C275

TEST SECURITY PROVISIONS FOR STATEWIDE ASSESSMENTS

The Bluffton-Harrison Metropolitan School District ("Corporation") shall abide by the *Indiana Assessments Policy Manual*. It is the intent of the Board of School Trustees that all staff comply with the requirements of the Indiana Department of Education (IDOE) regarding test security of the statewide assessments and the Indiana Assessments Policy Manual. The Corporation's testing "policy" shall consist of this Board of School Trustees policy and the corresponding Administrative Guidelines. The Superintendent is directed to develop and maintain Administrative Guidelines (C275-R) that fully comply with IDOE requirements in this area and that are reviewed annually. The Corporation will develop a local testing schedule, including the assessment name, testing dates and times, applicable grade levels, content areas, and testing room locations, prior to the start of the testing window for each assessment. The schedule will be annually adopted by the Superintendent as an Administrative Guideline.

Related Forms:
C275-E1 Testing Security and Integrity Agreement
C275-E2 Testing Irregularity Report Form
C275-E3 Testing Concerns and Security Violations Report
~~C275-E4 Social Media Unallowable Devices Concern Report~~

Indiana Assessments Policy Manual
Protocol for Reporting and Investigating Alleged Assessment Breaches
511 IAC 5-5-4

Bluffton-Harrison Metropolitan School District

Adopted: November 18, 2024
Revised: December 14, 2026

C275-R

Test Security Provisions for Statewide Assessments (AG)

The Bluffton-Harrison Metropolitan School District ("Corporation") shall abide by the *Indiana Assessments Policy Manual* and its Appendices A-H.

Training and Documentation

The Corporation shall provide a copy of the *Code of Ethical Practices and Procedures* to all school personnel who may be involved with any part of handling, securing, coordinating, or administering standardized tests.

~~Any individual~~ All staff (except bus drivers) and contractors present during an active testing window ~~who administers, handles, or has access to secure test materials at BHMSD~~ shall complete ~~assessment~~ the Test Security and Integrity T~~t~~raining and sign the *Testing Security and Integrity Agreement* prior to September 30. This includes, but is not limited to, the Corporation Testing Coordinator ("CTC"), test administrators ("TAs"), principal, teachers, in tested and non-tested grade levels, teachers' aides, front office staff, custodians, cafeteria workers, test examiners, proctors, and scribes. Staff whose duties do not include the testing process, such as cafeteria workers, may receive a brief training and indicate "Not Applicable" to item 12 on the *Testing Security Integrity Agreement*. Documentation of such trainings (sign in sheets, agendas, materials) and signed Agreements must be maintained ~~This form is to remain~~ on file in the school office each year and kept on file for at least two (2) years from the date of signing. ~~Before the opening of the test window for any standardized test, training of any/all persons associated with testing must have occurred.~~

All staff whose duties involve the testing process must receive test administration training prior to the state testing window for each assessment. This includes, but is not limited to, the ~~Corporation Testing Coordinator~~ ("CTC"), ~~test administrators~~ ("TA"), principal or designee, teachers in tested and non-tested grade levels, teachers' aids, front office staff, custodians, test examiners, proctors, scribes, and any other person associated with the testing process.

The Corporation shall ensure staff members who will provide students with test accommodations are familiar with each student's individual accommodation needs prior to testing and receive focused training on providing such accommodations prior to the start of the state testing window for each assessment.

The Corporation shall ensure all appropriate staff, including TA's and proctors, receive test security refresher training prior to the start of the state testing window for each assessment.

The Corporation shall provide any other information and professional development necessary to ensure that all appropriate staff have the knowledge and skills necessary to make ethical decisions related to preparing students for an assessment, administering the assessment, and interpreting the results from the assessment.

Schedule Adopted

Prior to the start of the state testing window, the Corporation shall establish a testing schedule, including the assessment name, testing dates and times, applicable grade levels, content areas, and testing room locations. This AG herby adopts such schedule, which will be kept on file in the school office.

Test Administration

TAs and Proctors must monitor the testing session. It is not acceptable for TAs and/or Proctors to leave students unsupervised (for any amount of time), to concentrate on other tasks or materials, or to otherwise ignore what is happening.

