without the approval of the awarding agency. Disposition – 2 C.F.R. §200.313(e)

Actor	Responsibility
	1. Unless the awarding agency requires an equipment transfer, when equipment acquired under an award is no longer needed for the original project or program or for any other activities supported by a federal or State awarding agency, requests disposition instructions from the awarding agency, if required by the terms and conditions of the award. 2. If an item of equipment has a current per unit fair market value of $5,000 or less, arranges for the retention, sale, or disposal of the equipment with no further obligation to the awarding agency. Notes the disposition of such items in the District's property records. 3. Except for awards exempted under 2 C.F.R. §200.312(b), or if the awarding agency fails to provide requested disposition instructions within 120 days, arranges for the retention or sale of items of equipment with a current per-unit fair-market value in excess of $5,000. The awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the awarding agency may permit the District to deduct and retain from the agency share $500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses. 4. If applicable, arranges for the transfer of title to the property to the federal or State government or to an eligible third party, provided that in such cases, the District is entitled to compensation for its attributable percentage of the current fair market value of the property. 5. If the District is authorized or required to sell the property, ensures compliance with Board policy 4:80, *Accounting and Audits*, regarding the disposition of property, and follows proper sales procedures to ensure the highest possible return. 6. For items of equipment with an acquisition cost of $5,000 or more: a. Obtains two signed bids from potential purchasers or two appraisals from authorized appraisers to determine the per unit current fair market value. b. If the per unit current fair market value is $5,000 or more, follows the procedures outlined in the Ill. State Board of Education's *State and Federal Grant Administration Policy, Fiscal Requirements, and Procedures* to obtain ISBE's approval, available at: www.isbe.net/Documents/fiscal_procedure_handbk.pdf. 7. When appropriate, arranges for the trade-in of equipment to be replaced or sale of the property when acquiring

Actor	Responsibility
	replacement equipment. Proceeds from the trade-in or sale may be used to offset the cost of the replacement equipment. **Note:** If the District fails to take appropriate disposition actions, the awarding agency may direct the District to take disposition actions.
Staff Members Who Receive Equipment/Supplies as Part of Their Job Duties	Use the equipment/supplies for the purposes authorized by the grant during the grant period, or until the property is no longer needed for the purposes of the project. Properly use the equipment in accordance with the manufacturer's instructions. Produce the equipment/supplies when requested by the Business Manager or designee, whether for inventory, scheduled maintenance, repair, or other purposes. Take reasonable steps to prevent damage to equipment and supplies in accordance with administrative procedure 4:80-AP1, *Checklist for Internal Controls*. Report any fraud, waste, or abuse of property in accordance with administrative procedure 4:80-AP2, *Fraud, Waste, and Abuse Awareness Program*. Immediately report lost or stolen equipment/supplies to the Business Manager or designee. Return the equipment/supplies when requested by the Business Manager or designee or if it is no longer needed.

Adopted 2/11/25

4:90 Student Activity and Fiduciary Funds [1]

The School Board, upon the Superintendent or designee's recommendation, establishes student activity funds to be managed by student organizations under the guidance and direction of a staff member for educational, recreational, or cultural purposes. The Board, upon the Superintendent or designee's recommendation, also establishes fiduciary funds to be supervised by the Superintendent or designee. The District has custodial responsibilities for fiduciary funds but no direct involvement in the management of such funds.

Student Activity Funds

The Superintendent or designee shall be responsible for supervising student activity funds in accordance with Board policy, 4:80, *Accounting and Audits*; State law; and the Ill. State Board of Education (ISBE) rules for student activity funds. The Board will appoint a treasurer for each fund to serve as the fund's sole custodian and be bonded in accordance with the School Code. The treasurer shall have all of the responsibilities specific to the treasurer listed in ISBE rules for school activity funds, including the authority to make loans between activity funds.

Unless otherwise instructed by the Board, a student activity fund's balance will carry over to the next fiscal year. An account containing student activity funds that is inactive for 12 consecutive months shall be closed and its funds transferred to another student activity fund or authorized fund with a similar purpose.

Fiduciary Funds

The Superintendent or designee shall be responsible for supervising fiduciary funds in accordance with Board policy 4:80, *Accounting and Audits*; State law; and ISBE rules for fiduciary funds. The Board will appoint a treasurer for each fund to serve as the fund's sole custodian and be bonded in accordance with the School Code. The treasurer shall have all of the responsibilities specific to the treasurer listed in the ISBE rules for fiduciary funds.

LEGAL REF.: 105 ILCS 5/8-2 and 5/10-20.19.

23 Ill.Admin.Code §§100.20, 100.80, and 100.85.

CROSS REF.: 4:80 (Accounting and Audits), 7:325 (Student Fundraising Activities)

Adopted: 4/9/24

4:100 Insurance Management

The Superintendent shall recommend and maintain all insurance programs that provide the broadest and most complete coverage available at the most economical cost, consistent with sound insurance principles.

The insurance program shall include each of the following:

- Liability coverage to insure against any loss or liability of the School District and the listed individuals against civil rights damage claims and suits, constitutional rights damage claims and suits, and death and bodily injury and property damage claims and suits, including defense costs, when damages are sought for negligent or wrongful acts allegedly committed in the scope of employment or under the Board's direction or related to any mentoring services provided to the District's licensed staff members; School Board members; employees; volunteer personnel authorized by 105 ILCS 5/10-22.34, 5/10-22.34a, and 5/10-22.34b; mentors of licensed staff members authorized in 105 ILCS 5/21A-5 et seq. (new teacher), 105 ILCS 5/2-3.53a (new principal), and 2-3.53b (new superintendents); and student teachers.
- Catastrophic accident insurance at the mandated benefit level for student athletes in grades 9 through 12 who sustain an accidental injury while participating in school-sponsored or school-supervised interscholastic athletic events sanctioned by the Ill. High School Association that results in medical expenses in excess of $50,000.
- Comprehensive property insurance covering a broad range of causes of loss involving building and personal property. The coverage amount shall normally be for the replacement cost or the insurable value.
- Workers' Compensation to protect individual employees against financial loss in case of a work-related injury, certain types of disease, or death incurred in an employee-related situation.

Student Insurance

The Board shall annually designate a company to offer student accident insurance coverage. The Board does not endorse the plan nor recommend that parents/guardians secure the coverage, and any contract is between the parents/guardians and the company.

LEGAL REF.: Consolidated Omnibus Budget Reconciliation Act, Pub. L. 99-272, §10001, 26 U.S.C. §4980B(f), 42 U.S.C. §300bb-1 et seq.105 ILCS 5/2-3.53a, 5/2-3.53b, 5/10-20.20, 5/10-22.3, 5/10-22.3a, 5/10-22.3b, 5/10-22.3f, 5/10-22.34, 5/10-22.34a, 5/10-22.34b, 5/21A-5 et seq., and 5/22-15.215 ILCS 5/, Ill. Insurance Code.

750 ILCS 75/, Ill. Religious Freedom Protection and Civil Union Act.

820 ILCS 305/, Workers' Compensation Act.

CROSS REF.: 7:300 (Extracurricular Athletics)

Adopted 12-12-23

4:110 Transportation

The District shall provide free transportation for any student in the District who resides: (1) at a distance of one and one-half miles or more from his or her assigned school, unless the School Board has certified to the Ill. State Board of Education that adequate public transportation is available, or (2) if adequate public transportation is not available, within one and one-half miles from his or her assigned school where walking to or from school or to or from a pick-up point or bus stop would constitute a *serious safety hazard* due to either (a) vehicular traffic or rail crossing or (b) *a course or pattern of criminal activity*, as defined in the Ill. Streetgang Terrorism Omnibus Prevention Act, 740 ILCS 147/. A student's parent(s)/guardian(s) may file a petition with the Board requesting transportation due to the existence of a serious safety hazard. Free transportation service and vehicle adaptation is provided for a special education student if included in the student's individualized educational program. Non-public school students shall be transported in accordance with State law. Homeless students shall be transported in accordance with Section 45/1-15 of the Education for Homeless Children Act. Foster care students shall be transported in accordance with Section 6312(c)(5)(B) of the Elementary and Secondary Education Act.

If a student is at a location within the District, other than his or her residence, for child care purposes at the time for transportation to and/or from school, that location may be considered for purposes of determining the one and one-half miles from the school attended. Unless the Superintendent or designee establishes new routes, pick-up and drop-off locations for students in day care must be along the District's regular routes. The District will not discriminate among types of locations where day care is provided, which may include the premises of licensed providers, relatives' homes, or neighbors' homes.

Bus schedules and routes shall be determined by the Superintendent or designee and shall be altered only with the Superintendent or designee's approval and direction. In setting the routes, the pick-up and discharge points should be as safe for students as possible.

No school employee may transport students in school or private vehicles unless authorized by the administration.

Every vehicle regularly used for the transportation of students must pass safety inspections in accordance with State law and Ill. Dept. of Transportation regulations. The strobe light on a school bus may be illuminated only when the bus is actually being used as a school bus and (1) is stopping or stopped for loading or discharging students on a highway outside an urban area, or (2) is bearing one or more students. The Superintendent shall implement procedures in accordance with State law for accepting comment calls about school bus driving.

All contracts for charter bus services must contain the clause prescribed by State law regarding criminal background checks for bus drivers.

Pre-Trip and Post-Trip Vehicle Inspection

The Superintendent or designee shall develop and implement a pre-trip and post-trip inspection procedure to ensure that the school bus driver: (1) tests the two-way radio or cellular radio telecommunication device and ensures that it is functioning properly before the bus is operated, and (2) walks to the rear of the bus before leaving the bus at the end of each route, work shift, or work day, to check the bus for children or other passengers in the bus.

LEGAL REF.: 20 U.S.C. §6312(c)(5)(B), Elementary and Secondary Education Act.
42 U.S.C. §11431 et seq., McKinney-Vento Homeless Assistance Act.
105 ILCS 5/10-22.22 and 5/29-1 et seq.
105 ILCS 45/1-15 and /1-17.
625 ILCS 5/1-148.3a-5, 5/1-182, 5/11-1414.1, 5/12-813.1, 5/12-815, 5/12-816, 5/12-821, and 5/13-109.
23 Ill.Admin.Code §§1.510 and 226.750; Part 120.
92 Ill.Admin.Code Part 440.

CROSS REF.: 4:170 (Safety), 5:100 (Staff Development Program), 5:120 (Employee Ethics; Conduct; and Conflict of Interest), 5:280 (Duties and Qualifications), 6:140 (Education of Homeless Children), 6:170 (Title I Programs), 7:220 (Bus Conduct)

ADMIN. PROC.: 4:110-AP2 (Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; Bus Driving Comments), 4:110-AP3 (School Bus Safety Rules), 4:110-E (Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses), 6:140-AP (Education of Homeless Children)

Adopted 5/10/22

4:110-AP1 Administrative Procedure - School Bus Post-Accident Checklist

Driver Post-Accident Procedures

4. Immediately after an accident:
   - Activate the hazard lights
   - Place the transmission in neutral and set the parking brake (manual) or place in park (automatic)
   - Turn off the ignition and remove the key
   - Locate and place the warning devices
5. The first consideration is whether it is safer to evacuate the students or to have them remain on the bus. 23 Ill.Admin.Code §1.510(l)(1).
6. Check for injuries, using the passenger list (if available) to indicate injuries. Immediately notify the pre-designated emergency and police services, and administer first aid. As soon as possible, notify the District or transportation office.
7. Don't leave students unattended and/or unsupervised. However, if you must leave to attend to the vehicle or warning devices, leave a responsible student in charge.
8. Check for conditions that could cause fires, including a ruptured fuel tank, leaking or broken fuel lines; and/or hot tire, etc. *Do not touch a suspected hot tire*. Place your hand near it to see if heat is radiating off of it.
9. When notifying the District or transportation office, give the following information:
   - Seriousness of the accident
   - Location and time of accident
   - Bus number and route number
   - School
   - Number of students on board
   - Extent of any injuries
   - Condition of vehicle
   - Weather/road conditions
   - Any other pertinent information
10. Stay with the children until help arrives. Do not release any student, even to parents, unless instructed to do so by police or the District or transportation office. Parents/guardians are not allowed on the bus.
11. Stay vigilant for the continued safety of everyone at the scene and:
    Never attempt to direct traffic.

    Never move the vehicle before the police arrive, unless absolutely necessary to avoid a traffic hazard.

    Never discuss liability or fault, or sign anything until someone from the District or transportation office arrives. Do not discuss details of the accident with the media.

    Never move an injured person unless the person's life is in jeopardy.

12. Cooperate with law enforcement. Provide concise and clear answers and details. Give your name, address, driver's license and bus driver permit numbers.

13. If your vehicle strikes an animal, continue until it is safe to stop, keeping in mind that the sight of an injured animal could upset the children on the bus. Park the vehicle and radio or call the District or transportation office with the information. The office will notify the proper authorities.
14. The District or transportation office, when notifying the school, may suggest that personnel follow up with students to minimize trauma or emotional after-effects.

Information Gathering

While at the accident scene the driver and/or transportation supervisor shall:

15. Obtain the name, address, date of birth, and seating position of every passenger on the bus.
16. If possible, obtain the names, addresses, driver's license numbers and phone numbers of any witnesses.
17. Regarding other vehicles involved in the accident, obtain the:
    - Other drivers' names
    - Other drivers' license numbers
    - Other drivers' addresses and phone numbers
    - Make, model, year, and license plate numbers of other involved vehicles
    - Other drivers' insurance carrier information
    - Name, address, and phone numbers of passengers in other involved vehicles

District or Transportation Office Responsibilities

18. Confirm that police and emergency services as appropriate were notified. An ambulance need not be called to the accident scene unless there are obvious injuries or complaints.
19. Send a transportation supervisor to the accident scene to assist the bus driver.
20. Arrange for the parents/guardians of children on the bus to be contacted.
21. Arrange alternate transportation for the children.
22. Contact the District's insurance carrier as soon as possible and follow its instructions.
23. Help the bus driver complete accident report forms, including insurance forms. Complete the Ill. State Board of Education's *School Bus Accident Report*, www.isbe.net/Documents/50-26_school_bus_accident.pdf and forward to the Regional Superintendent immediately after any accident.
24. Obtain any accident reports completed by third parties, including police reports.

Post-Accident Alcohol and Drug Testing

25. This section's provisions are required by 49 C.F.R. §382.303. For drug and alcohol testing requirements, see Board policy 5:285, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*; and administrative procedure 5:285-AP, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*.
26. School bus drivers shall be provided the necessary post-accident alcohol and drug testing information, procedures, and instructions before operating a bus.
27. As soon as practicable after an accident involving a school bus, the driver shall be tested for alcohol and controlled substances if:
    a. The accident involved the loss of human life;
    b. The driver receives a citation for a moving traffic violation arising from the accident; or
    c. A law enforcement officer directs that such a test be given. 625 ILCS 5/6-516.
28. If a required alcohol test is **not** administered:
    a. Within two hours, the District must prepare and maintain a file or record stating why the test was not properly administered.
    b. Within eight hours, the District shall cease attempts to administer an alcohol test and shall prepare the same record.

29. If a required controlled substance test is **not** administered within 32 hours, the District shall cease attempts to administer the test, and shall prepare and maintain a file or record stating why the test was not properly administered.
30. No driver required to take a post-accident alcohol test shall use alcohol for eight hours following the accident, or until undergoing a post-accident alcohol test.

Vehicle Inspection

Following an accident, each damaged bus component must be inspected before the bus is returned to service. 625 ILCS 5/13-109.

Adopted 10/8/24

4:110-AP2 Administrative Procedure - Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; and Bus Driving Comments

Bus Driver Communication Devices

State law prohibits a school bus driver from operating a school bus while using a cellular radio telecommunication device. It requires each school bus to contain either an operating cellular radio telecommunication device or two-way radio while the school bus driver is in possession of the school bus. The cellular radio telecommunication device or two-way radio must be turned on and adjusted in a manner that would alert the driver of an incoming communication request. 625 ILCS 5/12-813.1(b), (e).

Bus drivers may still have cell phones although they are prohibited from using cell phones for anything, including personal use, while operating a bus except: (1) in an emergency situation to communicate with an emergency response operator; a hospital; a physician's office or health clinic; an ambulance service; a fire department, fire district, or fire company; or a police department; (2) to call for assistance in the event of a "mechanical breakdown or other mechanical problem;" (3) to communicate with school authorities or their designees about bus operation or the welfare and safety of any passengers on the bus; or (4) when the bus is parked. 625 ILCS 5/12-813.1(c).

Bus/Vehicle Pre-Trip and Post-Trip Inspection

All school bus drivers, whether employed by the School District or private sector school bus company, shall perform each of the following:

1. Comply with the applicable pre-trip inspection of the mechanical and safety equipment on the school bus listed on the *School Bus Driver Pre-Trip Inspection Form* (92 Ill.Admin.Code §§458.1030 and 458.ILLUSTRATION A, *School Bus Driver's Pretrip Inspection Form*). **Note**: 92 Ill. Admin. Code §458.1030(u) requires any variations from the form to be approved by the Dept. of Transportation by calling 217/785-3031 or writing to:

   Vehicle-Inspection Unit Manager
   Ill. Dept. of Transportation, Div. of Traffic Safety
   1340 North 9th St.
   P.O. Box 19212
   Springfield, IL 62794-9212

2. Test the cellular radio communication device or two-way radio and ensure that it is functioning properly before the bus is operated. 625 ILCS 5/12-816.
3. Perform a visual sweep for children or other passengers at the end of a route, work shift or workday by:
   a. Activating interior lights of the school bus to assist the driver in searching in and under each seat (625 ILCS 5/12-816(c)), and
   b. Walking to the rear of the school bus/vehicle checking in and under each seat (625 ILCS 5/12-816(a), (b)).

If a mechanical post-trip inspection reminder system is installed, the driver shall comply with the requirements of that system. 625 ILCS 5/12-816(d).

Bus Driving Comments

Each school bus and multifunction school activity bus shall display a sign at the rear, with letters and numerals readily visible and readable, in the following form:

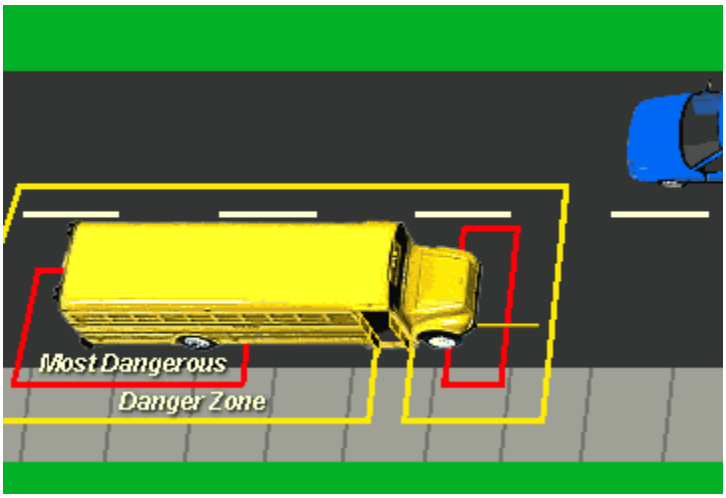
TO COMMENT ON MY DRIVING, CALL *[insert District area code and telephone number]*

Driving comments shall be accepted in the following manner:

1. Calls to comment on school bus driving shall be directed to the Superintendent or designee.
2. The Superintendent or designee shall conduct an internal investigation of the events that led to each complaint. Required for districts that own school buses by 625 ILCS 5/12-821(c)(1).
3. The Superintendent or designee shall inform the commenting party of the results of any investigation and the action, if any, taken to remedy the situation. Required for districts that own school buses by 625 ILCS 5/12-821(c)(2).

Adopted 10/11/22

4:110-AP3 Administrative Procedure - School Bus Safety Rules



The Building Principal shall distribute the following rules to all students. Those students not qualifying for school bus transportation to and from school should receive a copy because they may from time-to-time be transported to school activities by school bus.

1. Be aware of moving traffic and pay attention to your surroundings.
2. Dress properly for the weather. Make sure all drawstrings, ties, straps, etc. on all clothing, backpacks and other items, are shortened or removed to lessen the likelihood of them getting caught in bus doors, railings or aisles.
3. Arrive on time at the bus stop, and stay away from the street while waiting for the bus.
4. Stay away from the bus until it stops completely and the driver signals you to board. Enter in single file without pushing. Always use the handrail.
5. Take a seat right away and remain seated facing forward. Keep your hands, arms, and head inside the bus.
6. Talk quietly on the bus. No shouting or creating loud noises that may distract the driver. Tablets, iPods®, smart phones, and other electronic devices must be silenced on the bus unless a student uses headphones.
7. Help keep the bus neat and clean. Keep belongings out of the aisle and away from emergency exits. Eating and drinking are not allowed on the bus.
8. Always listen to the driver's instructions. Be courteous to the driver and other students. Sit with your hands to yourself and avoid making noises that would distract the driver or bother other passengers.
9. Wait until the bus pulls to a complete stop before standing up. Use the handrail when exiting the bus.
10. Stay out of the danger zone next to the bus where the driver may have difficulty seeing you. Take at least five giant steps (10 feet) away from the bus and out of the danger zone, until you can see the driver and the driver sees you. Never crawl under a bus.
11. If you must cross the street after you get off the bus, wait for the driver's signal and then cross in front of the bus. Cross the street only after checking both ways for traffic, even after the driver's signal.

12. Never run back to the bus, even if you dropped or forgot something.

Additional resources follow:

National Highway Traffic Safety Administration - **School Bus Safety**
https://one.nhtsa.gov/people/injury/buses/getting_to_school/schoolbus2.html

U.S. Department of Transportation - **School Bus Safety Campaign Material**
www.trafficsafetymarketing.gov/get-materials/school-bus-safety/evergreen-campaign-material

National Safety Council - **Tips for a Safe Ride**
www.nsc.org/home-safety/tools-resources/seasonal-safety/back-to-school/bus

Ill. State Police - **School Bus Safety**
https://isp.illinois.gov/StaticFiles/docs/TrafficResources/5-542.pdf

Ill. State Board of Education - **School Bus Safety What Parents Should Know**
www.isbe.net/Documents/bus_safety_parents.pdf

Ill. State Board of Education - **Instructions To School Bus Riders**
www.isbe.net/Documents/bus_ride_instruct.pdf

Adopted 10/8/24

4:110-E Exhibit - Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses

The purpose of this form is to give school bus drivers and/or emergency medical technicians information about students who have special needs or medical conditions. One copy of this form is kept in the nurse's office, and another copy is kept on the student's school bus in a secure location for bus drivers and emergency medical technicians. If the emergency care of the student requires medication, the parent/guardian must file a *School Medical Authorization Form* with the school nurse.

To be completed by the student's parent/guardian:

Student's Name *(Please print)*		Birth Date
Parent/Guardian's Name	Home Phone	Cell Phone
School	Grade	Teacher
Physician's Name	Physician's Phone	School Nurse's Phone

My child's special needs are: *(list behavioral or communication challenges and required responses)*

My child requires medication for: *(describe conditions and circumstances)*

Medication and Where Kept	Dosage	Directions

Parent/Guardian Signature Date

Adopted 10/8/24

4:120 Food Services

Good nutrition shall be promoted in the District's meal programs and in other food and beverages that are sold to students during the school day. The Superintendent shall manage a food service program that complies with this policy and is in alignment with School Board policy 6:50, *School Wellness*.

Food or beverage items sold to students as part of a reimbursable meal under federal law must follow the nutrition standards specified in the U.S. Dept. of Agriculture rules that implement the National School Lunch and Child Nutrition Acts. Schools being reimbursed for meals under these laws are *participating schools*.

The food service program in participating schools shall comply with the nutrition standards specified in the U.S. Dept. of Agriculture's *Smart Snacks rules* when it offers competitive foods to students on the school campus during the school day. *Competitive foods* are all food and beverages that are offered by any person, organization or entity for sale to students on the school campus during the school day that are not reimbursed under programs authorized by federal law. The food service programs in participating schools shall also comply with any applicable mandates in the Illinois State Board of Education's School Food Service rules implementing these federal laws and the Ill. School Breakfast and Lunch Program Act.

All revenue from the sale of any food or beverages sold in competition with the School Breakfast Program or National School Lunch Program to students in food service areas during the meal period shall accrue to the nonprofit school lunch program account.

LEGAL REF.: 42 U.S.C. §1751 et seq., Russell B. National School Lunch Act.
42 U.S.C. §1771 et seq., Child Nutrition Act of 1966.
7 C.F.R. Parts 210 (National School Lunch Program) and 220 (School Breakfast Program).
105 ILCS 125/, School Breakfast and Lunch Program Act.
23 Ill.Admin.Code Part 305, School Food Service.

CROSS REF.: 4:130 (Free and Reduced-Price Food Services), 6:50 (School Wellness)

Adopted 4/11/23

4:120-AP Administrative Procedure - Food Services; Competitive Foods; Exemptions

This procedure applies only to schools that participate in federal meal reimbursement programs. 7 C.F.R. Part 210; 23 Ill.Admin.Code Part 305. They are *participating schools*.

All food and beverages sold to students on the school campuses of participating schools during the school day must comply with the "general nutrition standards for competitive foods" specified in 7 C.F.R. §210.11, unless they are exempted by 23 Ill. Admin.Code §305.15(a).

Definitions

Competitive foods are all food and beverages that are offered by any person, organization or entity for sale to students on the school campus during the school day that are not reimbursed under programs authorized by federal law. 7 C.F.R. §210.11(a)(2); 23 Ill. Admin.Code §305.5. Competitive foods do not include foods offered during after-school athletics or extracurricular events, or weekend events. *School campus* means all areas of the property under the jurisdiction of the participating school that are accessible to students during the school day. 23 Ill.Admin.Code §305.5. *School day* means the period of time from midnight before the start of the official school day until 30 minutes after the end of the official school day. 23 Ill.Admin.Code §305.5.

Exempted fundraising day (EFD) means a school day on which foods and/or beverage items not meeting the "general nutrition standards for competitive foods" may be sold to students on the school campus. 7 C.F.R. §210.11 (b)(4); 23 Ill.Admin.Code §305.5.

Competitive Foods

Competitive foods and beverage items sold during the school day must meet the requirements listed at 7 C.F.R. §210.11 (c)-(m).

All revenue from the sale of competitive foods sold to students in the food service areas during meal periods shall accrue to the nonprofit school lunch program account. 23 Ill.Admin.Code §305.15(d).

Exempted Fundraising Days

EFD foods and/or beverages may not be sold in competition with school meals in the food service area during meal periods. 7 C.F.R. §210.11 (b)(4). In schools with grades 9-12, only 9 or fewer EFDs are allowed. In schools with grades 8 and below, EFDs are prohibited. 23 Ill.Admin.Code §305.15(b)(1)-(3).

To request an EFD, the Superintendent or designee for the participating school must be contacted. He or she will (1) explain the District's process and criteria for reviewing and approving or denying an EFD request, and (2) provide any written documents to assist with the EFD request. The Superintendent or designee must maintain a list of all EFDs held and retain them for at least three years. 7 C.F.R. §210.9(b)(17) and 23 Ill.Admin.Code §305.15(c)(3).

LEGAL REF.: 42 U.S.C. §1779, 7 C.F.R. §210.11.
23 Ill.Admin.Code Part 305, School Food Service.

Adopted 6/22/21

4:130 Free and Reduced-Price Food Services

Notice

The Superintendent shall be responsible for implementing the District's free and reduced-price food services policy and all applicable programs.

If State funding is available for the Healthy School Meals for All Program, the Board will annually determine if it will participate in the program.

Eligibility Criteria and Selection of Children

A student's eligibility for free and reduced-price food services shall be determined by the income eligibility guidelines, family-size income standards, set annually by the U.S. Dept. of Agriculture and distributed by the Ill. State Board of Education.

Notification

At the beginning of each school year, by letter, the District shall notify students and their parents/guardians of: (1) eligibility requirements for free and reduced-price food service; (2) the application process; (3) the name and telephone number of a contact person for the program; and (4) other information required by federal law. The Superintendent shall provide the same information to: (1) informational media, the local unemployment office, and any major area employers contemplating layoffs; and (2) the District's website (if applicable), all school newsletters, or students' registration materials. Parents/guardians enrolling a child in the District for the first time, any time during the school year, shall receive the eligibility information.

Nondiscrimination Assurance

The District shall avoid publicly identifying students receiving free or reduced-price meals and shall use methods for collecting meal payments that prevent identification of children receiving assistance.

Appeal

A family may appeal the District's decision to deny an application for free and reduced-price food services or to terminate such services as outlined by the U.S. Dept. of Agriculture in 7 C.F.R. §245.7, Determining Eligibility for Free and Reduced-Price Meals and Free Milk in Schools. The Superintendent shall establish a hearing procedure for adverse eligibility decisions and provide by mail a copy of them to the family. The District may also use these procedures to challenge a child's continued eligibility for free or reduced-price meals or milk.

During an appeal, students previously receiving food service benefits shall not have their benefits terminated. Students who were denied benefits shall not receive benefits during the appeal.

The Superintendent shall keep on file for a period of three years a record of any appeals made and the hearing record. The District shall also maintain accurate and complete records showing the data and method used to determine the number of eligible students served free and reduced-price food services. These records shall be maintained for three years.

LEGAL REF.: U.S. Dept. of Agriculture, Food and Nutrition Service, National School Lunch Program, 7 C.F.R. Part 210.

U.S. Dept. of Agriculture, Food and Nutrition Service, Determining Eligibility for Free and Reduced-Price Meals and Free Milk in Schools, 7 C.F.R. Part 245.

105 ILCS 125/, School Breakfast and Lunch Program Act.

105 ILCS 126/, Childhood Hunger Relief Act.

23 Ill.Admin.Code §305.10 et seq.

Adopted 4/9/24

4:130-E Exhibit - Free and Reduced-Price Food Services; Meal Charge Notifications

On District letterhead, website, in student handbook, newsletters, bulletins, and/or calendars

Date:

To: Parents/Guardians, Students, and Staff

Re: Eligibility and Meal Charge Notifications

The following notification is provided to all households of students at the beginning of each school year as federally required notification regarding eligibility requirements and the application process for the free and reduced-price food services that are listed in Board policy 4:130, *Free and Reduced-Price Food Services*, and 4:140, *Waiver of Student Fees*. This notification is also provided to households of students transferring to the District during the school year. For more information, see www.fns.usda.gov/school-meals/unpaid-meal-charges, and/or contact the Building Principal or designee.

Free and Reduced-Price Food Services Eligibility

When the parents/guardians of students are unable to pay for their child(ren)'s meal services, meal charges will apply per a student's eligibility category and will be processed by the District accordingly.

A student's eligibility for free and reduced-price food services shall be determined by the income eligibility guidelines, family-size income standards, set annually by the U.S. Dept. of Agriculture, and distributed by the Ill. State Board of Education.

Meal Charges for Meals Provided by the District

The Building Principal and District staff will work jointly to prevent meal charges from accumulating. Every effort to collect all funds due to the District will be made on a regular basis and before the end of the school year. Contact your Building Principal or designee about whether your child(ren)'s charges may be carried over at the end of the school year, i.e., beyond June 30th.

Unpaid meal charges are considered delinquent debt when payment is overdue as defined by Board policy 4:45, *Insufficient Fund Checks and Debt Recovery* and the Hunger-Free Students' Bill of Rights Act (105 ILCS 123/). The District will make reasonable efforts to collect charges classified as delinquent debt, including repeated contacts to collect the amounts and, when necessary, requesting that the student's parent(s)/guardian(s) apply for meal benefits to determine if the student qualifies for such benefits under Board policy 4:130, *Free and Reduced-Price Food Services*. The District will provide a federally reimbursable meal or snack to a student who requests one, regardless of the student's ability to pay or negative account balance.

