

CENTRAL NINE CAREER CENTER

Special Update AI

Draft - Policy Manual

7 policies

September 1, 2026

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SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

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Overview

INDIANA OVERVIEW AND COMMENTS

Special Update - June 2026

This update includes proposed revisions to six (6) policies. The proposed changes to your manuals are the result of our ongoing work with our Indiana clients, as well as our ongoing review of statutory language at the State and Federal levels, court decisions, Office for Civil Rights investigations, et cetera. The revisions recommended in this update are deemed necessary to comply with changes in the law, both State and Federal.

Legislation approved during the last legislative session has been the subject of scrutiny by Neola and its Indiana outside counsel, Karen Glasser Sharp of Lewis Kappes. Some of the laws passed in this most recent legislative session necessitated immediate updates to our policies. As is our practice, Neola will make any remaining revisions to policies and guidelines impacted by legislation passed in the most recent session of the General Assembly in the update that follows this Fall.

For ease of use, the policies, guidelines, legal alerts and reference document in this update are organized in numerical order in the sub-folder that has been posted in the Cooperative’s BoardDocs platform.

However, policies from multiple sections are grouped together in this Overview when and if the explanation is the same for the proposed revisions to a group of policies/guidelines.

Questions?

Any content-related questions should be directed to your Cooperative’s associate.

All production-related questions should be directed to the Coshocton Production Office at 632 Main Street, Coshocton, Ohio 43812 (email production@neola.com or phone 800-407-5815).

Billing questions should be directed to the Corporate Office at 3914 Clock Pointe Trail, Suite 103, Stow, Ohio 44224 (email czagar@neola.com, phone 330-926-0514, fax 330-926-0525).

The Update Material

The proposed new and revised policies included in this update have been thoughtfully prepared and have been reviewed by Lewis Kappes, Neola’s outside legal counsel in Indiana, for compliance with Federal and State law, Federal and State Regulatory Agencies, and applicable Federal and State court decisions.

If you make substantive changes to a Neola template, or substitute in its entirety a policy or other material of your own drafting, that material should be reviewed by the legal counsel for your Cooperative to verify compliance with applicable laws, regulations and court decisions.

If the Cooperative authors language and adds it to a policy template or deletes content that is not marked as a choice in the policy template, then these actions will constitute Cooperative-specific edits. *Neola does not review Cooperative-specific edits to update materials or Cooperative-specific policies for statutory compliance.* (See “Caveat RE: Cooperative-Specific Edits” below.)

If a policy or guideline is marked revision, the proposed revisions will include material to be added and material to be deleted. As you review a revised policy or guideline, you may choose to accept one, many or all of the changes presented.

If a policy or guideline is marked as a replacement, that means there have been enough changes made that instead of showing each individual change, a complete, clean replacement copy has been provided. As you review a replacement policy or guideline, you should also compare the replacement materials to your current policy or guideline to determine if there is some Cooperative-specific wording in your current material that you want included in the replacement policy. If so, any wording from the current policy should be added *using BoardDocs “Track Changes” tool* before returning the replacement policy electronically to the Coshocton production office for processing.

Policies that are to be deleted from the Cooperative’s Board-adopted Policy Manual require School Board action to rescind the policy.

Your Neola Associate will contact you in the near future to schedule an appointment to review this update and ensure you are current on this and previous updates.

If you are not an administrative guidelines client, you did not receive those materials in this packet. Contact your Associate for more information about becoming an administrative guidelines client.

Submitting Material

The Cooperative can incorporate the proposed edits in the Update documents into the Cooperative’s current policies using “Track Changes” or the editing tool in

the BoardDocs platform. Mark the current materials indicating which of the proposed revisions and additions you choose to include and/or to make additional edits, before presenting them to the Board for adoption. After adoption, return the materials on the BoardDocs policy site to Neola for processing and publishing. Please be sure to leave the “track changes” in the marked-up version that you submit to the production office in Coshocton, Ohio.

Please remember to email **production@neola.com** when you’ve posted your material and the disposition sheet so we know to go to your folder and retrieve it, and what we can expect to find there when we access it.

Please note, even if a Cooperative chooses not to include a policy or administrative guideline in their management documents that describes a statutory requirement, the Cooperative is still obligated to follow applicable Federal and State laws relating to that policy or guideline.

Caveat RE: Cooperative-Specific Edits

Please note also that if the Cooperative chooses during any step of the Update process to incorporate Cooperative-specific material into a new policy that has been proposed or insert Cooperative-specific material into a current policy for which revisions have been proposed in an update issued by Neola, then the Cooperative agrees to hold Neola harmless for those Cooperative-specific edits and acknowledges that Neola’s Warranty for legal challenges to the Cooperative-specific language in that policy will be voided. In addition, Neola retains ownership of the text from the original policy template that remains in a policy to which Cooperative-specific edits have been made. Cooperative-specific materials include the following:

- A. materials from the existing materials for the Cooperative that the Cooperative requests be incorporated into Neola templates during the drafting process;
- B. new policies or guidelines developed in their entirety by the Cooperative, exclusive of Neola;
- C. revisions to or deletions from a Neola template that substantively depart from that template; and
- D. outdated material that the Cooperative did not keep current with Neola updates.

Further, Neola does not advocate the use or incorporation of Cooperative-specific materials. Neola will, at the request of the Cooperative, incorporate Cooperative-specific materials into the licensed materials, with the implicit understanding that the Cooperative accepts all risks associated with the decision to request that such Cooperative-specific materials be incorporated. *Neola reserves the right to, but is not obligated to, advise the Cooperative to seek its own legal review of Cooperative-specific materials by the school board attorney who represents the Cooperative.* And Neola retains the copyright to any intellectual property from its template.

Caveat RE: Neola's Warranty

Neola proudly warrants that the content of the policy templates is legally correct.

However, when Federal and State law is amended or new provisions are added to State or Federal law and revision or replacement of an existing policy template is necessitated, the copyright date noted at the end of the policy is updated as well.

Please note that Neola's warranty applies only to the policy template with the most current copyright date. All previous iterations of the policy template are no longer warranted.

Therefore, material included in each update should be adopted if the Cooperative wants assurance that their adopted policies are warranted by Neola.

Notifying Neola of a Challenge to the Legal Accuracy of a Policy

The Neola staff in Indiana is vigilant in providing policy language to our clients that has been vetted for legal accuracy by our outside counsel. Should questions arise as to the legal compliance or accuracy of Neola materials, it is our expectation that our outside counsel would have the opportunity to assist in the resolution of such a claim. That can occur only if we are notified immediately upon receipt of such a challenge. Please notify Neola's corporate office (330-926-0514) if an issue arises in which such a review or assistance is necessary. To be eligible for assistance under our warranty we must be notified with ten (10) business days of the receipt of such a challenge.

Artificial Intelligence Tool Kit

The main objective of this process-based resource is to help Cooperative Administrators and Cooperative leaders effectively define, implement, and govern artificial intelligence (AI) within their unique local contexts. As AI technology rapidly evolves, Cooperatives face the challenges of managing emerging legal risks and navigating a landscape that often lacks clear statutory precedents. To support your forward movement, Neola is providing this comprehensive toolkit alongside legally vetted policy templates. Because every district is at a different stage of AI readiness, this resource is designed to help your leadership team and school board thoughtfully evaluate your capacity, mitigate compliance risks, and establish a clear, localized strategy.

Successful AI adoption requires a phased approach tailored to your Cooperative's size and resources. Your immediate priority must focus on risk mitigation—specifically instructing staff on the legal and privacy dangers of unvetted "Shadow AI" tools regarding FERPA, COPPA, and related statutes. Over the intermediate and long term, districts are encouraged to form representative AI work-groups.

While this toolkit is a robust planning framework, it is important to note its structural boundaries. The material provided is a guide, not a substitute for local legal review, and

highly specific compliance questions should always be directed to your district's legal counsel. Furthermore, because the tech market shifts daily, this document does not serve as a linear check-list, a data facilitation service, or a list of pre-vetted AI software. Your Cooperative ultimately retains ownership of its specific timelines, resource selection, and the final legal vetting of any AI tools deployed in your classrooms and business offices.

BYLAWS AND POLICIES

After reviewing the proposed revisions to the six (6) current Neola policy templates, the Superintendent should recommend the adoption of the new and revised material, and the Board should approve the Superintendent's recommendation so that the Cooperative's policies are legally consistent and correct.