TAs and Proctors must ensure that all students:

- Receive appropriate accommodations.
- Follow instructions provided in the Test Administrator's Manual (TAM)/administration manual.
- Do not exchange answers.
- Do not interfere with or distract others.
- Use only permitted materials and devices.
- Do not have access to cell phones, smart watches, or other unallowable devices.

The BHMSD Superintendent, CTC, and individual School Testing Coordinators (STCs) must ensure all personnel adhere to test administration and test security protocols with fidelity. Further, the CTC will work with the building STCs and Accommodation Managers (AMs) to ensure student accommodations are accurately reflected within the test platform prior to all assessment windows. Building AMs will work with special education staff to ensure all accommodations listed within the testing platform are accurate according to each student's IEP prior to student testing. Documentation (i.e., monitoring logs/reports sharing monitoring dates/times, names of TAs/Proctors monitored, what was observed during monitoring, information referenced in the "Room Observation" section of IDOE's 2026-27 Assessment Manual Appendix B: Assessment Monitoring Checklist, and any concerns) of monitoring conducted during testing must be kept on file at the local level. This documentation will be requested and reviewed during IDOE monitoring of schools.

Test Security and Integrity

The Corporation shall investigate and report any complaints of inappropriate testing practices and security issues according to the Protocol for Reporting and Investigating Alleged Breaches as established and published pursuant to 511 IAC 5-5-4. Any allegations of cheating, security breach, testing administration breach, intellectual property right infringement, loss of materials, or other deviation from acceptable and ethical security and test integrity procedures of Indiana's assessments, including, but not limited to, ILEARN, I AM, , IREAD-3, ISPROUT, SAT, and WIDA shall be immediately reported to the Indiana Department of Education. The complaint shall be submitted via the completion of the Testing Concerns and Security Violations Report Form,

found in Appendix C. The IDOE's process of investigation will follow the *Indiana Assessments Policy Manual Appendix A: Protocol for Reporting and Investigating Alleged Breaches*.

Any of the following issues are considered "Test Security" concerns as defined in 511 IAC 5-5-2:

A. "Integrity breach" means any action that undermines the integrity and/or inhibits the effectiveness of the assessment from achieving the purposes set forth in IC 20-32-5-1. An integrity breach includes, but is not limited to, any security breach, testing irregularity, testing administration breach, and violation of the Code of Ethical Practices and Procedures.

B. "Intellectual Property right" means any applicable copyright or trademark that may be contained in test and test preparation materials.

C. "Security breach" means the failure to observe/follow the documented procedures established to protect, maintain, and implement the testing process, such as the Ceode of Eethical Ppractices and Ppprocedures, the testing security and integrity agreement, and procedures prescribed in the testing manuals by any person administering or assisting with the administration of a systematic assessment.

D. "Testing administration breach" means the failure to follow the documented test administration procedures that could alter the results or testing environment of the assessment for one (1) or more students, including, but not limited to, timing an untimed test and not implementing required accommodations.

Testing Irregularities

A "Ttesting irregularity" means is any unexpected event that is not a testing security concern (defined above) that impacts the validity of one or more student tests (e.g., ticket swap, access to unallowable materials) or significantly disrupts the testing environment of two (2) or more students, including, but not limited to, the sounding of the fire alarm or a power outage. Any testing irregularity (including during SAT School Day administration) must, at a minimum, be locally documented and reported to the School Testing Coordinator, building Principal and CTC. Insignificant test irregularities where students are able to quickly and successfully return to the test should be documented locally.

Any "testing irregularity" that is not a testing security concern involving significant disruptions to testing should be reported by using *the Testing Irregularity Report Form* and submitted to the Office of Student Assessment. An SAT School Day testing irregularity need not be reported via the IDOE *Testing Irregularity Report Form* but must be reported to the College Board in the test day toolkit. Any testing irregularity must, at a minimum, be locally documented and reported to the School Testing Coordinator, building Principal and CTC. Failure to comply with the protocol identified may constitute evidence of an integrity breach, which may result in an action under IC 20-28-5-7 for the suspension or revocation of a license.

Any person who wishes to voice concerns about inappropriate testing practices may do so using the Testing Concerns and Security Violations Report Form.