When a student's funds are low and when there is a negative balance, reminders will be provided to the staff, students, and their parent(s)/guardian(s) at regular intervals during the school year. State law allows the Building Principal to contact parents(s)/guardian(s) to attempt collection of the owed money when the amount owed is more than the amount of five lunches [*or insert lower amount*]. If a parent/guardian regularly fails to provide meal money for the child(ren) that he/she is responsible for in the District and does not qualify for free meal benefits or refuses to apply for such benefits, the Building Principal or designee will direct the next course of action. Continual

failure to provide meal money may require the District to notify the Ill. Dept. of Children and Family Services (DCFS) and/or take legal steps to recover the unpaid meal charges, up to and including seeking an offset under the State Comptroller Act, if applicable.

LEGAL REF.: Healthy Hunger-Free Kids Act of 2010 (P.L. 111-296).

7 C.F.R. §245.5.

105 ILCS 123/, Hunger-Free Students' Bill of Rights Act.

23 Ill.Admin.Code Part 305, School Food Service.

Adopted 4/9/24

4:140 Waiver of Student Fees

The Superintendent will recommend to the School Board a schedule of fees, if any, to be charged students for the use of textbooks, consumable materials, extracurricular activities, and other school student fees. Students must also pay fines for the loss of or damage to school books or other school-owned materials.

Fees for textbooks, other instructional materials, and driver education, as well as fines for the loss or damage of school property are waived for students who meet the eligibility criteria for a waiver as described in this policy. In order that no student is denied educational services or academic credit due to the inability of parents/guardians to pay student fees and fines, the Superintendent will recommend to the Board which additional fees and fines, if any, the District will waive for students who meet the eligibility criteria for a waiver.

Notification

The Superintendent shall ensure that a notice of waiver applicability is provided to parents/guardians with every bill for fees and/or fines, and that applications for waivers are widely available and distributed according to State law and Ill. State Board of Education (ISBE) rule and that provisions for assisting parents/guardians in completing the application are available.

Eligibility Criteria

A student shall be eligible for a fee and fine waiver when:

1. The student currently lives in a household that meets the same income guidelines, with the same limits based on household size, that are used for the federal free meals program;
2. The student's parents/guardians are veterans or active-duty military personnel with income at or below 200% of the federal poverty line; or
3. The student is homeless, as defined in the McKinney-Vento Homeless Assistance Act (42 U.S.C. §11434a).

The Superintendent or designee will give additional consideration when one or more of the following factors are present:

- Illness in the family;
- Unusual expenses such as fire, flood, storm damage, etc.;
- Unemployment;
- Emergency situations;
- When one or more of the parents/guardians are involved in a work stoppage.

Verification

The Superintendent or designee shall establish a process for determining a student's eligibility for a waiver of fees and fines in accordance with State law requirements.

If a student receiving a waiver is found to be no longer eligible during the school year, the Superintendent or designee shall notify the student's parent/guardian and charge the student a prorated amount based upon the number of school days remaining in the school year.

Determination and Appeal

Within 30 calendar days after the receipt of a waiver request, the Superintendent or designee shall mail a notice to the parent/guardian whenever a waiver request is denied. The denial notice shall include: (1) the reason for the denial, (2) the process and timelines for making an appeal, and (3) a statement that the parent/guardian may reapply for a waiver any time during the school year if circumstances change. If the denial is appealed, the District shall follow the procedures for the resolution of appeals as provided in the ISBE rule on waiver of fees.

LEGAL REF.: 42 U.S.C. §11434a, McKinney-Vento Homeless Assistance Act.

105 ILCS 5/10-20.13, 5/10-22.25, 5/27-24.2, and 5/28-19.2.

23 Ill.Admin.Code §1.245 [may contain unenforceable provisions].

CROSS REF.: 4:130 (Free and Reduced-Price Food Services), 6:140 (Education of Homeless Children), 6:220 (Bring Your Own Technology (BYOT) Program; Responsible Use and Conduct)

Adopted 2/11/25

4:140-AP Administrative Procedure - Fines, Fees, and Charges - Waiver of Student Fees

Actor	Action
Superintendent or designee	Prepares and recommends to the School Board a list of school fees and fines to be charged to students for the use, damage, or loss of textbooks, consumable materials, field trips, extracurricular activities, graduation fees, and similar items. See 105 ILCS 5/1-3, amended by P.A. 102-805, eff. 1-1-23, and 23 Ill.Admin.Code §1.245(a) for a definition of *school fees*. **Initial notice:** For all students enrolling in the District for the first time, notifies their parents/guardians that the District will waive school fees and fines for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*. The initial notice must at least describe: (1) the Board's policy, including the criteria and other circumstances under which the District will waive school fees; (2) the school fees subject to a waiver; (3) the procedure to apply for a fee waiver, including the availability of a fee waiver request form and the documents required by the District in verifying income; and (4) the dispute resolution procedure. 23 Ill.Admin.Code §1.245(c)(2)(A). **Notice with every bill:** Includes a notice with every bill for fees and/or fines sent to parents/guardians that the District will waive school fees and fines for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*. *The notice must include a description of the waiver application process or the name, address, and telephone number of the person to contact for information concerning a waiver. 23 Ill.Admin.Code §1.245(c)(2)(B).* Determines whether the required inclusions in these notices will be satisfied by providing parents/guardians with a written copy of Board policy 4:140, *Waiver of Student Fees*, and 4:140-E1, *Application for Fee Waiver*.
Parents/Guardians seeking a school fee and fine waiver	**For waiver sought based on income guidelines for the federal free meals program or because parents/guardians are veterans or active-duty military personnel with income at or below 200% of the federal poverty line:** Complete 4:140-E1, *Application for Fee Waiver*, and return it to the Building Principal along with documents that will verify the family's income, such as, payroll stubs, tax returns, or evidence of receipt of food stamps or

	Temporary Assistance for Needy Families. 23 Ill.Admin.Code §1.245(d). May apply for a waiver of school fees and fines by completing 4:140-E1, *Application for Fee Waiver*, at any time. **For waiver sought based on homeless status:** Contact the District Liaison for Homeless Children, [*insert name*], at [*insert contact information*].
Building Principal or designee	Determines the student's eligibility for fee waiver in accordance with policy 4:140, *Waiver of Student Fees*. Notifies parents/guardians within 30 calendar days if their *Application for Fee Waiver* is denied. 23 Ill.Admin.Code §1.245(c)(3). A rejection notice must include: (1) the reason for the denial; (2) a notification of their right to appeal as well as the appeal process and timelines (4:140-E3, *Response to Application for Fee Waiver, Appeal, and Response to Appeal*); and (3) a statement that they may reapply at any time if circumstances change. 23 Ill.Admin.Code §1.245(c)(3)(A). Ensures that any completed 4:140-E1, *Application for Fee Waiver,* and 4:140-E3, *Response to Application for Fee Waiver, Appeal, and Response to Appeal,* are confidentially treated and maintained. 23 Ill.Admin.Code §1.245(f).
Parents/Guardians seeking a school fee and fine waiver	May appeal the denial of a waiver request. If requested, meets with the person who will decide the appeal in order to explain why the waiver should be granted. 23 Ill.Admin.Code §1.245(c)(3)(B).
Superintendent or designee	If the parents/guardians request to meet with the person who will decide the appeal to explain why the waiver should be granted, contacts the parents/guardians and schedules the meeting. 23 Ill.Admin.Code §1.245(c)(3)(B). Ensures that the person who decides the appeal is not the person who initially denied the waiver or a subordinate of this person. 23 Ill.Admin.Code §1.245(c)(3)(B). Responds in writing to parents/guardians' appeal within 30 calendar days of receipt of the appeal. 23 Ill.Admin.Code §1.245(c)(3)(B). Ensures that no discrimination or punishment of any kind, including the lowering of grades, exclusion from classes, or withholding of student records, transcripts, or diplomas, is exercised against a student whose parents/guardians are unable to purchase required textbooks or instructional materials or to pay required fees and fines. 105 ILCS 5/28-19.2(a), amended by P.A. 102-805, eff. 1-1-23; 23 Ill.Admin.Code §1.245(g).

Actor	Action
Superintendent or designee	Prepares and recommends to the School Board a list of school fees to be charged to students for the use of textbooks, consumable materials, field trips, extracurricular activities, graduation fees, and similar items. See 23 Ill.Admin.Code §1.245(a) for a definition of *school fees*. **Initial notice:** For all students enrolling in the District for the first time, notifies their parents/guardians that the District will waive school fees for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*. The initial notice must at least describe: (1) the Board's policy, including the criteria and other circumstances under which the District will waive school fees; (2) the school fees subject to a waiver; (3) the procedure to apply for a fee waiver, including the availability of a fee waiver request form and the documents whose use is required by the District in verifying income; and (4) the dispute resolution procedure. 23 Ill.Admin.Code §1.245(c)(2)A). **Annual notice:** Includes a notice with the first statement sent to parents/guardians who owe school fees that the District will waive school fees for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*. *The annual notice must include a description of the fee waiver application process or the name, address and telephone number of the person to contact for information concerning a fee waiver. 23 Ill.Admin.Code §1.245(c)(2)(B).* Determines whether the required inclusions in these notices will be satisfied by providing parents/guardians with a written copy of Board policy 4:140, *Waiver of Student Fees*, and form 4:140-E1, *Application for Fee Waiver*.
Parent(s)/Guardian(s) seeking a school fee waiver	Completes 4:140-E1, *Application for Fee Waiver*, and returns it to the Building Principal along with documents that will verify the family's income, such as, payroll stubs, tax returns, or evidence of receipt of food stamps or Temporary Assistance for Needy Families. 23 Ill.Admin.Code §1.245(d). May apply for a waiver of school fees by completing 4:140-E1, *Application for Fee Waiver*, at any time.
Building Principal or designee	Determines the student's eligibility for fee waiver based on policy 4:140, *Waiver of Student Fees*. Notifies the parent(s)/guardian(s) within 30 calendar days if their *Application for Fee Waiver* is denied. 23 Ill.Admin.Code §1.245(c)(3). A rejection notice must include: (1) the reason for the denial; (2) a notification of their right to appeal as well as

	the appeal process and timelines (4:140-E2, *Response to Application for Fee Waiver, Appeal, and Response to Appeal*); and (3) a statement that they may reapply at anytime if circumstances change. 23 Ill.Admin.Code §1.245(c)(3)(A). Ensures that any completed 4:140-E1, *Application for Fee Waiver,* and 4:140-E2, *Response to Application for Fee Waiver, Appeal, and Response to Appeal,* are confidentially treated and maintained. 23 Ill.Admin.Code §1.245(f).
Parent(s)/Guardian(s) seeking a school fee waiver	May appeal the denial of a fee waiver request. If desired, meets with the person who will decide the appeal in order to explain why the fee waiver should be granted. 23 Ill.Admin.Code §1.245(c)(3)(B).
Superintendent or designee	Contacts the parent(s)/guardian(s) to determine if they want to meet to explain why the fee waiver should be granted. 23 Ill.Admin.Code §1.245(c)(3)(B). If so, meets with the parent(s)/guardian(s) at a prearranged date and time. Ensures that the person who decides the appeal is not the person who initially denied the fee waiver or a subordinate of this person. 23 Ill.Admin.Code §1.245(c)(3)(B). Responds in writing to the parent(s)/guardian(s)' appeal within 30 calendar days of receipt of the appeal. 23 Ill.Admin.Code §1.245(c)(3)(B). Ensures that no discrimination or punishment of any kind, including the lowering of grades or exclusion from classes, is exercised against a student whose parent(s)/guardian(s) are unable to purchase required textbooks or instructional materials or to pay required fees. 105 ILCS 5/28-19.2(a).

Adopted 4/11/23

4:140-E1 Exhibit - Application for Fee Waiver

This application for a school fee and fine waiver is completely independent from the District process for determining eligibility for free meals. The information must be provided for your application to be considered. Submit completed application and income verification documents to the Building Principal. No fee or fine may be collected from a parent/guardian requesting a waiver until the District has acted on the initial request or appeal and the parent/guardian has been notified of its decision.

Student's Name *(please print)* School

Parent/Guardian Name *(please print)*

Address *(please print)*

1. The student named above lives in my household? ☐Yes ☐No
2. Total number of people living in my home _____
   Number of adults: ____
   Number of minors: ____
3. Total gross annual household income (before deductions) from all people living in my home
   1. $_____

   The above number must include all:

   Compensation for services, wages, salary, commissions, or fees;
   Net income from self-employment;
   Social Security;
   Dividends or interest on savings or bonds or income from estates or trusts;
   Net rental income;
   Public assistance or welfare payments;
   Unemployment compensation;
   Government civilian employee or military retirement, or pensions or veterans payments;
   Private pensions or annuities;
   Alimony or child support payments;
   Regular contributions from persons not living in the household;
   Net royalties; and
   Other cash income (including cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources).

4. My household meets the federal income guidelines for free meals (attached)?
   2. ☐Yes ☐No

   See www.isbe.net/Pages/Household-Eligibility-Resources.aspx.

5. My child's parents/guardians are veterans or active-duty military personnel with income at or below 200% of the federal poverty line, and proof of veteran/active-duty military status is enclosed.

3. ☐Yes ☐No

If you answered “No” to all of the previous questions, please indicate the reason(s) you are applying for a waiver of school fees and fines.

_____

_____

_____

Income Verification for Fee and Fine Waiver

You must present documents to verify income. Such documents may include, but are not limited to:

- Two pay stubs for each working member of household
- Unemployment statement showing benefits
- Medicaid Card showing case number
- Direct Certification letter from the State of Illinois
- Temporary Food assistance for needy families
- Disability benefit statement
- Current tax returns
- Foster placement papers
- Food Stamp Evidence

You may be requested to provide updated income verification at any time, but no more often than once per academic year.

Supplying false information to obtain a fee and fine waiver is a Class 4 felony, except when more than $300 is obtained, in which case State benefits fraud is a Class 3 felony (720 ILCS 5/17-6).

I attest that the statements made herein are true and correct.

_____ _____

Parent/Guardian *(signature)* Date

Adopted 4/11/23

4:140-E2 Exhibit - Application for Fee Waiver Based on Federal Free Meals Program

This application for a school fee and fine waiver is tied to a student's application for, eligibility for, or participation in the federal free meals program. Submit a completed application to the Building Principal. No fee or fine may be collected from a parent/guardian requesting a waiver until the District has acted on the initial request or appeal and the parent/guardian has been notified of its decision.

Student's Name *(please print)* School

Parent/Guardian Name *(please print)*

Address *(please print)*

I am requesting a waiver of school fees and fines because the above-named student:

☐ Currently lives in a household that meets the free lunch or breakfast income guidelines established by the federal government pursuant to the National School Lunch Act, 42 U.S.C. §1758(b); 7 C.F.R. §§ 245 and 245.6a (105 ILCS 5/10-20.3).

☐ Has parents/guardians who are veterans or active-duty military personnel with income at or below 200% of the federal poverty line, and proof of income and veteran/active-duty military status is enclosed.

If no box was checked, please indicate the reason(s) you are applying for a waiver of school fees and fines.

Supplying false information to obtain a fee and fine waiver is a Class 4 felony, except when more than $300 is obtained, in which case State benefits fraud is a Class 3 felony (720 ILCS 5/17-6).

I attest that the statements made herein are true and correct.

Parent/Guardian *(signature)* Date

Adopted 4/11/23

4:140-E3 Exhibit - Response to Application for Fee Waiver, Appeal, and Response to Appeal

Response to Application for Fee Waiver (*To parents/guardians)*

Student's Name *(please print)* School

☐ **Request granted** ☐ **Request denied for the following reason(s):**

If your request was denied, you may appeal in writing by completing the following portion of this form and submitting it to the Superintendent. If you appeal this decision, you have the right to meet with the Superintendent or designee to explain why the fee waiver should be granted. You may reapply at any time if circumstances change.

Building Principal or Office Staff Member Date

Appeal of the Denial of a Fee Waiver (*To be submitted to the Superintendent*)

☐ I am exercising my right to appeal the Building Principal's denial of my request to waive the school student fee described above.

☐ I would like to explain why the fee waiver should be granted during a phone/video conference or an in-person meeting with the person who will decide my appeal. *(If you check this box, someone from the Superintendent's office will contact you to make arrangements.)*

Parent/Guardian (*please print*) Telephone Number

Signature Date

The Superintendent's office will notify you in writing of the results of your appeal within 30 calendar days of receipt of your appeal.

Response to Appeal of the Denial of a Fee Waiver (*To parent(s)/guardian(s)*)

☐ Appeal received on: _____(*insert date*)___.

☐ I have reviewed your appeal.

☐ **Request granted** ☐ **Request denied for the following reason(s):**

4:140-E4 Exhibit - Resolution to Increase Driver Education Fees

WHEREAS, Section 27-24.2 of the School Code provides that the School District may charge a reasonable fee, not to exceed $50, to students who participate in a driver education course;

WHEREAS, the Illinois General Assembly amended that same section of the School Code in P.A. 97-145 to allow a school board to increase the fee to an amount not to exceed $250 by school board resolution following a public hearing on the increase, provided that the fee is waived for students who are unable to pay for the course;

WHEREAS, the School Board held a public hearing to increase the driver education course fee to an amount not to exceed $250 on _____*[date]*_____;

WHEREAS, the Board already waives the driver education course fees for students who are unable to pay (Board policy 4:140, *Waiver of Student Fees*);

WHEREAS, the Administration provided evidence at the hearing that a fee of $250 for each student taking the driver education course when added to the reimbursement from the State for driver education will not exceed the total cost of the driver education program in any year;

THEREFORE, BE IT RESOLVED, that the School Board hereby increases the driver education fee to an amount not to exceed $250, effective on _*[date]*_____, and waives this fee for any student who is unable to pay for the course according to the provisions in Board policy 4:140, *Waiver of Student Fees*.

Attested by: _____

Board President

Attested by: _____

Board Secretary

Adopted 4/11/23

4:150 Facility Management and Building Programs

The Superintendent shall manage the District's facilities and grounds as well as facility construction and building programs in accordance with the law, the standards set forth in this policy, and other applicable School Board policies. The Superintendent or designee shall facilitate: (1) inspections of schools by the Regional Superintendent and State Fire Marshal or designee, (2) review of plans and specifications for future construction or alterations of a school if requested by the relevant municipality, county (if applicable), or fire protection district, and (3) compliance with the 10-year safety survey process required by the School Code.

Standards for Managing Buildings and Grounds

All District buildings and grounds shall be adequately maintained in order to provide an appropriate, safe, and energy efficient physical environment for learning and teaching. The Superintendent or designee shall provide the Board with periodic reports on maintenance data and projected maintenance needs that include cost analysis. Prior Board approval is needed for all renovations or permanent alterations to buildings or grounds when the total cost will exceed $12,500, including the cost equivalent of staff time. This policy is not intended to discourage efforts to improve the appearance of buildings or grounds that are consistent with the designated use of those buildings and grounds.

Standards for Green Cleaning

For each District school with 50 or more students, the Superintendent or designee shall establish and supervise a green cleaning program that complies with the guidelines established by the Illinois Green Government Coordinating Council.

Standards for Facility Construction and Building Programs

As appropriate, the Board will authorize a comprehensive study to determine the need for facility construction and expansion. On an annual basis, the Superintendent or designee shall provide the Board with projected facility needs, enrollment trends, and other data impacting facility use. Board approval is needed for all new facility construction and expansion.

When making decisions pertaining to design and construction of school facilities, the Board will confer with members of the staff and community, the Ill. State Board of Education, and educational and architectural consultants, as it deems appropriate. The Board's facility goals are to:

1. Integrate facilities planning with other aspects of planning and goal-setting.
2. Base educational specifications for school buildings on identifiable student needs.
3. Design buildings for sufficient flexibility to permit new or modified programs.
4. Design buildings for maximum potential for community use.
5. Meet or exceed all safety requirements.
6. Meet requirements on the accessibility of school facilities to disabled persons as specified in State and federal law.
7. Provide for low maintenance costs, energy efficiency, and minimal environmental impact.

Naming Buildings and Facilities

Recognizing that the name for a school building, facility, or ground or field reflects on its public image, the Board's primary consideration will be to select a name that enhances the credibility and stature of the school or facility. Any request to name or rename an existing facility should be submitted to the Board. When a facility is to be named or renamed, the Board President will

appoint a special committee to consider nominations and make a recommendation, along with supporting rationale, to the Board. The Board will make the final selection. The Superintendent or designee may name a room or designate some area on a school's property in honor of an individual or group that has performed outstanding service to the school without using the process in this policy.

LEGAL REF.: 42 U.S.C. §12101 et seq., Americans with Disabilities Act of 1990, implemented by 28 C.F.R. Parts 35 and 36.
20 ILCS 3130/, Green Buildings Act.
105 ILCS 5/2-3.12, 5/10-20.49, 5/10-22.36, 5/10-20.63, and 5/17-2.11.
105 ILCS 140/, Green Cleaning Schools Act.
105 ILCS 230/, School Construction Law.
410 ILCS 25/, Environmental Barriers Act.
410 ILCS 35/25, Equitable Restrooms Act.
820 ILCS 130/, Prevailing Wage Act.
23 Ill.Admin.Code Part 151, School Construction Program; Part 180, Health/Life Safety Code for Public Schools; and Part 2800, Green Cleaning for Elementary and Secondary Schools.
71 Ill.Admin.Code Part 400, Ill. Accessibility Code.

CROSS REF.: 2:150 (Committees), 2:170 (Procurement of Architectural, Engineering, and Land Surveying Services), 4:60 (Purchases and Contracts), 8:70 (Accommodating Individuals with Disabilities)

Adopted 5/10/22

4:160 Environmental Quality of Buildings and Grounds

The Superintendent shall take all reasonable measures to protect: (1) the safety of District personnel, students, and visitors on District premises from risks associated with hazardous materials, and (2) the environmental quality of the District's buildings and grounds.

Pesticides

Pesticides will not be applied on the paved surfaces, playgrounds, or playing fields of any school serving grades K-8 during a school day or partial school day when students are in attendance for instructional purposes. Additionally, the application of any restricted use pesticides is prohibited on or within 500 feet of school property during normal school hours. Before pesticides are used on District premises, the Superintendent or designee shall notify employees and parents/guardians of students as required by the Structural Pest Control Act, 225 ILCS 235/, and the Lawn Care Products Application and Notice Act, 415 ILCS 65/.

Coal Tar Sealant

Before coal tar-based sealant products or high polycyclic aromatic hydrocarbon sealant products are used on District premises, the Superintendent or designee shall notify employees and parents/guardians of students in writing or by telephone as required by the Coal Tar Sealant Disclosure Act.

LEGAL REF.: 105 ILCS 5/10-20.17a; 5/10-20.48.

29 C.F.R. §1910.1030, Occupational Exposure to Bloodborne Pathogens, as adopted by the Illinois Department of Labor, 56 Ill.Admin.Code §350.700(b).

29 C.F.R. §1910.1200, Occupational Safety and Health Administration Hazard Communication Standards, as adopted by 820 ILCS 255/1.5, Toxic Substances Disclosure to Employees Act.

20 ILCS 3130/, Green Buildings Act.

105 ILCS 135/, Toxic Art Supplies in Schools Act.

105 ILCS 140/, Green Cleaning School Act.

105 ILCS 160/, Pesticide Application at Schools Act.

225 ILCS 235/, Structural Pest Control Act.

415 ILCS 60/14, Illinois Pesticide Act

415 ILCS 65/, Lawn Care Products Application and Notice Act.

410 ILCS 170/, Coal Tar Sealant Disclosure Act.

820 ILCS 255/, Toxic Substances Disclosure to Employees Act. (inoperative)

23 Ill.Admin.Code §1.330.

CROSS REF.: 4:150 (Facility Management and Building Programs), 4:170 (Safety)

Adopted 4/9/24

4:160-AP Administrative Procedure - Environmental Quality of Buildings and Grounds

Hazardous and/or Infectious Materials

The Buildings and Grounds Supervisor is responsible for the District's compliance with State and federal law concerning toxic, hazardous, and/or infectious materials. This includes requirements in the federal Occupational Safety and Health Administration (OSHA) Hazard Communication Standards (29 C.F.R. §1910.1200), adopted by the State Toxic Substances Disclosure to Employees Act (820 ILCS 255/, otherwise inoperative). See information on OSHA's website at www.osha.gov/hazcom.

Pesticide Application on School Grounds

The Buildings and Grounds Supervisor is responsible for compliance with the Lawn Care Products Application and Notice Act (415 ILCS 65/3) and the Pesticide Application at Schools Act (105 ILCS 160/) and shall:

31. Provide an annual schedule of pesticide application to the supervisor of each District building, ensuring that the applications take place outside of normal school hours (Monday through Friday, before 7 a.m. or after 4 p.m. or on days when students are not in attendance).
32. In coordination with the supervisor of each District building (including each Building Principal), notify employees and students and their parents/guardians in each building. The notification must:
    a. Be provided at least four business days before a pesticide application on school grounds.
    b. Be written or by telephone. If written, the notice may be included in newsletters, calendars, or other correspondence currently being published.
    c. Identify the intended date of the application.
    d. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

Prior notice is not required if an imminent threat to health or property exists. If such a situation arises, the Buildings and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written or telephonic notice is provided as soon as practicable.

Pesticide Application in School Buildings and Structures

The Buildings and Grounds Supervisor is responsible for compliance with the requirements in the Structural Pest Control Act (225 ILCS 235/) and shall:

33. Provide an annual schedule of pesticide application to the supervisor of each District building, ensuring that the applications take place outside of normal school hours (Monday through Friday, before 7 a.m. or after 4 p.m. or on days when students are not in attendance).
34. In coordination with the supervisor of each District building (including each Building Principal):
    a. Maintain a registry of all employees and parents/guardians of students.
    b. Notify those employees and parents/guardians of students before pesticides are applied in or on each building. The notification must:

i. Be provided at least two business days before a pesticide application in or on school buildings.
ii. Be written. The notice may be included in newsletters, bulletins, calendars, or other correspondence currently being published.
iii. Identify the intended date of the application.
iv. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

Prior notice is not required if an imminent threat to health or property exists. If such a situation arises, the Buildings and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written notice is provided as soon as practicable.

The Buildings and Grounds Supervisor is responsible for the District's integrated pest management program and the District's compliance with the Structural Pest Control Act. 225 ILCS 235/.

☐ *Applicable if the Superintendent determines that an integrated pest management program is economically feasible:*

The Buildings and Grounds Supervisor or designee shall: (1) develop and implement a program incorporating the Department of Public Health guidelines; (2) notify the Department, on forms provided by the Department, that a program is being implemented; (3) repeat the notification every five years after the initial notification; and (4) keep copies of all notifications and all written integrated pest management program plans.

☐ *Applicable if the Superintendent determines that adopting an integrated pest management program is not economically feasible because such adoption would result in an increase in pest control costs:*

The Buildings and Grounds Supervisor or designee shall: (1) notify the Department, on forms provided by the Department, that the development and implementation of an integrated pest management program is not economically feasible; (2) include in the notification the projected pest control costs for the term of the pest control program and projected costs for implementing a program for that same time period; (3) repeat this notification every five years after the initial notification until a program is developed and implemented; and (4) attend a training course, approved by the Department, on integrated pest management and repeat attendance every five years thereafter until a program is developed and implemented in the District's schools.

The Buildings and Grounds Supervisor or designee shall maintain copies of all notifications that are required by the Structural Pest Control Act and provide the Building Principal(s) or designee(s) sufficient information to allow him/her/them to inform all parents/guardians and school employees at least once each school year that the District has met its notification requirements.

Training and Necessary Equipment

Each Building Principal and noncertificated staff supervisor shall ensure that all staff members under his or her supervision receive training on the safe handling and use of hazardous materials as required by 105 ILCS 5/10-20.17a. Emergency response and evacuation plans must be a part of the training.

Before an employee is given an assignment where contact with blood or bodily fluids or other hazardous material is likely, the employee must be provided the necessary training, including

training in the universal precautions and other infection control measures to prevent the transmission of communicable diseases and/or to reduce potential health hazards as required by 23 Ill.Admin.Code §1.330. The appropriate supervisor shall maintain an attendance record of an employee's participation in the training.

Substitute Non-Hazardous Materials

District staff shall comply with State law governing toxic art supplies in schools. 105 ILCS 135/. This includes substituting non-hazardous material for hazardous substances whenever possible and minimizing the quantity of hazardous substances stored in school facilities. No art or craft material containing a toxic substance shall be ordered or purchased for use through grade 6; material containing toxic substances may be used in grades 7 through 12 only if properly labeled according to State law.

Infectious Materials

The Buildings and Grounds Supervisor shall prepare and distribute to all employees an Occupational Exposure Control Plan to eliminate or minimize occupational exposure to potentially infectious materials. The Plan shall comply with the Bloodborne Pathogens Standards adopted by State and federal regulatory agencies and an updated copy given to the Superintendent annually. The Plan shall address the following issues:

35. Exposure determination. Positions that do not subject the employee to occupational exposure are generally exempt from the Plan and the Standards.
36. Implementation schedule specifying how and when risks are to be reduced. The Standards are very specific on risks reduction, e.g., Universal Precautions must be followed; engineering and work practice controls are specified (hand washing, restricted food areas); personal protection equipment must be provided; housekeeping requirements are specified (regulated waste disposal and laundry); vaccination requirements (all employees who have occupational exposure must be offered, at employer expense, the hepatitis B vaccine and vaccination series); communication of hazards to employees through labeling and training; and recordkeeping.
37. Process for ensuring that all medical evaluations and procedures, including the hepatitis B vaccine and vaccination series and post-exposure evaluation and follow-up, are available as required by law.
38. Procedures for evaluating an exposure incident.

Emergency Response Plan

The Building Principal shall ensure that proper procedures for the cleanup of potentially hazardous material spills are followed including the following:

1. A building custodian is responsible for the actual cleanup,
2. Personal protective equipment, chemical neutralization kits, and absorbent material are available in each building at all times, and
3. Spill residue is placed in containers designated for such purpose and disposed of in compliance with local, State, and federal law.

Evacuation

The Building Principal shall ensure compliance with the School Safety Drill Act. 105 ILCS 128/. This includes, among other things, ensuring that evacuation rules are posted in each room and discussed with each class using the room during the first days of the school year. The evacuation

rules indicate the primary and alternate exits and the evacuation area to which students should proceed upon leaving the building.

The Building Principal shall conduct evacuation drills according to School Board policy 4:170, *Safety*, and administrative procedure 4:170-AP1, *Comprehensive Safety and Security Plan*.

LEGAL REF:

29 C.F.R. §1910.1030, Occupational Exposure to Bloodborne Pathogens, adopted by the Ill. Department of Labor at 56 Ill.Admin.Code §350.300.

29 C.F.R. §1910.1200, Occupational Safety and Health Administration Hazard Communication Standards, adopted by 820 ILCS 255/1.5, Toxic Substances Disclosure to Employees Act.

105 ILCS 5/10-20.17a and 5/10-20.49.

105 ILCS 135/, Toxic Art Supplies in School Act.

105 ILCS 140/, Green Cleaning School Act.

105 ILCS 160/, Pesticide Application at Schools Act.

225 ILCS 235/, Structural Pest Control Act.

415 ILCS 65/, Lawn Care Products Application and Notice Act.23 Ill.Admin.Code §1.330.

Adopted 12/12/23

4:165 Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors

Child sexual abuse and grooming behaviors harm students, their parents/guardians, the District's environment, its school communities, and the community at large, while diminishing a student's ability to learn. The Board has a responsibility and obligation to increase awareness and knowledge of: (1) issues regarding child sexual abuse, (2) likely warning signs that a child may be a victim of sexual abuse, (3) grooming behaviors related to child sexual abuse and grooming, (4) how to report child sexual abuse, (5) appropriate relationships between District employees and students based upon State law, and (6) how to prevent child sexual abuse.