If one or more of the current templates to which revisions are proposed as a result of recent changes in the Indiana Code or Federal law and included in this update are not among the policies previously adopted by the Board for the Cooperative, Neola recommends that the Cooperative reconsider the material and adopt those templates as new policies for the Cooperative.

Policy 3220.01 - Teacher Appreciation (Revised)

This policy has been revised to reflect the provisions of House Bill 1266 to clarify that the Teacher Appreciation Grant may be used to pay the Federal Insurance Contributions Act (FICA) and Indiana state teachers' retirement fund (TRF) costs associated with distributing this stipend.

The proposed revision to this policy should be recommended for adoption by the Superintendent and adopted by the Board to remain in compliance with State law.

Policy 6210 - Fiscal Planning (Revised)

This policy has been revised to reflect the provisions of House Bill 1210, which requires an individual designated by the Board to publish a contract entered into with a municipal advisor in a prominent location on the Corporation's website and upload the contract to the Indiana Gateway.

The proposed revision to this policy should be recommended for adoption by the Superintendent and adopted by the Board to remain in compliance with State law.

Policy 7540.03 - Student Technology Acceptable Use and Safety (Revised)

Policy 7540.04 - Staff Technology Acceptable Use and Safety (Revised)

Policy 7540.09 - Artificial Intelligence ("AI") (Replacement)

Policy 7544 - Use of Social Media (Revised)

These policies have been modified to provide appropriate guardrails for Artificial Intelligence (AI) Use by Corporation employees and students. Further several of these policies address provisions of House Bill 1408 regarding the use of Social Media by students under the age of sixteen (16).

These revisions are strongly recommended.

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SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po3220.01

Revised Policy - Special Update - Artificial Intelligence - June 2026 - TEACHER APPRECIATION GRANTS

Revised Policy - Special Update - Artificial Intelligence - June 2026

3220.01 - TEACHER APPRECIATION GRANTS

[DRAFTING NOTE: The statute places the revenue received from the Teacher Appreciation Grant outside of negotiations. Discussion of the policy for distribution of the funds with a certificated employee or group of certificated employees at one or more meetings open to all certificated employees is at the discretion of the Cooperative.]

The Board of **Directors** **Managers** adopts this policy for the benefit of the Cooperative's teachers. The Cooperative **(-) shall (x)** may **[END OF OPTIONS]** distribute teacher appreciation grant funds as described in this policy.

Definitions:

For purposes of this policy, the following definitions apply:

The term "teacher" means a professional person whose position with the Cooperative requires a license (as defined in I.C. 20-28-1-7) and whose primary responsibility is the instruction of students.

The term "license" refers to a document issued by the IDOE that grants permission to serve as a particular kind of teacher. The term includes any certificate or permit issued by the Indiana Department of Education (IDOE).

Distribution of Annual Teacher Appreciation Grants:

The Cooperative shall identify not more than twenty percent (20%) of certified teachers as eligible grant recipients annually based on the criteria outlined below. The Cooperative shall report to each member school corporation how each recipient met the criteria outlined below.

Teacher appreciation grant funds received by the Cooperative from its member school corporations may be used only to pay stipends within the amounts described below to licensed teachers who meet the following criteria:

- A. have instructed students in the Cooperative for at least one (1) school year prior to the grant distribution year;
- B. maintain employment at the Cooperative at the time of the grant distribution;
- C. are determined to significantly impact student outcomes using National, State, or local assessment measures; and
- D. are designated in one (1) of the following categories:
 - 1. meets the criteria for a recognition stipend;
 - 2. meets the criteria for an exemplary stipend; or
 - 3. meets the criteria for an exemplary plus stipend.

The following criteria apply in evaluating a teacher for a stipend designation:

- A. For a recognition stipend designation, whether the teacher demonstrates high performance in teaching based on student outcomes.
- B. For an exemplary stipend designation whether the teacher:
 - 1. demonstrates high performance in teaching based on student outcomes; and
 - 2. meets one (1) of the following:
 - a. mentors or coaches another teacher to improve student outcomes, or provides instructional leadership to improve student outcomes across multiple classrooms; or
 - b. serves in a high need or geographic shortage area as determined by the IDOE based on educator supply and demand.
- C. For an exemplary plus stipend designation, whether the teacher:
 - 1. demonstrates high performance in teaching based on student outcomes;
 - 2. mentors or coaches another teacher to improve student outcomes, or provides instructional leadership to improve student outcomes across multiple classrooms; and

3. serves in a high need or geographic shortage area as determined by the IDOE based on educator supply and demand.

[DRAFTING NOTE: The following are optional]

[] The Cooperative establishes the following additional criteria for a recognition stipend designation:

- A. _____
- B. _____
- C. _____

[] The Cooperative establishes the following additional criteria for an exemplary stipend designation:

- A. _____
- B. _____
- C. _____

[] The Cooperative establishes the following additional criteria for an exemplary plus stipend designation:

- A. _____
- B. _____
- C. _____

[END OF OPTIONS]

The Cooperative shall utilize the rubric developed by the IDOE pursuant to I.C. 20-43-16-7.

The Cooperative shall distribute the teacher appreciation grant funds as follows.

The amount of the stipend that the Cooperative may distribute to a teacher for a State fiscal year under this chapter must be within the following amounts:

- A. For a teacher who receives a stipend for a recognition designation, \$3,500.
- B. For a teacher who receives a stipend for an exemplary designation, \$5,000.

C. For a teacher who receives a stipend for an exemplary plus designation, \$7,500.

A stipend to an individual teacher in a particular year is not subject to collective bargaining and is in addition to the minimum salary or increases in the salary set under I.C. 20-28-9-1.5. The Cooperative may discuss with a certificated employee or a group of certificated employees at one or more meetings open to all certificated employees the policy for distribution of teacher appreciation grants.

The Cooperative shall distribute all stipends from a teacher appreciation grant to individual teachers within sixty (60) business days of the date the IDOE distributes the teacher appreciation grant funds to the member school corporation from which the Cooperative received the funds.

The teacher appreciation grant may be used to pay the Federal Insurance Contributions Act (FICA) and Indiana State Teachers' Retirement Fund (TRF) costs associated with distributing this stipend.

The Cooperative shall return any part of the grant not distributed as stipends to teachers (x) to the IDOE not later than June 30 - ~~() to its member school corporations not later than _____~~ **[must be prior to June 30 to allow each member school corporation to return the funds to IDOE by June 30] [END OF OPTION]** of the applicable State fiscal year.

I.C. 20-18-2-22

I.C. 20-28-1-7

I.C. 20-29-6-7

I.C. 20-43-16

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Legal

I.C. 20-18-2-22

I.C. 20-28-1-7

I.C. 20-29-6-7

I.C. 20-43-16

SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po6210

Revised Policy - Special Update - Artificial Intelligence - June 2026 - FISCAL PLANNING

Revised Policy - Special Update - Artificial Intelligence - June 2026

6210 - FISCAL PLANNING

The Board of Directors ~~Managers~~ shall collect and assemble the information necessary to discharge its responsibility for the fiscal management of the Cooperative and to plan for the financial needs of the educational program. The Board will strive to maintain both short and long-range projections of the Cooperative's financial requirements.

Accordingly, the Board directs the Executive Director _____ to:

- A. (☒) include cost estimates of all ongoing financial requirements;
- B. (☒) prepare a long-range year-by-year plan for the maintenance and replacement of facilities and equipment;
- C. (☒) maintain a plan of anticipated local, State, and Federal revenues;
- D. (☒) report to the Board any serious financial implications that emerge from the Cooperative's ongoing fiscal planning.

In addition, the Board directs the to maintain annually a detailed year forecast of estimated expenditures and revenues of the Operations Fund.

The Board further directs the Executive Director _____ to publish a contract entered into with a municipal advisor in a prominent location on the Cooperative's website and upload the contract to the Indiana Gateway. A "municipal advisor" means a person who is not an employee of the Cooperative who: 1) provides advice to or on behalf of the Cooperative concerning financial issues, including advice related to: (A) Cooperative financial products or the issuance of Cooperative securities, including with respect to structure, timing, and terms; or (B) budgeting and long term financial planning; or 2) undertakes solicitation of the Cooperative.