Investigation~~s~~ Procedures

The CTC shall investigate any complaints, allegations, or concerns o~~n~~f inappropriate testing practices or testing irregularities. The investigation will include, but not be limited to, the following:

A. a formal process by which all complaints are documented and can be tracked to resolution;

B. an initial inquiry to determine whether there is credible evidence that such an event occurred is to be conducted within one (1) school day of the receipt of the complaint;

C. protection of the integrity of any ongoing assessments, and protection of the integrity of the rights of individuals;

D. If IDOE requests an investigation, a report must be submitted to the IDOE Office of Student Assessment within ten (10) business days. This report must include all ~~of the~~ documents requested by IDOE and the CTC's determination of whether misconduct occurred, did not occur, or whether the allegations could not be substantiated. The CTC's determination, however, shall not be binding on IDOE or any action that IDOE may take.

Testing Materials

Secure test materials should not be delivered to school buildings more than one week in advance of test administration. Teachers and other school staff members are not allowed access to secure test materials more than four hours in advance of the test administration.

Only appropriate staff (including CTCs, School Testing Coordinators ("STCs"), TAs, and other designees carrying out testing procedures, if any) may have access to the TAM prior to administration of the test. No one may review any secure test questions before, during, or after the assessment administration.

CTC trains all building STCs on the appropriate, secure storage and distribution of all secure and nonsecure paper test materials. STCs utilize identified, locked storage areas coupled with daily sign-out and sign-in log sheets for all material handling before, during, and after testing. All test materials should be stored at a central location under lock and key.

Annual Review of Test Preparation Practices

The Corporation will annually review school materials and practices related to preparing students for assessments.The CTC trains all staff annually on the appropriate, allowable test preparation

materials offered throughout the district's Indiana Standards-based curricula, the IDOE Released Items Repository, and other state and district-approved academic interventions.

This AG shall be reviewed annually.

511 IAC 5-5
2026-2027 Indiana Assessments Policy Manual
2026-2027 Indiana Assessments Policy Manual Appendix A: Protocol for Reporting and Investigating Alleged Breaches
2026-2027 Indiana Assessments Policy Manual Appendix A: Code of Ethical Practices and Procedures
2026-27 Indiana Assessments Policy Manual Appendix D: Test Invalidation Guidance
2026-27 Indiana Assessments Policy Manual Appendix F: Practice Test Guidance
2026-27 Indiana Assessments Policy Manual Appendix G: Assessment Technology Policy
2026-27 Indiana Assessments Policy Manual Appendix H: Materials Return and Destruction Guidance

~~2024-2025 Indiana Assessments Policy Manual~~
~~2024-2025 Protocol for Reporting and Investigating Alleged Breaches~~
~~2024-2025 Code of Ethical Practices and Procedures~~

Associated Forms:
2026-27 Indiana Assessments Policy Manual Appendix A: Indiana Testing Security and Integrity Agreement
2026-27 Indiana Assessments Policy Manual Appendix B: Monitoring Checklist
2026-27 Indiana Assessments Policy Manual Appendix C: Testing Irregularity and Report Form
2026-27 Indiana Assessments Policy Manual Appendix C: Testing Concerns and Security Violations Report
2026-27 Indiana Assessments Policy Manual Appendix C: Social Media and Unallowable Devices Concern Report
2026-27 Indiana Assessments Policy Manual Appendix E: Assessment User Roles and Responsibilities Checklist

C275-E1: Testing Security and Integrity Agreement
C275-E2: Testing Irregularity Report
C275-E3: Testing Concerns and Security Violations Report
C275-E4: Social Media and Unallowable Devices Concern Report

Bluffton-Harrison Metropolitan School District

Adopted: November 18, 2024
Revised: December 14, 2026

ALCOHOL AND CONTROLLED SUBSTANCE POLICY FOR COMMERCIAL DRIVER'S LICENSE (CDL) AND SAFETY SENSITIVE POSITIONS

It is the policy of the Bluffton-Harrison Metropolitan School District ("BHMSD" or "Corporation") that its drivers (CDL Drivers) and employees in safety sensitive positions be free of substance abuse and alcohol abuse. Employees who hold a CDL license (Commercial Driver's License) and who drive a school bus or other vehicle that qualifies under 49 C.F.R. Part 382, and employees in safety sensitive positions, must participate in the Corporation's controlled substance and alcohol testing program. Participation in this program is a requirement of each qualified employee and is a condition of employment. A copy of this Policy and information packet regarding the harmful effects of controlled substances and alcohol (Drivers Packet) will be provided to all employees. The Assistant Superintendent is designated to answer questions regarding this policy.