To address the Board's obligation to increase awareness and knowledge of these issues, prevent sexual abuse of children, and define prohibited grooming behaviors, the Superintendent or designee shall implement an Awareness and Prevention of Sexual Abuse and Grooming Behaviors Program. The Program will:

1. Educate students with:
    a. An age-appropriate and evidence-informed health and safety education curriculum that includes methods for how to report child sexual abuse and grooming behaviors to authorities, through policy 6:60, *Curriculum Content*;
    b. Information in policy 7:250, *Student Support Services*, about: (i) District counseling options, assistance, and intervention for students who are victims of or affected by sexual abuse, and (ii) community-based Children's Advocacy Centers and sexual assault crisis centers and how to access those serving the District.
2. Train District employees about child sexual abuse and grooming behaviors by January 31 of each school year with materials that include:
    a. A definition of prohibited grooming behaviors and employee-student boundary violations pursuant to policy 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest;*
    b. Evidence-informed content on preventing, recognizing, reporting, and responding to child sexual abuse, grooming behaviors, and employee-student boundary violations pursuant to policies 2:260, *Uniform Grievance Procedure*; 2:265, *Title IX Grievance Procedure*; 5:90, *Abused and Neglected Child Reporting*; 5:100, *Staff Development Program*; and 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*; and
    c. How to report child sexual abuse, grooming behaviors, and/or employee-student boundary violations pursuant to policies 2:260, *Uniform Grievance Procedure*; 2:265, *Title IX Grievance Proce*dure; and 5:90, *Abused and Neglected Child Reporting*.
3. Provide information to parents/guardians in student handbooks about the warning signs of child sexual abuse, grooming behaviors, and employee-student boundary violations with evidence-informed educational information that also includes:
    d. Assistance, referral, or resource information, including how to recognize grooming behaviors, appropriate relationships between District employees and students based upon policy 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*, and how to prevent child sexual abuse from happening;
    e. Methods for how to report child sexual abuse, grooming behaviors, and/or employee-student boundary violations to authorities; and
    f. Available counseling and resources for children who are affected by sexual abuse, including both emotional and educational support for students affected by sexual

abuse, so that the student can continue to succeed in school pursuant to policy 7:250*, Student Support Services*.

4. Provide parents/guardians of students in any of grades K through 8 with not less than five days' written notice before commencing any class or course providing instruction in recognizing and avoiding sexual abuse, as well as the opportunity to object in writing.

LEGAL REF.: 105 ILCS 5/10-23.13, 5/22-85.5, 5/27-9.1a, and 5/27-13.2.
105 ILCS 110/3, Critical Health Problems and Comprehensive Health Education Act.
325 ILCS 5/, Abused and Neglected Child Reporting Act.
720 ILCS 5/11-25, Criminal Code of 2012.

CROSS REF.: 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 4:175 (Convicted Child Sex Offender; Screening; Notifications), 5:90 (Abused and Neglected Child Reporting), 5:100 (Staff Development Program), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 6:60 (Curriculum Content), 7:20 (Harassment of Students Prohibited), 7:250 (Student Support Services)

Adopted 10/8/24

4:170 Safety

Safety and Security

All District operations, including the education program, shall be conducted in a manner that will promote the safety and security of everyone on District property or at a District event. The Superintendent or designee shall develop, implement, and maintain a comprehensive safety and security plan that includes, without limitation:

1. An emergency operations and crisis response plan(s) addressing prevention, preparation, response, and recovery for each school;
2. Provisions for a coordinated effort with local law enforcement and fire officials, emergency medical services personnel, and the Board Attorney;
3. A school safety drill plan;
4. Instruction in safe bus riding practices; and
5. A clear, rapid, factual, and coordinated system of internal and external communication.

In the event of an emergency that threatens the safety of any person or property, students and staff are encouraged to follow the best practices discussed for their building regarding the use of any available cellular telephones.

School Safety Drill Plan

During every academic year, each school building that houses school children shall conduct, at a minimum, each of the following in accordance with the School Safety Drill Act (105 ILCS 128/):

1. Three school evacuation drills to address and prepare students and school personnel for fire incidents. One of these three drills shall require the participation of the local fire department or district.
2. One bus evacuation drill.
3. One severe weather and shelter-in-place drill to address and prepare students and school personnel for possible tornado incidents.
4. One law enforcement lockdown drill to address a school shooting incident and to evaluate the preparedness of school personnel and students. This drill shall occur no later than 90 days after the first day of school of each year, and shall require the participation of all school personnel and students present at school at the time of the drill, except for those exempted by administrators, school support personnel, or a parent/guardian.

Annual Review

The Board or its designee will annually review each school building's emergency operations and crisis response plan(s), protocols, and procedures, as well as each building's compliance with the school safety drill plan. This annual review shall be in accordance with the School Safety Drill Act (105 ILCS 128/) and the Joint Rules of the Office of the State Fire Marshal and the Ill. State Board of Education (ISBE). 29 Ill.Admin.Code Part 1500.

Automated External Defibrillator (AED)

The Superintendent or designee shall implement a written plan for responding to medical emergencies at the District's physical fitness facilities in accordance with the Fitness Facility Medical Emergency Preparedness Act and shall file a copy of the plan with the Ill. Dept. of Public

Health (IDPH). The plan shall provide for at least one automated external defibrillator (AED) to be available at every physical fitness facility on the premises according to State law requirements.

The District shall have an AED on site as well as a trained AED user: (1) on staff during staffed business hours; and (2) available during activities or events sponsored and conducted or supervised by the District. The Superintendent or designee shall ensure that every AED on the District's premises is properly tested and maintained in accordance with rules developed by the IDPH. This policy does not create an obligation to use an AED.

Carbon Monoxide Alarms

The Superintendent or designee shall implement a plan with the District's local fire officials to:

1. Determine which school buildings to equip with approved *carbon monoxide alarms* or *carbon monoxide detectors,*
2. Locate the required carbon monoxide alarms or carbon monoxide detectors within 20 feet of a carbon monoxide emitting device, and
3. Incorporate carbon monoxide alarm or detector activation procedures into each school building that requires a carbon monoxide alarm or detector. The Superintendent or designee shall ensure each school building annually reviews these procedures.

Soccer Goal Safety

The Superintendent or designee shall implement the Movable Soccer Goal Safety Act in accordance with the guidance published by the IDPH. Implementation of the Act shall be directed toward improving the safety of movable soccer goals by requiring that they be properly anchored.

Unsafe School Choice Option

The unsafe school choice option allows students to transfer to another District school or to a public charter school within the District. The unsafe school choice option is available to:

1. All students attending a persistently dangerous school, as defined by State law and identified by the ISBE.
2. Any student who is a victim of a violent criminal offense, as defined by 725 ILCS 120/3, that occurred on school grounds during regular school hours or during a school-sponsored event.

The Superintendent or designee shall develop procedures to implement the unsafe school choice option.

Lead Testing in Water

The Superintendent or designee shall implement testing for lead in each source of drinking water in school buildings in accordance with the Ill. Plumbing License Law and guidance published by the IDPH. The Superintendent or designee shall notify parent(s)/guardian(s) about the sampling results from their children's respective school buildings.

Emergency Closing

The Superintendent is authorized to close school(s) in the event of hazardous weather or other emergency that threatens the safety of students, staff members, or school property.

LEGAL REF.: 105 ILCS 5/10-20.2, 5/10-20.57, 5/18-12, and 5/18-12.5.

105 ILCS 128/, School Safety Drill Act; 29 Ill.Admin.Code Part 1500.

210 ILCS 74/, Physical Fitness Facility Medical Emergency Preparedness Act.

225 ILCS 320/35.5, Ill. Plumbing License Law.

CROSS REF.: 4:110 (Transportation), 4:175 (Convicted Child Sex Offender; Screening; Notifications), 4:180 (Pandemic Preparedness; Management; and Recovery), 4:190 (Targeted School Violence Prevention Program), 5:30 (Hiring Process and Criteria), 8:30 (Visitors to and Conduct on School Property), 8:100 (Relations with Other Organizations and Agencies)

Adopted 4/9/24

4:170-AP1 Administrative Procedure - Comprehensive Safety and Security Plan

Contents:

A. Safety- and Security-Related Administrative Procedures and Forms
B. Definitions
C. District Safety Coordinator and Safety Team; Responsibilities
D. Safety Team Meetings
E. Annual Safety Review
F. School Safety Drill Plan
G. School Emergency Operations and Crisis Response Plan (SEOCRP)
H. Material to be Included in Each SEOCRP
I. Managing Communications During and About an Emergency or Crisis
J. Required Notices
K. Resources
Attachment A – School Emergency Operations and Crisis Response Plan Format
Attachment B – Alignment of Comprehensive Safety and Security Plan with Targeted School Violence Prevention Program

A. Safety and Security Related Administrative Procedures and Forms

Administrative material on school safety and security may be implemented under this plan, including, without limitation, any in the following list.

4:60-AP3	*Criminal History Records Check of Contractor Employees*
4:110-AP1	*School Bus Post-Accident Checklist*
4:110-AP3	*School Bus Safety Rules*
4:110-E	*Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses*
4:160-AP	*Environmental Quality of Buildings and Grounds*
4:170-AP1, E1	*Accident or Injury Form*
4:170-AP1, E2	*Memo to Staff Members Regarding Contacts by Media About a Crisis*
4:170-AP2	*Routine Communications Concerning Safety and Security*
4:170-AP2, E1	*Letter to Parents/Guardians Regarding Student Safety*
4:170-AP2, E2	*Letter to Parents/Guardians Regarding the Dangers of Underage Drinking*
4:170-AP2, E3	*Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers*
4:170-AP2, E4	*Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting*
4:170-AP2, E5	*Notice to Parents/Guardians of Lockdown Drill; Opt-out*
4:170-AP4	*National Terrorism Advisory System*

4:170-AP5	*Unsafe School Choice Option*
4:170-AP6	*Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED*
4:170-AP6, E1	*School Staff AED Notification Letter*
4:170-AP6, E2	*Notification to Staff and Parents/Guardians of CPR and AED Video*
4:170-AP8	*Movable Soccer Goal Safety*
4:175-AP1	*Criminal Offender Notification Laws; Screening*
4:175-AP1, E1	*Informing Parents/Guardians About Offender Community Notification Laws*
4:180-AP1	*School Action Steps for Pandemic Influenza or Other Virus/Disease*
4:180-AP2	*Pandemic Influenza Surveillance and Reporting*
4:190	*Targeted School Violence Prevention Program*
4:190-AP1	*Targeted School Violence Prevention Program*
4:190-AP1, E1	*Targeted School Violence Prevention Program Resources*
4:190-AP2	*Threat Assessment Team (TAT)*
4:190-AP2, E1	*Principles of Threat Assessment*
4:190-AP2, E2	*Threat Assessment Documentation*
4:190-AP2, E3	*Threat Assessment Key Areas and Questions; Examples*
4:190-AP2, E4	*Responding to Types of Threats*
4:190-AP2, E5	*Threat Assessment Case Management Strategies*
4:190-AP2, E6	*Targeted School Violence Prevention and Threat Assessment Education*
6:235-E4	*Keeping Yourself and Your Kids Safe On Social Networks*
6:235-E5	*Children's Online Privacy Protection Act*
7:140-AP	*Use of Metal Detectors and Searches for Student Safety*
7:140-E	*Letter to Parents/Guardians Regarding the Right to Privacy in the School Setting Act*
7:150-AP	*Agency and Police Interviews*
7:280-AP	*Managing Students with Communicable or Infectious Diseases*
7:290-AP	*Resource Guide for Implementation of Suicide and Depression Awareness and Prevention Program*

B. Definitions

SEOCRP is a School Emergency Operations and Crisis Response Plan (formerly *Emergency Operations Plan*). Each school or facility has an SEOCRP.

First responders are local law enforcement, fire department officials, emergency medical services personnel, and any other entity in the community that provides emergency assistance.

Incident means any event or occurrence that threatens the safety and security of individuals on school property or at school events.

District Safety Coordinator is the individual who manages the District's safety and security efforts.

Safety Team is the Superintendent's administrative committee that is responsible for its respective SEOCRP. Each school or facility has a Safety Team.

SRO means school resource officer, defined as a law enforcement officer who has been primarily assigned to a school or school district under an agreement with a local law enforcement agency.

C. District Safety Coordinator and Safety Team; Responsibilities

The Superintendent appoints an administrator to be the **District Safety Coordinator** to manage the District's safety and security efforts and serve as the District's spokesperson during a crisis or emergency.

The Superintendent appoints members of a **Safety Team** for each school or facility, with input from the District Safety Coordinator and each school's Building Principal. The Building Principal and SRO, if any, shall be members of the Safety Team.

The District Safety Coordinator and each school's Safety Team are responsible for developing, implementing, and maintaining a **SEOCRP** with the following objectives as explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013),* at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

- **Prevention**, meaning the capabilities needed to avoid, deter, or stop an incident. Prevention requires the use of: (a) research-based principles of safety and security, (b) an ongoing analysis of data (e.g., incident and inspection reports, complaints, suggestions), and (c) an ongoing program for identifying and evaluating unreasonable risks.
- **Protection,** meaning the capabilities needed to secure schools against violence and manmade or natural disasters. Protection focuses on ongoing actions that protect students, teachers, staff, visitors, networks, and property from a threat or hazard.
- **Mitigation,** meaning the capabilities needed to reduce the likelihood or impact of an incident or emergency. Mitigation requires, among other things, high-quality training, and instruction programs to execute and improve the SEOCRP.
- **Response**, meaning the capabilities needed to stabilize an incident, save lives, establish a safe and secure environment, and facilitate the transition to recovery. Effective response requires, among other things, a clear, rapid, factual, and coordinated system of internal and external communication.
- **Recovery,** meaning the capabilities needed to restore the learning environment.

D. Safety Team Meetings

The District Safety Coordinator chairs the Safety Team meetings. The meetings are held as determined by the District Safety Coordinator. **At least once annually, the Safety Team shall request the participation of first responders and the Board Attorney in a meeting to review and provide input.** The following matters are suggested agenda items:

- Review the agenda and determine who will take meeting notes.

- Review the notes from the previous meeting.
- Discuss the status of previously submitted recommendations.
- Receive, review, and discuss individual and Safety Team committee reports and recommendations concerning one or more items below.
    4. Safety and security data from incidents, investigations, audits, etc.
    5. Recommendations received from stakeholders and first responders
    6. Emerging issues
    7. Status of the SEOCRP
    8. Status of the safety and security communication system
    9. Status of training programs
    10. Status of programs to build awareness of, and support for, the SEOCRP (contests, posters, drives, etc.)
- Clarify information and recommendations for a report to the Superintendent.
- Confirm the Safety Team meeting schedule and review upcoming meeting dates.

E. Annual Safety Review

The District Safety Coordinator facilitates the annual safety review meeting conducted by the School Board or its designee, as required by 105 ILCS 128/25, amended by P.A. 102-395, and 128/30. During the annual safety review, the law requires the School Board or its designee to "review each school building's emergency and crisis response plans, protocols, and procedures, including procedures regarding the District's threat assessment team, the efficacy and effects of law enforcement drills, and each building's compliance with the school safety drill programs." If the school board uses a designee, it should preferably be someone other than the District Safety Coordinator to assure an unbiased audit. The District Safety Coordinator assists the Board or its designee to comply with annual review requirements, including without limitation, the completion of a report certifying that the review took place. See the Ill. State Board of Education (ISBE) website for an annual review checklist and report at: www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx. The Open Meetings Act (OMA) allows the Board to enter closed session to discuss security procedures, school building safety and security, and the use of personnel and equipment to respond to an actual, a threatened, or a reasonably potential danger to the safety of employees, students, staff, the public, or public property. 5 ILCS 120/2(c)(8). Consult the Board Attorney for assistance with this OMA exception.

F. School Safety Drill Plan

The School Safety Drill Act (105 ILCS 128/, amended by P.A.s 102-395, 102-791, 103-104, eff. 1-1-24, and 103-197, eff. 1-1-24) and any implementing State administrative rules shall supersede this procedure in the event of a conflict.

The Building Principal shall keep the Superintendent or designee informed of when drills are scheduled and/or accomplished. ISBE's fillable *School Drill Documentation* form for documenting the completion of minimum drill requirements may be used (see www.isbe.net/Documents/91-02_school_drill_documentation.pdf).

Each academic year, each school building that houses students must conduct a minimum of:

11. **Three school evacuation drills.** These drills prepare students and personnel for situations that occur when conditions outside of a school building are safer than inside a school building. Evacuation may be necessary depending on the circumstances. They may include a fire, suspicious item or person, or incident involving a hazardous

material, including but not limited to a chemical, incendiary, explosive, and bomb threat.

One of the three school evacuation drills requires the participation of the appropriate local fire department, unless waived as provided below. A date is selected according to the following timeline:

- No later than **September 1** of each year, the local fire department or fire district must contact the Building Principal in order to make arrangements.
- No later than **September 14** of each year, the Building Principal or designee and the local fire department or fire district may agree to waive the provisions concerning participation by the local fire department in a school evacuation drill.
- No later than **September 15** of each year, each Building Principal or designee must contact the responding local fire official and propose to the local fire official four dates within the month of October, during at least two different weeks of October, on which to hold the drill. The fire official may choose any of the four available dates, and if he or she does so, the drill occurs on that date.
- Alternatively, the Building Principal or designee and the local fire official may, by mutual agreement, set any other date for the drill, including a date outside of the month of October.
- If the fire official does not select one of the four offered dates in October or set another date by mutual agreement, the school does not need to include the local fire service in one of its mandatory school evacuation drills.

After a drill in which the local fire service participated, the Building Principal should request certification from the local fire service that the school evacuation drill was conducted. Additional school evacuation drills for fire incidents may involve the participation of the appropriate local fire department. In addition, schools may conduct additional school evacuation drills to account for other evacuation incidents, including without limitation, suspicious items or bomb threats.

12. **One school bus evacuation drill.** This drill prepares students and school personnel for situations that occur when conditions outside of the bus are safer than inside the bus. Evacuation may be necessary, depending on the circumstances, in the event of a fire, suspicious items, and incidents involving hazardous materials. Schools may conduct additional bus evacuation drills.

    In addition, instruction on safe bus riding practices should be provided for all students. See 4:110-AP3, *School Bus Safety Rules*.

13. **One severe weather and shelter-in-place drill.** This drill prepares students for situations involving severe weather emergencies or the release of external gas or chemicals. Severe weather and shelter-in-place drills must address and prepare students and school personnel for possible tornado incidents. Other drills shall be based on the needs and environment of particular communities, including severe weather (such as tornadoes, wind shears, lightning, and earthquakes), incidents involving hazardous materials, and incidents involving weapons of mass destruction.
14. **One law enforcement lockdown drill.** This drill addresses a school shooting incident and evaluates the preparedness of school personnel and students for situations calling for the involvement of law enforcement when there is an active threat or an active shooter within a school building. A law enforcement lockdown drill must occur no later than 90 days after the first day of each school year. This drill must be conducted: (a)

according to the District's emergency operations and crisis response plan(s), (b) on days and times when students are normally present in the school building, and (c) with the participation of all school personnel and students present at school at the time of the drill, except for those exempted at the discretion of administrators or school support personnel. The appropriate local law enforcement agency must observe administration of the drill.

Schools must notify parents/guardians in advance of any lockdown drill that involves student participation, and must allow parents/guardians to exempt their child from participating for any reason. The District may, at its discretion, exempt a student from participating in a lockdown drill. 105 ILCS 128/20(c)(4), added by P.A. 102-395. When deciding whether to exempt a student, the District must include the student's individualized education program team or 504 plan team, if any, in the decision. 105 ILCS 128/20(c)(4), amended by P.A. 103-197, eff. 1-1-24. For students who do not participate in the lockdown drill, districts must provide alternative safety education and instruction related to an active threat or active shooter event. For students who do participate in the lockdown drill, districts must allow them to ask questions related to it. See 4:170-AP2, E5, *Notice to Parent/Guardian of Lockdown Drill; Opt-out*. In addition, a law enforcement lockdown drill must meet each of the following criteria:

- During each calendar year, the appropriate local law enforcement agency contacts the Building Principal to request participation in the law enforcement lockdown drill. The Building Principal and the local law enforcement agency shall set, by mutual agreement, a date for the drill.
- The lockdown drill involves the onsite participation of the local law enforcement agency, provided that an agreeable date can be reached between the Building Principal and the local law enforcement agency. If the parties cannot reach an agreeable date, the school shall hold the drill without participation from the local law enforcement agency.
- After a drill in which local law enforcement participated, the Building Principal should request a certification from local law enforcement that the law enforcement lockdown drill was conducted. The local law enforcement agency shall also notify the school of any deficiencies noted during the drill.
- The lockdown drill cannot include any simulations that mimic an actual school shooting incident or active shooter event. Law enforcement may only run an active shooter simulation, including simulated gun fire drills, on school days when students are not present.
- All lockdown drills must be announced in advance to all school personnel and students prior to the commencement of the drill.
- Lockdown drill content must be age and developmentally appropriate, and must include trauma-informed approaches to address the concerns and well-being of school personnel.
- Lockdown drills must include and involve school personnel, including school-based mental health professionals.

The District Safety Coordinator, in cooperation with the Building Principal, shall encourage local law enforcement agencies to establish a school walk-through program. This program encourages local law enforcement officials to walk through school properties during their patrols with the goal of increasing security (school districts are encouraged, but not mandated, to do this by House Resolution 153 (98th General Assembly, 2013)).

G. School Emergency Operations and Crisis Response Plan (SEOCRP)

Each Safety Team shall develop, implement, and maintain a SEOCRP using the process below, as explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013),* at: www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

15. Develop a schedule and invite the participation of first responders.
16. Identify threats and hazards, assess risks, and prioritize threats and hazards.
17. Determine goals and objectives.
18. Develop, review, evaluate, and maintain the SEOCRP.
19. Share the SEOCRP with stakeholders and train them. This includes, without limitation, having the SEOCRP accessible in a digital format.

Each SEOCRP shall include a plan for local law enforcement to rapidly enter a school building in an emergency. 105 ILCS 128/50 (final citation pending), added by P.A. 103-194, eff. 1-1-24.

Each SEOCRP shall be in the format suggested by and explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013)*, at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf. See also *The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide (2019)*, at: https://rems.ed.gov/docs/District_Guide_508C.pdf; and the **Attachment** to this procedure.

H. Material to be Included in Each SEOCRP

Each school Safety Team annually gathers and/or renews the following material for inclusion in the SEOCRP:

20. District-level Targeted School Violence Prevention Plan. See Board policy 4:190, *Targeted School Violence Prevention Program*, and 4:190-AP1, *Targeted School Violence Prevention Program*.
21. Building-level Threat Assessment Team procedures. See 4:190-AP2, *Threat Assessment Team (TAT)*.
22. Building evacuation protocol. The Building Principal or designee shall: (a) keep a comprehensive evacuation map - describing main and alternate routes - in the main office, (b) post signs containing main and alternate evacuation routes for each occupied area in a conspicuous place, preferably near the exit, (c) prepare evacuation plans for outdoor areas (playgrounds and stadiums), and (d) keep all staff informed of the evacuation plans.
23. Documents concerning safety drills. The Building Principal shall schedule, execute, and document safety drills as per the School Safety Drill Act (105 ILCS 128/, amended by P.A.s 102-395, 102-791, 103-104, eff. 1-1-24, and 103-197, eff. 1-1-24) and this procedure.
24. Maps and layouts, including: (a) campus map, (b) building floor plan, (c) location of first aid kits, AEDs, fire extinguishers, and any trauma kits (105 ILCS 5/10-20.85, added by P.A. 103-128), and (d) map or plan describing the areas to be used in the event of an emergency or crisis for triage, emergency helicopter landing, media center, non-victim students, and parents/guardians. The Safety Team or Principal shall annually give a copy of these to first responders.
25. A protocol to secure a list of people present in the building at any time.
26. Tornado response plan, including a map showing tornado wall locations (105 ILCS 128/25).

27. Carbon monoxide alarm or detector activation plans, protocols, and procedures (105 ILCS 5/10-20.57 and 430 ILCS 135/).
28. The safety equipment's maintenance schedule and the person(s) responsible.
29. An emergency early dismissal protocol.
30. A plan for inviting warnings or tips, e.g., a hotline or website for individuals to make anonymous tips.
31. A protocol for student supervision in the event of an emergency or crisis.
32. A safety patrol plan (105 ILCS 5/10-22.28).
33. Bicycle use rules.
34. Roadway and parking rules.
35. Procedures on student and staff illness and injuries at school and school events (23 Ill.Admin.Code §1.530(c)).
36. A plan for giving students instructions on safe school bus riding practices, including the operation and use of emergency doors and windows (as a means of escape), seat belts, and fire extinguisher (105 ILCS 128/20(b)). The District's parent-teacher advisory committee, in cooperation with school bus personnel, establishes and maintains bus safety rules (105 ILCS 5/10-20.14). See 4:110-AP3, *School Bus Safety Rules*.
37. Safety and security related administrative material. See section A, above.
38. The location of any door security locking means and the use of the locking and unlocking means from within and outside the room(s) (105 ILCS 5/10-20.72, renumbered by P.A. 102-558).
39. Other documents identified by the Safety Team.

I. Managing Communications During and About an Emergency or Crisis

The District Safety Coordinator, with assistance from the Safety Team, is responsible for compiling information and preparing communications concerning an emergency or crisis. The District Safety Coordinator serves as the spokesperson during a crisis or emergency. All District communications should come from this source to ensure accuracy, creditability, and compliance with laws granting confidentiality to student records.

The spokesperson shall follow best practices for spokespersons during an emergency or crisis and receive training on public relations. The Board Attorney serves as a resource to the spokesperson. The objective is:

- To provide the maximum amount of verified information to staff members, students' family members, and the media as quickly as possible,
- While simultaneously respecting student privacy and complying with laws granting confidentiality to student records (Ill. School Student Records Act, 105 ILCS 10/; Family Educational Rights and Privacy Act, 20 U.S.C. §1232g). See 7:340-AP1, *School Student Records*.

All staff members are requested to refrain from spreading information about an emergency or crisis unless the information is from the District Safety Coordinator. All inquiries should be directed to the spokesperson.

Everyone in the school community can positively affect an emergency or crisis situation by:

1. Avoiding speculation as to the cause.
2. Avoiding allocation of blame.
3. Helping school and law enforcement officials gather the facts.

4. Sticking to the facts during discussions.
5. Deferring all media requests to the spokesperson.
6. Comforting and supporting each other.

J. Required Notices

A school staff member shall immediately notify the Building Principal when he or she:

1. Observes any person in possession of a firearm on or around school grounds; however, such action may be delayed if immediate notice would endanger students under his or her supervision. 105 ILCS 5/10-27.1A(a).
2. Observes or has reason to suspect that any person on school grounds is or was involved in a drug-related incident. 105 ILCS 5/10-27.1B.
3. Observes a battery committed against any staff member or is subject to a battery. 105 ILCS 5/10-21.7, amended by P.A. 102-894.

Upon receiving a report of No. 1, above, the Building Principal or designee shall immediately notify local law enforcement. 105 ILCS 5/10-27.1A(b), 5/10-27.1B, and 5/10-21.7. In addition, upon receiving a report on any of the above Nos. 1-3, the Building Principal or designee must notify the Superintendent or designee and any involved student's parent/guardian. See the **Required Notices** subhead of policy 7:190, *Student Behavior*, and 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*.

Upon receiving a report of any of the above Nos. 1-3, the Superintendent or designee shall immediately notify local law enforcement. 105 ILCS 5/10-27.1A(c), amended by P.A. 103-34, 5/10-27.1B(b), and 5/10-21.7. The Superintendent or designee will also report incidents involving battery against staff members to ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year and no later than August 1 for the preceding school year. 105 ILCS 5/10-21.7, amended by P.A. 102-894. SIRS is available at www.isbe.net/Pages/School-Incident-Reporting-System.aspx or by going to ISBE's home page and accessing the District's Web Application Security (IWAS) account. Reporting on SIRS does not satisfy the requirement to report incidents to local law enforcement authorities.

K. Resources

Guide for Developing High-Quality School Emergency Operations Plans: At a Glance
www.rems.ed.gov/K12GuideForDevelHQSchool.aspx

Guide for Developing High-Quality School Emergency Operations Plans
www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf

The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide https://rems.ed.gov/docs/District_Guide_508C.pdf

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center Tool Box www.rems.ed.gov/toolbox.aspx

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute
www.alicetraining.com

ISBE/OSFM All Hazard Preparedness Guide for Illinois Schools
www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx

Illinois Emergency Management Agency (IEMA) www2.illinois.gov/ready/Pages/default.aspx

Schools/Campus – Resources, including School Safety Information Sharing
https://ready.illinois.gov/plan/schools.html

Safe2Help Illinois, designed to offer students a safe, confidential way in which to share information that might help prevent suicides, bullying, school violence, or other threats to school safety, www.safe2helpil.com/

Illinois Terrorism Task Force (ITTF) https://ready.illinois.gov/hazards/terrorism.html

National Association of School Psychologists (NASP) - Recommendations for Comprehensive School Safety and Crisis Policies www.nasponline.org/resources-and-publications/resources-and-podcasts/school-safety-and-crisis

U.S. Secret Service (USSS) National Threat Assessment Center (NTAC) www.secretservice.gov/protection/ntac

Improving School Safety Through Bystander Reporting: A Toolkit for Strengthening K-12 Reporting Programs, developed by the USSS NTAC and the Cybersecurity and Infrastructure Security Agency (CISA) www.secretservice.gov/sites/default/files/reports/2023-05/cisa-usss-k-12-bystander-reporting-toolkit-508_final_0.pdf

Bomb Threat Response Planning Tool, developed by the U.S. Dept. of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives and the U.S. Dept. of Education's Office of Safe and Drug Free Schools www.ojp.gov/ncjrs/virtual-library/abstracts/bomb-threat-response-interactive-planning-tool-schools-cd-rom

School Crisis Guide - Help and Healing in a Time of Crisis, published by NEA Health Information Network www.nea.org/resource-library/neas-school-crisis-guide

Attachment A

School Emergency Operations and Crisis Response Plan Format

Basic Plan

1. Introductory Material
1.1 Promulgation Document and Signatures
1.2 Approval and Implementation
1.3 Record of Changes
1.4 Record of Distribution
1.5 Table of Contents
2. Purpose, Scope, Situation Overview, and Assumptions
3. Concept of Operations
4. Organization and Assignment of Responsibilities
5. Direction, Control, and Coordination
6. Information Collection, Analysis, and Dissemination
7. Training and Exercises
8. Administration, Finance, and Logistics
9. Plan Development and Maintenance

2.1 Purpose
2.2 Scope
2.3 Situation Overview
2.4 Planning Assumptions

10. Authorities and References

Functional Annexes

Note: This is not a complete list, but it is recommended that all SEOCRPs include at least the following functional annexes:

1. Communications
2. Evacuation
3. Shelter-in-Place
4. Lockdown
5. Accounting for All Persons
6. Reunification
7. Continuity of Operations (COOP)
8. Security
9. Recovery
10. Health and Medical

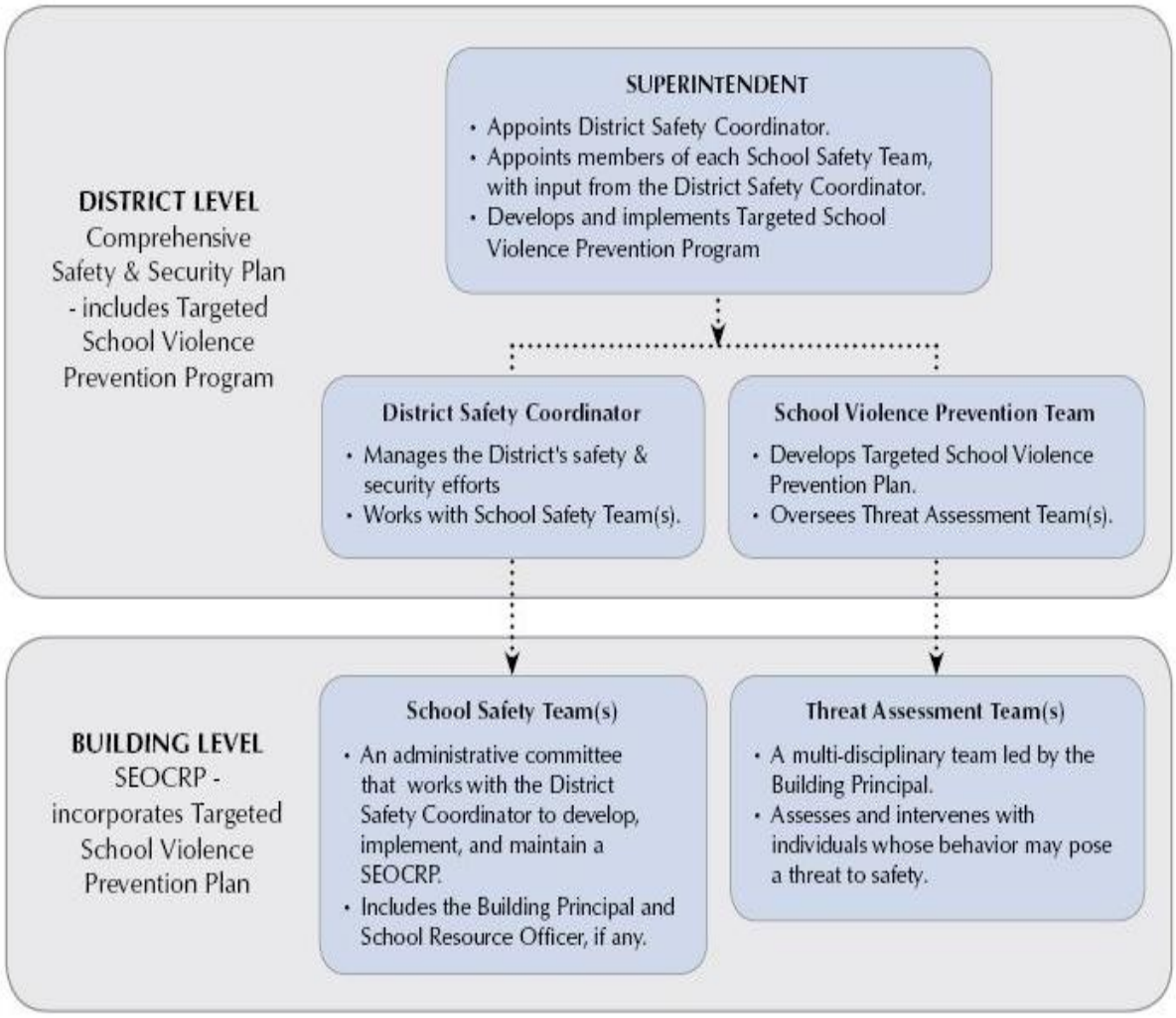
Threat- or Hazard-Specific Annexes

Note: This is not a complete list. Each school's annexes will vary based on its hazard analysis.