Legal

I.C. 20-26-5-4

I.C. 20-35-5-5

I.C. 20-35-5-13

I.C. 20-35-5-16

I.C. 36-1-7

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SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po7540.03

Revised Policy - Special Update - Artificial Intelligence - June 2026 - STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY

Revised Policy - Special Update - Artificial Intelligence - June 2026

7540.03- STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY

Technology has fundamentally altered the ways in which information is accessed, communicated, and transferred in society. As a result, educators are continually adapting their means and methods of instruction, and the way they approach student learning, to incorporate the vast, diverse, and unique resources available through the Internet. The Board of Managers provides Technology Resources (as defined in Bylaw 0100 - Definitions) to support the educational and professional needs of its students and staff. With respect to students, Cooperative Technology Resources afford them the opportunity to acquire the skills and knowledge to learn effectively and live productively in a digital world. The Board provides students with access to the Internet for limited educational purposes only and utilizes online educational apps and services to enhance the instruction delivered to its students. The Cooperative's computer network and Internet system do not serve as a public access service or a public forum, and the Board imposes reasonable restrictions on its use consistent with its limited educational purpose.

The Board regulates the use of Cooperative Technology Resources by principles consistent with applicable local, State, and Federal laws, the Cooperative's educational mission, and articulated expectations of student conduct as delineated in the Student Code of Conduct. This policy, its related administrative guidelines and the Student Code of Conduct govern students' use of Cooperative Technology Resources and students' personal communication devices when they are connected to the Cooperative computer network, Internet connection, and/or online educational apps and services, or when used while the student is on Cooperative-owned property or at a Cooperative-sponsored activity (see Board Policy 5136 - Personal Communication Devices).

Users are prohibited from engaging in actions that are illegal (such as libel, slander, vandalism, harassment, theft, plagiarism, inappropriate access, and the like) or unkind (such as personal attacks, invasion of privacy, injurious comment, and the like) when using Cooperative Technology Resources. Because its Technology Resources are not unlimited, the Board also has instituted restrictions aimed at preserving these resources, such as placing limits on use of bandwidth, storage space, and printers.

Users have no right to or expectation of privacy when using Cooperative Technology Resources (including but not limited to privacy in the content of their personal files, e-mails, and records of their online activity when using the Cooperative's computer network and/or Internet connection).

~~First, the~~ The Cooperative may not be able to limit access technologically, through its Technology Resources, to only those services and resources that have been authorized for the purpose of instruction, study and research related to the curriculum. Unlike in the past, when educators and community members had the opportunity to review and screen materials to assess their appropriateness for supporting and enriching the curriculum according to adopted guidelines and reasonable selection criteria (taking into account the varied instructional needs, learning styles, abilities, and developmental levels of the students who would be exposed to them), access to the Internet, because it serves as a gateway to any publicly available file server in the world, opens classrooms and students to electronic information resources that may not have been screened by educators for use by students of various ages.

The Board prohibits the sending, receiving, viewing, or downloading of materials that are harmful to minors on computers and other technology devices owned or leased by the Cooperative or connected to the Cooperative computer network.

Pursuant to State and Federal law, the Board has implemented technology protection measures that protect against (e.g., filter or block) access to visual displays/depictions/materials that are obscene, constitute child pornography, and/or are harmful to minors, as defined by the Children's Internet Protection Act. At the discretion of the Board or the Director, the technology protection measures may be configured to protect against access to other material considered inappropriate for students to access. The Board also utilizes software and/or hardware to monitor online activity of students to restrict access to child pornography and other material that is obscene, objectionable, inappropriate and/or harmful to minors. The technology protection measures may not be disabled at any time that students may be using the Cooperative Technology Resources, if such disabling will cease to protect against access to materials that are prohibited under the Children's Internet Protection Act. Any student who attempts to disable the technology protection measures will be subject to discipline.

The Director or Technology Coordinator may unblock temporarily or permanently ~~may-unblock~~ access to websites or online education apps and services containing appropriate material, if access to such sites has been blocked inappropriately by the technology protection measures. The determination of whether material is appropriate or inappropriate shall be based on the content of the material and the intended use of the material, not on the protective actions of the technology protection measures.

Parents/Guardians are advised that a determined user may be able to gain access to apps and services and/or resources on the Internet that the Board has not authorized for

educational purposes. In fact, it is impossible to guarantee students will not gain access through the Internet to information and communications that they and/or their parents may find inappropriate, offensive, objectionable or controversial. Parents of minors are responsible for setting and conveying the standards that their children should follow when using the Internet.

Pursuant to Federal law, students shall receive education about the following:

- A. safety and security while using e-mail, chat rooms, social media, and other forms of direct electronic communication ;
- B. the dangers inherent with the online disclosure of personally identifiable information when using Artificial Intelligence (AI) and when online;
- C. the consequences of unauthorized access (e.g., "hacking," "harvesting," "digital piracy," "data mining," etc.), cyberbullying, and other unlawful or inappropriate activities by students online ;and
- D. unauthorized disclosure, use, and dissemination of personally identifiable information regarding minors .

Staff members shall provide instruction for their students regarding the appropriate use of technology and online safety and security as specified above. Furthermore, staff members will monitor the online activities of students while at school.

[x] Monitoring may include, but is not necessarily limited to, visual observations of online activities during class sessions or use of specific monitoring tools to review browser history and network, server, and computer logs. **[end of option]**

The Cooperative is not responsible for monitoring, reviewing, or supervising a student's use of a Cooperative-issued device(s) while the device(s) is used at home or in other non-Cooperative settings.

Building principals/building administrators are responsible for providing training so that Ed-Tech users under their supervision are knowledgeable about this policy and its accompanying guidelines. The Board expects that staff members will provide guidance and instruction to students in the appropriate use of Cooperative Technology Resources. Such training shall include, but not be limited to, education concerning appropriate online behavior, including interacting with other individuals on social media and in chat rooms, and cyberbullying awareness and response. Users of Cooperative Technology Resources (and their parents if they are minors) are required to sign a written agreement to abide by the terms and conditions of this policy and its accompanying guidelines.

[x] Students will be assigned a school email account that they are required to utilize for all school-related electronic communications, including those to staff members, peers, and

individuals and/or organizations outside the Cooperative, with whom they are communicating for school-related projects and assignments. (☒) Further, as directed and authorized by their teachers, they shall use their school-assigned email account when signing up/registering for access to various online educational services, including mobile applications and apps and services that will be utilized by the student for educational purposes.

[end-of-option]

Students are responsible for good behavior when using Cooperative Technology Resources - i.e., behavior comparable to that expected of students when they are in classrooms, in school hallways, on other school premises and at school sponsored events. Communications on Education Technology are often public in nature. General school rules for behavior and communication apply. The Cooperative does not approve any use of its Technology Resources that is not authorized by or conducted strictly in compliance with this policy and its accompanying guidelines.

[NOTE: If language about social media is added to Policy 7540, it is recommended that this language be added to this policy.]

~~[] -Students may use Cooperative Technology Resources to access or use social media only if it is done for educational purposes in accordance with their teacher's approved plan for such use.~~

[end-of-option]

[☒] Use of Artificial Intelligence/Natural Language Processing Tools for School Work

Students are required to rely on their own knowledge, skills, and resources when completing schoolwork. In order to ensure the integrity of the educational process and to promote fair and equal opportunities for all students, except as outlined below, the use of ~~Artificial Intelligence (AI)- AI~~ and Natural Language Processing (NLP) tools (collectively, "AI/NLP tools") is ~~strictly~~ prohibited for the completion of schoolwork. The use of AI/NLP tools, without the express permission/consent of a teacher, undermines the learning and problem-solving skills that are essential to academic success and that the staff is tasked to develop in each student. Students are encouraged to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI/NLP tools, and they should ask their teachers when they have questions and/or need assistance. Unauthorized use of AI/NLP tools is considered a form of plagiarism, and any student found using these tools without permission or in a prohibited manner will be disciplined in accordance with the Student Code of Conduct.

Notwithstanding the preceding, students can use AI/NLP tools in the school setting if they receive prior permission/consent from their teacher, so long as they use the AI/NLP tools in

an ethical and responsible manner. Teachers have the discretion to authorize students to use AI/NLP tools for the following uses:

- A. **Research assistance:** AI/NLP tools can be used to help students quickly and efficiently search for and find relevant information for their school projects and assignments.
- B. **Data Analysis:** AI/NLP tools can be used to help students to analyze, understand, and interpret large amounts of data, such as text documents or social media posts. This can be particularly useful for research projects or data analysis assignments, e.g., scientific experiments and marketing research.
- C. **Language translation:** AI/NLP tools can be used to translate texts or documents into different languages, which can be helpful for students who are learning a new language or for students who are studying texts written in a different language.
- D. **Accessibility:** AI/NLP tools can be used to help students with disabilities access and understand written materials. For example, text-to-speech software can help students with specific learning disabilities or visual impairments to read texts, and AI-powered translation tools can help students with hearing impairments understand spoken language.