Assistant Superintendent
jmeitzler@bhmsd.org
260-824-2620
805 E. Harrison St.
Bluffton, IN 46714

SAFETY-SENSITIVE FUNCTION (Categories of employees subject to testing)

A driver or employee in a safety sensitive position may be tested at any time the driver performs a safety sensitive function. ***Safety-sensitive function*** includes all time spent either waiting to be dispatched; inspecting equipment or otherwise inspecting, servicing, and/or conditioning any commercial motor vehicle; driving; in or upon a commercial motor vehicle; loading/unloading a vehicle, supervising or assisting in the loading/unloading process, attending a vehicle being loaded/unloaded, remaining in readiness to operate a vehicle, or giving or receiving receipts for shipments loaded/unloaded; performing accident-related duties; or repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle. A supervisor, mechanic or clerk, etc., who is on call to perform safety-sensitive functions may be tested at any time they are on call, ready to be dispatched while on-duty (§382.305).

TESTING PROGRAM

Participation includes initial screening for existing employees, pre-employment screening, participation in a random testing program, post-accident analysis, return to duty testing, and follow-up testing associated with alcohol or controlled substance misuse, and employees who are suspected of controlled substance and/or alcohol use. Any driver who tests positive will be subject to a minimum of six (6) follow-up tests in the first twelve (12) months. The follow-up testing period shall not exceed sixty (60) months.

All individuals hired for safety-sensitive positions will be subject to a pre-employment query of the Commercial Driver's License Drug and Alcohol Clearinghouse prior to beginning employment. In addition, all individuals hired for safety-sensitive positions will be subject to a pre-employment screening.

Refusal to submit to alcohol/controlled substance testing will be recorded as a positive test. An employee refuses to take a drug test if they fail to appear for a test within a reasonable amount of time; fail to remain at the testing site until the testing process is complete; fail to provide a urine specimen or sufficient specimen without an adequate medical explanation for the failure; fail to permit the observation or monitoring of the provision of a specimen; fail to take an additional drug test as directed by the Corporation or a collector; fail to undergo a medical evaluation as directed by the Medical Review Officer (MRO); fail to cooperate; fail to follow directions during collection; or is reported by the MRO as having a verified adulterated or substituted test result.

It is incumbent on the driver to report to his/her supervisor use of any prescription or over-the-counter controlled substances that may affect job performance or the safety of others.

Transportation supervisors and mechanics will be trained in the detection of alcohol and controlled substance use. Information obtained in the course of testing drivers is confidential and will not be made part of the driver's personnel file or made available to a third party (excluding Corporation legal counsel) without direct written consent of the driver.

If a driver is involved in an accident while driving a Corporation vehicle, the driver must immediately contact the Supervisor regarding appropriate transport and testing under the DOT post-accident testing protocols.

The Corporation will strictly adhere to all standards of confidentiality and assures that drivers' testing records and results will be released only to those authorized under §382.405.

Detailed information on the following Corporation testing procedures can be found in the Corporation's FMCSA/DOT DRUG AND ALCOHOL TESTING PROGRAM Manual, which is incorporated into this policy by reference and will be the subject of annual training for transportation staff:

- Procedure for performance of controlled substance tests , including split specimen collection and analysis for controlled substances
- Procedure for performance of alcohol tests, including whether breath or saliva screening tests will be performed
- Employee privacy protections
- Testing process integrity
- Procedures for assuring test results will be attributed to the correct driver

The following is the contact information for the Medical Review Officer:

Indiana Testing Inc.
881 S. Girls School Rd.
Indianapolis, IN 46231
800-295-2587 (Phone)

317-271-6332 (Fax)

Clinical Reference Laboratory
8405 Quivira Rd.
Lenexa, KS 66215

DRIVERS WITH AN ALCOHOL CONCENTRATION OF 0.02 OR GREATER BUT LESS THAN 0.04

Consistent with 49 C.F.R. 382.505, any driver who has an alcohol concentration of 0.02 or greater but less than 0.04 shall not perform or continue to perform safety-sensitive functions for an employer until the start of the driver's next regularly scheduled duty period, but not less than 24 hours following administration of the test. No employer shall take any action against a driver based solely on test results showing an alcohol concentration of less than 0.04. This provision is listed in compliance with Federal Motor Carrier Safety Administration ("FMCSA") regulations and does not prohibit the Corporation from taking any action otherwise consistent with the law.