1. Hurricane or Severe Storm
2. Earthquake
3. Tornado
4. Hazardous Materials Incident
5. Mass Casualty Incident
6. Active Shooter
7. Pandemic or Disease Outbreak

Attachment B

Alignment of Comprehensive Safety and Security Plan with Targeted School Violence Prevention Program



Adopted 4/9/24

4:170-AP1, E1 Exhibit - Accident or Injury Form

The supervisory staff member must complete this form for submission to the Superintendent whenever any person is injured on District property or at a District-sponsored event.

Name of injured person _____

Date of Birth _____ Telephone _____

Address _____

Class, activity, or event _____

Accident location _____

Accident date _____ Time of accident _____

How did the accident occur? (Describe sequence of events) _____

_____

_____

Emergency contact notified? ☐ Yes ☐ No If no, explain why: _____

_____

If yes, provide the following:

Contact name _____ Relationship _____

Time and method of contact _____ By whom _____

Witnesses Information

Name	Address	Telephone

First aid administered? ☐ Yes ☐ No

If yes, describe first aid administered and by whom: _____

_____

_____

Supervisor (*please print*)

_____ _____

Signature Date

Adopted 10/11/22

4:170-AP, E2 Exhibit - Memo to Staff Members Regarding Contacts by Media About a Crisis

If the media attempts to contact you about a death or other crisis, please follow these guidelines:

1. It is perfectly correct to tell a reporter that you would rather not comment on the incident, especially if it has been an emotional strain. Rather than shouting "No comment" (which could imply that you are trying to hide something), say something like, "this incident has affected the school community greatly, and I would prefer to not comment on it." One should then refer the reporter to the Safety Program Coordinator, person designated for the District's public relations, or other designated spokesperson.
2. According to School Board policy and the Family Educational Rights and Privacy Act (FERPA), the only information about a student that the school is allowed to release is a verification of period of attendance at the school. If the parent/guardian of a student under age 18, or a student aged 18 or older, gives permission, then certain *directory* information (address, participation in sports or activities, awards received, etc.) may also be released. In the event of such approval, that information will be given to the media by the Superintendent or the designated spokesperson.
3. Best practices are to avoid specific comments about students, such as the following: "_____ was a B student," "_____ was having trouble in class, and had been referred to the social worker last week," and "_____ was constantly in trouble for dealing drugs and smoking on school grounds." Do not speculate, assume, or hypothesize. If a reporter persists with these questions, say something like, "Board policy prohibits me from specifically commenting on any student. Furthermore, I wish to respect the family's privacy."
4. Do not feel compelled to correct a reporter if a reporter tells you incorrect information. For example, to try and obtain more information, a reporter might say, "I was informed the student was failing…." Refer the reporter to the Safety Program Coordinator, person designated for the District's public relations, or the designated spokesperson.
5. For persistent reporters, it may be helpful to acknowledge that you understand that he or she has a job to do, but you have a job to do as well and you do not have authority to comment.
6. If you choose, you may make your own personal comments about how the crisis has affected you. If the incident involved an athlete's death, the coach might say, "_____'s death is very tragic, and the team and I will miss him/her/them."
7. You may also address actions the school is taking to deal with the crisis. For example, "Although this is a terrible situation, we are fortunate to have a crisis plan to counsel students and faculty who are understandably upset."
8. Do not agree to set up interviews with students. All requests for interviews should be directed to the Safety Program Coordinator, person designated for the District's public relations, or the designated spokesperson.
9. Media ordinarily should not be in a school building following a crisis (see *Appendix F: Planning for the Psychological Aftermath of School Tragedy* of the Ill. State Board of Education *School Emergency and Crisis Response Plan Guide*, available at: www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx). If you are approached by a member of the media in a school building, immediately notify the Building Principal or other administrator.

10. Do not speculate or comment on the cause of death or other crisis, especially in an apparent suicide or murder. Tell reporters that information on the death should be obtained from the police department.
11. Remember, you do not have to answer any questions at all and may choose to simply refer all reporters to the Safety Program Coordinator, person designated for the District's public relations, or the designated spokesperson.

Adopted 10/11/22

4:170-AP2 Administrative Procedure - Routine Communications Concerning Safety and Security

This procedure's purpose is to identify and organize the District's routine communications to stakeholders regarding safety and security. These routine communications are an integral part of the District's coordinated communication system. Communications to stakeholders that do not concern safety or security are organized with their respective topics.

Form, Memo, or Letter	Explanation
4:15-E1 - *Letter to Employees Regarding Protecting the Privacy of Social Security Numbers* 4:15-E2 - *Statement of Purpose for Collecting Social Security Numbers* 4:15-E3 - *Statement for Employee Manual or District Website Concerning the District's Purpose for Collecting Social Security Numbers*	Board policy makes the Superintendent responsible for ensuring that the District complies with the Identity Protection Act, 5 ILCS 179/. The letter informs staff members about their obligation to protect the privacy of social security numbers. 4:15-E2 and 4:15-E3 fulfill the requirement in the Identity and Protection Act to provide a statement of the purposes for which the District is collecting and using social security numbers.
4:110-E - *Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses*	The parent/guardian of a student with special needs or medical conditions completes this form to provide information to bus drivers and emergency medical technicians. One copy is kept at the school and another copy on the student's school bus in a secure location. 105 ILCS 5/10-20.35 encourages, but does not require, this communication.
4:170-AP1, E1 - *Accident or Injury Form*	This form documents an accident or injury. It provides useful information for examining and evaluating risks. Many insurance companies require completion of their own forms.
4:170-AP1, E2 - *Memo to Staff Members Regarding Contacts by Media About a Crisis*	This memo is intended to encourage staff members to refer questions from the media to the District spokesperson to avoid disseminating incomplete or inaccurate information, or unintentionally violating student privacy rights.
4:170-AP2, E1 - *Letter to Parents/Guardians Regarding Student Safety*	This letter is intended to gain the support and cooperation of parents/guardians concerning the District's safety and security plan. It should align with 4:170-AP1, *Comprehensive Safety and Security Plan*.
4:170-AP2, E2 - *Letter to Parents/ Guardians Regarding Educational*	This letter informs parents/guardians about: (1) the dangers of underage drinking, (2) the prohibition on serving alcohol to minors, and (3) the punishment for

Form, Memo, or Letter	Explanation
Programs About the Dangers of Underage Drinking	violating these laws. House Resolution 98-162 encourages, but does not require, this communication.
4:170-AP2, E3- *Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers*	This letter informs parents/guardians about social media apps that can be harmful and disruptive. It describes *hyperlocal* social media apps, e.g., YikYak, that use GPS on cell phones to target groups in specific areas and *temporary* social media apps that offer a false sense of anonymity or a false belief that content *disappears* after a certain set time limit, e.g., *ask.fm* and *Snapchat*.
4:170-AP6, E1 - *School Staff AED Notification Letter*	This letter informs staff members of AED locations and instructions for responding to medical emergencies, as required by 77 Ill.Admin.Code §527.800(b).
4:170-AP6, E2 - *Notification to Staff and Parents/Guardians of CPR and AED Video*	This notification informs parents/guardians and staff of the training video on hands-only cardiopulmonary resuscitation and automated external defibrillators available on the Ill. High School Association's website. Required by 105 ILCS 25/1.10, added by P.A. 98-305.
4:175-AP1, E1 - *Informing Parents/Guardians About Offender Community Notification Laws*	This notification informs parents/guardians that information about sex offenders and violent offenders against youth is available on the Ill. Dept. of State Police's website. It is provided during school registration or parent-teacher conferences, as required by 730 ILCS 152/.
6:235-AP1 - *Acceptable Use of the District's Electronic Networks* 6:235-AP1, E1 - *Student Authorization for Access to the District's Electronic Networks* 6:235-AP1, E2 - *Staff Authorization for Access to the District's Electronic Networks* 6:235-E3 - *Online Privacy Statement*	Internet safety is promoted by wide distribution of the District's rules and guidelines.
6:235-E4 - *Keeping Yourself and Your Kids Safe on Social Networks*	Many parents/guardians are unaware that the Children's Online Privacy Protection Act gives them control over the types of information that websites can collect from their children. This document's purpose is to provide information to parents/guardians about this Act.

Form, Memo, or Letter	Explanation
6:250-E - *Resource Person and Volunteer Information Form and Waiver of Liability*	Board policy makes the Superintendent responsible for establishing procedures for securing and screening resource persons and volunteers. This form is completed by an individual who wants to be a resource person and/or volunteer in a school.
7:180-AP1, E2 - *Be a Hero by Reporting Bullying*	The District's anti-bullying program seeks to stop bullying and school violence. This exhibit's purpose is to encourage reporting by both witnesses and victims.
7:180-AP1, E3 - *Memo to Staff Regarding Bullying*	The District's anti-bullying program seeks to stop bullying and school violence. This exhibit informs staff members about the District's anti-bullying program and its expectations of staff members.
7:180-AP1, E4 - *Memo to Parents/Guardians Regarding Bullying*	The District's anti-bullying program seeks to stop bullying and school violence. This exhibit informs parents/ guardians of the District's anti-bullying program and encourages them to help the District identify students who are being bullied.
7:180-AP1, E5 - *Report Form for Bullying*	The District's anti-bullying program seeks to stop bullying and school violence. This form is completed by the bullying target, witness, or other person and submitted to the Building Principal's office. Its purpose is to expedite bullying reports.
7:185-E - *Memo to Parents/Guardians Regarding Teen Dating Violence*	This memo informs students and their parents/guardians about the Board's policy prohibiting teen dating violence. Required by 105 ILCS 110/3.10(b)(5).
4:170-AP2, E4 - *Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting*	Informing parents/guardians about sexting may help gain their support and cooperation to end sexting and its resulting disruption to the educational environment.
7:270-E1 - *School Medication Authorization Form*	This form offers a systematic process for parents/guardians to provide notice and instructions to the school nurse or other staff member regarding medications, asthma inhalers, and/or epinephrine injectors.
7:270-E2 - *School Medication Authorization Form - Medical Cannabis*	This form offers a systematic process for parents/guardians to provide notice and instructions to the school nurse or other staff member regarding student's use of medical cannabis.
7:280-E3 - *Preventing Staphylococcal Infections for Schools*	This exhibit contains information for students and their parents/guardians and staff members concerning preventing staphylococcal infections in schools.

Form, Memo, or Letter	Explanation
7:300-E1 - *Agreement to Participate*	This exhibit documents that a student athlete and his or her parent/guardian were informed about the risks inherent in sports and received IHSA's: (1) information about performance enhancing substances testing program, and (2) Concussion Information Sheet. It also asks the parent/guardian for emergency contacts.
7:300-E2 - C*ertificate of Physical Fitness for Participation in Athletics*	This certificate provides documentation that the parent/guardian believes that his or her student athlete is in good health and capable of participating in the sport or activity. The parent/guardian also provides a short medical history and current medications for the student athlete.
7:300-E3 - *Authorization for Medical Treatment*	Parents/guardians sign this form to authorize medical treatment of their child who is a student athlete.
8:30-E1 - *Letter to Parent Regarding Visits to School by Child Sex Offenders*	This exhibit informs parents/guardians that State law restricts when a child sex offender may be on school property. It provides instructions to any parent/guardian who is a child sex offender.
8:30-E2 - *Child Sex Offender's Request for Permission to Visit School Property*	A child sex offender uses this exhibit to request permission to visit school property. He or she must provide the reason(s) for seeking permission to visit school property.

Adopted 8/13/19

4:170-AP2 E1 Letter to Parents/Guardians Regarding Student Safety

On District letterhead

Date

Re: Student Safety

Dear Parents/Guardians:

Student safety is our District's top priority. Our District has developed a *Comprehensive Safety and Security Plan*. In addition to physical safety, the District is concerned with students' academic, social, behavioral, and emotional safety and will help students cope with an emergency or disaster and its aftermath. The following outlines our emergency and disaster response plans.

School Emergency Operations and Crisis Response Plan (SEOCRP)

The District has plans for all four phases of emergency and disaster management:

1. Prevention - the capabilities needed to avoid, deter, or stop an incident.
2. Preparation - the capabilities needed to: (a) protect students, teachers, staff, visitors, networks, and property against threats or hazards, and (b) mitigate the likelihood of an incident or to reduce the impact of one.
3. Response - the capabilities needed to stabilize an incident, save lives, establish a safe and secure environment, and facilitate the transition to recovery.
4. Recovery - the capabilities needed to restore the learning environment.

These phases are covered in each SEOCRP. In addition, the District has a District Safety Coordinator and each school has a Safety Team. State law requires the District to annually review its plans.

Communications to Stakeholders

The District will share emergency information via its website, information hotline, the media, text message, and/or telephone contact.

Emergency Responses

Emergency responses will depend on the circumstances and may include lockdown or evacuation. During a lockdown, no one may enter or leave the building until it is safe to do so. For evacuation purposes, each school has at least one off-campus site where students and staff assemble to be accounted for and temporarily housed.

In the unlikely event an emergency response is needed at your child's school, staff members will be busy supervising students. We will attempt to provide information through the District's information hotline, _____, and/or website _____.

If students are evacuated, students at _____ School will go to _____. You may pick up your child at this location after notifying the school official in charge. Additional instructions will be given in the event of an evacuation, including alternative methods to return your child home.

Cooperation and Assistance Request

During any emergency or potential disaster and for the safety of all students and staff, please follow the instructions of the District Safety Coordinator as well as the Building Principal. These instructions will be widely disseminated.

Providing false information or engaging in disruptive behavior will only lessen our response effectiveness.

If you have any questions, please feel free to contact the District office or your child's Principal. In the meantime, thank you for your cooperation and support.

Web Address:_____

Information Hotline Number:_____

Sincerely,

Superintendent

Adopted 10/8/24

4:170-AP2 E2 Letter to Parents/Guardians Regarding the Dangers of Underage Drinking

On District letterhead

Date

Re: Underage Drinking

Dear Parents/Guardians:

A child's well-being in and out of school is important to us. One area of concern for parents/guardians and educators across the country is underage drinking. Alcohol use can cause destructive behavior that has consequences for a child's health, behavior, and school performance regardless of when and where consumption takes place. It can also lead to an increase in risky behavior.

According to the Centers for Disease Control and Prevention (CDC), 1 in 10 teens in high school drinks and drives. Teen drivers are three times more likely than experienced drivers to be in a fatal crash, and drinking any alcohol greatly increases this risk for teens. The CDC and the National Institutes of Health indicate that regular alcohol consumption by minors also corresponds to increased rates of suicide, sexual assault, high-risk sex, fighting, crime, and alcohol dependence. No one fully understands the lifetime consequences of alcohol consumption on the developing brain, but studies have shown weakened memory and worsening of school performance due to increased truancy and learning impairments.

It is illegal for any person under 21 years of age to acquire, possess, or consume alcoholic beverages. District policies prohibit alcohol use by students. District policies also prohibit students from (a) alcohol use, possession, distribution, purchase, or sale at school or school functions, and (b) attending school or school functions under the influence of alcohol. Below is a listing of some relevant Illinois laws that apply to underage drinking.

Driving While Under the Influence (DUI)

Any person under the age of 21 who has consumed alcohol and operated or been in actual physical control of a motor vehicle may be requested to submit to tests to determine alcohol content. If that person refuses the test or has an alcohol concentration greater than .00, his or her driver's license will be suspended for three months to two years. 625 ILCS 5/11-501.1(c).

Driving while under the influence of alcohol is a Class A misdemeanor punishable by a fine and jail for up to 364 days. By driving a motor vehicle anywhere in Illinois, a person gives *implied consent* to a test to determine the alcoholic/drug content of his/her blood. If a person refuses to submit to the test, his/her license will automatically be suspended. 625 ILCS 5/11-501.

Consumption of Alcohol by a Minor

Consumption of alcohol by a minor is a Class A misdemeanor. Minors convicted of alcohol possession in a public space face up to 364 days in jail and a $2,500 fine, plus court costs and court-ordered evaluations and counseling. If a person under the age of 21 pleads guilty to, or is found guilty of, consuming alcohol while under the age of 21, he or she will lose his or her driving privileges for at least three months, even if the person was not driving, and even if he or she gets court supervision (a non-conviction sentence). 235 ILCS 5/6-20(f) and 625 ILCS 5/6-206(a)(43).

Fake Identification

Conviction for using a fake ID to obtain alcohol is a Class A misdemeanor. Punishment carries a fine of not less than $500 and requires at least 25 hours of community service. It may also affect driving privileges. If possible, any community service must be performed for an alcohol abuse prevention program. 235 ILCS 5/6-16(a)(i) and 625 ILCS 5/6-206(a).

Criminal Liability for Parents/Guardians

Any parent/guardian or other adult who furnishes alcohol to a minor, or who allows his or her residence to be used for the unlawful possession or consumption of alcohol by minors, may be charged with a Class A misdemeanor, punishable by a fine of not less than $500 and jail for up to 364 days. Where a violation directly or indirectly results in great bodily harm or death to any person, the crime is a Class 4 felony, punishable by one to three years in prison and up to a $25,000 fine. 235 ILCS 5/6-16(a-1).

Civil Liability for Parents/Guardians

Any parent/guardian or other adult who provides alcohol (such as at a home party) may be liable in a civil action for monetary damages. The action may be sought by someone who suffers personal injury, loss of support, or property loss through the actions of an intoxicated minor whose intoxication resulted from a parent/guardian or other adult giving the minor alcohol. 235 ILCS 5/6-21.

Illegal Transportation of Open Liquor

It is unlawful for any person to transport, carry, possess, or have any alcoholic liquor within the passenger area of any motor vehicle except in the original container and with the seal unbroken. 625 ILCS 5/11-502.

In conclusion, our District encourages you to talk with your child and partner with the school community to prevent underage drinking by our students. For more information on underage drinking and how to talk to your child about it, please see the following links:

pubs.niaaa.nih.gov/publications/MakeADiff_HTML/makediff.htm

www.responsibility.org/prevent-underage-drinking

https://www.stopalcoholabuse.gov/

Sincerely,

Superintendent

Adopted 10/8/24

4:170-AP2, E3 Exhibit - Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers

On District letterhead

Date

Re: Disruptive Social Media Apps; Dangers

Dear Parent(s)/Guardian(s):

Staying on top of social medial trends is important for parents/guardians. The District wants you to know that the following social media apps have the potential to disrupt the school environment by becoming a platform for bullying, unlawful behaviors, and other dangers.

- *Hyperlocal* social media apps, e.g., *YikYak*, present safety and security concerns for our students. Hyperlocal apps use GPS on cell phones to target groups in specific areas.
- *Temporary* social media apps, e.g., *ask.fm*, *Snapchat*, and *Whisper* often present a false belief of anonymity. Temporary apps allow people to send messages and images that self-destruct after a set window of time.

Children need to understand that their online choices are important. Content never truly goes away and no one online is anonymous. Law enforcement agencies have the ability to pinpoint users and content creators, and they do investigate crimes involving the Internet and social media app usage.

The District encourages you to review the resources below and talk with your children. Let's partner together to help children understand how their digital footprints affect their and others' futures. As you discuss this topic with your child, please remind him or her how to report his or her concerns:

1. Tell your child to take a screen shot (if possible) or video (when screen shot not possible) of the content and show you or another trusted adult. Always encourage open conversations about what is happening online. When age-appropriate, discuss that possession and forwarding of sexted images violates federal and state child pornography laws.
2. Use the reporting mechanisms within the social media apps.
3. When a situation begins to disrupt your child's education, report it to your child's school.

Resources about Social Media Apps and Protecting Your Child Online

www.commonsensemedia.org, discusses apps, movies, and more! Type in the app you want to learn more about, and this website will summarize it for you.

www.consumer.ftc.gov/topics/protecting-kids-online, contains resources for adults seeking to help children make safe and responsible online choices.

Sincerely,

Building Principal

Adopted 11/12/19

4:170-AP2, E4 Exhibit - Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting

On District letterhead

Date

Re: Preventing and Reducing Incidences of Sexting

Dear Parents/Guardians:

Sexting is generally defined as sending, sharing, viewing, receiving, or possessing *indecent visual depictions* of oneself or another person using a cell phone. A student will be disciplined for sexting at school.

Discussing sexting and its legal and social consequences with your children may prevent and reduce incidences of it at school and elsewhere. A recent survey revealed that about 15 percent of teens have sent sext messages. It can cause enormous emotional pain for the students involved, often with legal implications. The following talking points from the American Academy of Pediatrics may help start the discussion:

- Talk to your children, even if the issue hasn't directly impacted your community. Ask "have you heard of sexting?" "Tell me what you think it is." Learn what your child's understanding is and add an age-appropriate explanation. For more information about starting age-appropriate discussions, see *Sexting: How to Talk With Kids About the Risks – from the American Academy of Pediatrics* at: www.healthychildren.org/English/family-life/Media/Pages/the-new-problem-of-sexting.aspx.
- Make sure children of all ages understand that the District's student behavior policy prohibits sexting, and that it is further punishable in Illinois through the Juvenile Court Act and the Criminal Code of 2012.
- Collect cell phones at gatherings of tweens and teens. Experts have noted that peer pressure can play a major role in sexting, with attendance at parties being a major contributing factor.
- Monitor the media for stories about sexting that illustrate the consequences for both senders and receivers of these images. Ask "Have you seen this story?" "What did you think about it?" "What would you do if you were this child?"
- Rehearse ways your child can respond if asked to participate in sexting.

For more information on sexting, how to talk to your children about it, and how to say no to sexting, please see the following links:

Talking About Sexting, Common Sense Media, at: www.commonsensemedia.org/blog/talking-about-sexting

Say No to "Sexting" (Grades 7-12), Planet Nutshell, at: https://planetnutshell.com/portfolio/say-no-to-sexting-grades-7-12/

Teen girls 'bombarded and confused' by sexting requests: study, Medical Xpress, at: https://medicalxpress.com/news/2017-12-teen-girls-bombarded-sexting.html

Sincerely,

Superintendent

Adopted 10/8/24

4:170-AP2, E5 Notice to Parents/Guardians of Lockdown Drill; Opt-out

Distribute to parents/guardians in advance of any law enforcement lockdown drill addressing a school shooting incident that involves student participation, as required by 105 ILCS 128/20(c).

Date:

Re: Law Enforcement Lockdown Drill

Dear Parent(s)/Guardian(s):

The School Safety Drill Act requires that within the first 90 days of every academic year, we conduct at least one law enforcement lockdown drill. This drill addresses a school shooting incident and evaluates the preparedness of school personnel and students for situations involving law enforcement when there is an active threat or an active shooter within a school building. Please be assured that the lockdown drill:

- Does not include any simulations that mimic an actual school shooting incident or active shooter event,
- Is announced in advance to all school personnel and students before it begins,
- Includes content that is age and developmentally appropriate,
- Includes and involves school personnel, including school-based mental health professionals,
- Includes trauma-informed approaches to address the concerns and well-being of school personnel, and
- Permits students to ask questions related to it.

This year's lockdown drill will take place on *(insert date)*. If you do not want your child to participate in the lockdown drill, please complete the following **Opt-out Request** and return it to your child's classroom teacher by *(insert date)*.

☐ I request that the District opt-out my child from the law enforcement lockdown drill. I understand that my child will be provided with alternative safety education and instruction related to an active threat or active shooter event.

_____
Student (*please print*)

_____
Parent/Guardian (*please print*)

_____ _____
Parent/Guardian Signature Date

If you have any questions, please feel free to contact me.

Sincerely,

Building Principal Adopted 5/10/22

4:170-AP2, E6 Letter to Parents/Guardians About Safe Firearm Storage

Optional. This letter is adapted from a template developed by the U.S. Dept. of Education Readiness and Emergency Management for Schools Technical Assistance Center, available at: https://rems.ed.gov/docs/Safe-Firearm-Storage.

On District letterhead

Date

Re: Safe Firearm Storage

Dear Parents/Guardians:

All students and members of our school community deserve to feel safe, welcomed, and included. It is on all of us to work together to prevent firearm violence and to avoid the harm and tragedy that shootings of any kind can cause in the spaces in which we live, learn, work, and play.

Safe firearm storage is one of many preventative actions that you can take to keep our school community and school buildings and grounds safe. When firearms are stored safely, it can help prevent them from getting into the hands of children and teens who may use them to, intentionally or unintentionally, harm themselves or others. Safe storage can go a long way in preventing lives from being lost or permanently altered. If you have firearms in your home or if your child spends time in a space where firearms are present, there are important steps that can be taken to keep firearms secured and out of reach of unintended users.

Firearm-Related Injuries and Deaths: A Problem We Must Solve Together

Firearm-related injuries and deaths are a public health crisis that communities across the nation face every day:

- Since 2018, there have been more than 100 school shooting incidents per year in our country and those numbers have steadily increased.
- Approximately three-quarters of perpetrators in school-based active shooter situations acquired their firearm from the home of a parent/guardian or close relative. This illustrates the connection between your role as parents/guardians and the District's role in keeping students safe while at school.
- However, this issue goes beyond school-based active shooter situations and includes a variety of firearm injury types, including interpersonal violence, suicide, and unintentional fatal and nonfatal firearm injuries.
- More than four million children live in a household with at least one unlocked and loaded firearm. Studies have found that households with both locked firearms and locked ammunition have significantly lower risks of self-inflected firearm injuries and even lower risks of unintentional firearm injuries among children and teens compared to households that did not safely store firearms.

Safe Firearm Storage: Actions to Take to Keep Our Communities Safe

Safe firearm storage can help prevent and minimize the risk of firearm-related deaths and injuries. Everyone, both firearm owners and non-owners, has a role to play in building awareness of safe, responsible firearm storage. Below are simple, highly effective practices that can help to reduce firearm-related incidents in our community and help protect our children. In addition to these practices, it is important to also engage children and teens in conversations about the dangers

associated with using firearms and what to do and not do in the event they access a firearm, to prevent fatal or non-fatal injuries.

- **Safely Store Firearms**: Store firearms - always unloaded - in a tamper-proof locked cabinet, box, safe, firearm vault, or storage case that children or other unauthorized adults cannot access.
- **Safely Store Ammunition**: Store ammunition in a separate, tamper-proof locked cabinet, safe, firearm vault, or storage case that children or other unauthorized adults cannot access.
- **Secure Firearms**: Use trigger locks or cable locks to prevent a firearm from firing.
    - Trigger locks use a mechanism that clamps down around the trigger or trigger housing to prevent it from being pressed. Note: trigger locks should not be installed on loaded firearms.
    - Cable locks use a cable that is threaded through the barrel or action of a firearm to prevent it from firing.

For more information about safe firearm storage, please see the following links:

Safe Storage Fact Sheet, U.S. Dept. of Justice, at: www.ojp.gov/sites/g/files/xyckuh241/files/media/document/safe_storage_fact_sheet.pdf

Secure Gun Storage Resources, Be SMART, at: https://besmartforkids.org/secure-gun-storage/resources/

Securing Your Firearm, Project Child Safe, at: https://projectchildsafe.org/securing-your-firearm/

We can all work together to promote awareness about how we can protect our children and our school community by safely storing firearms. Thank you for being a partner in these efforts, and for helping reduce firearm-related injury and deaths in our community.

Sincerely,

Superintendent

Adopted 10/8/24

4:170-AP4 Administrative Procedure - National Terrorism Advisory System

The National Terrorism Advisory System (NTAS) is designed to convey timely information to the American public about terrorist threats. NTAS issues two types of advisories: *Bulletins* and *Alerts*, which are described below:

Bulletins - Communicate current developments or general trends about terrorism threats without necessarily indicating a specific threat. This means a Bulletin provides broad terrorism threat information that allows recipients to quickly take protective measures.

Alerts - Are only issued when specific, credible information about a terrorist threat is available. An Alert may include specific information, if available, about the nature of the threat, including the geographic region, mode of transportation, or critical infrastructure potentially affected by the threat, as well as steps that individuals and communities can take to protect themselves and help prevent, mitigate, or respond to the threat. Alerts carry an expiration date and will be automatically canceled on that date. Updates to an Alert, as well the cancelation of an Alert, will be distributed in the same way as the original Alert.

Alerts will state whether a threat is *elevated* or *imminent* as follows:

A threat is *elevated* if there is no specific information about the timing or target.

A threat is *imminent* if the threat is believed to be specific and impending.

NTAS advisories are issued by the U.S. Dept. of Homeland Security at: www.dhs.gov/national-terrorism-advisory-system.

District Response Measures

The Superintendent or designee is responsible for tracking Bulletins and Alerts and disseminating those that merit administrative review.

After receiving an NTAS advisory, the Superintendent, Building Principal or other appropriate administrator (*administrator*) will review it and determine what response measures, if any, should be taken. To determine the appropriate response, the administrator should assess the threat to District activities for which he or she is responsible and consider reviewing the threat with other administrators and/or public safety officials. A range of potential response measures are listed below in the column entitled **Potential Response Measures in Addition to Any Suggested by the NTAS Advisory**.

The Superintendent and Building Principal(s) should strongly consider closing school(s) and canceling activities whenever there is an *imminent* threat to the District or one of its buildings.