As outlined above, under appropriate circumstances, AI/NLP tools can be used effectively as a supplement to but not a replacement for traditional learning methods. Consequently, with prior teacher permission/consent, students can use such resources to help them better understand and analyze information and/or access course materials. Students must disclose the use and the extent of AI assistance on any submitted work as required by their teacher. If a student has any questions about whether they are permitted to use AI/NLP tools for a specific class assignment, they should ask their teacher.

Expectations for Responsible Artificial Intelligence (AI) Use

Students are prohibited from inputting Personally Identifiable Information (PII), defined in Policy 7540.09 - Artificial Intelligence ("AI"), confidential student or staff data, or any non-public school records into any AI tool or service that has not been explicitly approved and contracted by the Cooperative.

Students are prohibited from using AI to bully, harass, threaten, impersonate or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person.

Any student suspected of using AI to create a synthetic intimate image will be referred to law enforcement, in addition to any disciplinary action imposed by administration.
Synthetic intimate image means an image generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an

intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts the conduct of the identifiable person.

[END OF OPTION]

Users who disregard this policy and its accompanying guidelines may have their use privileges suspended or revoked, and disciplinary action may be imposed on them. Users are personally responsible and liable both civilly and criminally, for uses of Technology Resources that are not authorized by this Policy and its accompanying guidelines.

The Board designates the Director and as the administrator(s) responsible for initiating, implementing, and enforcing this Policy and its accompanying guidelines as they apply to students' use of Cooperative Technology Resources.

This policy shall be posted on the Cooperative's website.

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Legal

P.L. 106-554 (2000), Children's Internet Protection Act of 2000

47 U.S.C. 245(h)(1)(B), Communications Act of 1934, as amended (2003)

18 U.S.C. 1460

18 U.S.C. 2246

18 U.S.C. 2256

20 U.S.C. 6301 et seq., Part F, Elementary and Secondary Education Act of 1965, as amended (2003)

20 U.S.C. 6777, 9134 (2003)

47 C.F.R. 54.500 - 54.523

I.C. 20-26-5-40.5

I.C. 35-49-2-2

SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po7540.04

Revised Policy - Special Update - Artificial Intelligence - June 2026 - STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY

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7540.04 - STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY

Technology has fundamentally altered the ways in which information is accessed, communicated, and transferred in society. As a result, educators are continually adapting their means and methods of instruction, and the way they approach student learning, to incorporate the vast, diverse, and unique resources available through the Internet. The Board of Managers provides Cooperatives Technology Resources and Information Resources (as defined by Bylaw 0100 - Definitions) to support the educational and professional needs of its staff and students. The Board provides staff with access to the Internet for limited educational purposes only and utilizes online educational services/apps to enhance the instruction delivered to its students and to facilitate the staff's work. The Cooperative's computer network and Internet system do not serve as a public access service or a public forum, and the Board imposes reasonable restrictions on its use consistent with its limited educational purpose.

The Board regulates the use of Cooperative Technology Resources and Information Resources by principles consistent with applicable local, State, and Federal laws, and the Cooperative's educational mission. This policy, its related administrative guidelines, (x) Board Policy 7544 - Use of Social Media (~~-~~) and AG 7544 - Use of Social Media, [END OF OPTION] - and any applicable employment contracts and collective bargaining agreements govern the ~~staffs'~~ staff's use of the Cooperative's Technology Resources and Information Resources and the staff's personal communication devices (PCDs) when they are connected to the Cooperative's computer network, Internet connection and/or online educational apps and services, or when used while the staff member is on Cooperative-owned property or at a Cooperative-sponsored activity (see Policy 7530.02 - Web Content, Apps and Services).

[DRAFTING NOTE: Choose the first option above if the Director recommends and the Board adopts Board Policy 7544 - Use of Social Media and the second option above if the Director has issued administrative guidelines for the policy.]

Users are prohibited from engaging in actions that are illegal (such as libel, slander, vandalism, harassment, theft, plagiarism, inappropriate access, and the like) or unkind (such as personal attacks, invasion of privacy, injurious comment, and the like) when using Cooperative Technology Resources and Information Resources. Because its Technology Resources are not unlimited, the Board also has instituted restrictions aimed at preserving these resources, such as placing limits on use of bandwidth, storage space, and printers.

Users have no right to or expectation of privacy when using Cooperative Technology Resources and Information Resources (including, but not limited to, privacy in the content of their personal files, e-mails, and records of their online activity when using the Cooperative's computer network and/or Internet connection).

Staff members are expected to utilize Cooperative Technology Resources and Information Resources to promote educational excellence in our schools by providing students with the opportunity to develop the resource sharing, innovation, and communication skills and tools that are essential to both life and work. The Board encourages the faculty to develop the appropriate skills necessary to effectively access, analyze, evaluate, and utilize these resources in enriching educational activities. The instructional use of the Internet and online educational services will be guided by Board Policy 2520 – Selection of Instructional Materials and Equipment.

The Internet is a global information and communication network that provides students and staff with access to up-to-date, highly relevant information that will enhance their learning and the education process. Further, Cooperative Technology Resources provide students and staff with the opportunity to communicate with other people from throughout the world. Access to such an incredible quantity of information and resources brings with it, however, certain unique challenges and responsibilities.

The Cooperative may not be able to limit access technologically through its Technology Resources to only those services and resources that have been authorized for the purpose of instruction, study and research related to the curriculum. Unlike in the past, when educators and community members had the opportunity to review and screen materials to assess their appropriateness for supporting and enriching the curriculum according to adopted guidelines and reasonable selection criteria (taking into account the varied instructional needs, learning styles, abilities, and developmental levels of the students who would be exposed to them), access to the Internet, because it serves as a gateway to any publicly available file server in the world, opens classrooms and students to electronic information resources which may not have been screened by educators for use by students of various ages.

The Board prohibits the sending, receiving, viewing, or downloading of materials that are harmful to minors on computers and other technology related devices owned or leased by the Cooperative or connected to the Cooperative's computer network.

The Board prohibits an employee from using Cooperative Technology Resources to:

- A. engage in lobbying (as defined in I.C. 2-7-1-9) that is outside the scope of the employee's duties;
- B. engage in illegal activity; or
- C. violate the Cooperative's cybersecurity policy (if applicable).

Pursuant to Federal law, the Cooperative has implemented technology protection measures that protect against (e.g., filter or block) access to visual displays/depictions/materials that are obscene, constitute child pornography, and/or are harmful to minors, as defined by the Children's Internet Protection Act or I.C. 35-49-2-2. At the discretion of the Board or Director, the technology protection measures may be configured to protect against access to other material considered inappropriate for students to access. The Board also utilizes software and/or hardware to monitor online activity of students to restrict access to child pornography and other material that is obscene, objectionable, inappropriate and/or harmful to minors. The technology protection measures may not be disabled at any time that students may be using Cooperative Technology Resources and Information Resources if such disabling will cease to protect against access to materials that are prohibited under the Children's Internet Protection Act. Any staff member who attempts to disable the technology protection measures without express written consent of an appropriate administrator will be subject to disciplinary action, up to and including termination.

The Director or Technology Coordinator temporarily or permanently may unblock access to websites or online educational apps and services containing appropriate material, if access to such sites has been blocked inappropriately by the technology protection measures. The determination of whether material is appropriate or inappropriate shall be based on the content of the material and the intended use of the material, not on the protection actions of the technology protection measures. [x] The Director or Technology Coordinator also may disable the technology protection measures to enable access for bona fide research or other lawful purposes. **[end of option]**

Staff members will participate in professional development programs in accordance with the provisions of law and this policy. Training shall include:

- A. the safety and security of students while using e-mail, chat rooms, social media, and other forms of direct electronic communications;
- B. the inherent danger of students disclosing personally identifiable information when using Artificial Intelligence (AI) and when online;
- C. the consequences of unauthorized access (e.g., "hacking," "harvesting," "digital piracy," "data mining," etc.), cyberbullying and other unlawful or inappropriate activities by students online; and

D. unauthorized disclosure, use, and dissemination of personally identifiable information regarding minors.

Furthermore, staff members shall provide instruction for their students regarding the appropriate use of technology and online safety and security and specified above, and staff members will monitor students' online activities while at school.