No action shall be taken under FMCSA or DOT authority against the driver based solely on test results showing an alcohol concentration of less than 0.02. Alcohol concentration results of less than 0.02 are considered negative for the purposes of this employer testing program. No employer may penalize a driver based on a test result of less than 0.02 alcohol concentration conducted under Federal requirements.

COSTS

All Corporation employees who test positive for controlled substances and/or alcohol, will assume responsibility for all incurred testing fees. This includes positive results on Pre-employment, Probable Cause, Random, Post-Injury and Post-Accident testing.

All employees who request that split specimens be forwarded to another laboratory will be responsible for the cost.

Any employee who tests positive and is referred for an evaluation by a Substance Abuse Professional (SAP), will be required to incur the costs for the Return to Duty testing and all Follow-up testing required by FMCSA/DOT and/or Corporation. Corporation will pay for all negative controlled substance and alcohol testing.

PROHIBITED BEHAVIOR

The following shall be considered "prohibited conduct" for purposes of this policy:

- No employee shall report for duty or remain on duty while having an alcohol concentration greater than 0.00.

- No employee shall use alcohol while performing safety-sensitive functions.

- No employee shall perform safety-sensitive functions within eight (8) hours after using alcohol. FMCSA regulations require four (4) hours; however, the Corporation is choosing a more stringent requirement for the safety of all students.

- No employee required to take a post-accident alcohol test shall use alcohol for eight (8) hours following the accident or until he/she undergoes a post-accident alcohol test, whichever occurs first.

- No employee shall refuse to submit to a post-accident, a random, a reasonable suspicion, return-to-duty, follow-up, or post-injury breath alcohol or urine-controlled substance test.

- No employee shall report for duty or remain on duty when the employee uses any controlled substance, except when use is pursuant to the instructions of a physician who has advised the employee that the substance does not adversely affect the employee's ability to operate a commercial motor vehicle or perform a safety-sensitive function.

If the Corporation has actual knowledge or has reason to believe that an employee has engaged in prohibited conduct, the Corporation may require the employee to submit to controlled substance and/or alcohol testing. If an employee engages in prohibited conduct, the employee is not qualified to drive a commercial motor vehicle or to perform a safety-sensitive function and shall be immediately removed from service. Corporation may in its discretion, at the request of the employee, keep the employee's position open while such employee attempts to become re-qualified. Corporation may also, at its discretion, take action against the employee up to and including termination.

All employees and other members of the school community are required to report suspicious behavior to their supervisor, the Transportation Director, or the Superintendent.

CONSEQUENCES

The Board of School Trustees for Bluffton-Harrison Metropolitan School District mandates that drivers and other employees covered under 49 C.F.R. Part 382, must cooperate with school officials in the execution of Alcohol and Controlled Testing Procedures. Failure to cooperate with school officials or their agent(s) will be considered insubordination and the driver shall be terminated as a driver subject to applicable laws. Drivers or other employees who have a positive controlled substance test result or have an alcohol concentration of 0.04 or greater shall be immediately removed from his or her safety-sensitive function and subject to discipline, which may include termination of employment, an unpaid suspension, or administrative leave/paid suspension. Any driver who has a verified positive controlled substances test result, has an alcohol concentration of 0.04 or greater, or refuses to submit to a test must also be evaluated by a substance abuse professional.

EMPLOYEE TRAINING

Corporation shall provide educational materials that explain the requirements of 49 C.F.R. 382.601, consequences of violating the regulations, materials that explain the harmful effects of alcohol and controlled substance abuse, and the employer's policies and procedures with the

respect to meeting these requirements. The materials supplied to employees may include information on the effects of alcohol misuse and controlled substances use on an individual's health, work, and personal life; signs and symptoms of an alcohol problem; and available methods of intervening when an alcohol and/or controlled substance problem is suspected; available methods of intervening when an alcohol or controlled substance problem is suspected, including confrontation, referral to any employee assistance program and/or referral to management; additional employer policies with respect to the use or possession of alcohol or controlled substances, for example, the consequences for an employee found to have a specified alcohol or controlled substances level based on the employer's authority independent of 49 C.F.R. 382.601.