Response Category	**Potential Response Measures in Addition to Any Suggested by the NTAS Advisory**
Emergency Planning and Preparedness	Update the school emergency operations and crisis response plan (SEOCRP), specifically the emergency and disaster response procedures. See 4:170-AP1, *Comprehensive Safety and Security Plan*, at Sections G and H. Address critical emergency needs under the direction of public safety officials. Coordinate emergency plans with county, State, and federal agencies.

Response Category	Potential Response Measures in Addition to Any Suggested by the NTAS Advisory
	Inventory emergency supplies and equipment. Maintain current emergency communication lists for employees and students. Test alternative communication capabilities. Designate an alternative communications center located off school property. Review parent/guardian notification procedures. Review procedures to reunite students with their parents/guardians should schools close mid-day.
Communication/Activities with Employees	Instruct employees to report suspicious activities or persons to the administrative office. Conduct emergency and disaster response training for all employees. Disseminate emergency communications methods and resources, e.g., where to get information, to employees. Review SEOCRP with all employees. Update employee emergency contact numbers.
Communication/Activities with Students	Instruct students to report suspicious activities or persons to any employee. Conduct school safety drills with students.
Classes and School Activities	Close school(s) early. Cancel classes. Cancel outside activities and field trips. Cancel all activities. Cancel regular and/or extracurricular bus service.
Building and Grounds Security	Reassess facility security measures, e.g., lock exterior doors. Increase building security throughout the school system. Implement visitor control procedures. Limit visitor access to school. Prohibit visitor access to school. Prohibit parking near buildings. Request police department to increase patrols around school. Take additional precautions during events and activities, e.g., hiring additional security staff, restricting public access, or canceling the event/activity. In anticipation of a building lockdown, ensure each school building has a reasonable supply of food, drinking water, medical supplies, back-up communication equipment, generator, batteries, etc.

Response Category	Potential Response Measures in Addition to Any Suggested by the NTAS Advisory
Parent/Guardian Communication	Disseminate emergency communications methods and resources, e.g., where to get information, to parents/guardians and the community. Update student emergency contact numbers. Test parent/guardian notification procedures. Increase communication with parents/guardians and community via website and email distribution. Inform parents/guardians of procedures to reunite students with parents/guardians should schools close mid-day.

Resources

For further information on NTAS (including to access NTAS Bulletins or Alerts, view sample NTAS advisories, sign up to receive NTAS Alerts, or add NTAS Alerts to a website) see: www.dhs.gov/national-terrorism-advisory-system.

Adopted 10/11/22

4:170-AP5 Administrative Procedure - Unsafe School Choice Option

Illinois public school districts must comply with the following two statutes: (1) 105 ILCS 5/2-3.134 requires ISBE to maintain data and annually publish a list of persistently dangerous schools, and (2) 105 ILCS 5/10-21.3a, amended by P.A. 100-1046, requires each school board to adopt a policy governing the transfer of students within the district from a persistently dangerous school to another public school in the district. Board policy 4:170, *Safety*, fulfills this requirement with its section on **Unsafe School Choice Option**.

This procedure implements the policy. It incorporates guidance issued by the U.S. Dept. of Education (DOE), *Unsafe School Choice Option, Non-Regulatory Guidance* (February 2004), available under the Policy Guidance section at www2.ed.gov/programs/dvpgovgrants/legislation.html, when No Child Left Behind (NCLB) was in effect. NCLB was repealed. The law that took its place is called the Every Student Succeeds Act (ESSA), which amended ESEA on December 10, 2015. ESEA, as amended by ESSA, still requires states to implement an unsafe school choice option; however, the DOE has not updated its guidance to be consistent with this new law. This procedure incorporates DOE guidance to the extent that it is consistent with the new law. ESSA implementation guidance is expected as states implement the law.

Unsafe School Choice Option for Students in Persistently Dangerous Schools

Actor	Action
ISBE	4. Identifies each Illinois school that is a *persistently dangerous school* as defined in 105 ILCS 5/10-21.3a(b) (attached). As of May 2014, ISBE has not identified a *persistently dangerous school*.
Building Principal or designee	Within 10 calendar days of identification, or longer time if necessary, notifies by U.S. mail, the parents/guardians of students attending a *persistently dangerous school*, of that school's status as *persistently dangerous*.
Superintendent	Keeps the Board informed as appropriate. Determines which, if any, schools will receive students assigned to a *persistently dangerous school*. The recipient school may be a public charter school. If a recipient school is not available in the District, the Superintendent will explore other appropriate options, e.g., intergovernmental agreements with another district to accept transfer students. The needs and preferences of affected students and parents/guardians will be considered.

Actor	Action
	Develops and implements a corrective action plan.
Building Principal or designee	Within 20 calendar days of identification, or longer time if necessary, informs parents/guardians of the following: 1. The status of the corrective action plan; and 2. The identities of any available school or public charter school into which students may transfer.
Parents/guardians	As soon as possible after being informed of the unsafe school choice option, confers with the Building Principal concerning whether to exercise the transfer option.
Building Principal or designee	Executes any requested transfers as soon as possible. Transfers will be in effect at least while the original school is identified as *persistently dangerous*. When determining the transfer length, the Principal considers the student's educational needs as well as other factors affecting the student's ability to succeed if returned to the transferring school.
Superintendent or designee	Upon corrective action plan's completion, requests that ISBE remove the school from the list of *persistently dangerous schools*.

Unsafe School Choice Option for Any Student Who Is a Victim of a Violent Criminal Offense Occurring on School Grounds During Regular School Hours or During a School-Sponsored Event

Actor	Action
Building Principal or designee	Notifies the Superintendent that a student was a victim of a violent crime, as defined by 725 ILCS 120/3 (attached), occurring on school grounds during regular school hours or during a school-sponsored event.
Superintendent	As soon as possible, determines which, if any, schools are available recipients for a student who was a victim of a violent crime while in school or on school grounds. The recipient school may be a public charter school. If a recipient school is not available in the District, the Superintendent will explore other appropriate options, e.g., an agreement with a neighboring district to accept the student. The needs and preferences of the affected student and his or her parents/guardians shall be considered. Keeps the Board informed as appropriate.

Actor	Action
Building Principal or designee	As soon as possible, notifies the student's parents/guardians that the student may transfer to another school, provided another school is available.
Parents/guardians	As soon as possible after being informed of the unsafe school choice option, confers with the Building Principal concerning whether to exercise the transfer option.
Building Principal or designee	Executes any requested transfer as soon as possible. When determining the transfer length, considers the student's educational needs as well as other factors affecting the student's ability to succeed if returned to the transferring school.

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Definitions for "Persistently Dangerous School"

105 ILCS 5/10-21.3a, amended by P.A. 100-1046 (current as of June 2021)

§10-21.3a(b). In order to be considered a persistently dangerous school, the school must meet all of the following criteria for 2 consecutive years:

1. Have greater than 3% of the students enrolled in the school expelled for violence-related conduct.
2. Have one or more students expelled for bringing a firearm to school as defined in 18 U.S.C. 921.
3. Have at least 3% of students enrolled in the school exercise the individual option to transfer schools pursuant to subsection (c) of this section. [105 ILCS 5/10-21.3a(c), see the second section of this procedure]

Definitions for "Crime Victim" and "Violent Crime"

725 ILCS 120/3, amended by P.A. 100-961 (current as of June 2021)

§ 3. The terms used in this Act shall have the following meanings:

(a) "**Crime victim**" or "**victim**" means (1) any natural person determined by the prosecutor or the court to have suffered direct physical or psychological harm as a result of a violent crime perpetrated or attempted against that person or direct physical or psychological harm as a result of (i) a violation of Section 11-501 of the Illinois Vehicle Code or similar provision of a local ordinance or (ii) a violation of Section 9-3 of the Criminal Code of 1961 or the Criminal Code of 2012; (2) in the case of a crime victim who is under 18 years of age or an adult victim who is incompetent or incapacitated, both parents, legal guardians,

foster parents, or a single adult representative; (3) in the case of an adult deceased victim, 2 representatives who may be the spouse, parent, child or sibling of the victim, or the representative of the victim's estate; and (4) an immediate family member of a victim under clause (1) of this paragraph (a) chosen by the victim. In no event shall the defendant or any person who aided and abetted in the commission of the crime be considered a victim, a crime victim, or a representative of the victim.

(c) "**Violent Crime**" means: (1) any felony in which force or threat of force was used against the victim; (2) any offense involving sexual exploitation, sexual conduct, or sexual penetration; (3) a violation of Section 11-20.1, 11-20.1B, 11-20.3, 11-23, or 11-23.5 of the Criminal Code of 1961 or the Criminal Code of 2012; (4) domestic battery or stalking; (5) violation of an order of protection, a civil no contact order, or a stalking no contact order; (6) any misdemeanor which results in death or great bodily harm to the victim; (7) any violation of Section 9-3 of the Criminal Code of 1961 or the Criminal Code of 2012, or Section 11-501 of the Illinois Vehicle Code, or a similar provision of a local ordinance, if the violation resulted in personal injury or death. "**Violent crime**" includes any action committed by a juvenile that would be a violent crime if committed by an adult. For the purposes of this paragraph, "personal injury" shall include any Type A injury as indicated on the traffic accident report completed by a law enforcement officer that requires immediate professional attention in either a doctor's office or medical facility. A Type A injury shall include severely bleeding wounds, distorted extremities, and injuries that require the injured party to be carried from the scene.

Adopted 11/9/21

4:170-AP6 Administrative Procedure - Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED

The following operations implement School Board policy 4:170, *Safety*, requiring a plan for responding to medical emergencies at a physical fitness facility. These operations shall be completed consistent with the Physical Fitness Facility Medical Emergency Procedures Act, 210 ILCS 74/, and the Ill. Dept. of Public Health (IDPH) Rules, Title 77, Part 527, Physical Fitness Medical Emergency Preparedness Code. Any definitions of terms found in this Act and IDPH implementing rules are used as the definitions of those terms in this procedure. 77 Ill.Admin.Code Part 527.

Actor	Action
Superintendent or designee	Appoints a staff member to coordinate the operations in this Procedure who will be known as the *Plan Coordinator*. Plan Coordinator: _____ _____ Name Position Files this plan with the IDPH, Division of EMS & Highway Safety, 422 S. 5th St. - 3rd Floor, Springfield, IL 62701. Files an updated plan with the IDPH after a change in the facility that affects the ability to comply with a medical emergency, such as the facility was closed for more than 45 days. 77 Ill.Admin.Code §527.400(a) and (c). Dates plan submitted: _____ _____ _____ _____ _____ _____ Decides, with input from the Plan Coordinator, the schedule for purchasing and maintenance of AEDs. See 210 ILCS 74/50 for compliance date schedule(s). If the AED becomes inoperable, the district must replace or repair it within 10 days. Persons using the facility must be notified if an operable AED is not on the premises. The AED shall be mobile and accessible at all times when the AED is operable. 77 Ill.Admin.Code §527.600. Designates each Building Principal as the individual who must be notified in the event of a medical emergency. 77 Ill.Admin.Code §527.400(a). Building Office Contact _____ _____ _____ _____ _____ _____

Actor	Action
	Follows the requirements of 77 Ill.Admin.Code §525.500 upon receiving a completed report that an AED was used. Cooperates to provide information that may be necessary for non-transport vehicle (defined at 77 Ill.Admin.Code §515.825) in compliance with 77 Ill.Admin.Code §515.350 (requires documentation of all medical care provided and a report to the EMS System within 24 hours for the EMS System to review) and provides information to IDPH upon request.
Plan Coordinator	**Responsibilities Concerning Emergency Responders** With the Building Principal, identifies all staff members who, through their education or training, are appropriate emergency responders for specific facilities. If possible, train all emergency responders in CPR and AED use. Facility _____ Emergency Response Providers _____ _____ _____ _____ _____ _____ _____ **Responsibilities Concerning AED Users** Determines the appropriate number of trained AED users and anticipated rescuers or users needed for each facility equipped with an AED. Each facility with an AED must have at least one trained AED user on staff during staffed business hours (210 ILCS 74/15 and 77 Ill.Admin.Code §527.600) and take reasonable measures to ensure that anticipated rescuers or users are trained pursuant to 410 ILCS 4/15 and 77 Ill.Admin.Code §527.800. Working with the Building Principal, identifies trained AED users and requests that other appropriate staff members and anticipated rescuers or users become trained. Facility _____ Trained AED Users _____ _____ _____ _____ _____ _____ _____ **Responsibilities Concerning AED Registration** Coordinates with local emergency medical services systems. 77 Ill.Admin.Code §527.500. Notifies an agent of the local emergency communications or vehicle dispatch center of the existence, location, and type of the automated external defibrillator. 410 ILCS 4/20(b) and 77 Ill.Admin.Code §527.500. Cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can

Actor	Action
	complete the Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code §515.350). 77 Ill.Admin.Code §525.500. **Responsibilities Concerning Location of AED and Other First Aid Equipment** **Indoor Facility** - Decides, with input from the Building Principal or designee, where to place the AED and other first aid equipment so that their location will be conspicuous, easily accessible, and convenient; the AED must be mobile and accessible at all times. 77 Ill.Admin.Code §527.600. **Outdoor Facility** - Ensures that the AED is placed within 300 feet of the outdoor facility in an open building with unimpeded access that has marked directions to the location of the AED at its entrances. 210 ILCS 74/15(b-10) and 77 Ill.Admin.Code §527.600(c). Facility _____ First Aid & AED Location _____ _____ _____ _____ _____ _____ _____ Keeps a copy of the AED's manual with the AED. 77 Ill.Admin.Code §527.700(b). **Responsibilities Concerning Notification and Posting** Along with the Building Principal, notifies all staff members of the location of any AEDs as well as the instructions for responding to medical emergencies. 77 Ill.Admin.Code §527.800(b). **Responsibilities Concerning Training** Coordinates, with input from the Building Principal, the training of: (1) all staff members who regularly supervise students in physical fitness facilities in the use of CPR and, if appropriate, AEDs, and (2) any non-employee coaches, instructors or other similarly situated anticipated rescuers or users. 77 Ill.Admin.Code §527.800 and 210 ILCS 74/15(b) and (b-5). **Responsibilities Concerning Instructions for Responding to Medical Emergencies** Along with the Building Principal, notifies all facility staff of the location of any AEDs and the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.800(b). Coordinates, along with the Building Principal, the posting of the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.800(b). **Responsibilities Concerning Maintenance and Testing of AEDs**

Actor	Action
	Ensures that all AEDs are maintained and tested according to manufacturer's guidelines. 77 Ill.Admin.Code §527.700(a) and 210 ILCS 74/15(c). Keeps a copy of the maintenance and testing manual at the facility and keeps a copy of the manual with each AED. 77 Ill.Admin.Code §527.700(b).
Building Principal	In a conspicuous place in the physical fitness facility, posts: (1) the list of all staff members who are emergency responders, and (2) the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.400(a). Posts a notice at the facility's main entrance stating that an AED is located on the premises. Receives notice in the event of a medical emergency. 77 Ill.Admin.Code §527.400(a).
School Nurse(s)	Along with the Plan Coordinator, helps staff members understand the instructions for responding to medical emergencies. These instructions must provide that the AED should be operated only by trained AED users, unless the circumstances do not allow time to be spent waiting for a trained AED user to arrive. 77 Ill.Admin.Code §527.800(c).
Trained AED User(s) and/or Other Emergency Responder(s)	According to their training, uses appropriate emergency responses upon the occurrence of any sudden, serious, and unexpected sickness or injury that would lead a reasonable person, possessing an average knowledge of medicine and health, to believe that the sick or injured person required urgent or unscheduled medical care. 77 Ill.Admin.Code §527.400(a). According to their training, uses the AED to help restore a normal heart rhythm. 77 Ill.Admin.Code §527.400(a). Calls 911 for medical emergencies and whenever an AED is used. 77 Ill.Admin.Code §527.400(b). Informs the Building Principal whenever the AED or other emergency response is used. 77 Ill.Admin.Code §527.400(b). Whenever an AED is used, cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete a Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code §515.350). 77 Ill.Admin.Code §525.500.
All Facility Staff Members and Users	Follow the *Step-by-Step Emergency Response Plan* described below: 4. Immediately notify the building's emergency responder(s) whose contact information is posted in the facility. Under life and death circumstances call 911 without delay.

Actor	Action
	5. Bring the first aid equipment and AED to the emergency scene. The AED should be operated only by trained AED users for the intended purpose of the AED, unless the circumstances do not allow time for a trained AED user to arrive. 6. Immediately inform the Building Principal or designee of the emergency. 7. The emergency responder will take charge of the emergency. This person will apply first aid, CPR, and/or the AED, as appropriate. 8. If necessary, the emergency responder instructs someone to call 911, providing the location in the building and which entrance to use. This person should make sure someone is sent to open the door for paramedics and guide them to the scene. 9. When paramedics arrive and assume care of the victim, the emergency responder or other staff person notifies the victim's parent/guardian or other emergency contact. 10. If an AED was used, the person using it cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete the Data Collection and Submission report about the use of the AED. If appropriate, a supervising staff member completes an accident report. 11. If an adult refuses treatment, the emergency responder documents the refusal and, if possible, asks the adult to sign a statement stating that he or she refused treatment.

Adopted 10/8/24

4:170-AP6, E1 Exhibit - School Staff AED Notification Letter

On District letterhead

Date:

To: Staff members

Re: Notification to School Staff of the Physical Fitness Facility Medical Emergency Response Instructions and AED Availability

We would like to notify you about our plan for responding to medical emergencies that might occur in our physical fitness facilities. This plan includes access to an Automated External Defibrillator (AED) in the following locations in these facilities:

Facility	Location

The AEDs are strategically placed and readily accessible to predetermined AED users to maximize rapid use. The AED is available during school hours and after school during any activity or program organized by the school and supervised by a school employee. The predetermined AED users are school nurses and any other person who has received AED training (American Heart Association, American Red Cross, or equivalent training) and has a completion card on file with the Superintendent. Any anticipated rescuers or users should now also be trained and certified.

The following information is posted with each AED:

1. Instructions to immediately call 911 and instructions for emergency care.
2. Instructions for using an AED.

Please contact me if you would like information on becoming a trained AED user. If you anticipate that your duties make you more likely to use an AED, you should become trained and certified. It is important to note that the Physical Fitness Facility Medical Emergency Preparedness Act and the Local Governmental and Governmental Employees Tort Immunity Act protect staff members from liability. We appreciate your support.

Sincerely,

Superintendent

Attachments: Step-by-Step Emergency Response Plan (bottom of page 4 of 4:170-AP6, *Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED*)

Adopted 9/8/20

4:170-AP6, E2 Exhibit - Notification to Staff and Parents/Guardians of CPR and AED Video

On District letterhead, website, in student handbook, newsletters, bulletins, and/or calendars

Date:

To: Parents/Guardians and Staff

Re: CPR and AED Video

State law requires the Ill. High School Association to post a hands-only cardiopulmonary resuscitation (CPR) and automated external defibrillators (AED) training video on its website. The law also requires the District to notify staff members and parents/guardians about the video. You are encouraged to view the video, which will take less than 15 minutes of your time, at:

www.ihsa.org/Resources/SportsMedicine/CPRTraining.aspx.

Adopted 10/8/24

4:170-AP8 – Moveable Soccer Goal Safety

Actor	Action
Superintendent	Requires all Building Principals to: 1. Identify any movable soccer goal that the District owns or controls and is on school grounds; and 2. Ensure that supervisors comply with the Movable Soccer Goal Safety Act a/k/a *Zach's Law*. 430 ILCS 145/.
Building Principal	Reviews the Ill. Dept. of Public Health's assistance materials found at https://dph.illinois.gov/topics-services/prevention-wellness/injury-violence-prevention/soccer-goal-safety. Identifies any movable soccer goals on school grounds, or that the school owns or controls. Implements the Movable Soccer Goal Safety Act (430 ILCS 145/) by, among other things, instructing staff members to properly secure or anchor a movable soccer goal when installing, setting up, maintaining, or moving one.

Adopted 10/8/24

4:175 Convicted Child Sex Offender; Screening; Notifications

Persons Prohibited on School Property without Prior Permission

State law prohibits a child sex offender from being present on school property or loitering within 500 feet of school property when persons under the age of 18 are present, unless the offender meets either of the following two exceptions:

1. The offender is a parent/guardian of a student attending the school and has notified the Building Principal of his or her presence at the school for the purpose of: (i) attending a conference with school personnel to discuss the progress of his or her child academically or socially, (ii) participating in child review conferences in which evaluation and placement decisions may be made with respect to his or her child regarding special education services, or (iii) attending conferences to discuss other student issues concerning his or her child such as retention and promotion; or
2. The offender received permission to be present from the School Board, Superintendent, or Superintendent's designee. If permission is granted, the Superintendent or Board President shall provide the details of the offender's upcoming visit to the Building Principal.

In all cases, the Superintendent or designee shall supervise a child sex offender whenever the offender is in a child's vicinity. If a student is a sex offender, the Superintendent or designee shall develop guidelines for managing his or her presence in school.

Screening

The Superintendent or designee shall perform fingerprint-based criminal history records information checks and/or screenings required by State law or Board policy for employees; student teachers; students doing field or clinical experience other than student teaching; contractors' employees who have direct, daily contact with one or more children; and resource persons and volunteers. The Board President shall ensure that these checks are completed for the Superintendent. He or she shall take appropriate action based on the result of any criminal background check and/or screen.

Notification to Parents/Guardians

The Superintendent shall develop procedures for the distribution and use of information from law enforcement officials under the Sex Offender Community Notification Law and the Murderer and Violent Offender Against Youth Community Notification Law. The Superintendent or designee shall serve as the District contact person for purposes of these laws. The Superintendent and Building Principal shall manage a process for schools to notify the parents/guardians during school registration that information about sex offenders is available to the public as provided in the Sex Offender Community Notification Law. This notification must occur during school registration and at other times as the Superintendent or Building Principal determines advisable.

LEGAL REF.: 20 U.S.C. §7926, Elementary and Secondary Education Act.
20 ILCS 2635/, Uniform Conviction Information Act.
720 ILCS 5/11-9.3, Criminal Code of 2012.
730 ILCS 152/, Sex Offender Community Notification Law.
730 ILCS 154/75-105, Murderer and Violent Offender Against Youth Community Notification Law.

CROSS REF.: 2:110 (Qualifications, Term, and Duties of Board Officers), 3:40 (Superintendent), 3:50 (Administrative Personnel Other Than the Superintendent), 3:60 (Administrative Responsibility of the Building Principal), 4:165 (Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors), 5:30 (Hiring Process and Criteria), 5:260 (Student Teachers), 6:250 (Community Resource Persons and Volunteers), 8:30 (Visitors to and Conduct on School Property), 8:100 (Relations with Other Organizations and Agencies)

Adopted 5/14/22

4:175-AP1 Criminal Offender Notification Laws; Screening

Laws Protecting Students on School Grounds

The following list describes laws protecting students on school grounds from individuals convicted of serious crimes:

1. A child sex offender is prohibited from being present on school property or loitering within 500 feet of school property when persons under the age of 18 are present unless specifically permitted by statute. 720 ILCS 5/11-9.3. See School Board policies 4:175, *Convicted Child Sex Offender; Screening; Notifications*; 8:30, *Visitors to and Conduct on School Property*; and administrative procedure 8:30-AP, *Definition of Child Sex Offender*.
2. Law enforcement must notify schools of offenders who reside or are employed in the county. See: (a) Sex Offender Community Notification Law, 730 ILCS 152/, and (b) Murderer and Violent Offender Against Youth Community Notification Law, 730 ILCS 154/75154/105. These laws are hereafter referred to as "offender notification laws." See also policy 4:175, *Convicted Child Sex Offender; Screening; Notifications*.

   The School Code (105 ILCS 5/10-21.9, 5/21B-5 and 5/21B-80) lists criminal offenses that disqualify an individual from District employment if the individual was convicted. 105 ILCS 5/20-21.9 requires any person hired by the District to submit to a fingerprint-based criminal history records check through (a) the Ill. State Police (ISP) for an individual's *Criminal History Records Information* (CHRI), and (b) the Federal Bureau of Investigation (FBI) national crime information databases. The law also requires a school district to initially check two publicly-available Illinois offender databases for each applicant being considered for hire and, if hired, repeatedly at least once every five years that an individual remains employed by the District, which are (a) the Statewide Sex Offender Registry, https://isp.illinois.gov/Sor/Disclaimer, and (b) the Statewide Murderer and Violent Offender Against Youth Registry, https://isp.illinois.gov/MVOAY/Disclaimer. Obtaining the results of the fingerprint-based criminal history records check and review of the database registries is a *complete criminal history records check* as required by the School Code. See policy 5:30, *Hiring Process and Criteria*; administrative procedure 5:30-AP2, *Investigations*; and ISBE's non-regulatory guidance document, *Criminal History Records Information (CHRI) Checks for Certified and Non-certified School Personnel*, at: www.isbe.net/Documents/guidance_chr.pdf
3. The National Sex Offender Public Website, www.nsopw.gov/; however, if performing a check here note that the same information will likely appear in the information furnished by the FBI.
4. The provisions in the School Code described above also apply to employees of persons or firms holding contracts with a school district who have direct, daily contact with students. 105 ILCS 5/10-21.9(f). See administrative procedures 4:60-AP3, *Criminal History Records Check of Contractor Employees*; 5:30-AP2, *Investigations*.
5. Being charged with attempting to commit, conspiring to commit, soliciting, or committing any offense listed in 105 ILCS 5/21B-80(b-5) results in the automatic suspension or revocation of the individual's license until the individual's criminal charges are adjudicated through a court of competent jurisdiction. If the individual is acquitted, his or her license or application shall be immediately reinstated.
6. Conviction of an offense listed in 105 ILCS 5/21B-80(c) results in the automatic suspension or revocation of the individual's license. Conviction of an offense listed in 105

ILCS 5/21B-80(b), depending upon whether the individual's sentence has been satisfactorily completed and seven years have passed since that date, may result in automatic suspension or revocation of the individual's license.

7. The offender notification laws require law enforcement to ascertain whether a juvenile sex offender or violent offender against youth is enrolled in a school and, if so, to provide a copy of the registration form to the Building Principal and any school counselor designated by him or her. This registration form must be kept separately from any and all school records maintained on behalf of the juvenile sex offender. See Board policy 4:175, *Convicted Child Sex Offender; Screening; Notifications*.
8. When a criminal sexual offense is committed, or alleged to have been committed, by a District employee or contractor, law enforcement shall immediately transmit a copy of the criminal history record information relating to the investigation of the offense/alleged offense to the Superintendent. This transmission occurs either (725 ILCS 191/15, added by P.A. 102-652):
    a. Upon the Superintendent's request to a law enforcement agency; or
    b. If the law enforcement agency knows the offender/alleged offender is employed by the District (either as an employee or contractor), automatically.

    The copy of the CHRI that is provided must exclude the identity of the adult victim, and if the Superintendent is otherwise aware of the adult victim, he or she must keep that person's identity confidential.

Receipt of Information from and Collaboration with Law Enforcement

Offender Notification Laws: The Superintendent and Building Principal(s) shall notify the local law enforcement official, including the relevant lawyers in the States Attorney's Office and/or county sheriff that he or she is the District's official contact person for purposes of the offender notification laws. The Superintendent and/or Building Principal may at any time request information from law enforcement officials regarding sex offenders or violent offenders against youth.

The Superintendent will provide Building Principals and other supervisors with a copy of all lists received from law enforcement officials containing the names and addresses of sex offenders and violent offenders against youth.

The Building Principal or designee shall provide the lists to staff members in his or her building on a need-to-know basis, but in any event:

- A teacher will be told if one of his or her students, or a student's parent/guardian, is on a list.
- The school counselor, nurse, social worker, or other school service personnel will be told if a student or the parent/guardian of a student for whom he or she provides services is on a list.

No person receiving a list shall provide it to any other person, except as provided in these procedures, State law, or as authorized by the Superintendent. Requests for information should be referred to the local law enforcement officials or State Police.

Licensed Teacher Felony Conviction Notification Laws: On behalf of the Board, the Superintendent, or if the licensed teacher is the Superintendent, the Board President, shall notify the State Superintendent of Education promptly and in writing of the name of a licensed teacher who was convicted of a felony, along with the conviction and the name and location of the court where the conviction occurred.

On behalf of the Board, the Superintendent, or if the teacher is the Superintendent, the Board President, shall notify the Teachers' Retirement System (TRS) of the State of Ill. Board of Trustees

promptly and in writing when the District learns that a teacher as defined in the Ill. Pension Code was convicted of a felony, along with the name and location of the court where the conviction occurred, and the case number assigned by that court to the conviction.

Juvenile Delinquency Adjudication Notifications: The Superintendent or designee shall contact the Juvenile Division of the County State's Attorney Office(s) having jurisdiction over the District's school(s) to discuss how the State's Attorney shall inform the Superintendent or designee of any students adjudicated as delinquent minors for offenses that would be felonies and/or certain weapons offenses under the Criminal Code of 2012. 705 ILCS 405/5-901(8), amended by P.A. 102-197. The Superintendent and/or designee(s) shall ensure the dissemination of such information is limited to the Building Principal and any school counselor designated by the Building Principal. Id.

Informing Staff Members and Parents/Guardians About the Law

Building Principals or their designees shall inform parents/guardians about the availability of information concerning sex offenders during school registration and, if feasible, during parent-teacher conferences. Information should be distributed about the Statewide Sex Offender Registry, https://isp.illinois.gov/Sor/Disclaimer, and the Statewide Murderer and Violent Offender Against Youth Registry, https://isp.illinois.gov/MVOAY/Disclaimer. Information may also be included in the Student Handbook. See the Sex Offender Community Notification Law, 730 ILCS 152/, and exhibit 4:175-AP1, E1, *Informing Parents/Guardians About Offender Community Notification Laws.*

Requests for additional information shall be referred to local law enforcement officials.

Screening Individuals Who Are Likely to Have Contact with Students at School or School Events

The law is silent with regard to *screening* volunteers and individuals in the proximity of a school. *Screening* is not the same as the School Code's requirement to perform a *fingerprint-based criminal history records check* through (a) the ISP for an individual's *Criminal History Records Information* (CHRI), and (b) the FBI's national crime information databases. 105 ILCS 5/10-21.9.

Screening involves checking an individual's name and address against the: (1) Statewide Sex Offender Registry, https://isp.illinois.gov/Sor/Disclaimer, and (2) the Statewide Murderer and Violent Offender Against Youth Registry maintained by the State Police, https://isp.illinois.gov/MVOAY/Disclaimer. 105 ILCS 5/10-21.9(a-5), (a-6).

There are five categories listed below of individuals with the potential to have contact with students at school or at school events.

1. For employees and student teachers, the Superintendent or Building Principal(s) perform the following tasks:
    a. Complete the required forms to request the *fingerprint-based criminal history records check*; see 5:30-AP2, *Investigations*. 105 ILCS 5/10-21.9(a).
    b. *Screen* the individual's name and address against the: (1) Statewide Sex Offender Registry, https://isp.illinois.gov/Sor/Disclaimer, and (2) the Statewide Murderer and Violent Offender Against Youth Registry maintained by the State Police, https://isp.illinois.gov/MVOAY/Disclaimer. 105 ILCS 5/10-21.9(a-5), (a-6). This screening must be done for applicants being considered for hire and, if hired, repeatedly at least once every five years that an individual remains employed by the District.
    c. Review the lists of sex offenders and violent offenders against youth as the lists are received from law enforcement. If a match is found, the Superintendent immediately contacts the local police officials to confirm or disprove the match. The Superintendent immediately notifies the Board if a match is confirmed. The Board President will

contact the Board Attorney and the Board will take the appropriate action to comply with State law that may include terminating the individual's employment.

d. May request the individual to authorize a clearance of his or her name through the Ill. Dept. Of Children and Family Services (DCFS) CANTS system. This check documents that the person does not have an indicated report or record on DCFS' registry of child abuse and/or neglect. 325 ILCS 5/11.1(a)(11) and (c). Clearances must be requested using the DCFS form at www.dhs.state.il.us/page.aspx?item=48125.