☒ Monitoring may include but is not necessarily limited to visual observations of online activities during class sessions or use of specific monitoring tools to review browser history and network, server, and computer logs.

[END OF OPTION]

The disclosure of personally identifiable information about students online is prohibited.

Building principals/building administrators are responsible for providing training so that users under their supervision are knowledgeable about this policy and its accompanying guidelines. The Board expects that staff members will provide guidance and instruction to students in the appropriate use of the Cooperative Technology Resources and Information Resources. All users of Cooperative Technology Resources and Information Resources are required to sign a written agreement to abide by the terms and conditions of this policy and its accompanying guidelines.

☒ Staff will be assigned a school email address that they are required to utilize for all school-related electronic communications, including those to students, parents, and other constituents, fellow staff members, and vendors or individuals seeking to do business with the Cooperative. **[END OF OPTION]**

☒ With prior approval from the Director or Technology Coordinator, staff may direct students who have been issued school-assigned email accounts to use those accounts when signing-up/registering for access to various online educational services, including mobile applications and apps and services that will be utilized by the students for educational purposes under the teacher's supervision.

[END OF OPTION]

Staff members are responsible for good behavior on Cooperative Technology Resources and Information Resources, i.e., behavior comparable to that expected when they are in classrooms, in school hallways, on other school premises and at school-sponsored events.

Communications on Education Technology are often public in nature. The Board does not approve any use of Cooperative Technology Resources and Information Resources that is not authorized by or conducted strictly in compliance with this policy and its

accompanying guidelines ☐ and Board Policy 7544 - Use of Social Media ~~() and its accompanying guidelines~~ **[END-OF-OPTION]** :

[DRAFTING NOTE: Choose the first option above if the Director recommends and the Board adopts Board Policy 7544 - Use of Social Media and the second option above if the Director has issued administrative guidelines for the policy.]

[NOTE: If the use of social media is authorized by Board Policy 7540 - Technology and Board Policy 7544 - Use of Social Media, choose the appropriate option to match that language.]

~~☐ Staff members may use Cooperative Technology Resources and Information Resources to access or use social media only if it is done for Cooperative educational or business-related purposes.~~

☒ Staff members use of Cooperative Technology Resources and Information Resources to access or use social media shall be consistent with Board Policy 7544 - Use of Social Media ~~() and its accompanying guidelines~~ **[end of option]** :

[END-OF-OPTIONS]

[DRAFTING NOTE: Choose the following option to provide further direction to staff regarding the appropriate versus inappropriate use of social media.]

☒ An employee's personal or private use of social media may have unintended consequences. While the Board respects its employees' First Amendment rights, those rights do not include permission to post inflammatory comments that could compromise the Cooperative's mission, undermine staff relationships, or cause a substantial disruption to the school environment. This warning includes staff members' online conduct that occurs off school property, including from the employee's private computer. Postings to social media should be done in a manner sensitive to the staff member's professional responsibilities.

General school rules for behavior and communication apply.

Users who disregard this policy and its accompanying guidelines may have their use privileges suspended or revoked, and disciplinary action may be imposed against them. Users are personally responsible and liable, both civilly and criminally, for uses of Technology Resources and Information Resources not authorized by this Board Policy and its accompanying guidelines. Users who violate this policy will be subject to disciplinary action, up to and including termination.

The Board designates the Director and the _____ Technology Coordinator _____ as the administrators responsible for initiating,

implementing, and enforcing this policy and its accompanying guidelines as they apply to staff members' use of Cooperative Technology Resources and Information Resources.

[Optional]

[☒] Social Media Use

In addition, Federal and State confidentiality laws forbid schools and their employees from using or disclosing students' education records without parent consent (see Board Policy 8330 - Student Records). Education records include a wide variety of information, and posting personally identifiable information about students is not permitted. Staff members who violate State and Federal confidentiality laws or privacy laws related to the disclosure of confidential student or employee information may be disciplined.

Nothing in this policy is intended to interfere with any school employee's rights under applicable law with respect to union organizing or collective bargaining.

[END OF OPTION]

[DRAFTING NOTE: The following AI/NLP Processing Tools language is optional]

[☒] Use of Artificial Intelligence (AI) /Natural Language Processing Tools

Staff are permitted to use ~~Artificial Intelligence (AI)~~ AI and Natural Language Processing (NLP) tools (collectively, "AI/NLP tools") to accomplish their job responsibilities so long as the use is ethical, responsible, and does not violate any provisions of this policy. ~~(e.g., it does not infringe on students' or staff members' privacy rights, violate their duty to maintain confidentiality related to personally identifiable information, etc.).~~

Staff are strictly prohibited from inputting Personally Identifiable Information (PII) defined in Policy 7540.09 - Artificial Intelligence ("AI"), confidential student or staff data, or any non-public school records into any AI tool or service that has not been explicitly approved and contracted by the Cooperative.

Any staff suspected of using AI to create a synthetic intimate image will be referred to law enforcement in addition to any disciplinary action imposed by administration. Synthetic intimate image means an image generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts the conduct of the identifiable person.

With respect to students, it is the Board's policy that they are required to rely on their own knowledge, skills, and resources when completing school work. In order to ensure the

integrity of the educational process and to promote fair and equal opportunities for all students, except as outlined below, students are prohibited from using AI/NLP tools to complete school work. The use of AI/NLP tools without the express permission/consent of a teacher is considered to undermine the learning and problem-solving skills that are essential to a student's academic success and that the staff is tasked to develop in each student. Consequently, students are encouraged to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI/NLP tools, and they are expected to ask their teachers when they have questions and/or need assistance. A student's unauthorized use of AI/NLP tools is considered a form of plagiarism, and any student found using such tools without permission or in a prohibited manner will be disciplined in accordance with the Student Code of Conduct.

Notwithstanding the preceding, students are allowed to use AI/NLP tools in the school setting if they receive prior permission/consent from their teacher, so long as they use the AI/NLP tools in an ethical and responsible manner. Teachers have the discretion to authorize students to use AI/NLP tools for the following uses:

- A. Research assistance: AI/NLP tools can be used to help students quickly and efficiently search for and find relevant information for their school projects and assignments.
- B. Data Analysis: AI/NLP tools can be used to help students to analyze, understand, and interpret large amounts of data, such as text documents or social media posts. This can be particularly useful for research projects or data analysis assignments, e.g., scientific experiments and marketing research.
- C. Language translation: AI/NLP tools can be used to translate texts or documents into different languages, which can be helpful for students who are learning a new language or for students who are studying texts written in a different language.
- D. Writing assistance: AI/NLP tools can provide grammar and spelling corrections, as well as suggest alternative word choices and sentence structure, to help students improve their writing skills.
- E. Accessibility: AI/NLP tools can be used to help students with disabilities access and understand written materials. For example, text-to-speech software can help students with specific learning disabilities or visual impairments to read texts, and AI-powered translation tools can help students with hearing impairments to understand spoken language.

As outlined above, under appropriate circumstances, AI/NLP tools can be used effectively as a supplement to but not a replacement for traditional learning methods. Consequently, with prior teacher permission/consent, students can use AI/NLP tools to help them better understand and analyze information and/or access course materials. Students must disclose the use and the extent of AI assistance on any submitted work as required by their

teacher. If a student has any questions about whether they are permitted to use AI/NLP tools for a specific class assignment, they should ask their teacher.

[END OF OPTIONAL LANGUAGE]

This policy shall be posted on the Cooperative's website.

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Legal

P.L. 106-554 (2000), Children's Internet Protection Act

47 U.S.C. 254(h),(1),(B), Communications Act of 1934, as amended (2003)

18 U.S.C. 1460

18 U.S.C. 2246

18 U.S.C. 2256

20 U.S.C. 6301 et seq., Part F, Elementary and Secondary Education Act of 1965, as amended (2003)

20 U.S.C. 6777, 9134 (2003)

47 C.F.R. 54.500 - 54.523

I.C. 2-7-1-9

I.C. 20-26-5-40.5

SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po7540.09

Replacement Policy - Special Update - Artificial Intelligence - June 2026 - ARTIFICIAL INTELLIGENCE

Replacement Policy - Special Update - Artificial Intelligence - June 2026

7540.09 - ARTIFICIAL INTELLIGENCE ("AI")

The Board of Managers recognizes the positive impact that artificial intelligence ("AI") technology may have in the Cooperative's educational program and operations. The Director is authorized to support the use of AI technology when its use is consistent with the Cooperative's mission, goals, and operational integrity.