Employees who suspect they may have an alcohol or other drug abuse problem are encouraged to seek counseling and information on a confidential basis, and may contact the Human Resources Office for a list of available resources.

COMMERCIAL DRIVER'S LICENSE DRUG AND ALCOHOL CLEARINGHOUSE

The Corporation will collect, maintain, and report to the Commercial Driver's License Drug and Alcohol Clearinghouse the following personal information:

a. A verified positive, adulterated, or substituted drug test result;

b. An alcohol confirmation test with a concentration over 0.00;

c. A refusal to submit to any test required by subpart C of this part;

d. An employer's report of actual knowledge, as defined at 49 C.F.R. 382.107:

e. On duty alcohol use pursuant to 49 C.F.R. 382.205;

f. Pre-duty alcohol use pursuant to 49 C.F.R. 382.207;

g. Alcohol use following an accident pursuant to 49 C.F.R. 382.209; and

h. Controlled substance use pursuant to 49 C.F.R. 382.213;

i. A SAP report of the successful completion of the return-to-duty process;

j. A negative return-to-duty test; and

k. An employer's report of completion of follow-up testing.

The Corporation shall ensure that each employee is required to sign a statement certifying that he/she has received a copy of these materials described in 49 C.F.R. 382.601.

The Superintendent is authorized to develop administrative guidelines to implement this policy.

49 C.F.R. Part 382

Federal Motor Carrier Safety Administration - *Implementation Guidelines for Alcohol and Drug Regulations in Highway Transportation*
FMCSA/DOT Drug and Alcohol Testing Program Manual

Bluffton-Harrison Metropolitan School District

Adopted: January 13, 2025

Revised: November 17, 2025, December 14, 2026

DEBT MANAGEMENT POLICY

The purpose of the Bluffton-Harrison Metropolitan School District's Debt Management Policy ("Debt Policy") is to establish and maintain well-defined guidelines around issuing new debt and considerations for outstanding debt to protect the fiscal stability of the Corporation. The Corporation Treasurer and the School Board of Finance shall review this Debt Policy annually to determine if any adjustments are needed during the annual Board of Finance meeting.

Definitions:

For purposes of this policy, the following definitions apply:

Amended and Restated Post Issuance Compliance Procedures shall mean the post-issuance procedures approved by the School Board President, School Board Secretary, and Corporation Treasurer on the date of the most recent Board of Finance meeting.

Corporation shall mean the Bluffton-Harrison Metropolitan School District.

Corporation Debt shall include short-term debt, long-term debt or any related school building corporation debt.

Finance Team shall mean the Superintendent, Corporation Treasurer, municipal advisor, and bond counsel.

School Board shall mean the Bluffton-Harrison Metropolitan School District Board of School Trustees.

Objectives:

In order to achieve its purpose, the Debt Policy has the following objectives:

- To guide the Corporation's Finance Team;
- To set forth operating principles minimizing the cost of government and financial risk;
- To maintain appropriate financial capacity for present and future needs; and
- To protect the Corporation's credit rating and provide for adequate resources to meet the obligations of the Corporation debt.

Guidelines for Debt:

Financing Team

The Corporation employs various professionals for assistance with its debt issuance. These professionals include underwriters, trustees, consultants, municipal advisors and attorneys.

For these professional services, the Corporation, through its Corporation Treasurer, will evaluate its professionals as needed. When evaluating the professionals, the Corporation will consider general municipal financing expertise and qualifications, as well as the specific understanding of the Corporation's debt structure, finances, legal covenants, and familiarity with the Corporation.

Debt Limits

The Corporation will observe state constitutional and statutory restrictions applicable to any debt issued by the Corporation~~. The Corporation shall not be subject to any additional local debt limitation, but as a policy goal, the Corporation will target a maximum non-exempt debt service levy tax rate (excludes debt approved by referenda) not to exceed $0.6999 ("Maximum Targeted Rate").~~ The Corporation will monitor ~~other~~ debt measurements in conjunction with the issuance of ~~additional~~ bonds, including debt compared to gross assessed value and debt per capita.