   If an indicated report by DCFS or by a child welfare agency of another jurisdiction is found, the Board must consider the individual's status as a condition of employment. Contact the Board Attorney for guidance.

e. Notify the State Superintendent of Education in writing within 10 business days when a fingerprint-based criminal history records check returns a pending *criminal charge against a license holder for an offense set forth in 105 ILCS 5/21B-80.*

f. Notify the State Superintendent of Education in writing within 15 business days when a fingerprint-based criminal history records check returns a conviction *of a crime set forth in 105 ILCS 5/21B-80 or when publicly-available Illinois offender databases checks find a registration.*

2. For students doing field or clinical experience other than student teaching, the Superintendent or Building Principal(s):

   a. May require the same fingerprint-based criminal history records check required of student teachers. The cost of this check will be reimbursed by the student seeking the experience.

   b. Performs the responsibilities listed in 1. b. & c., above.

3. For volunteers, see 6:250-AP, *Resource Persons and/or School Volunteers; Screening.* The Superintendent or Building Principal(s):

   a. May require the same fingerprint-based criminal history records check required of student teachers.

   b. Performs the responsibilities listed in 1. b. & c., above.

4. For contractors' employees, see 4:60-AP3, *Criminal History Records Check of Contractor Employees*; 5:30-AP2, *Investigations*.

5. For individuals in the proximity of a school or bus stop, the Building Principal(s) review(s) the lists of sex offenders and violent offenders against youth as they are received from law enforcement. The Building Principal or designee shall: (a) notify staff members according to the section of this procedure on **Receipt of the Information from Law Enforcement**, and (b) attempt to alter school bus stops and the route students travel to and from school in order to avoid contact with an individual on such a list.

CROSS REF.: 3:40 (Superintendent), 3:50 (Administrative Personnel Other Than the Superintendent), 3:60 (Administrative Responsibility of the Building Principal), 4:165 (Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors), 4:175 (Convicted Child Sex Offender; Screening; Notifications), 5:30 (Hiring Process and Criteria), 6:250 (Community Resource Persons and Volunteers), 8:30 (Visitors to and Conduct on School Property)

ADMIN. PROC.: 4:60-AP3 (Criminal History Records Check of Contractor Employees), 4:175-AP1, E1 (Informing Parents/Guardians About Offender Community Notification Laws), 5:30-AP2 (Investigations), 6:250-AP (Resource Persons and/or School Volunteers; Screening), 6:250-E (Resource Person and Volunteer Information Form and Waiver of Liability), 8:30-AP (Definition of Child Sex Offender), 8:30-E1 (Letter to Parent Regarding Visits to School by Child Sex Offenders), 8:30-E2 (Child Sex Offender's Request for Permission to Visit School Property)

Adopted 5/10/22

4:175-AP1, E1 Exhibit - Informing Parents/Guardians About Offender Community Notification Laws

On District letterhead, website, and/or in student handbook

Date:

To: Parents/Guardians

Re: Offender Community Notification Laws

State law requires schools to notify parents/guardians during school registration or parent-teacher conferences that information about sex offenders and violent offenders against youth is available to the public on the Ill. State Police (ISP) website. The ISP website contains the following:

Illinois Sex Offender Registry, https://isp.illinois.gov/Sor/Disclaimer

Illinois Murderer and Violent Offender Against Youth Registry, https://isp.illinois.gov/MVOAY/Disclaimer

Frequently Asked Questions Concerning Sex Offenders, https://isp.illinois.gov/Sor/FAQs

Adopted 11/12/19

4:180 Pandemic Preparedness; Management; and Recovery

The School Board recognizes that the District will play an essential role along with the local health department and emergency management agencies in protecting the public's health and safety during a pandemic.

A pandemic is a global outbreak of disease. Pandemics happen when a new virus emerges to infect individuals and, because there is little to no pre-existing immunity against the new virus, it spreads sustainably.

To prepare the School District community for a pandemic, the Superintendent or designee shall: (1) learn and understand how the roles that the federal, State, and local government function; (2) form a pandemic planning team consisting of appropriate District personnel and community members to identify priorities and oversee the development and implementation of a comprehensive pandemic school action plan; and (3) build awareness of the final plan among staff, students, and community.

Emergency School Closing

In the case of a pandemic, the Governor may declare a disaster due to a public health emergency that may affect any decision for an emergency school closing. Decisions for an emergency school closing will be made by the Superintendent in consultation with and, if necessary, at the direction of the Governor, Ill. Dept. of Public Health, District's local health department, emergency management agencies, and/or Regional Office of Education.

During an emergency school closing, the Board President and the Superintendent may, to the extent the emergency situation allows, examine existing Board policies pursuant to Policy 2:240, *Board Policy Development*, and recommend to the Board for consideration any needed amendments or suspensions to address mandates that the District may not be able to accomplish or implement due to a pandemic.

Board Meeting Procedure; No Physical Presence of Quorum and Participation by Audio or Video

A disaster declaration related to a public health emergency may affect the Board's ability to meet in person and generate a quorum of members who are physically present at the location of a meeting. Policy 2:220, *School Board Meeting Procedure*, governs Board meetings by video or audio conference without the physical presence of a quorum.

Payment of Employee Salaries During Emergency School Closures

The Superintendent shall consult with the Board to determine the extent to which continued payment of salaries and benefits will be made to the District's employees, pursuant to Board policies 3:40, *Superintendent*, 3:50, *Administrative Personnel Other Than the Superintendent*, 5:35, *Compliance with the Fair Labor Standards Act*, 5:200, *Terms and Conditions of Employment and Dismissal*, and 5:270, *Employment At-Will, Compensation, and Assignment*, and consistent with: (1) applicable laws, regulations, federal or State or local emergency declarations, executive orders, and agency directives; (2) collective bargaining agreements and any bargaining obligations; and (3) the terms of any grant under which an employee is being paid.

Suspension of In-Person Instruction; Remote and/or Blended Remote Learning Day Plan(s)

When the Governor declares a disaster due to a public health emergency pursuant to 20 ILCS 3305/7, and the State Superintendent of Education declares a requirement for the District to use *Remote Learning Days* or *Blended Remote Learning Days*, the Superintendent shall approve and

present to the Board for adoption a Remote and/or Blended Remote Learning Day Plan (Plan) that:

1. Recommends to the Board for consideration any suspensions or amendments to curriculum-related policies to reduce any Board-required graduation or other instructional requirements in excess of minimum curricular requirements specified in School Code that the District may not be able to provide due to the pandemic;
2. Implements the requirements of 105 ILCS 5/10-30; and
3. Ensures a plan for periodic review of and/or amendments to the Plan when needed and/or required by statute, regulation, or State guidance.

LEGAL REF.: 105 ILCS 5/10-16.7, 5/10-20.5, 5/10-20.56, and 5/10-30.
5 ILCS 120/2.01 and 120/7(e), Open Meetings Act.
20 ILCS 2305/2(b), Ill. Dept. of Public Health Act (Part 1).
20 ILCS 3305/, Ill. Emergency Management Agency Act.
115 ILCS 5/, Ill. Educational Labor Relations Act.

CROSS REF.: 1:20 (District Organization, Operations, and Cooperative Agreements), 2:20 (Powers and Duties of the School Board; Indemnification), 2:220 (School Board Meeting Procedure), 2:240 (Board Policy Development), 3:40 (Superintendent), 3:50 (Administrative Personnel Other Than the Superintendent), 3:70 (Succession of Authority), 4:170 (Safety), 5:35 (Compliance with the Fair Labor Standards Act), 5:200 (Terms and Conditions of Employment and Dismissal), 5:270 (Employment At-Will, Compensation, and Assignment), 6:20 (School Year Calendar and Day), 6:60 (Curriculum Content), 6:300 (Graduation Requirements), 7:90 (Release During School Hours), 8:100 (Relations with Other Organizations and Agencies)

Adopted 10/11/22

4:180Administrative Procedure - School Action Steps for Pandemic Influenza or Other Virus/Disease

Building a strong relationship with the local health department and emergency medical agencies is critical for developing a meaningful school action plan to address pandemic influenza (flu) or other virus/disease. The key planning activities in this checklist should build upon the School District's existing contingency plans.

The following is a list of important step-by-step actions school officials should take before a pandemic flu or other virus/disease outbreak. This list needs to be repeated when an outbreak has several cycles or waves.

Prior to Outbreak/Preparedness and Planning Phase

Actor	Action
Superintendent or designee	Identify Pandemic Planning Team to operate as a Superintendent Committee that includes one or two School Board members, administrators, and staff members.
Superintendent and School Board	Identify, modify, and monitor relevant policies that a pandemic may possibly affect, including but not limited to: 1:20, *District Organization, Operations, and Cooperative Agreements* 2:20, *Powers and Duties of the School Board; Indemnification* 2:70, *Vacancies on the School Board - Filling Vacancies* 2:200, *Types of School Board Meetings* 2:220, *School Board Meeting Procedure* 3:70, *Succession of Authority* 4:130, *Free and Reduced-Price Food Services* 4:180, *Pandemic Preparedness; Management; and Recovery* 5:35, *Compliance with the Fair Labor Standards Act* 5:40, *Communicable and Chronic Infectious Disease* 5:180, *Temporary Illness or Incapacity* 5:185, *Family and Medical Leave* 5:200, *Terms and Conditions of Employment and Dismissal* 5:270, *Employment At-Will, Compensation, and Assignment* 5:300, *Schedules and Employment Year* 5:330, *Sick Days, Vacation, Holidays, and Leaves* 6:20, *School Year Calendar and Day* 6:60, *Curriculum Content* 6:120, *Education of Children with Disabilities* 6:150, *Home and Hospital Instruction* 7:70, *Attendance and Truancy* 7:280, *Communicable and Chronic Infectious Disease* 8:100, *Relations with Other Organizations and Agencies*

Actor	Action
Superintendent or designee and Pandemic Planning Team	Begin review and use of the following publications: For flu season: 1. **School District (K-12) Pandemic Influenza Planning Checklist** at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_checklist.pdf. For COVID-19: 2. **Interim Guidance for Administrators of US K-12 Schools and Child Care Programs** at: 3. www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-guidance.html. Review and ensure a succession of authority plan exists in case Board members, administrators, and/or others are unable to fulfill duties during the pandemic. Succession plans for Board members unable to fulfill duties during the pandemic may create a vacancy on the Board. Discuss the issues of succession plans for elected officials with the Board Attorney. See Board policies 2:70, *Vacancies on the School Board - Filling Vacancies*, and 3:70, *Succession of Authority*. Work with local health and emergency preparedness officials. They may want to use the schools to disseminate information to families about a crisis. Train employees about FLSA, overtime, and recordkeeping requirements necessary to work during a pandemic while the District is closed. Open communications with employee unions regarding "wages, hours and terms and conditions of employment" during a pandemic. Address policies for employee absenteeism, identifying critical job functions, plans for alternate coverage, and return-to-work policies as well as disease symptom recognition. Ensure resources for nurses and staff to receive training and personal protective equipment to identify flu or other pandemic disease symptoms. For flu reporting, see 4:180-AP2, *Pandemic Influenza Surveillance and Reporting*. Remember that a person who is infected does not show symptoms right away, but children becoming ill may show different behavior than usual, such as eating less or being irritable. Knowing the differences between seasonal and pandemic flu is also critical to pandemic preparedness. A fact sheet is available at: www.cdc.gov/flu/pandemic-resources/basics/about.html. Train staff to protect themselves from occupational exposure to flu or other disease through workplace *social distancing* based upon the Occupational Safety and Health Administration's (OSHA), **Guidance on Preparing Workplaces for an Influenza**

Actor	Action
	Pandemic, which may be found at: www.osha.gov/pandemic-influenza. Ensure that **Standard Surveillance** disease recognition procedures are in place and implemented. See 4:180-AP2, *Pandemic Influenza Surveillance and Reporting*. For flu, encourage the use of simple non-medical ways to reduce the spread of flu by *cough and sneeze etiquette* and cleansing of hands and work areas. For COVID-19, see the **Interim Guidance for Administrators of US K-12 Schools and Child Care Programs**, *When there is no community transmission (preparedness phase)* section at: www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-guidance.html. Decide to what extent the District will encourage or require students and staff to stay home when they are mildly ill. Some parents/guardians may need to be more cautious in keeping their students out of school. Identify students who have a greater risk of infection and are most vulnerable to serious illness. Review their health needs and encourage those families to talk with their health care providers. Assess nutritional assistance needs for students who receive free and reduced-price food programs. For more information about providing continuity of meal distribution for students eligible for reimbursable meals, see Q & A #5 at: www.isbe.net/Documents/usda_qa072309.pdf and ISBE's nutrition page specific to managing COVID-19 issues at: www.isbe.net/nutrition. Through consultation with the Regional Office of Education or Intermediate Service Center and local authorities, develop strategies for remote learning through collaborative agreements (television or other local cable stations, teleconferencing, electronic instructional resources, etc.). 105 ILCS 5/10-30, added by P.A. 101-643 and see 6:20-AP, *Remote and/or Blended Remote Learning Day Plan(s)*. Educate staff, students, and parents/guardians about the differences between the various types of flu, other viruses, and/or other diseases, best hygienic practices to prevent them, and what could occur in a pandemic. See **Sample Parent Letter #1, Preparation and Planning** at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_ltr_preparation.pdf. Also see, **Preparing for the Flu** at: www.cdc.gov/h1n1flu/schools/toolkit/pdf/schoolflutoolkit.pdf and www.dph.illinois.gov/topics-services/diseases-and-conditions/influenza#publications-publications-influenza.

Actor	Action
	Review Sections IV and V of **School Guidance During an Influenza Pandemic** at: www.idph.state.il.us/pandemic_flu/schoolguide.htm.

Outbreak of Flu or Other Virus/Disease

Actor	Action
Superintendent or designee	Depending upon the type of virus/disease: For COVID-19, review the *Interim Guidance for Administrators of US K-12 Schools and Child Care Programs* at: 5. www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/k-12-guidance.html. For flu, consider issuing **Sample Parent Letter # 2, First Bird Case** at: 6. www.idph.state.il.us/pandemic_flu/school_guide/sppg_ltr_bird.pdf. Begin **Heightened Surveillance** responses. See 4:180-AP2, *Pandemic Influenza Surveillance and Reporting*. Issue **Sample Parent/Guardian Letter #3, Illinois/Regional Cases**, informing parents/guardians that some students are sick but schools remain open, include tip sheets and information resource list. A sample is at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_il_cases.pdf.
Pandemic Planning Team	When a confirmed case has entered a school, regardless of community transmission, work with local health department regarding a press release announcing that schools will remain open, if applicable, and advising parents/guardians of their need to prepare. A sample, titled **Schools Open**, is at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_media_open.pdf. **Note:** If this sample is used for COVID-19, amend it with those specifics.
Building Principal	Post flu or other virus/disease prevention signs on campuses. See Section V of **School Guidance During an Influenza Pandemic** at: www.idph.state.il.us/pandemic_flu/schoolguide.htm. For COVID-19, see **Promoting Behaviors that Reduce Spread** subhead in the **CDC's Considerations for Schools** at: www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html, including a handwashing etiquette example at: www.cdc.gov/handwashing/when-how-handwashing.html.

Expansion of the Outbreak

Actor	Action
Local Health Department	Issue epidemic statement to general public.
Superintendent or designee	For flu, begin **Intensive Surveillance** responses. See 4:180-AP2, *Pandemic Influenza Surveillance and Reporting*.

Continued Expansion of the Outbreak

Actor	Action
Local Health Department	Evaluate the need for school closure with local school officials.
Superintendent or designee	In consultation with local health department, emergency management agencies, and Regional Office of Education, close school(s). Issue press release. A sample, titled **Schools Closed,** is at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_media_closed.pdf. **Note:** If this sample is used for COVID-19, amend it with those specifics. Issue **Sample Parent Letter #4, School Closure**. A sample is at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_closures.pdf . **Note:** If this sample is used for COVID-19, amend it with those specifics.
School Board and/or Superintendent	Cancel any non-academic events.

Following the Outbreak

Actor	Action
Local Health Department	Evaluate the advisability of opening school(s) with school officials.
Superintendent or designee	Issue press release that schools are open. Issue **Sample Parent Letter #5, Schools Reopen**. A sample is at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_reopening.pdf. **Note:** If this sample is used for COVID-19, amend it with those specifics.
Pandemic Planning Team	Continue communicating with local health department.
Superintendent or designee	For flu, return to **Heightened Surveillance** response. See 4:180-AP2, *Pandemic Influenza Surveillance and Reporting*. Begin checklist again if an outbreak recurs.

Local Health Department:

Name

Address

Telephone

Regional Office of Education:

Name

Address

Telephone

Emergency Management Agencies:

Name

Address

Telephone

Name

Address

Telephone

Important Resources

ISBE and IDPH released a publication titled **School Guidance During an Influenza Pandemic**, December 2006 at:

www.idph.state.il.us/pandemic_flu/schoolguide.htm.

The resource is meant to guide and supplement, not replace school districts' existing plans.

Further information on pandemic flu can be found by calling 1-800-CDC-INFO or at the following websites:

www.cdc.gov/flu/pandemic-resources/index.htm
www.cdc.gov/flu
www.redcross.org

Further information on COVID-19 is subject to continual change. Follow the HHS/CDC and IDPH websites or call 1-800-CDC-INFO.

Adopted 10/11/22

4:180-AP2 Administrative Procedure - Pandemic Influenza Surveillance and Reporting

During all levels of a pandemic flu outbreak, monitoring and documenting the number of students and faculty who are absent and report having influenza is critical. Keeping track of these numbers helps health officials determine whether: (1) the outbreak is increasing in scope, (2) to declare an epidemic and (3) to close school buildings and facilities. Consult the local public health department for an illness' *expected range*.

The following information assists officials with monitoring illness rates and the potential for an epidemic:

- Basic surveillance level definitions and response actions with instructions as outlined below.
- Website links to reporting form(s) to submit to the local public health department.
- Sample attendance log to document flu-related absences.

Surveillance Levels	Response Actions
Standard Surveillance - Reported illnesses are within expected range.	Monitor attendance for increased reports of absence due to flu-like illness. Do not report absences to the local health department.
Heightened Surveillance - Reported illnesses exceed expected range.	Monitor weekly attendance for flu-like illness/absences on **Weekly Influenza Census** at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_weekly_census.pdf. Begin morning *flu check* first hour of school; screen those who report positive for symptoms. Log absences due to flu-like illness on **Daily Pandemic Influenza Census Log**, a sample is available at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_daily_census.pdf. Send weekly absence report to local health department upon request.
Intensive Surveillance - Reported illnesses significantly exceed expected range.	Monitor daily attendance and log absences on Daily Influenza Census or Daily Pandemic Influenza Log at: www.idph.state.il.us/pandemic_flu/school_guide/sppg_daily_census.pdf. Continue morning flu check. Send daily absence report to local health department upon request. Begin preparation for potential school closure.

Important Resources

School Guidance During an Influenza Pandemic, Section III. Surveillance at: www.idph.state.il.us/pandemic_flu/schoolguide.htm.

4:180-AP3 Administrative Procedure – Grant Flexibility; Payment of Employee Salaries During a Pandemic

The Superintendent may implement this procedure, after consultation with the Board, when it is determined it would be in the best interests of the District to utilize federal or State agency grant flexibilities that allow continued payment of employee salaries and benefits from grant funds during a pandemic. This procedure shall be implemented consistent with District practices required by Board policies 5:200, *Terms and Conditions of Employment and Dismissal*, and 5:270, *Employment At-Will, Compensation, and Assignment*.

During a pandemic, federal and/or State agencies may take official action to temporarily allow the District (as a grant recipient) to continue to charge employee salaries and benefits to grant funds while the activities of a grant are closed in whole or in part because of a pandemic, when those payments are made consistent with the District's local practices for the payment of salaries and benefits to *similarly situated* employees paid from *other* funding sources (i.e., not tied to grant-funds) during a pandemic. The Districts will use this procedure to address the payment of salaries and benefits to grant-funded employees and similarly situated non-grant funded employees during a pandemic.

When school buildings are closed due to a pandemic, the Superintendent shall:

1. Consult with the Board to determine the extent to which continued payment of salaries and benefits will be made to the District's employees, pursuant to Board policies 3:40, *Superintendent*, 3:50, *Administrative Personnel Other Than the Superintendent*, 5:35, *Compliance with the Fair Labor Standards Act*, 5:200, *Terms and Conditions of Employment and Dismissal* and 5:270, *Employment At-Will, Compensation, and Assignment*, and consistent with the following:
    a. Laws, regulations, federal or State or local emergency declarations, executive orders, and agency directives;
    b. Collective bargaining agreements and any bargaining obligations; and
    c. The terms of any grant under which an employee is being paid.
2. When permitted by the terms of any grant or related regulatory flexibility, and in consultation with the Board, ensure that the District continues to charge to the respective grants payment of the salaries and benefits to grant-funded employees when payment of salary and benefits is also being made to similarly situated non-grant funded employees.
3. Consult with the Board Attorney for guidance on the continued payment of salaries and benefits for grant-funded employees and similarly situated non-grant funded employees and any related legal obligations, such as collective bargaining.
4. Make recommendation(s) to the Board about the continued payment of grant-funded and similarly situated non-grant funded employees' salary and benefits during the emergency closure.
5. Regularly report to the Board regarding the payment of grant-funded and similarly situated non-grant funded employees and the work being performed by those employees during the period of the emergency closure.

Adopted 4/13/21

4:190 Targeted School Violence Prevention Program

Threats and acts of targeted school violence harm the District's environment and school community, diminishing students' ability to learn and a school's ability to educate. Providing students and staff with access to a safe and secure District environment is an important Board goal. While it is not possible for the District to completely eliminate threats in its environment, a Targeted School Violence Prevention Program (Program) using the collective efforts of local school officials, staff, students, families, and the community helps the District reduce these risks to its environment.

The Superintendent or designee shall develop and implement the Program. The Program oversees the maintenance of a District environment that is conducive to learning and working by identifying, assessing, classifying, responding to, and managing threats and acts of targeted school violence. The Program shall be part of the District's Comprehensive Safety and Security Plan, required by Board policy 4:170, *Safety*, and shall:

12. Establish a District-level School Violence Prevention Team to: (a) develop a District-level Targeted School Violence Prevention Plan, and (b) oversee the District's Building-level Threat Assessment Team(s).
13. Establish Building-level Threat Assessment Team(s) to assess and intervene with individuals whose behavior may pose a threat to safety. This team may serve one or more schools.
14. Require all District staff, volunteers, and contractors to report any expressed threats or behaviors that may represent a threat to the community, school, or self.
15. Encourage parents/guardians and students to report any expressed threats or behaviors that may represent a threat to the community, school, or self.
16. Comply with State and federal law and align with Board policies.

The Local Governmental and Governmental Employees Tort Immunity Act protects the District from liability. The Program does not: (1) replace the care of a physician licensed to practice medicine in all of its branches or a licensed medical practitioner or professional trained in violence prevention, assessments and counseling services, (2) extend beyond available resources within the District, (3) extend beyond the school day and/or school-sponsored events, or (4) guarantee or ensure the safety of students, District staff, or visitors.

LEGAL REF.: 105 ILCS 5/10-20.14, 5/10-21.7, 5/10-27.1A, 5/10-27.1B, 5/24-24, and 5/27-23.7.
105 ILCS 128/, School Safety Drill Act.
745 ILCS 10/, Local Governmental and Governmental Employees Tort Immunity Act.
29 Ill.Admin.Code Part 1500.

CROSS REF.: 2:240 (Board Policy Development), 4:170 (Safety), 5:90 (Abused and Neglected Child Reporting), 5:100 (Staff Development Program), 5:230 (Maintaining Student Discipline), 6:65 (Student Social and Emotional Development), 6:270 (Guidance and Counseling Program), 7:140 (Search and Seizure), 7:150 (Agency and Police Interviews), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:185 (Teen Dating Violence Prohibited), 7:190 (Student Behavior), 7:250 (Student Support Services), 7:290 (Suicide and Depression Awareness and Prevention), 7:340 (Student Records), 8:30 (Visitors to and Conduct on School Property), 8:100 (Relations with Other Organizations and Agencies)

Adopted 10/8/24

4:190-AP1 Administrative Procedure - Targeted School Violence Prevention Program

Use this procedure to establish a Targeted School Violence Prevention Program (Program). It defines terms important to the Program, outlines actions for specific staff members to execute, and is adapted from the premier best practice model as of this publication: *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12_threat_assessment_management_mppg_mpd.pdf.

This administrative procedure contains three sections as follows:

1. Glossary of Terms
2. Establishment and Function of Targeted School Violence Prevention Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery

Glossary of Terms

Aberrant Behavior – Behavior that is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior involves actions, statements, communications, or responses that are unusual for the person or situation; actions that could lead to violence toward self or others; or actions that are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):

- Unusual withdrawal or isolation of subjects from peers and family members;
- Sullen or depressed behavior from an otherwise friendly and positive person;
- Atypical or out-of-context outbursts of verbal or physical aggression;
- Increased levels of agitation, frustration, or anger;
- Confrontational, accusatory, or blaming behavior;
- An atypical interest in or fascination with weapons or acts of violence; and/or
- Fixation on violence as a means of addressing a grievance.

District Environment – Broadly characterized as the District's learning and working environment; it includes the physical environment of school buildings and grounds, all services and programs provided by the District, and the overall school climate.

Pose a Threat – To pose a threat means an individual has, or is in the process of obtaining, the intent and capability to cause harm to self or others through planning and preparation.

Protective Factors – Characteristics or resources that make it less likely that an individual will engage in violence.

Risk Factors – Characteristics that make it more likely that an individual may engage in violence. Risk factors are usually stable over time.

School Climate – A part of the District environment, school climate is the quality and character of school life. School climate is based on patterns of students', parents'/guardians', and school personnel's experience of school life; it also reflects norms, goals, values, interpersonal relationships, teaching and learning practices, and organizational structures.

Targeted School Violence – Includes school shootings and other school-based attacks where a school or a member of the school community was deliberately selected as the target of the attack and was not simply a random target of opportunity.

Targeted School Violence Prevention Plan (TSVP Plan) – For purposes of policy 4:190, *Targeted School Violence Prevention Program*, and this procedure, a District-wide plan that is incorporated into each School Emergency Operations and Crisis Response Plan (SEOCRP) in 4:170-AP1, *Comprehensive Safety and Security Plan*. A TSVP Plan is collectively implemented by local school officials, District staff, students, families, and the community with the goal of preventing and identifying threats and targeted school violence. Under a properly implemented TSVP Plan, schools can respond to individuals/situations that raise safety concerns.

Threat – A concerning communication or behavior that indicates that an individual may pose a danger to the safety of school staff or students through acts of violence or other behavior that could cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; it is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat. For more information on types of threats, see the subheads **Glossary of Terms** and **Assessing and Classifying Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

Threat Assessment – A systematic, fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially disruptive, dangerous, or violent situations, to assess them, and to manage/address them.

Threat Assessment Team (TAT) – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments. For information about TAT members, the function of TATs, and their procedures, see 4:190-AP2, *Threat Assessment Team (TAT)*.

Warning Signs – Characteristics or behaviors that are associated with a current or escalating risk of violence. These tend to be dynamic, acute, and often associated with new stresses, events, losses, or failures.

Establishment and Function of Targeted School Violence Prevention Plan

Following are the strategic procedures to integrate a TSVP Plan into the District's existing policies and procedures.

Actor	Action
Superintendent	Selects School Violence Prevention Team (SVP Team) members from throughout the community to include: Building Principals (Building Principals are mandatory for successful implementation of a TSVP Plan). District Safety Coordinator (see 4:170-AP1, *Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities*) Teachers Law enforcement representatives Board Attorney District psychologist(s), social worker(s), and/or counselor(s)

Actor	Action
	Other mental health workers and/or social service agencies Faith leaders Community members Students Chairs and convenes SVP Team meetings for the purpose of developing a TSVP Plan. Determines whether to recommend that the Board assess the District's conditions for development and learning (see 7:180-AP1, *Prevention, Identification, Investigation, and Response to Bullying*, for resources and more discussion). Informs the Board of the SVP Team's progress, needs, and recommendations by adding information items to the Board's agendas as needed. Prior to the start of each school year, files 4:190-AP2, *Threat Assessment Team (TAT)*, and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center, as applicable. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Informs the Board that this filing was completed.
SVP Team SVP Team, cont'd	Meets when called by the Superintendent for the purpose of: (1) developing a TSVP Plan, and (2) creating, implementing, and monitoring TATs. For more information about the function of TATs, see 4:190-AP2, *Threat Assessment Team (TAT)*. See Recommendation #1 from the *Recommendations of the Illinois Terrorism Task Force School Safety Working Group*, encouraging districts to establish TATs, at www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf. Ensures that the District's TSVP Plan complies with applicable civil rights statutes and other State and federal laws. Ensures that all District staff are annually trained and understand the TSVP Plan, the role of the SVP Team, and the role a TAT. Ensures that procedures are maintained for effective information sharing between the District and local law enforcement agencies and community services agencies,

Actor	Action
SVP Team, cont'd	including defining the threshold for law enforcement intervention. Regularly assesses the effectiveness of the TSVP Plan throughout the District, including the establishment of resources for central reporting mechanisms at the District-wide and school-building level. Identifies Board policies and procedures or equivalent topics that possibly affect a TSVP Plan, including but not limited to: 1:20, *District Organization, Operations, and Cooperative Agreements* 2:150, *Committees* 2:240, *Board Policy Development* 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited* 3:40, *Superintendent* 3:60, *Administrative Responsibility of the Building Principal* 4:165, *Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors* 4:170, *Safety* 4:190, *Targeted School Violence Prevention Program* 5:90, *Abused and Neglected Child Reporting* 5:100, *Staff Development Program* 5:130, *Responsibilities Concerning Internal Information* 5:230, *Maintaining Student Discipline* 6:65, *Student Social and Emotional Development* 6:120, *Education of Children with Disabilities* 6:235, *Access to Electronic Networks* 7:20, *Harassment of Students Prohibited* 7:130, *Student Rights and Responsibilities* 7:140, *Search and Seizure* 7:150, *Agency and Police Interviews* 7:170, *Vandalism*
SVP Team, cont'd	7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment* 7:185, *Teen Dating Violence Prohibited* 7:190, *Student Behavior*

Actor	Action
	7:200, *Suspension Procedures* 7:210, *Expulsion Procedures* 7:230, *Misconduct by Students with Disabilities* 7:250, *Student Support Services* 7:340, *Student Records* 8:10, *Connection with the Community* 8:95, *Parental Involvement* 8:100, *Relations with Other Organizations and Agencies* Recommends, through the Superintendent, proposed policy changes to the Board for consideration. See Board policy 2:240, *Board Policy Development*. Recommends and procures resources for stakeholder training.
Building Principal	Ensures 4:170-AP1, *Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRP)*, is: Available throughout schools (do **not** limit to office); Distributed to and discussed with local law enforcement; and Regularly reviewed with building staff. Notifies and educates all staff, volunteers, and contractors of their duty to immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of violence. Notifies and educates staff, parents/guardians, students, and community members: (1) to report individuals and situations of concern to any school administrators or other authorities, i.e., local law enforcement, or the Safe2Help Illinois helpline (www.safe2helpil.com/), and (2) how school officials will address these concerns. Distributes Board policy 4:190, *Targeted School Violence Prevention Program*; 4:190-AP2, E6, *Targeted School Violence Prevention and Threat Assessment Education*; and 7:180-AP1, E2, *Be a Hero by Reporting Bullying*; and discusses what TATs are and what they do when they learn of threats and/or school violence. Assesses the feasibility of forming a local anonymous tip line and organizing its management. Any locally operated

Actor	Action
	school violence helpline must work in conjunction with Safe2Help Illinois as needed. 5 ILCS 860/10(d), added by P.A. 102-752. When a tip or concern is raised, ensures TATs are trained to engage in their work. See 4:190-AP2, *Threat Assessment Team (TAT)*.
All District staff, volunteers, and contractors	Read 4:190-AP2, E6, *Targeted School Violence Prevention and Threat Assessment Education*. Immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of targeted violence. Upon belief that an individual/situation poses a clear and immediate threat of serious violence that requires containment, notify school security and/or law enforcement in accordance with the SEOCRP. See 4:170-AP1, *Comprehensive Safety and Security Plan*.
School Board	Monitors 4:190, *Targeted School Violence Prevention Program*, and considers adopting changes recommended by the SVP Team. See Board policy 2:240, *Board Policy Development*. Ensures that prior to the start of each school year, the Superintendent files 4:190-AP2, *Threat Assessment Team (TAT)*, and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Provides both the SVP Team and TATs with appropriate resources, which may include providing resources and access for staff professional development opportunities. These opportunities should train staff to properly respond to individuals who provide them with information about a threat or school safety concern.
Superintendent/Building Principal	Ensures the student behavior policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See Board policies 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*, 7:20, *Harassment of Students Prohibited*, 7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment*, and 7:190, *Student Behavior*.

