Standard Operating Procedure (SOP): District Use of Generative Artificial Intelligence (AI)

District: Gunnison Watershed School District
Effective Date: November 17, 2026
Applies To: All District Staff, Students, Contractors, and Third-Party Providers
Related Board Policies: GBEE (Staff Use of Technology), JRCB (Privacy and Protection of Confidential Student Information), JS (Student Use of the Internet and Electronic Communications)

Purpose & Scope

This Standard Operating Procedure (SOP) defines clear guidelines and best practices for the responsible, compliant, and secure use of Generative AI (GenAI) technologies across the school district. It supports District Policies GBEE, JRCB, and JS. It covers general GenAI software, language models, and specific protocols for AI notetakers and meeting recordings during online functions to ensure student privacy, regulatory compliance, AI literacy in staff and students and proper workplace/school conduct.

1. District Operations, Procurement, & Security

This section governs how AI software enters the district, how data is safeguarded, and how district oversight is maintained in accordance with District Policies GBEE and JRCB.

- **1.1 Tool Vetting & Approval Pathway:** AI tools, applications, browser extensions, or software features may not be used for district business or installed on district devices without prior review and formal approval by the Technology Department. Tools will be classified as: 1) staff use, or 2) staff and student use.
- **1.2 Approved vs. Prohibited Inventory:** The district maintains a published list of AI applications categorized as **Approved**, **With Restrictions**, or **Under Review**. Staff must verify a tool's status before creating accounts or inputting district data.
- **1.3 Prohibition on PII Input (Data Privacy & Compliance):** All users are strictly prohibited from entering or directing others to enter confidential or Personally Identifiable Information (PII) of any student, staff member, or individual into a GenAI tool. PII includes but is not limited to name, address, email address, telephone number, Social Security number, or other identifying details (34 CFR § 99.3; District Policies JRCB, GBEE, JS). Users should also avoid entering their own PII into GenAI tools.
- **1.4 Enterprise vs. Consumer Accounts:** Staff are prohibited from using personal or consumer AI accounts for district business. Staff must use district-managed accounts operating within closed environments to ensure that language models do not train on district data and that all data remains secure within our private enclave.
- **1.5 Public Records Obligations:** AI-generated transcripts, summaries, and meeting recordings created during official District functions may constitute public records subject to inspection under applicable open record laws (e.g., state public records acts/CORA). All recordings and AI records must comply with District retention policies.
- **1.6 Incident Reporting:** Any suspected data breach, exposure of confidential information via AI, or generation of harmful synthetic media must be reported immediately to the Technology Department and building administration.

2. Generative AI Notetakers & Online Meeting Recordings

This section governs the use of automated AI assistants, bots, and transcription features in online meetings.

- **2.1 Discretionary Use:** Staff members may utilize District-approved GenAI tools at their discretion according to the guidelines outlined in this SOP and related District Policies GBEE and JRCB.
- **2.2 Meeting Host Designation & Ownership:** To maintain data oversight and prevent meeting clutter, only the meeting organizer or an explicitly designated host is permitted to invite or enable an AI notetaker or recording tool on an online call. Individual attendees must not launch separate AI notetakers.
- **2.3 Approved Tools & Distribution:** The designated host must utilize a District-approved AI notetaking tool and is responsible for sharing generated notes, transcripts, or summaries with all meeting participants following the call.
- **2.4 Prohibition on Unvetted Bots:** AI notetaking tools, recording bots, and automated summary applications that have not gone through formal district vetting are prohibited from joining district-hosted virtual meetings (Google Meet, Zoom, Microsoft Teams).
- **2.5 Consent, Transparency & Right to Opt-Out:**
    - Host and participant notification is mandatory prior to initiating any AI transcription or recording. Meeting hosts must verbally announce the use of an AI notetaker at the start of the call.
    - Participants reserve the right to request that AI recording or summarizing features be turned off during meetings. If requested, the host must pause or turn off the AI tool.
- **2.6 Bot Attendance & In-Person Representation:** Staff may create or configure bots (automated internet agents). However, staff may not send a bot to a meeting instead of attending themselves. Staff are expected to attend online meetings and functions in person or actively online.
- **2.7 Confidential Meetings Prohibited (Strict Bans):** Pursuant to District Policy JRCB, AI bots and automated recording tools are strictly prohibited from attending or recording meetings that involve or could potentially involve discussions of confidential student information (e.g., IEP/504 meetings, disciplinary hearings, student counseling sessions), personnel evaluation discussions, legal consultations, and executive board sessions.
- **2.8 Storage & Record Retention:** All AI-generated transcripts, summaries, and recordings are official district records subject to public records laws and retention schedules. Stored files must reside exclusively on secure district cloud storage.

3. Generative AI & Staff (Professional & Administrative Use)

This section sets expectations for teachers, administrators, and staff using AI for daily work.

- **3.1 Human-in-the-Loop Requirement:** AI outputs must be treated as drafts. Staff members are fully responsible for the accuracy, appropriateness, and fairness of any final deliverable (e.g., lesson plans, newsletters, rubrics, reports) created with AI assistance.
- **3.2 Evaluative & High-Stakes Limitations:** AI tools may not be used as the sole or primary basis for evaluative decisions, such as grading student performance, writing employee evaluations, or making special education placement decisions.

4. Generative AI & Students (Classroom & Learning)

This section defines student access, academic integrity, and digital citizenship expectations pursuant to District Policy JS.

- **4.1 Age & Account Eligibility:** Student use of AI applications must align with COPPA age restrictions and district privacy agreements. Students may only interact with AI through district-approved, managed tools with appropriate consent.
- **4.2 Academic Integrity Framework:**
    - **Default Rule:** Students are expected to submit original work unless explicit permission is granted by the instructor for AI use.
    - **Teacher Discretion:** Educators have the authority to define the level of allowable AI assistance for specific learning activities (e.g., AI permitted for brainstorming, but prohibited for writing).
- **4.3 Critical AI Literacy:** Instruction involving student AI use must include foundational lessons on digital

citizenship, identifying algorithmic bias, recognizing factual "hallucinations," and practicing ethical citation.

- **4.4 Specialized Student Support & Practitioner Tools:** When AI tools are utilized by special education staff, mental health professionals, or service providers in a manner that processes identifiable student data, individualized education plans (IEPs), or counseling notes, practitioners must obtain explicit prior written consent from parents or legal guardians. Such tools must comply with FERPA, district privacy standards, and the prohibition on unvetted PII input (Section 1.3), and must never be used during confidential meetings (Section 2.7).

5. Resources & References

- COSN Gen AI Maturity Tool
- COSN Gen-AI-Readiness Checklist
- Colorado Roadmap for AI in K-12 Education: Guidance for Integrating AI Into Teaching and Learning
- Blueprint for An AI Bill of RIghts
- Artificial Intelligence and the Future of Teaching and Learning
- CU Tech Tips: Using AI Meeting Tools & CORA Obligations
- Common Sense Education: AI Toolkit for School Districts