The Corporation, with the assistance of, and oversight by the Finance Team, will work to not exceed the Maximum Targeted Rate, and any changes to this policy goal must be approved by the School Board.

Refunding Bonds

The Corporation may refund outstanding debt to achieve interest cost savings, remove or change burdensome bond covenants, adjust interest rates, release funds or a lien on building corporation property, restructure the stream of debt service payments and for any other reason deemed in the best interests of the Corporation, as determined by the Finance Team and the School Board.

If the Corporation determines it will refund outstanding debt to achieve cost savings, then such cost savings should target savings or benefit to the Corporation of two to three percent (2-3%); however, smaller savings amounts may be evaluated for financings where there are significant present value savings and the interest rate environment is increasing.

Tax-Exempt or Taxable Debt

Most debt will be issued as tax-exempt when permitted under federal law. To qualify as tax-exempt, the terms of the issuance and the use of issuance proceeds must comply with IRS regulations. Bond counsel will review the transaction and intended use of bond proceeds with the Finance Team and make a determination on the tax status of the bonds under consideration. The Corporation will take the necessary steps to maintain the tax-exempt status of the bonds after issuance (in accordance with its Tax Compliance Procedures, which are contained in bond transcripts for the applicable tax-exempt financing).

The Corporation may issue taxable debt for projects or uses that do not meet federal and/or state regulations for tax-exempt funding. In some instances, the use of tax-exempt debt might not be cost-effective, leading to the use of a taxable issuance as the lowest possible cost of funds. The Finance Team shall determine the most cost-effective way to finance the

project for each financing. The following items should be considered when the Corporation plans to issue taxable debt:

- Conventional call provisions in the taxable market can differ materially from those included in the tax-exempt market, and, if deemed appropriate, the Corporation will consider the economic benefits and costs of a make whole call or issuing non-callable bonds, both of which are common in the taxable bond market.
- Consideration should be given to whether the Corporation would benefit from using a blend of tax-exempt bonds and taxable bonds on a particular financings. Analysis should be completed prior to the bond sale regarding as to structure would produce the lowest cost for a given maturity when considering applicable legal options.

Debt Considerations:

Debt Structure
All capital improvements financed through the issuance of debt will be financed for a period, in general, not to exceed the useful economic life of the improvements and in consideration of the ability of the Corporation.

Long-term debt, payable from ad valorem taxes, is limited to the maximum allowable time period under law. Call features should be evaluated based on market conditions and other considerations at the time debt is issued. The Corporation will evaluate call features with the Finance Team, with the advice of its municipal advisor, and will determine what is in the Corporation's best interest based upon an assessment of the municipal bond market at the time of the financing.

The Corporation only plans to issue fixed rate debt and will not issue variable rate debt. Should future market conditions change to make variable rate debt a more attractive option for the Corporation, then the School Board will re-evaluate this portion of the Debt Policy at that time.

Bond Ratings
In connection with a bond financing, the Finance Team shall evaluate whether there is a benefit to have one or more ratings assigned to the bond issue. When making this assessment, the Finance Team shall determine whether the estimated cost of securing the rating or ratings is likely to result in an estimated reduction in the total interest cost. The estimated reduction in interest cost should exceed the estimated costs to secure the rating, including the cost of professional services needed to assist with the rating process.

Additionally, the Finance Team shall respond to any inquiries from the rating agencies after the debt has been issued to provide the rating agencies with accurate and timely information that is relevant to the financial position of the Corporation. The Corporation Treasurer, with the assistance of its municipal advisor, shall maintain a relationship with one or more rating agencies on a consistent basis to keep the rating agencies informed of

capital plans, upcoming debt issuance or other information that is pertinent to the Corporation's finances.

Management of Bond Proceeds

When bonds are issued, the bond proceeds will be deposited into the accounts as set forth in the authorizing document for the bond financing, which may include the construction fund and an escrow fund for refunding. Monies allocated to these funds may be invested until needed. The investment strategy for each fund will depend, in part, on federal and state statutes and regulations governing the types of instruments permitted to be used and will consider any tax covenants associated with tax-exempt debt. The funds will be invested in accordance with the School Board's Investment Policy, F200 – Investment Income, and the Business Department, with assistance from its municipal advisor and bond counsel, shall determine the appropriate investments of bond proceeds for the applicable bond issue which will meet these state and federal requirements.