Actor	Action
	Ensures that staff responds to students who provide them with information about a threatening or concerning individual/situation.

Preparedness for a Targeted School Violence Crisis, Response, and Recovery

Following is an extension of 4:170-AP1, *Comprehensive Safety and Security Plan*. It outlines additional tasks for the Superintendent, District Safety Coordinator, and Building Principal(s) preparing for a targeted school violence crisis that school officials can incorporate into training related to each existing SEOCRP.

Actor	Action
Superintendent, Building Principal, and SVP Team	Examine 4:170-AP1, *Comprehensive Safety and Security Plan*, and recommend any changes to existing procedures to the Superintendent or District Safety Coordinator.
District Safety Coordinator	Meets with SVP Team to foster an understanding of what additional items each 4:170-AP1 Safety Team (see 4:170-AP1, *Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities*) might add to its procedures to accomplish a response and recovery. Adds an agenda item to the 4:170-AP1 Safety Team meetings specific to Targeted School Violence; considers inviting the Board Attorney and local law enforcement and emergency responders to this meeting. **Note:** During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District. Local law enforcement's familiarity with the identity of the District's legal counsel *before* a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it. Considers designating a trained public relations and communication manager to inform parents/guardians and the community during a crisis and to keep pace with social media information.
Superintendent and Building Principal(s)	For crisis preparedness and response, ensure that: 4:170-AP1, *Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRP)*, reflects each individual building's needs. 4:170-AP1, *Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan*, supports a TSVP Plan.

Actor	Action
	4:170-AP1, *Comprehensive Safety and Security Plan, Parts G and H*, reflects each building's needs. Also ensure that multiple copies of these plans exist, and direct that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal's office is insufficient. For crisis recovery, ensure that 4:170-AP1, *Comprehensive Safety and Security Plan, Parts I, J, and K*, reflects District needs and that the Board Attorney is aware of the plans. Recommend to the District Safety Coordinator any other additional crisis recovery items that the 4:170-AP1 Safety Team deems necessary.

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4:190-AP1, E1 Exhibit - Targeted School Violence Prevention Program Resources

General Resources

Virginia Center for School and Campus Safety: www.dcjs.virginia.gov/virginia-center-school-and-campus-safety

U.S. Dept. of Education Readiness and Emergency Management for Schools Technical Assistance Center: https://rems.ed.gov/

School Violence: Prevention, Centers for Disease Control and Prevention: https://www.cdc.gov/violenceprevention/youthviolence/schoolviolence/fastfact.html.

School and Campus Health, Substance Abuse and Mental Health Services Administration: www.samhsa.gov/school-campus-health

Suicide Prevention Resource Center: www.sprc.org/

Final Report of the Federal Commission on School Safety, Federal Commission on School Safety (December 2018): www2.ed.gov/documents/school-safety/school-safety-report.pdf

Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence, U.S. Secret Service (July 2018): https://www.secretservice.gov/press/releases/2018/07/ntac-enhancing-school-safety-using-threat-assessment-model

A Study of the Pre-Attack Behaviors of Active Shooters in the United States Between 2000 and 2013, Federal Bureau of Investigation (June 2018): https://www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf/view

Call for Action to Prevent Gun Violence in the United States of America, Interdisciplinary Group on Preventing School and Community Violence (February 2018): https://education.virginia.edu/research-initiatives/research-centers-labs/research-labs/youth-violence-project/call-action-prevent-gun-violence-united-states-america

Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks, Federal Bureau of Investigation (November 2016): www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view

Guide for Developing High-Quality School Emergency Operations Plans, U.S. Depts. of Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and Federal Emergency Management Agency (June 2013): https://rems.ed.gov/docs/School_Guide_508C.pdf

School Connectedness: Strategies for Increasing Protective Factors Among Youth, Centers for Disease Control and Prevention (2009): https://stacks.cdc.gov/view/cdc/5767.

Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack, U.S. Secret Service and U.S. Dept. of Education (May 2008): rems.ed.gov/docs/DOE_BystanderStudy.pdf

Comprehensive School Threat Assessment Guidance, Cornell, D. (2018): www.schoolta.com/manual

The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States, U.S. Secret Service (July 2004): www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf

Illinois Resources

Ill. State Board of Education, School Emergency and Crisis Response Plan Guide: www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx

Ill. School and Campus Safety Resource Center: http://ilschoolsafety.org/

Ill. Emergency Management Agency, Ready Illinois Schools/Campus – Resources: https://ready.illinois.gov/plan/schools-resources.html

Recommendations of the Illinois Terrorism Task Force School Safety Working Group (April 5, 2018): www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf

Ill. Attorney General, Preventing Mass Shootings in Community Settings: https://illinoisattorneygeneral.gov/Safer-Communities/Violence-Prevention-and-Community-Safety/Preventing-Mass-Shootings

Ill. Association of School Boards, School Safety and Security page: https://www.iasb.com/policy-services-and-school-law/guidance-and-resources/school-safety-and-security/

Safe 2 Help Illinois: www.safe2helpil.com/

School Climate Resources

National Center on Safe Supportive Learning Environments: https://safesupportivelearning.ed.gov/

World Health Organization Information Series on School Health's Document *10, Creating an Environment for Emotional and Social Well-Being*: www.who.int/publications/i/item/creating-an-environment-for-emotional-and-social-well-being-an-important-responsibility-of-a-health-promoting-and-child-friendly-school

National School Climate Center: www.schoolclimate.org

Rachel's Challenge, programs for creating a school climate less susceptible to harassment, bullying, and violence: rachelschallenge.org

Sandy Hook Promise, gun violence prevention programs: https://www.sandyhookpromise.org/our-programs/program-overview/

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4:190-AP2 Administrative Procedure - Threat Assessment Team (TAT)

This procedure implements Threat Assessment Teams (TATs). TAT members are professional educators, mental health professionals, law enforcement professionals, and professionals from other disciplines as necessary who are trained in behavioral threat assessment. 105 ILCS 128/45(a).

TATs function at the Building level, taking direction from the District-level School Violence Prevention Team. They identify, inquire, assess, and manage a range of threats that may be posed to the school community. Threats may be posed from a broad range of individuals affecting the District environment, including:

- Students: current and former (and potentially prospective)
- Employees: current and former (and potentially prospective)
- Parents/guardians or other family members of students
- Persons who are (or have been) in relationships with staff or students
- Contractors, vendors, or other visitors
- Persons unaffiliated with the District

Customize this procedure to each TAT's building-specific needs, and use it in conjunction with 4:190-AP1, *Targeted School Violence Prevention Program*; 4:190-AP2, E1, *Principles of Threat Assessment*; 4:190-AP2, E2, *Threat Assessment Documentation*; 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*; 4:190-AP2, E4, *Responding to Types of Threats*; and 4:190-AP2, E5, *Threat Assessment Case Management Strategies*. This procedure contains five sections as follows:

17. Glossary of Terms
18. TAT Formation, Development, and Responsibilities
19. Assessing and Classifying Threats
20. Responding to and Managing Threats
21. Reporting Threats to Outside Agencies

Glossary of Terms

Pose a Threat – To pose a threat means an individual has, or is in the process of obtaining, the intent and capability to cause harm to self or others through planning and preparation.

Protective Factors – Characteristics or resources that make it less likely that an individual will engage in violence.

Risk Factors – Characteristics that make it more likely that an individual may engage in violence. Risk factors are usually stable over time.

Subject of Concern (Subject) – An individual who has been identified to pose a threat of violence or serious harm to self/others.

Target – An individual who is the intended target of the threat posed by the subject of concern.

Threat – A concerning communication or behavior that indicates that an individual may pose a danger to the safety of school staff or students through acts of violence or other behavior that could cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; it is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or

observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat.

Threat Assessment – A systemic, fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially disruptive, dangerous, or violent situations, to assess them, and to manage/address them.

Threat Assessment Team (TAT) – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments that, if available to serve, must include the following members: an administrator, a teacher, a school counselor, a school psychologist, a school social worker, and at least one law enforcement official.

TAT Triage Team – Consists of at least two members of the TAT designated by the Building Principal to triage reported cases of concerning, aberrant, or threatening behavior and/or communication. Considers the nature and level of concern of cases to determine if existing resources and mechanisms are sufficient to address concerns, or whether the full TAT should further assess and manage the situation, and initiates any crisis responses as appropriate.

Types of Threats –

Routine/No Known Concern: Subject/situation does not indicate a threat of violence or harm to self or others, or need for assistance or intervention. No impact on others, environmental factors, or precipitants that need TAT intervention. Close the case.

Low Level: Subject/situation does not indicate a threat of violence or harm to self or others; would or may benefit from intervention or assistance with concerns. Target, environmental/systemic, or precipitating events may be present at low levels. May involve some ongoing assessment management with passive monitoring and/or periodic active monitoring, and referrals as appropriate. Close the case if no team interventions or monitoring are indicated.

Moderate Level: Subject/situation does not pose a threat of serious violence or harm though risk cannot be ruled-out. Subject may be developing the capability for harm and is engaging in aberrant or concerning behaviors that indicate a need for assistance/intervention. Targets/others are likely concerned and impacted. Environmental/systemic or precipitating factors may be present. Consider law enforcement/security notification as appropriate. Requires ongoing assessment and management plan, active monitoring, and referrals as appropriate.

High Level: Subject/situation poses, or is rapidly developing the capability for, a threat of serious violence or harm to self or others; or is in urgent need of hospitalization or treatment. Targets/others are impacted. Typically involves environmental/systemic factors and consideration for precipitating events. Requires immediate notification of school administration and law enforcement, subject containment, target protection and safety plan, activation of crisis response protocols as appropriate, ongoing assessment and management plan, active monitoring, and referrals as appropriate.

Imminent: Subject/situation poses an imminent threat of serious violence or harm to self/others and has or may reasonably have significant impact on others. Requires immediate law enforcement and school administration notification, subject containment, target protection and safety planning, implementation of crisis response and notification protocols, ongoing assessment and management plan, and active monitoring.

Warning Signs – Characteristics or behaviors that are associated with a current or escalating risk of violence. These tend to be dynamic, acute, and often associated with new stresses, events, losses, or failures.

TAT Formation, Development, and Responsibilities

Following are tasks to integrate TATs into the District's Targeted School Violence Prevention Plan.

Actor	Action
Superintendent or designee	Ensures TATs are trained in threat assessment by a threat assessment expert. Free statewide training is available through the Ill. School and Campus Safety Program, at: https://ready.illinois.gov/plan/schools.html. Prior to the start of each school year, files this procedure and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center, as applicable. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Informs the Board that this filing was completed.
Building Principal	Leads TAT. Selects TAT members with expertise in: School administration, e.g., a principal or other senior administrator from the school(s) covered by the TAT; Instruction, e.g., a teacher or administrator with instructional experience; Counseling, e.g., a school counselor, school psychologist or school social worker; Law enforcement, e.g., a school resource officer; Being a staff member in the building, e.g., school safety staff, human resources staff, special education staff, school nurse; and Other community resource persons (as members or consultants as determined by the TAT). When resources allow, selects designated back-up for each core TAT member, from the same or similar areas of expertise, to fulfill their duties in the event of their absence or inability. Designates a TAT Triage Team. Ensures that any reporting mechanisms used by the school community are kept up to date, work consistently, and are checked on a regular and timely basis. Establishes an intake and triage process for reports regarding concerning, aberrant, or threatening behavior and/or communication.

Actor	Action
	When a report is received, activates the TAT and uses this procedure.
TAT	Receives education and seeks training resources, including but not limited to 4:190-AP2, E1, *Principles of Threat Assessment;* 4:190-AP2, E2, *Threat Assessment Documentation*; 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*; 4:190-AP2, E4, *Responding to Types of Threats*; and 4:190-AP2, E5, *Threat Assessment Case Management Strategies*. Receives initial and periodic refresher threat assessment training by a threat assessment expert. Commits to work collaboratively with each other, with other school staff, and (as appropriate) with community resources to support the purposes of the TAT and the safety of the school, its students, and its staff. Actively, lawfully, and ethically communicates with each other, District administrators, and other school staff who have a need to know particular information to support the safety of the school, its students, and its staff. Trains staff, students, parents/guardians, and other members of the school community to recognize and report possible threats by conducting presentations, broadly disseminating relevant information, and ensuring access to consultation from the TAT. Identifies and trains members of the school community who can take reports of possible threats. Effectively implements Board policy 4:190, *Targeted School Violence Prevention Program*.

Assessing and Classifying Threats

When a threat is reported, the Building Principal and TAT assess and classify the threat using the criteria and process outlined below.

Actor	Action
Building Principal and/or TAT Triage Team	When a potential threat report is received, initiates the following intake and triage process. <u>Intake</u> Obtains basic information about the potential threat, including but not limited to: Initial Report of Concern: Date/time reported, date/time reviewed, person receiving report. Reporting Party: Name, affiliation, contact information, relationship to subject of concern. Incident/Nature of Concern: Date/time occurred, location, nature of threat/concern, weapons involved/threatened, details about concerns, and any relevant background information. Subject of Concern: Name, affiliation, contact information, relationship to reporting party or target(s). Identified/Identifiable Target(s): Name, affiliation, contact information, relationship to report party or subject. Determines if an imminent threat exists. An imminent threat is indicated by such factors as: 22. Subject intends imminent and/or serious harm to self/others; or 23. Subject lacks inhibitions for using violence. If an imminent threat exists, initiates School Emergency Operations and Crisis Response Plan (SEOCRP) and notifies law enforcement in accordance with 4:170-AP1, *Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCRP)*. If no imminent threat exists, or once an imminent threat is contained, proceeds to triage. <u>Triage</u> Triages threat to determine if the full TAT must be involved. Triage may include, as necessary and appropriate: Reviewing the reported concerning, aberrant, or threatening behavior and/or communication. Reviewing school and other records for any prior history or interventions with the individual(s) involved. Conducting timely and thorough interviews of the person(s) who reported the threat, the recipient(s) or target(s) of the threat, other witnesses who have knowledge of the threat, and where reasonable, the individual(s) who allegedly engaged in the threatening behavior or communication. The

Actor	Action
	purpose of the interviews is to gain a holistic understanding of the situation, determine the nature and level of the concerns, identify areas where more information may be needed, and inform appropriate strategies or interventions to address any concerns identified. Determines if the full TAT must be involved. To determine that the full TAT does not need to be involved, all TAT Triage Team members must concur that there is no identifiable threat/concern, or that there is a low level of concern regarding issues that are being adequately addressed. If the full TAT must be involved, convenes it as soon as possible. Documents intake and triage using 4:190-AP2, E2, *Threat Assessment Documentation*.
TAT	Conducts a comprehensive and holistic assessment of the threat using the STEP framework set forth in 4:190-AP2, E1, *Principles*

Actor	Action
	of Threat Assessment. See 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*, for key questions to ask the person(s) who reported the threat, the threat recipient(s)/target(s), other witnesses, and the subject to assess the threat. Once the assessment is complete, classifies the threat as one of the following: Routine/No Known Concern, Low Level, Moderate Level, High Level, or Imminent. Documents the threat assessment and classification using 4:190-AP2, E2, *Threat Assessment Documentation*, and ensures that TAT documentation follows the acronym FORT: [2] **F** **Fair** – sought to understand situations and give individuals an opportunity to be heard and understood; **O** **Objective** – sought information based on facts and observations of the case and not speculation or bias; **R** **Reasonable** – engaged in responses that were effective and proportionate to the situation; and **T** **Timely** – quickly and responsively addressed reports of threatening behavior.
Building Principal	Where the TAT classifies the threat as a Moderate, High, or Imminent level of concern and the threat requires further intervention to prevent violence or serious harm, notifies: 24. The parent(s)/guardian(s) of any student who is the target/recipient of a threat; and 25. The parent(s)/guardian(s) of any student who engaged in threatening behaviors.

Responding to and Managing Threats

Actor	Action
TAT	Identifies appropriate responses to the threat based upon its level. See 4:190-AP2, E4, *Responding to Types of Threats*, for examples of responses to each threat level. Develops, implements, and monitors an individualized, fact-based case management plan to intervene with, address, and reduce the threat by: Designating a TAT member as case manager to monitor the status of the subject and to notify the TAT of any change in

[2] *Source: © G. Deisinger (1996).*

Actor	Action
	status, response to interventions/referrals, or additional information that would be cause for reassessment and/or changes in interventions strategies; Assisting the subject, and any impacted staff or students, in accessing appropriate school and community-based resources for support and/or further intervention; Appointing one or more TAT members to engage directly with the subject to prevent the subject from becoming isolated; and Using the least intrusive interventions and strategies that are sufficient, fair, and reasonable to address the concerns identified. See 4:190-AP2, E5, *Threat Assessment Case Management Strategies*, for interventions and strategies, including those that are subject-based, target-based, and environmental/systems-based. Documents this process and any case updates using 4:190-AP2, E2, *Threat Assessment Documentation*. Submits updates regularly, e.g., at least every 30 days, until the case is resolved and the subject no longer poses a threat to the school, its students, or its staff. Maintains documentation in accordance with Board policy, State records laws, and administrative procedures.

Reporting Threats to Outside Agencies

The following is the process to notify the Local Law Enforcement Agency (LLEA) and/or the Ill. State Police (ISP) about certain types of threats. See also 4:170-AP1, *Comprehensive Safety and Security Plan, Part J, Required Notices*.

Actor	Action
Superintendent or designee	Reports batteries committed against teachers, teacher personnel, administrative personnel, or educator support personnel to: (1) the LLEA immediately after the occurrence of the attack, and (2) ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year and no later than August 1 for the preceding school year. 105 ILCS 5/10-21.7, amended by P.A. 102-894. Immediately notifies the LLEA upon receiving a report from any school personnel regarding a verified incident involving: A firearm in a school or on school-owned or leased property. 105 ILCS 5/10-27.1A(c), amended by P.A. 103-34. Drugs in a school or on school-owned or leased property, including any conveyance owned, leased, or used by the

Actor	Action
	school for the transport of students or school personnel. 105 ILCS 5/10-27.1B(b); 105 ILCS 127/).
Building Principal	Reports to the LLEA threats to the safety and welfare of students and teachers by illegal use of drugs and alcohol, by illegal use or possession of weapons, or by illegal gang activity. 105 ILCS 5/10-21.4a. Reports other threats to the LLEA as necessary and appropriate. Immediately notifies the LLEA upon receiving a report that any person has been observed in possession of a firearm on school grounds (other than a law enforcement official engaged in the conduct of his or her official duties). If the person found to be in possession of a firearm on school grounds is a student, the Building Principal or designee shall also immediately notify the student's parent/guardian. 105 ILCS 5/10-21.7A(b). Reports directly to the ISP within 24 hours of a determination that a student or other person poses a clear and present danger to himself, herself, or others. 430 ILCS 66/105 and 405 ILCS 5/6-103.3; 20 Ill.Admin.Code §1230.120(b). See 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*, for further information.

Adopted 10/8/24

4:190-AP2, E1 Exhibit - Principles of Threat Assessment

This exhibit is a resource to educate Building-level Threat Assessment Team (TAT) members about the assumptions and principles underlying behavioral threat assessment and management.

Assumptions

The following assumptions are informed by findings of the U.S. Secret Service and U.S. Dept. of Education's *Safe School Initiative*, as well as other research about targeted violence occurring in or related to educational settings. Key assumptions include:

1. There is no one demographic profile of a perpetrator of targeted violence, nor is there a profile for the type of school that has been targeted.
2. In addition to students, others also engage in targeted violence in schools, including administrators, teachers, other staff, parents/guardians of students, contractors, people in relationships with staff or students, and even people with no connection with the school.
3. Incidents of targeted violence at school/workplaces are rarely sudden, impulsive acts. Perpetrators engage in a process of considering, planning, and preparing for acts of targeted violence.
4. Perpetrators usually have multiple motives to act violently, the most common involving an unresolved grievance with a peer.
5. Many perpetrators of major acts of violence have experienced psychological, behavioral, or developmental symptoms, but may not have been diagnosed with a mental health condition or benefited from adequate treatment.
6. Many perpetrators of major violence impacting schools are suicidal in addition to their violent acts toward others.
7. Most individuals who perpetrate violence engage in multiple behaviors, prior to the incident, which cause others to have serious concerns about their behavior and/or well-being.
8. Many individuals who perpetrate violence have multiple stressors, including significant difficulties with losses or failures.
9. Many student perpetrators have been victims of, or participated in, prior bullying, which was often observed by others.
10. Most individuals who perpetrate violence do not threaten their targets directly prior to engaging in violence, though many express their grievances and aspects of their thoughts or plans to others, often through social media or online activities.
11. Prior to most incidents of targeted violence, other people know about aspects of the individual's ideas, plans or preparations to cause harm.
12. Many bystanders who have knowledge of concerning behaviors do not report them.
13. While most perpetrators act alone, in many cases, others, e.g., staff, students, peers, family members, etc., are involved in some way, such as failing to report concerns (or take other steps) to prevent violence, encouraging violence, and even helping with plans or preparation for violence.

The Pathway to Violence

Individuals who committed targeted violence rarely "just snapped," but engaged in a process of thought and behavior that escalated over days, weeks, months, and even years. A graphic representation of this process, the *Pathway to Violence*, is shown in Figure 1. As with any model, the Pathway reflects a general process for understanding intentional actions. For a given person,

the process is not necessarily linear, but may ebb and flow in the rate and direction of movement and cycle between phases of the process. As the subject exerts or demonstrates increased "intensity of effort" around the ideation, planning and preparation, e.g., more attention, time, energy, resources, etc., there is greater risk for harm, and likely a greater impact on others. The steps along the Pathway include:

- **Grievance -** A real or perceived sense of loss, mistreatment, or injustice, often fueling a feeling of being wronged. Most people will experience grievances through life and the vast majority do not engage in acts of violence. However, for those who do engage in targeted violence, grievances (or other motivations) are common precursors.
- **Ideation -** Expressing thoughts or fantasies regarding the use of violence to address a real or perceived grievance. Note that many people have occasional or fleeting thoughts of violence in response to perceived grievances, yet most do not act on them or move forward along the Pathway. Knowledge that someone is thinking about violence does not confirm that a danger exists but should raise the possibility that the subject is struggling with a grievance.
- **Planning -** Giving thought and consideration not only to the idea of violence, but also to the who, what, when, where, and how of doing so. Expressions may begin to reference timing, location, targets, means, methods, etc. The subject may seek out and gather information regarding their plan and other incidents of targeted violence to learn from other perpetrators.
- **Preparation -** Beyond just having or acquiring weapons, this stage involves attempts to prepare for the violence and to develop or acquire the capability to cause harm to the intended target(s). Subjects try to obtain the means to fulfill their plans, which may be weapons, tools, and clothing to match their fantasies. Subjects may seek or take advantage of opportunities and circumstances that support their plans. Subjects may conduct surveillance or probe boundaries or security systems to see if they can assess areas where they do not belong or get close to people in ways that are inappropriate or atypical.
- **Implementation -** The subject initiates the operationalized plan once reaching a point where they perceive themselves as capable of doing so. Capability is based on the subject's perceived skill to cause harm and their will to do so.

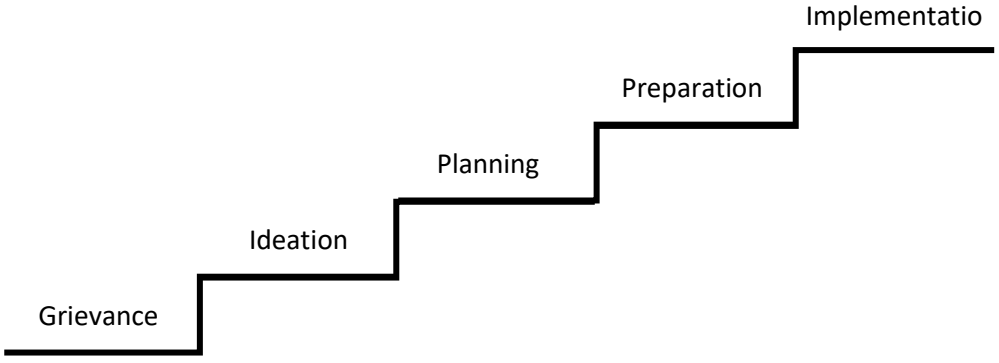


Figure 1: the *Pathway to Violence*

As a subject moves to the right along the pathway, there is often an escalation in the rate of movement (i.e., a flurry of activity or energy burst), or changes in the frequency of behaviors causing concern (e.g., a number of concerns over time), or a sudden change in their patterns of behavior. Where a subject has caused numerous concerns over time and then suddenly there is no more information about concerns regarding the subject (i.e., they "go off the radar"), the TAT

should check whether the concerning behavior has stopped, the subject has become more covert in their actions, or community members have stopped reporting concerns.

Research indicates that while targeted violence incidents are rarely spontaneous and impulsive, they can escalate rapidly from ideation through implementation. That is, the time span between the subject's decision to cause harm and the actual incident may be short. This may be expedited by a sense of desperation for resolution, lack of concern for consequences, or the influences of others encouraging escalation (e.g., through social media or direct communications). Consequently, when there are indications that a subject may pose a threat to the school community, threat assessment teams will need to move quickly to inquire about and intervene in that planning or preparation.

The steps along this pathway indicate opportunities to observe, identify and intervene with threatening and/or aberrant behaviors that cause concern for violence by, or the well-being of, the individual. Frequently, information about an individual's ideas, plans and preparations for violence can be observed before violence can occur. However, information is likely to be scattered and fragmented. For example, a teacher may see a certain set of behaviors of an individual in her class, a coach observes other behaviors or expressed thoughts by the individual, a school resource officer has other concerns, and a school administrator is aware of certain conduct violations. The challenge, and the key, is to act quickly upon initial reports of concern, gather other pieces of the puzzle, and assemble them to determine what picture emerges.

Guiding Principles

The fact that most individuals engaged in pre-incident planning and preparation, and frequently shared their intentions, plans, and preparations with others, suggests that the information about targeted violence is likely to be uncovered through a sound threat assessment process.

To determine the risk of a threat, the TAT focuses on actions/behaviors, communications, and specific circumstances that might suggest that an individual intends to engage in violence and is planning or preparing for that event. The threat assessment process is centered upon an analysis of the known (or reasonably knowable) behavior(s) in a given situation.

TATs train to focus on the following core principles of threat assessment and management:

1. **Effective assessment is based upon facts and observations of behavior, rather than on characteristics, traits, or profiles.** Perpetrator profiles do not provide a reliable basis for making judgments of the threat posed by a particular individual. The threat assessment process examines the behavior of the subject in relation to the context, issues, challenges, and resources involved. This provides for an individualized, holistic, and contextually based assessment of and response to the situation.
2. **Targeted violence is the result of an understandable, and usually discernable, process of thinking and behavior.** This is often referred to as the *Pathway to Violence*, discussed above.
3. **Violence stems from an interaction among the *S*ubject(s), *T*arget(s), *E*nvironment/Systems, and *P*recipitating Incidents (STEP).**[3] Identifying, assessing, and managing potential acts of violence or other harm requires a comprehensive and holistic perspective of the situation involving the following key domains and their interaction:

[3] *Source: Deisinger (1996); Deisinger & Nolan (2020).*

   a. **S** – Is the **Subject** engaging in behavior(s) that may pose a threat of violence or harm to self or others, or significant disruption, or otherwise indicate a need for assistance or intervention?
   b. **T** – Are **Targets**/others vulnerable to harm, in need of or protective actions, impacted by the situation, or otherwise indicate a need for assistance or intervention?
   c. **E** – Are there **Environmental**/systemic issues contributing to or impacting upon the situation?
   d. **P** – Are there reasonably foreseeable **Precipitating events** that may impact the situation?
   e. **PLUS** – Are there actions the threat assessment team can facilitate (to address any concerns noted), beyond those already being effectively done?
4. **Violence is a dynamic process.** No one is either always dangerous or never dangerous. The level of concern depends on the totality of the situation. An assessment is only as good as the quality of information on which it was based at the time that it was made. Threat assessment and management involves ongoing review, re-assessment, and modification of intervention strategies through the point at which the case is adequately resolved.
5. **Threat assessment is about prevention, not prediction.** TATs do not try to predict whether an individual is a violent person. Instead, TATs try to determine under what circumstances an individual might become violent or engage in other harmful or significantly disruptive behaviors, what the impact of the situation is upon others (even when an individual poses no identifiable threat), what environmental/systemic factors may be contributing to the situation, and whether there are any precipitating events on the foreseeable horizon.
6. **Social media and online activity are critical considerations in many cases.** Individuals of concern, and those concerned about them, often use social media to express such concerns. For those who may pose a threat, their expression of grievances, violent intent, planning, and preparation can often be observed in online activities.
7. **A central question in a threat assessment inquiry is whether an individual *poses* a threat (i.e., is building the capability to cause harm), not just whether the person has *made* a threat (directly expressed intent to harm).** Research on serious targeted violence in schools and workplaces has found that few perpetrators directly communicated a threat to their target before the violence. In most incidents, perpetrators did not directly threaten their targets, but they did communicate their intent and/or plans to others before the violence. This indirect expression or third-party communication of intent to cause harm is often referred to as *leakage*. The absence of a direct threat should not, by itself, cause a team to conclude that a subject does not pose a threat or danger to self or others.
8. **The relationship between mental illness and violence is complex.** Most people living with mental illness will not be violent toward others. Most people who are violent are not mentally ill. The presence of serious mental illness increases general risk of violence, but it is not the major factor that it is perceived to be and is almost never the sole or primary explanation for a violent act. Other risk factors, e.g., having a history of violence, childhood exposure to violence, or substance abuse or dependence, have more significant correlations with violence overall. When considering targeted violence, substantially higher rates of severe mental illness have been observed among adult mass murderers, public figure attackers, and lone actor terrorists than in the general population. However, even for many of these, having a mental illness was less of a factor for violence risk than was the cessation or lack of adequate treatment for the illness. For threat assessors dealing with a subject of concern, the symptoms and behaviors associated with the subject's mental illness (versus the diagnosis) can be significant factors impacting a case.

9. **An inquisitive, objective, and diligent mindset is critical to successful threat assessment and management.** Those who carry out threat assessments must strive to be thorough, diligent, accurate, and fair, continuing throughout the assessment process both to gather pieces of information and to fit the pieces into a larger picture to gain understanding of the context and situation. One hallmark of a good inquiry or investigation is corroboration or fact-checking. Where possible, it is important to see where information from one source is confirmed by (or with) information from another source.
10. **A collaborative and coordinated approach between systems within the school and community are critical for an effective threat assessment and management process.** Effective working relationships and collaborations with services and programs both within the school, e.g., school psychologist, school social worker, school counselor, school-based mental health clinicians, administrators, disciplinary officers, human resources, etc., and the broader community, e.g., mental health providers, juvenile justice system, child welfare agencies, law enforcement, etc., are critical to identifying, assessing, and managing individuals who are on the *Pathway to Violence*.
11. **Essential elements of an effective threat assessment and management process.** Research and practice have shown that, to establish and sustain an effective behavioral threat assessment and management process, organizations must have a systemic process that:
    a. Utilizes an effective and relevant multi-disciplinary approach that enhances the team's ability to address all threats;
    b. Enables community engagement and centralized awareness of developing concerns through an active outreach program;
    c. Conducts a thorough holistic and contextual assessment of the situation (e.g., using the STEP framework);
    d. Implements proactive and integrated case management strategies (e.g., using the STEP framework);
    e. Monitors and re-assesses cases on a longitudinal basis;
    f. Conducts all practices in accordance with relevant laws, policies, and standards of practice; and

Sustains a focus on continuous improvement of the process and adapts to challenges and changing needs.