Any use of AI technology in the Cooperative's educational program or operations must be in accordance with State and Federal law as well as Board policies- () including but not limited to the following: Board Policy 2266 – Nondiscrimination on the Basis of Sex in Education Programs and Activities; Board Policy 5136 – Personal Communication Devices; Board Policy 5500 – Student Conduct; Board Policy 7540.03 – Student Technology Acceptable Use and Safety; Board Policy 7540.04 – Staff Technology Acceptable Use and Safety; Board Policy 8330 – Student Records; Board Policy 8350 – Confidentiality; and Board Policy 8351 – Security Breach of Confidential Databases- [end of option] :
[DRAFTING NOTE: Confirm and select as needed]

Violation of this policy may result in disciplinary consequences. Students may be disciplined for violations, up to and including suspension or expulsion. Staff may be disciplined for violations, up to and including suspension or termination of employment. The Administration will refer any illegal acts to law enforcement.

The Board of Directors ~~Managers~~ acknowledges the positive impact and transformative potential of Artificial Intelligence (AI) in education and operations, emphasizing a balanced, people-centered approach. It supports the responsible and innovative use of AI in classrooms and professional settings, with the understanding that AI should enhance human interaction and instruction, not replace it, and all AI-driven decisions require human review. The Director is authorized to support the use of artificial intelligence technology when its use is consistent with the Cooperative's mission, goals, and operational integrity. The (x) Director (x) ___ Technology Coordinator _____ **[END-OF OPTIONS]** is responsible for overseeing and ensuring compliance of this policy.

Definitions

For purposes of this policy, the following definitions apply:

Artificial Intelligence (AI)

AI refers to systems or tools capable of performing tasks that typically require human intelligence, including but not limited to decision-making, problem-solving, and language understanding. AI is computer code that can resemble human intelligence to complete a given task (e.g., problem-solving, planning, etc.). It involves developing algorithms and systems that can perceive, reason, learn, and make decisions based on data made available to the AI tool.

Generative AI

A subset of AI that uses large language models (LLMs) and other advanced algorithms to create content, such as text, images, audio, or video, in response to user input.

Generative AI works by analyzing large datasets to learn patterns and features, which it then uses to generate new, original content. It uses complex algorithms, often based on neural networks, to make predictions based on the input data it has processed, thereby enabling it to create a wide range of output, from text and images to music and code, that mimic the system or characteristics of the data on which it was trained.

At its core, generative AI predicts the flow of language. Trained on massive amounts of text taken from publicly available Internet sources to recognize relationships that most commonly exists between individual units of meaning (including full or partial words, phrases, and sentences), LLMs can, with great frequency, generate replies to users' prompts that are contextually appropriate, linguistically facile, and factually correct.

Natural Language Processing (NLP)

A field of artificial intelligence that focuses on enabling computers to understand, interpret, and respond to human language in a meaningful way. Example of NLP include but are not limited to Grammarly, GPT-Based APIs, Google Cloud Natural Language AI, Microsoft Azure Text Analytics, IBM Watson NLP, Amazon Comprehend, etc.

Large Language Model (LLM)

A sophisticated AI system trained on extensive text data to process and produce language and recognize patterns, grammar, and nuances. It can perform tasks like text generation, question answering, and language translation.

Algorithm

A set of rules or instructions guiding AI operations and decision-making.

Personally Identifiable Data/Personal Data

Refers to any information that can directly or indirectly identify an individual, including but not limited to names, addresses, student records, and health information.

Proprietary Information/Data

Refers to the broad category of non-public, sensitive, or confidential data belong to the Cooperative, its staff, or its operations. This information is considered the Cooperative's. This information is generally protected from unauthorized disclosure or use.

Public-Domain AI

AI models where the developers may openly share the model's architecture (Open-Source) or provide free, public access to a closed-source interface (e.g., standard web-based chatbots). Because these tools are typically used without a formal Cooperative contract, they present a high risk of data exposure.

- A. **Shared Data:** Data input into these tools is frequently used to train global models, making the information publicly available or accessible to the provider.
- B. **Lack of Filtering:** These models may require the Cooperative to manually implement its own "wrapper" or filtering layers to manage safety.
- C. **Reliability Issues:** Content produced may be less reliable as it often draws from unverified, publicly scraped data sources.

Due to the high potential for violating Federal and State privacy laws (including the Family Educational Rights and Privacy Act or FERPA and the Indiana Access to Public Records Act or APRA), the use of Public-Domain AI is prohibited for any task involving student records, personally identifiable information (PII), or confidential Cooperative operations.

Enterprise-Grade AI

AI models where the developers protect the model's architecture, underlying code, and training data, typically providing access via a restricted service or "black box" interface. Unlike consumer tools, Enterprise-Grade AI is provided under a formal contract or agreement that:

- A. **Guarantees Data Privacy & Security:** Ensures all Cooperative data remains isolated within a private "tenant" or environment.

- B. **Prohibits Model Training:** Strictly ensures that Cooperative data, including student and staff information, is not used to train the provider's global models.
- C. **Provides Managed Oversight:** Includes internally managed filters and verifiable data sources, often producing more reliable and accurate results than unvetted models.

Due to the "black box" nature of these systems, the Cooperative still requires a formal audit and contract to verify that these security and privacy safeguards are technically enforced.

Locally Hosted AI

AI models deployed and operated entirely on Corporation-owned hardware, with no data transmitted to external servers. Locally hosted models may be either consumer-grade or enterprise-grade in origin. When properly configured, locally hosted AI tools represent a high standard of data privacy because student and staff data never leaves Cooperative infrastructure. The Cooperative still requires a formal audit to verify that these security and privacy safeguards are technically enforced.

AI Agent

An AI agent is an autonomous software entity that can observe its environment, make decisions, and take actions to achieve specific goals without direct human intervention for every step. Unlike standard AI chatbots, AI Agents have the capacity to execute tasks (e.g., sending emails, modifying files). Due to the heightened risks regarding network security, data confidentiality, and the potential for autonomous errors, the use of AI Agents requires a higher level of review and explicit written approval from the IT Department prior to implementation.

General Principles

A. **Transparency**

Users of AI tools must disclose when and how these tools have been employed in the creation of academic work, professional work, or used to influence and/or make decisions. (x) Spell check, grammar assistance, and similar refinement/editing tools do not need to be disclosed unless required by a student's teacher. **[END-OF-OPTION]**

B. **Ethical Use**

Cooperative employees who use AI technologies must do so in ways consistent with institutional values, privacy standards, FERPA, the Individual with Disabilities

Education Act (IDEA), copyright laws, and ethical principles, honesty, trustworthiness, and personal dignity of both employees and students.

C. **Content Responsibility**

Cooperative employees who use AI technologies are responsible for the content created by that AI tool.

D. **Use of AI in Relation to Other Policies**

Any use of artificial intelligence technology in the Cooperative's educational program or operations must be in accordance with State and Federal law as well as Board policies () including but not limited to the following: Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity; Policy 2260.01 - Section 504/ADA Prohibition Against Discrimination Based on Disability; Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs and Activities; Policy 5136 - Personal Communication Devices; Policy 5500 - Student Conduct; Policy 5517 - Anti-Harassment; Policy 5517.01 - Bullying; Policy 7540.03 - Student Technology Acceptable Use and Safety; Policy 7540.04 - Staff Technology Acceptable Use and Safety; Policy 8310 - Public Records; Policy 8330 - Student Records; Policy 8350 - Confidentiality; and Policy 8351 - Security Breach of Confidential Databases. **[DRAFTING NOTE: Confirm and Select as Needed]**

AI Tool Approval

[DRAFTING NOTE: Choose one, two, or three of the options below. The Cooperative should understand all legal risks associated with this selection.]

The Cooperative will approve the use of ~~() Public-Domain AI,~~ ~~() Enterprise-Grade,~~ **(x) Locally Hosted AI tool(s)**(end of options) once each tool has been reviewed and verified for compliance with Federal law, State statute, and Board policies.