Post Issuance Compliance

The Corporation will adhere to its Amended and Restated Post Issuance Compliance Procedures, which may be revised from time to time to ensure compliance with its continuing disclosure undertakings, including timely filings of required financial information, audits and reportable events on the Municipal Securities Rulemaking Board's EMMA website.

Bluffton-Harrison Metropolitan School District

Adopted: April 21, 2025

Revised: November 17, 2025, December 14, 2026

School Library Material Removal Request Procedure

The school libraries housed within the Bluffton-Harrison Metropolitan School District (the "Corporation") support and enrich the curriculum, students' personal interests, and learning. Despite the careful selection of materials and the qualification of those involved in the selection process, objections to school library materials may occur.

A parent or guardian of a student enrolled in the Corporation or a community member who resides within the geographic boundaries of the Corporation ("Requester") may submit a request to remove material from a school library on the grounds that the material is obscene or harmful to minors as those terms are defined by the Indiana criminal code:

> **35-49-2-1 Obscene matter or performance**
> A matter or performance is obscene for purposes of this article if:
> (1) the average person, applying contemporary community standards, finds that the dominant theme of the matter or performance, taken as a whole, appeals to the prurient interest in sex;
> (2) the matter or performance depicts or describes, in a patently offensive way, sexual conduct; and
> (3) the matter or performance, taken as a whole, lacks serious literary, artistic, political, or scientific value.
>
> **35-49-2-2 Matter or performance harmful to minors**
> A matter or performance is harmful to minors for purposes of this article if:
> (1) it describes or represents, in any form, nudity, sexual conduct, sexual excitement, or sado-masochistic abuse;
> (2) considered as a whole, it appeals to the prurient interest in sex of minors;
> (3) it is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable matter for or performance before minors; and
> (4) considered as a whole, it lacks serious literary, artistic, political, or scientific value for minors.

The Requester should first discuss the item of concern with the school librarian. If the concern still exists, the Requester can make a request to remove the material by submitting a fully completed Removal Request Form to the Superintendent within 10 days of the discussion with the school librarian. Such form must explain~~ing~~ why the requester believes the material is obscene or harmful to minors and submitting the same to the Assistant Superintendent.

A request for removal of school library material will be treated as a request to remove the material from all school libraries. Notwithstanding, material subject to a request for removal will remain available and in circulation until a final decision is made.

Upon receipt of a completed Removal Request Form the Superintendent will convene a review committee ("Committee") to review the request for removal and the subject material. The Committee will include at a minimum: a district level administrator, a school librarian, a teacher, a building level administrator, and a school employee who lives within the geographic boundaries of the Corporation (if not already fulfilled by another Committee member).

When considering the request for removal, all Committee members should fully review the material (read or view the entire work), so that the Committee may consider the material in its entirety. The Committee shall consider both whether the material subject to the request is obscene and whether it is harmful to minors regardless of whether the request is based on just one or the other ground for removal. Upon completion of its review, usually within thirty (30) school days, the Committee will provide the Requester and the Board of School Trustees with a written recommendation. If material is subject to removal under this Policy, the material will be removed from all School Corporation buildings/locations where such material was available.

If the Requester is not satisfied with the recommendation of the Committee, a written appeal may be made within ten (10) school days to the Board of School Trustees. The appeal should be sent to the Superintendent. The Board will review the recommendation and appeal at the next public meeting.

If the Requester submits no appeal, the Board will make its decision based on the recommendation of the Committee. The request for removal, Committee recommendation, and any appeal will be reviewed by the Board at the next public meeting following the recommendation.

The Corporation will not process requests regarding school library material previously subject to this procedure absent extenuating circumstances.

Bluffton-Harrison Metropolitan School District

Adopted: December 16, 2024
Revised: December 14, 2026

References:

IC 20-26-5.5 *et seq*.
IC 35-49-2-1 – Definition of "obscene"
IC 35-49-2-2 – Definition of "harmful to minors"