Adopted 10/8/24

4:190-AP2, E2 Exhibit - Threat Assessment Documentation

Imminent threats require immediate containment and action to protect the District's environment and/or identified or identifiable target(s). A Threat Assessment Team (TAT) does not document its activities in response to an imminent threat until after the threat is contained.

The Virginia Center for School and Campus Safety has created a model *Threat Assessment and Management Form* (Form) containing six parts, on pages 114-126 in a publication entitled *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12_threat_assessment_management_mppg_mpd.pdf.

The Form contains investigation questions designed to help a TAT gather information to identify, assess, classify, respond to, and manage threats of targeted violence to the District's environment. Modify the questions on the Form to reflect the District's local conditions and each TAT's specific building needs. Members of the TAT should use the Form to document threat assessment activities and in conjunction with 4:190-AP1, *Targeted School Violence Prevention Program*; 4:190-AP2*, Threat Assessment Team (TAT)*; 4:190-AP2, E1, *Principles of Threat Assessment*; 4:190-AP2, E3, *Threat Assessment Key Areas and Questions; Examples*; 4:190-AP2, E4, *Responding to Types of Threats*; and 4:190-AP2, E5, *Threat Assessment Case Management Strategies*.

Consult the Board Attorney for recordkeeping procedures when or if the information gathered and entered in the Form is placed in a student's temporary record. See also Board policy 7:340, *Student Records*.

Adopted 10/8/24

4:190-AP2, E3 Administrative Procedure - Threat Assessment Key Areas and Questions; Examples

This exhibit provides examples for Building-level Threat Assessment Team (TAT) members to use when assessing reports of threats to the District's environment. TAT members use this exhibit to assess a threat while following 4:190-AP2, *Threat Assessment Team (TAT)*.

Key Areas of Assessment

Review and use the following **key areas** of assessment. This is not intended as an exhaustive or complete list of areas of assessment. Additional questions may be asked for clarification and/or to probe more deeply to fully understand the circumstances.

Before conducting an interview with a subject of concern (subject): (1) learn the facts that brought the subject to the attention of school administrators and others; and (2) review information about the subject's background, interests, and behaviors.

Interview with threat recipient(s)/target(s) and witness(es): Interview, when possible, all persons who witnessed the reported and/or concerning behavior, including the subject and all recipients/targets. Inform the interviewee that the primary purpose of the interview is to gather information about a possible situation of concern with the goals of preventing harm to staff or students, and providing assistance to those involved.

Ask potential targets about their relationship to the subject and any recent interactions with the subject. Gather information about grievances and grudges that may exist in these relationships. Conduct interviews of potential targets with special sensitivity and gather information without unduly alarming them. If the TAT believes a risk of violence to a potential target exists, offer him/her any available assistance and support for their safety.

Because the process facilitates increased and revised understanding of issues over time, always review new information and re-evaluate the threat accordingly. Maintain contact with the target to obtain information about any further behaviors of concern, improvements to the situation, or other relevant developments.

Review records and consult with staff who know the subject: Background information may assist the TAT's approach to and questioning of the subject. It may also help determine whether the subject poses a threat to particular targets. Knowing background information before the interview may help the TAT judge whether the subject is forthcoming and straightforward. Areas that may contain helpful background information include:

26. Recent (and perhaps historical) work or school performance history
27. Disciplinary or personnel actions
28. Prior TAT contacts
29. Law enforcement or security contacts at school and in the community
30. Prior critical involvement with mental health or social services
31. Presence of problems in the subject's life
32. Current or historical grievances that may be related to the behavior of concern
33. Online searches: Internet, social media, email, etc.

Interview with the subject of concern: Directly ask a subject who is a staff member or student about his/her actions and intentions. Many subjects will respond forthrightly to direct questions when they are asked in a non-judgmental manner. This interview could elicit important information

that permits the TAT to understand a subject's situation and identify possible targets, which can assist the assessment of the risk of violence. More leads for further inquiry may also arise.

Interviews send the message to the subject that the District noticed his/her behavior, and it caused concern. They also provide the subject an opportunity to: (1) tell his/her perspective, background, and intent; (2) be heard and experience support/empathy where appropriate; and (3) reassess and redirect his/her behavior away from concerning activities. To a subject who has mixed feelings about attacking, an interview may suggest people are interested in his/her welfare, and that there are better, more effective, ways to deal with problems or with specific people.

Although interviewing a subject might provide valuable information, relying too heavily on that interview to make judgments about whether the subject poses a threat is likely to present problems. Information offered by the subject may be incomplete, misleading, or inaccurate; and seeking corroboration and verifying information learned during the interview is important.

Key Questions to Ask

Thoughtful consideration of the answers to the following key questions will produce a foundation for the TAT's response to the main question in its assessment: Does the subject pose a threat of targeted violence toward the District's environment? Note: this is not intended as an exhaustive or complete list of areas of inquiry, but as core areas that support assessment and understanding of the situation, the nature and severity of any risk, and that may guide TAT interventions. Additional questions may be asked for clarification and/or to probe more deeply to fully understand the situation.

Questions Regarding the Subject of Concern

Inquiry regarding a subject of concern seeks information regarding the nature and severity of concerns, whether the subject may pose a threat of violence or other harm to self or others; or is otherwise in need of assistance or intervention. The inquiry considers all sources of information that may be relevant to gaining as comprehensive an understanding of the subject and their concerns, as circumstance may allow. Consider the presence of risk and protective factors, warning signs, coping skills and support systems that may be relevant to the case.

34. What behaviors are causing concern for or about the subject?

Does the situation or circumstance that led to these statements or actions still exist?

When, where, and in what circumstances do the behaviors tend to occur?

Is there a pattern to the behaviors or a change in pattern of behavior that is causing concern?

If the behaviors have occurred previously, how has the subject dealt with the grievances? What kept them from acting violently?

Has the subject previously come to someone's attention or raised concern in a way that suggested the subject needs intervention or supportive services?

Are the subject's behaviors causing others concern for the welfare of the subject or others?

35. Have there been any concerning, aberrant, threatening, or violent communications?

Were there *directly communicated threats* (threats made directly) to targets or sources of grievances?

Has there been *leakage* (communications to third parties about grievances, ideation, or intent to use violence, planning, or preparation?)

How, e.g., in person, letter, email, diary/journal, social media, website, etc., and to whom, e.g., targets, peers, others, is the subject communicating?

What is the *intensity of effort* (frequency and duration of contact, multiple measures used, multiple recipients or targets of communication) in communications or attempts to address grievance?

Do the subject's communications provide insight about motives/grievances, ideation, planning, preparation, timing, targets, etc.?

Has anyone been alerted or *warned away*?

36. What are the subject's motives and goals?

Does the subject have a major grievance or grudge?

Against whom? What is the relationship between the subject and any identifiable targets?

Are there other motives that support the use of violence, such as a desire for notoriety/fame?

What does the subject seem to want to achieve with the behavior?

Does the subject seem fixated on the grievance, target, or need for justice through violence? *Fixation* may be exhibited through increasing perseveration on person or cause or need for resolution; increasingly strident opinion and negative characterization of target; impact on family and other associates of subject, if present and aware; and/or angry emotional undertone, accompanied by social or occupational deterioration.

What efforts have been made to resolve the problem and what has been the result?

37. Has the subject shown any inappropriate interest in, fascination, or identification with other incidents or perpetrators of targeted violence (e.g., school/workplace attacks, mass murderers, terrorism, weapons, etc.)?

Do they exhibit a heightened interest, fascination, obsession, or fixation with acts of violence?

Do they immerse themselves in exposure to violence through movies, videos, books, video games, social media, etc., to the detriment of other life activities or in ways that negatively impact others?

Identification - a strong desire or need to emulate or be like others - may be with the perpetrators of targeted violence or powerful figures; grievances of other perpetrators; weapons or tactics of other perpetrators; effect or notoriety of other perpetrators; and/or ideologies or groups that support and encourage the use of violence to address grievances.

38. Does the subject have, or are they developing, the capacity to carry out an act of targeted violence?

Are there *Pathway to Violence* (see 4:190-AP2, E1, *Principles of Threat Assessment*) warning behaviors?

Where is the subject along the Pathway? How quickly are they moving?

Are there changes in activity levels or rate of movement or *energy bursts* (flurries of or changes in frequency/variety of activity)? Do certain circumstances or events tend to impact their movement?

Is the subject's thinking and behavior organized sufficiently to engage in planning and preparation?

Is there a history of violence that speaks to capacity or potential targets?

Are there aspects of *novel aggression* (testing limits/boundaries or atypical aggression) when there is no history of violence?

39. Is the subject experiencing hopelessness, desperation, and/or despair?

Has the subject experienced a recent perceived loss, failure, or injustice?

Do they experience shame or humiliation related to the loss, failure, or injustice?

Is the subject having significant difficulty coping with a stressful event? Are there multiple stressors?

Are there indications of *last resort behaviors* (increasing desperation or distress, pressing subject into violence as a position of last resort)?

Has the subject engaged in behavior that suggests they have considered ending their life?

40. Has the subject's behavior indicated or raised concern of need for intervention or supportive services?

Does the subject have difficulty coping?

Are there symptoms of severe, acute, or untreated mental illness, such as:

Significant lack of contact with reality (hallucinations, delusions, or extreme wariness, distrust, or paranoia)
Symptoms that impact the subject's perception of grievances or how others respond to subject
Significant or sustained agitation or anxiousness
Significant or sustained depressed mood
Alcohol or other drug use/abuse
Pervasive patterns of maladaptive behavior

Does the subject have access to treatment resources? If so, are they actively engaged in those services and compliant with the treatment plan and/or prescriptions?

41. Does the subject have protective factors, stabilizers, or buffers that inhibit use of violence?

Several factors may decrease risk or inhibit escalation to violence. Check for these protective factors to see if they are present and stable, absent, or diminishing, or need to be bolstered:

Views violence as unacceptable, immoral
Accepts responsibility for actions
Demonstrates remorse for inappropriate behavior
Respects reasonable limits and expectations
Uses socially sanctioned means of addressing grievances
Values life, job, relationships, freedom
Fears loss of reputation, job, freedom, life
Maintains, uses, and builds effective coping skills
Treatment access, compliance, and engagement
Sustains trusted and valued relationships/support systems

A sustained, trusting, and valued relationship with at least one responsible person can be a key stabilizer and inhibitor to violence. That person can provide support, challenge distorted perceptions or violent ideation and help connect the subject with support. Consider:

Does the subject have at least a friend, colleague, family member, or other person that they trust and can rely upon for support, guidance, or assistance?
Is that trusted person someone that would work collaboratively with the TAT for the well-being of the subject? Does that other person have skill and willingness to monitor, intervene, and support the subject?
Is the subject emotionally connected to and engaged with other people?
Is there a deterioration of support, increased withdrawal, or isolation from, or alienation by prior support systems?

Questions Regarding Potential Targets

Targets (and others impacted by the subject's behavior) may behave or respond in ways that indicate the level of threat they perceive, that increase their vulnerability or diminish their ability to protect themselves, or that reflect needs for assistance or support.

Are targets (or others) indicating vulnerability or concern about, or impact by, the subject's behavior?

Are those who know the subject concerned that he or she might act based on violent ideas or plans?

Are those who know the subject concerned about a specific target?

Are they concerned for the well-being of the subject?

Are targets or others around the subject engaging in protective actions, e.g. distancing, avoiding, minimizing conflict, modifying routines or behaviors, etc., even if they do not define the subject as a threat.

Are targets engaging in behavior or in situations that increase their:

Desirability: A source of the subject's grievances or fuel fantasies for violence.
Availability: The proximity or access between the subject and the target.
Vulnerability: Lack of protective factors or behaviors or coping abilities of the target.

Do targets have adequate coping and support resources?

Are targets or others experiencing stress, trauma, or other symptoms that may benefit from intervention?

Questions Regarding Environmental/Systemic Factors Impacting the Situation

These factors impact or stem from the school/workplace/family environment or systemic issues or challenges that may allow, encourage (or not discourage), or exacerbate the use of violence to address concerns, may inhibit reporting of concerns, or that may impact ability to effectively resolve concerns.

Are there environmental/systemic factors that are impacting the situation?

Systemic, policy, or procedural problems?

Unfair, inconsistent, or biased disciplinary processes?

Silos, gaps, or delays in reporting of concerns?

Poor conflict management skills?

Poor supervisory skills and/or willingness to address?

Inadequate resources to address needs?

School/family/social climate concerns, e.g., harassment, bullying, bias, neglect, or abuse?

Lack of support or treatment resources in the community?

Social influences of others in the environment?

Questions Regarding Precipitating Events

Violence risk is dynamic and situational. It is important to consider not just the current situation involving the subject, target and environment/systems, but also those that may change in the near to mid-term, and whether those changes could make things better or worse for the case.

Are there Precipitating Events that may impact the situation currently and in the foreseeable future?

Common precipitants are related to loss, failures, or injustices, as well as events or circumstances that trigger memories of past grievances, or situations that create unexpected opportunities to act.

Questions Regarding the Integrity of the Threat Assessment Process

What is the consistency, credibility, and completeness of information about the situation?

Are the subject's conversation and story consistent with his or her actions?

Do collateral sources confirm or dispute what the subject says is going on and how they are dealing with it?

Are there multiple sources? If so, are they providing consistent information?

What gaps exist in understanding the situation? What don't we know?

What bias or misperceptions may be influencing witnesses, targets, TAT members? Consider sources of bias/distortion in our thought processes, including but not limited to:

Confirmation Bias: Seeking and integrating information that supports/affirms our prior beliefs Anchoring: Base final judgment on information gained early on – first impressions may bias future perspectives.
Over-Confidence: Failure to spot limits of knowledge and therefore perceive less risk. Too much faith in ability.

In-Group Bias: Overestimate abilities, value, and credibility of people we know (or are similar to) more than people we do not know or who are different.
Availability: Overestimate likelihood of events that have greater availability in memory due to being unusual, recent, or emotionally salient.
Probability Neglect: Overestimate risks of harmless or low probability events, while underestimate risks of high probability events even when they are not harmless (1/84 chance of dying in vehicle accident vs 1/5,000+ of dying in plane crash).
Fundamental Attribution Error: Place blame for own bad outcomes on external events. When others have bad outcomes, make judgements about them – failure to account for interactions between the person and the situation.
Hindsight Bias: Overestimate predictability of past events based on current knowledge of facts and outcome.

Adopted 10/8/24

4:190-AP2, E4 Exhibit - Responding to Types of Threats

After a threat is assessed, use this exhibit with subhead **Responding to and Managing Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*. It provides examples of possible responses for TATs to consider and is not intended as an exhaustive or complete list.

Imminent Threat Responses

Imminent threats require immediate: containment and action to protect the target, referral to law enforcement, and consultation with school security. Following containment and action to protect the target, the TAT becomes involved and follows the procedures set forth in High-Level Threat Responses.

Low-Level Threat Responses

Resolve a low-level threat case with any of the following, as appropriate:

1. No further action;
2. Have involved individuals issue a clarification, explanation, retraction and/or an apology;
3. Refer the subject for disciplinary action in accordance with Board policy; and/or
4. Refer the subject and/or target to school and/or community-based resources.

If the subject and/or target is referred for resources or services, a member of the TAT is designated to monitor the subject's/target's reactions for a short period of time, to ensure the referral was effective.

When the target is a student the TAT may, at its discretion, notify the target and his/her parent(s)/guardian(s). If the parent(s)/guardian(s) are notified, contact them promptly and reassure them that the threat has been resolved. That TAT may also notify parent(s)/guardian(s) of the subject, so they are aware of the situation and that it has been resolved.

If new information comes to the attention of the TAT, reassess and update the case management plan.

Moderate-Level Threat Responses

Resolve a moderate-level threat case with any of the following, as appropriate:

1. Protect the target with the following precautions:
    a. Direct supervision to prevent the threat while at school, at school functions, or on the bus.
    b. Caution the subject about the consequences of carrying out the threat.
    c. Notify the target and (if he/she is a student) the target's parent(s)/guardian(s) of the threat, the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.
    d. When the subject is a student, contact the subject's parent(s)/guardian(s) to assume responsibility for supervising the subject and to enlist their support to prevent the subject from carrying out the threat.
2. Consult with the school resource officer to assist in monitoring and supervising the subject and determine the need, if any, for law enforcement action.
3. Refer the subject for disciplinary action in accordance with Board policy.
4. Refer the subject and/or target for counseling, conflict mediation, or other interventions to reduce the threat and to address the underlying conflict/issues that led to the threat. The Building Principal will involve school-based professionals and/or community-based professionals who can provide assistance and appropriate intervention.

5. Conduct a mental health risk assessment when the TAT reasonably believes that mental health or disability issues are causing or contributing to the risk of violence. Follow parameters for the mental health risk assessment as outlined in High-Risk Threat Responses, below.

<u>High-Level Threat Responses</u>

Resolve a high-level threat with any of the following, as appropriate:

1. Notify law enforcement to contain the threat and to consult regarding school safety and security.
2. Immediately protect the target with the following precautions:
   a. Direct supervision to prevent the threat while at school, at school programs, or on the bus.
   b. Caution the subject about the consequences of carrying out the threat.
   c. Notify the target and (if he/she is a student) the target's parent(s)/guardian(s) of the threat, the seriousness of the threat, the identity of the subject who made the threat, and what actions are being taken to support the safety of the target and the school as a whole.
   d. When the subject is a student, contact the subject's parent(s)/guardian(s) to enlist their support to prevent the subject from carrying out the threat; have either law enforcement or the subject's parent(s)/guardian(s) assume responsibility for supervising the subject.
3. Refer the subject for disciplinary action in accordance with Board policy.
4. Conduct a mental health risk assessment when the TAT reasonably believes that mental health or disability issues are causing or contributing to the risk of violence. The mental health risk assessment will be conducted by a qualified independent medical/psychological professional who does not have a treatment relationship with the subject. The professional will base his/her assessment on a review of all available information, including but not limited to an interview of the subject by the professional. The professional will prepare a written report that identifies the problem/conflict that prompted the threat and recommends strategies to address the problem/conflict and to reduce the risk of violence.
   a. The Building Principal will determine the conditions for the subject's readmission to school, which may include requiring the subject to cooperate in a mental health evaluation. If the subject is a student, the parent(s)/guardian(s) will be notified of all readmission requirements and of any failure to comply. A readmission meeting will be held prior to the subject's return to school.
   b. The TAT will attempt to obtain any required signed permission for release and exchange of information with mental health provider(s), if any, and where appropriate, LLEAs.
   c. After receiving the mental health risk assessment report, the TAT will convene to complete and implement a written safety plan that includes immediate steps to prevent the threat from being carried out and a plan for further action before the subject is permitted to return to school or an alternative educational environment. The safety plan will include:

      Readmission conditions;

      Interventions, such as counseling or medication, that are needed to reduce risk;

      Scheduled follow-up contact with the subject (and parent(s)/guardian(s) if subject is a student) to assess changes in risk and update the safety plan over time, until the perceived threat is resolved; and

The identities of person(s) responsible for monitoring and verifying that the safety plan is being followed.

A student/staff member should only be removed if the threatening behaviors engaged in by the subject are a violation of the code of conduct/Board policy, and when all applicable disciplinary procedures are followed.

In the event that applicable disciplinary procedures are not available to school-based staff, and the school administration or TAT believes the subject poses a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services as provided in federal regulations implementing the Americans with Disabilities Act of 1990 (ADA) at 28 C.F.R. §35.139, the ADA's direct threat standard may be applied. Before applying the ADA's direct threat standard, the Building Principal will contact the District's Director of Special Education and Board Attorney (through the Superintendent, if not authorized to contact the Board Attorney directly).

Adopted 10/8/24

4:190-AP2, E5 Exhibit - Threat Assessment Case Management Strategies

Case management is a critical component of Building-level Threat Assessment Team (TAT) work. TATs use this exhibit to examine types of research-based case management strategies when developing a case management plan in response to a threat. Types include: subject-based, target-based, environmental/systemic, and monitoring for the impact of precipitating events on case management. See subhead **Responding to and Managing Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

Case management integrates interventions, as appropriate, across the following relevant domains:

S De-escalate, assist, refer, correct, contain, or control the **Subject** who may pose a threat of violence, harm, or significant disruption to self or others; or otherwise indicate a need for assistance or intervention;

T Decrease vulnerabilities, provide support and assistance for the **Target/others impacted or otherwise indicating a need for assistance or intervention**;

E Address **Environmental**/systemic issues to minimize impact, escalation, or recurrence;

P Prepare for and mitigate against **Precipitating events** that may impact the situation; and

PLUS Are there any actions the TAT can or should facilitate to address any concerns noted, beyond those already being effectively done?

Subject-Based Case Management Strategies

Schools regularly use many of the following examples of interventions or strategies to address situations involving concerning, aberrant or threatening behavior. TATs should consider a broad range of interventions that may de-escalate, assist, refer, contain, control or redirect the subject away from plans and preparation for violence; and toward engaging with others, problem solving, adapting, and improving their coping skills and well-being. Examples include, but are not limited to:

1. Check-in/check-out to maintain channel of communication and engagement (with subject) to:
   a. Gather information
   b. Build rapport and relationship
   c. Decrease isolation
   d. De-escalate volatile reactions
   e. Provide feedback and mentoring
   f. Monitor reactions to grievances, interventions, and precipitating events
2. Problem-solving about legitimate grievances
3. Parent/family involvement
4. Referral for assistance or support services, such as:
   a. Academic/work assistance
   b. Special education IEP or Section 504 accommodations
   c. Alternative schooling/work
   d. Social skills training
   e. Conflict resolution training/anger management

    f. Behavioral contracting
    g. Modification of classroom assignment or work schedule
    h. Involvement in extracurricular activities
    i. Performance improvement plans
    j. Peer coaching/mentoring
5. Welfare/well-being checks
6. Counseling/mental health services, such as:
    a. Check-in/check-out with school counseling staff
    b. Ongoing support with school counseling staff
    c. Outpatient counseling/mental health care
    d. Emergency psychiatric evaluation
7. Independent medical/psychological evaluations, such as:
    a. Clinical violence risk and *direct threat* evaluation
    b. Fitness for duty evaluation
8. Referral for disciplinary measures, such as:
    a. Subject confrontation or warning
    b. Administrative orders for no contact or communication
    c. Detention
    d. Suspension
    e. Termination/expulsion
9. Referral/notification to law enforcement or criminal justice system
    a. Law enforcement/juvenile justice involvement
    b. Court-issued protective orders
    c. Diversion programs

TATs select intervention strategies with the greatest potential for addressing short-term crises as well as longer-term preventive power. While holding students and staff accountable for their actions, school administrators will be fair and reasonable in disciplinary responses. Disciplinary responses may be combined with other actions such as parent/guardian conferences, modifications of student classroom assignment or schedule, and referrals to in-school and community-based programs.

TATs recognize that even fair and reasonable discipline can be perceived by the subject as punitive discipline, which may lead to escalating threatening behavior. Suspension, expulsion, or termination may risk triggering an immediate or delayed violent response unless they are coupled with containment and support. Suspension, expulsion, or termination options that focus solely on accountability and controlling the subject do not address the ongoing challenges of:

1. Moving the subject away from thoughts, plans of, and capacity for violence and/or disruption;
2. Connecting the subject to resources (when needed);
3. Mitigating organizational/systemic factors; and
4. Monitoring the subject when he/she is no longer connected to the District.

In addition, a student who is suspended or expelled is often under less supervision than if he/she were to remain in a school setting. A student who is expelled may conclude: “I have lost everything. I have only a short time to act. I will give them what they deserve.” TATs consider and plan for those responses by using separation strategies intentionally, being aware of their limitations, and anticipating their consequences.

<u>Target-Based Case Management Strategies</u>

TATs attempt to minimize risk and negative impact on identified or identifiable targets and seek to maintain contact with targets (where appropriate) to help monitor the actions and impact of the

subject of concern. Examples of target-based case management strategies include, but are not limited to:

1. Strategies for Targets
    a. Set clear limits and boundaries with the subject regarding communications and contact.
    b. Document all contacts with the subject using a log noting the date/time/means of contact, nature of contact, witnesses, and impact on the target.
    c. Monitor communications for changes/escalations by the subject.
    d. Avoid contact with or response to the subject - do not reinforce the subject's attempts to get a response.
    e. Minimize reactivity to the subject's actions.
    f. Minimize publicly available information especially with social media and phone, e.g., by scrubbing Internet information, checking privacy settings on social media applications.
    g. Maintain/enhance situational awareness.
    h. Vary routine - be careful about consistent habits.
    i. Develop contingency plans for avoidance or escape from the subject, shelter, situational awareness, and personal safety.
    j. Use support systems - being/feeling like a target can be stressful.
2. Organizational Strategies for Reducing Target Vulnerability
    a. Engage/liaise with target - assign a team member as a point of contact for support and assistance.
    b. Change work/class schedule (hours and/or location).
    c. Change/enhance security in work/class location.
    d. Notify staff who can help monitor if the subject is present or posing a threat to target.
    e. Security staffing
    f. Safety escorts
    g. Fear management
    h. Counseling/employee assistance program referrals

<u>Environmental/System Case Management Strategies</u>

TATs take a holistic view of the situation, monitoring for underlying systemic causes that may be contributing not just to a given case, but perhaps to a range of cases over time. This level of intervention focuses on group and subgroup behavior, not just that of the subject or target. Strategies include, but are not limited to:

1. Address systemic, policy, or procedural problems.
2. Address reporting gaps/delays.
3. Intervene with associates that support violent behavior.
4. Enhance conflict management skills of groups.
5. Bullying prevention/intervention programs
6. Enhance supervisory skills and accountability.
7. Enhance school/workplace climate by building a safe, caring, and connected community. TATs work best in schools that have an overall safe climate, where students and employees feel respected and feel that situations are handled fairly. Connection through human relationships is a central component of a culture of safety and respect. The principle objective of school violence-reduction strategies is to create cultures and climates of safety, respect, and emotional support within the school. Strategies to support and enhance a positive school/workplace climate include, but are not limited to:
    a. Effective communication among and between school staff, students, and parents/guardians.
    b. School climate assessments and intervention with identified issues.

c. Emphasis on school connectedness.
d. Strong but caring stance against a code of silence.
e. Bullying/harassment prevention and intervention.
f. School-law enforcement partnerships, including well-trained school resource officers.
g. Collaborative relationships with mental health, social services, and other community-based resources.
h. Planning and preparation to deal with, respond to, and recover from potential crises.
i. Physical security and crime prevention through environmental design.

Monitoring for the Impact of Precipitating Events on Case Management

TATs recognize that cases do not occur in a vacuum and that life continues while they are assessing and intervening with a given case. TATs maintain an ongoing, longitudinal approach to anticipating, monitoring for, and (to the extent possible) managing the impact of potential precipitating events such as:

1. Minimize unnecessary precipitants where possible (look to systemic issues that unnecessarily impact cases).
2. Consider the impact of the timing and location of interviews.
3. Monitor and plan for loss/injustice impacting the subject, e.g., job or income, status, relationship, health, rejection/ostracization, etc.
4. Monitor and plan for key dates/events in the process of case management, such as:
   a. Anniversaries, e.g., date of beginning of relationship, date of end of relationship, date served with court orders/separation documents, birthdays, holidays, etc.
   b. Hearings
   c. Court dates
   d. Service of notice about outcomes
5. Monitor for reactions to administrative/court actions.
6. Monitor for reactions to case management/interventions.
7. Monitor for contagion effect of other high profile or locally significant acts of violence.

Adopted 10/8/24

4:190-AP2, E6 Exhibit - Targeted School Violence Prevention and Threat Assessment Education

On District letterhead

Date:

To: District Staff and Parents/Guardians

From: Building Principal

Re: Targeted School Violence Prevention Program

Student safety is our District's top priority. To maximize safety, the District uses a threat assessment process to identify *threats* and prevent *targeted school violence*. This process is part of the Targeted School Violence Prevention Program (Program). For more information, see Board policy 4:190, *Targeted School Violence Prevention Program*. The Program is part of the preparedness and response phases of the School Emergency Operations and Crisis Response Plan, which in turn is part of the District's Comprehensive Safety and Security Plan.

The District wishes to create a climate that encourages sharing *any* information about a safety concern with a trusted adult who can help. **Sharing information about threats and safety concerns is everyone's responsibility: students, parents/guardians, staff, and community members.** The question-and-answer section below is designed to help students, parents/guardians, and staff understand when school officials want individuals to share information about a safety concern.

What Is a Threat?

A threat is a concerning communication or behavior that indicates that an individual may pose a danger to the safety of school staff or students through acts of violence or other behavior that could cause harm to self or others. It may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or in another way. Threats may be direct ("I'm going to beat you up" or "I'm going to blow this place up!") or indirect ("Come and watch what I am going to do to her."). A threat can be vague ("I'm going to hurt him.") or implied ("You better watch out."). Any possession of a weapon or mention of one is a possible threat.

A threat is a threat *regardless* of whether it is observed by or communicated directly to the target of the threat or is observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat.

Sometimes students make threats that may seem funny or "joking," but sometimes a threat is very serious and/or criminal. **When you are in doubt as to whether the statement is kidding or serious, the responsible thing to do is to tell the Principal or other responsible staff member.**

What Is Targeted School Violence?

Targeted School Violence includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity. Individuals who have committed targeted violence did not "just snap," but engaged in a process of thought and escalation of action over days, weeks, months, and even years.

In the majority of incidents of targeted violence, perpetrators did not directly threaten their targets, but they *did* communicate their intent and/or plans to others before the violence. This indirect expression or third-party communication of intent to cause harm is often referred to as *leakage*. Reporting *leakage* is key to preventing targeted school violence.

Who Is Required to Report Threats?

All District staff, volunteers, and contractors are required to report any expressed threats or behaviors that may represent a threat to the community, school, or self to the Building Principal. Parents/guardians and students are also encouraged to report any such threats to the Building Principal.

Reported threats are assessed by the school's Threat Assessment Team (TAT). Each TAT includes people with expertise in counseling, instruction, school administration, and law enforcement. The goal of the threat assessment process is to take appropriate preventive or corrective measures to maintain a safe and secure school environment, to protect and support potential victims, and to provide assistance, as needed, to the individual being assessed.

The threat assessment process does not preclude anyone from acting immediately to address an imminent threat.

What Can Staff and Parents/Guardians Do?

The TAT will provide guidance to students and staff regarding recognizing concerning, aberrant, threatening, and prohibited behaviors to be reported. While there is no one list of behaviors that may cause concern, examples include, but are not limited to:

- Threatening statements or gestures
- Persons with ongoing, unresolved grievances with members of the school community
- Atypical, unusual, or bizarre communications or behavior
- Significant changes in behavior
- Increased focus or fixation on aspects of violence, harm, or death
- Information about someone expressing thoughts, plans, or preparations for violence
- Concerns that someone may harm themselves
- Behavior that significantly disrupts the learning or working environment
- Behavior that seems troubling or disturbing
- Persons seeming isolated and alienated from others
- Anyone unknown to the school

Staff and parents/guardians can reinforce this guidance by discussing with students what a threat is, encouraging students not to make threats or "joking" statements in the first place, and reiterating that seeking help to prevent someone from getting hurt or hurting another by reporting threats is appropriate.

Adopted 10/8/24