AI Tool Evaluation

Before adopting any AI tool or system, the Cooperative will conduct a comprehensive risk assessment - evaluating data sources (including use of student PII), decision-making impacts on students, potential bias or disparate impact, and vendor compliance with privacy, security, and data retention laws - and ensure all contracts include clear legal, ethical, and technical safeguards aligned with FERPA, IDEA, COPPA, PPRA, Indiana statutes, Article 7 of the Indiana Administrative Code, 511 IAC 7-32-1 et seq., and Cooperative policies. AI systems must be reviewed to ensure they are nondiscriminatory, fully accessible, and do not compromise the rights or individualized support of students, particularly those protected under Federal and State civil rights laws.

AI Tool Selection

The Cooperative approves the use of AI tools as delineated in the policy, that have been carefully reviewed, evaluated, and approved by (☒) _____ [e.g.,

IT Technology Coordinator, Director, Curriculum Director, or an AI Committee] for student and staff use.

Transparency

The Cooperative is committed to transparency and accountability in AI use by informing teachers, students, and parents when AI influences or makes decisions, clearly explaining how it works and what data it uses, assigning oversight to Technology Coordinator _____, and conducting regular audits to evaluate accuracy, fairness, and impact on equity and student rights. The Cooperative will maintain a public AI Tool Inventory that lists every approved AI tool and includes a summary of its data-handling and privacy features. [☒] The AI Tool Inventory will be posted on the Cooperative website.

[END OF OPTION]

Vendor Vetting & Contracts

All AI tools used by the Cooperative must undergo a formal risk assessment by the IT/Legal Department to review their terms of service and data handling practices to ensure compliance with all Federal and State privacy laws. The Cooperative prohibits the input by any user of any student information, staff information, or confidential district data into any AI tool that does not have a formal, vetted contract guaranteeing data privacy and non-use for training.

[DRAFTING NOTE: It is recommended that the Cooperative maintain a list for clarity, but one is not required.]

(☒) The Cooperative maintains a centralized Approved AI Tool List. Any tool not identified on this list is considered legally unvetted and is prohibited for Cooperative use.

[END OF OPTION]

Compliance with Student Data Privacy Mandates

All contracts with third-party AI providers that involve the processing, storage, or transmission of student data must include a formal Data Protection Addendum (DPA). To ensure compliance with all Federal laws, State statutes, and Cooperative policies (including but not limited to FERPA (34 CFR Part 99), the DPA technically and legally must enforce the following:

- A. **School Official Designation:** The Vendor must contractually acknowledge that it is acting as a "School Official" with a legitimate educational interest. The Vendor

shall remain under the "direct control" of the Cooperative regarding the use and maintenance of all education records.

- B. **Data Ownership & Custody:** The Cooperative retains sole ownership and legal custody of all data provided to or generated by the AI tool. The Vendor is prohibited from claiming any proprietary interest in student-generated content or Corporation-provided PII.
- C. **Prohibition on Model Training:** The Vendor must provide a "Zero-Retention" or "Private Tenant" guarantee, ensuring that Cooperative data—including de-identified or "anonymized" inputs—is never used to train, refine, or improve the Vendor's global AI models or shared with third-party aggregators.
- D. **Security & Breach Notification:** The Vendor must employ industry-standard encryption (AES-256 or higher) and provide immediate notification within twenty-four _____ (24) ~~[INSERT NUMBER]~~ hours of any suspected unauthorized acquisition of student PII, in alignment with Policy 8351 - Security Breach of Confidential Databases. ~~[DRAFTING NOTE: Since the State legal requirement is 45 days, many cooperatives use their contracts to create a much tighter window (often 24, 48, or 72 hours) to allow enough time to investigate before the 45-day clock runs out - I.C. 24-4.9-3-3.] -~~
- E. **Right to Audit & Deletion:** The Cooperative reserves the right to audit the Vendor's data-handling logs. Upon termination of the agreement, the Vendor must provide a certificate of destruction for all Cooperative data within thirty (30) days.

Employee Use of AI

- A. **Instructional Integration:** Employees may integrate AI tools into their instruction at their discretion and should clearly define the parameters for AI usage in the classroom by students using only Corporation-approved AI applications/tools.
- B. **Transparency & Professional Responsibility:** When using AI to create instructional materials, assessments, or feedback, employees shall maintain transparency by disclosing the role of AI in these processes. Employees must review and verify the accuracy and appropriateness of any AI-generated content. While AI may be used to assist with routine support functions, employees remain responsible for the intellectual core and final verification of all professional work products (including lesson plans, evaluations, and communications) to ensure the accuracy and appropriateness of the content.
- C. **Data Privacy & Information Security:** Employees shall not input sensitive, confidential, personally identifiable, or proprietary information about students, colleagues, or institutional operations into AI systems that lack safeguards and policies to protect such data from being used in their training models. If an

employee intends to enter PII or sensitive or proprietary data into an AI tool, they first must ensure the tool is on the Corporation's Approved AI Tool Inventory. If it is not, they must seek written approval from their () Principal (x) Supervisor [END-OF-OPTIONS], who will consult with the (x) IT Department () [END-OF-OPTIONS] regarding legal and privacy safeguards.

- D. **Academic Integrity & Detection:** Using AI detection software to enforce academic integrity should be done in accordance with the knowledge that this software is not foolproof and that the disruptive nature of AI technologies in education can lead to considerable confusion regarding expectations for AI use. Employees should use AI-detection ethically and as the starting point of an inquiry into a possible violation of academic integrity rather than as a definitive indication of student dishonesty. Employees also must disclose the use of AI software in course curricula.
- E. **Workflow Enhancement:** Employees may use AI tools to enhance workflows, such as drafting communications, analyzing data, or developing reports, provided the outputs are verified for accuracy and compliance with State and Board policies. The use of AI tools for such purposes should be disclosed when disseminating AI output.
- F. **Records Management:** Any record, or portion thereof, generated or compiled by an artificial intelligence (AI) system is subject to all provisions of this policy, other applicable Board policies, (x) administrative guidelines, [END OF OPTION] and State or Federal laws. The Cooperative is fully responsible for the accuracy, security, access, and disclosure of all AI-generated content within a record, as if created solely by a Cooperative employee. (See Policy 8310 - Public Records and Policy 8330 - Student Records.)
- G. **Behavioral Prohibitions:** Staff members are prohibited from using artificial intelligence (AI) tools to bully, harass, threaten, impersonate, or create or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used in ways that violate student or employee privacy, compromise confidential information, engage in academic or professional misconduct, or otherwise disrupt the educational environment.

Student Use of AI

- A. **Instruction:** Students shall receive age appropriate instruction about responsible AI use, digital citizenship, privacy, and the risks/limitations of AI prior to using AI.
- B. **Academic Standard and Authorized Use:** Students are expected to develop their own knowledge, skills, and understanding of course material rather than relying solely on AI tools, and they should ask their teacher(s) when they have

questions and/or need assistance. Students may use AI tools for academic purposes when specifically and clearly permitted by their teacher(s). The use of AI must be disclosed properly and cited in accordance with the established guidelines and not be employed to undermine authentic learning or learning objectives for the course or assignment. If a student has any questions about whether they are permitted to use AI tools for a specific class assignment, they should ask their teacher(s).

- C. **Behavioral Prohibitions:** Students are prohibited from using AI to bully, harass, threaten, impersonate, or create or distribute deceptive or harmful content, including deepfake or synthetic media that falsely depicts another person. AI may not be used for academic dishonesty, privacy violations, or any conduct that materially disrupts the educational environment. Violations of this policy will result in disciplinary action consistent with Policy 5500 - Student Conduct and other applicable Board policies.
- D. **Academic Misconduct and Consequences:** Unauthorized use of AI tools will be considered a form of plagiarism, unauthorized collaboration, or misrepresentation of AI-generated content as original work, and any student found using these tools without permission or in a prohibited manner will be disciplined in accordance with the Student Handbook or Policy 5500 – Student Conduct. **{DRAFTING NOTE: Confirm the Board has adopted this policy if referenced}** AI-detection results shall not serve as the sole basis for a finding of academic dishonesty without additional corroborating evidence or student inquiry.
- E. **Academic Accessibility:** AI tools can be utilized to assist students with disabilities in accessing and understanding written materials. For example, text-to-speech software can help students with specific learning disabilities, visual impairments, or other disabilities in reading texts, and AI-powered translation tools can help students with hearing impairments understand spoken language (e.g., create transcripts or provide closed-captioning for spoken material). Specific use of AI technologies beyond universal application for students with disabilities is best addressed in each student's individualized education program (IEP).

Use of AI to Generate any Synthetic Intimate Representation

Any staff member or student suspected of using AI or other technological means to create a synthetic intimate representation will be referred to law enforcement in addition to any disciplinary action imposed by administration. Synthetic Intimate Representation means a representation generated using technological means that uses an identifiable person's face, likeness, or other distinguishing characteristic to depict an intimate representation of that person, regardless of whether the representation includes components that are artificial, legally generated, or generally accessible, and that is so realistic that a reasonable person would believe it depicts conduct of the identifiable person.

Employee Training

Employees will receive training. (~~→~~) ~~annually~~ (☒) periodically ~~[END-OF-OPTION]~~ to ensure adherence to this and other related policies, data privacy, student records, and allowable/approved AI tools in the Cooperative.

Non-Academic Use of AI

Students and staff are prohibited from using AI to generate false or knowingly misleading representations of other students, staff, administrators, volunteers, or Board members that are reasonably interpreted as derogatory, threatening, or otherwise objectionable to a reasonable person, including by way of AI generated or manipulated visual or verbal depictions of any such individual, or the distribution of such depictions through any means, for example via social media, regardless of whether the distributor created the depictions themselves.

Enforcement

Violation of this policy may result in disciplinary consequences. Students may be disciplined for violations, up to and including suspension or expulsion. Staff may be disciplined for violations, up to and including suspension or termination of employment. The Administrator will refer any illegal acts to law enforcement.

Questions or Concerns

Staff, parents, or members of the public who have questions or concerns regarding this policy or the use of AI in the Cooperative should contact the (☒) ~~Cooperative Administrator~~ (☒) Technology Coordinator ~~[END-OF-OPTION]~~

po2260 - NONDISCRIMINATION AND ACCESS TO EQUAL EDUCATIONAL OPPORTUNITY **po2260.01 - SECTION 504/ADA PROHIBITION AGAINST DISCRIMINATION BASED ON DISABILITY**

po2266 - NONDISCRIMINATION ON THE BASIS OF SEX IN EDUCATION PROGRAMS OR ACTIVITIES

po5136 - PERSONAL COMMUNICATION DEVICES

po5500 - STUDENT CONDUCT

po5517 - ANTI-HARASSMENT

po5517.01 - BULLYING

po7540.03 - STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY

po7540.04 - STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY

po8310 - PUBLIC RECORDS

po8330 - STUDENT RECORDS

po8350 - CONFIDENTIALITY

po8351 - SECURITY BREACH OF CONFIDENTIAL DATABASES

SPECIAL UPDATE - JUNE 2026 - ARTIFICIAL INTELLIGENCE

po7544

Revised Policy - Special Update - Artificial Intelligence - June 2026 - USE OF SOCIAL MEDIA

Revised Policy - Special Update - Artificial Intelligence - June 2026

7544 - USE OF SOCIAL MEDIA

Technology is a powerful tool to enhance education, communication, and learning.

The ~~School Board~~ Board of Directors ~~Managers~~ authorizes the use of social media to promote community involvement and facilitate effective communication with students, parents/guardians, staff () (including ~~Cooperative-approved~~ volunteers) **[END-OF OPTION]**, and the general public. Social media is defined in Bylaw 0100.

The Director is charged with designating the Cooperative-approved social media platforms/sites - ~~() , which shall be listed on the Cooperative's website.~~ **[END-OF OPTION]**

~~() In designating Cooperative-approved social media platforms/sites, the Director shall specify which platforms/sites are appropriate for use at the Cooperative-level, the building or department level, for extra-curricular extracurricular activities, and at the individual level by employees for professional purposes.~~ **[END-OF OPTION]**

It is critical that students be taught how to use social media platforms safely and responsibly. Social media (as defined in Bylaw 0100) are ~~a~~ powerful and pervasive technology that affords students and employees the opportunity to communicate for school and work ~~purposes,~~ purposes and to collaborate in the delivery of a comprehensive education. Federal law mandates that the Cooperative provide for the education of students regarding appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, and regarding cyberbullying awareness and response. See Board Policy 7540.03 – Student Technology Acceptable Use and Safety.

The Cooperative recognizes that employees may use social media for personal, as well as professional reasons. The Cooperative neither encourages nor discourages employees' use of social media for personal purposes. The Cooperative regulates employees' use of social media for purposes related to their Cooperative assignment to the same extent as it regulates any other form of employee communication in that regard.

[DRAFTING NOTE: Cooperatives should consult with their legal counsel concerning the First Amendment implications associated with using social media that permits public comment. Select Option 1 or 2.]

☒ [Option 1]

The Cooperative uses approved social media platforms/sites as interactive forms of communication.

~~[END OF OPTION 1]~~

~~[] [Option 2]~~

~~The Cooperative uses approved social media platforms/sites as interactive forms of communication and () accepts () invites () welcomes public comments [END OF OPTION] . The Cooperative approved social media platforms/sites are considered limited public forums. As such, the Cooperative will monitor posted comments to verify they are on-topic, consistent with the posted rules for use of the forum, and in compliance with the platform/site's applicable terms of service. The Board's review of posted comments will be conducted in a viewpoint neutral manner, manner and consistent with State and Federal law. Employees' personal posts on the public platforms/sites are limited/restricted to matters of general public interest that are not related to the employee's specific employment and wholly unrelated to the employee's job responsibilities (i.e., matters where it is clear the individual is posting not in an official capacity, but simply as a member of the public). Employees in administrative positions are ordinarily not permitted to post personal comments on matters of general public interest because to do so could be misconstrued as Board-sponsored speech.~~

~~[END OF OPTION 2]~~

~~[END OF OPTIONS]~~

Each Cooperative-approved social media account/site must contain a statement that specifies its purpose(s) and limits those who access the social media account/site and use of the account/site for only that/those purpose(s), and in accordance with any specified procedures and applicable terms of service. Users are personally responsible for the content of their posts.

Social Media for Instructional and School-Sponsored Activities

Staff (including ~~Cooperative-approved~~ volunteers) may, with prior approval/authorization from the ~~() Principal, () Director, (x)~~ Technology Coordinator, use social media platforms/sites for classroom instruction or school-sponsored activities. When a staff member uses a Cooperative-approved social media platform/site for an educational purpose, it will be considered an educational activity and will not be considered a limited public forum. Students' use of Cooperative-approved social media platforms/sites must be consistent with the Student Code of Conduct, Policy 5722/AG 5722 – School-Sponsored Student Publications and Productions,

Policy 7540.03/AG 7540.03 – Student Technology Acceptable Use and Safety, the instructor’s directions/procedures, and the platform/site’s applicable terms of service. Students are prohibited from posting or releasing personally identifiable information about students, employees, and volunteers through Cooperative-approved social media without appropriate consent.

[DRAFTING NOTE: Select either Option 3 or 4, or, at the Cooperative’s discretion, choose neither option.]

[] [Option 3]

Staff members ~~(-)~~ (including Cooperative-approved volunteers) **[END OF OPTION]** must provide parents of students involved in a school-sponsored activity the ability to opt-out of having their child use social media platforms/sites for communication purposes associated with that activity, ~~activity~~ and arrange for an alternative method of communicating with the participating student concerning the school-sponsored activity. ~~Staff members (-) (including volunteers) must obtain parental consent for students to participate in the use of social media platforms/sites related to a school-sponsored activity if the student(s) is sixteen (16) years old or younger.~~

[END OF OPTION 3]

[] [Option 4]

Staff members ~~(-)~~ (including Cooperative-approved volunteers) **[END OF OPTION]** must obtain parental consent for students to participate in the use of social media platforms/sites related to a school-sponsored activity. If a parent refuses to provide such consent, the staff member must arrange for an alternative method of communicating with the participating student concerning the school-sponsored activity.

[END OF OPTION 4]

[END OF OPTIONS]

Expected Standards of Conduct on Cooperative-Approved Social Media

Employees (**xx**) and ~~Cooperative-approved~~ volunteers **[END OF OPTION]** who access Cooperative-approved social media platforms are expected to conduct themselves in a respectful, courteous, and professional manner. Students, parents, and members of the general public who access Cooperative-approved social media platforms are similarly expected to conduct themselves in a respectful, courteous, and civil manner.

Cooperative-approved social media sites shall not contain content that is obscene; is vulgar and lewd such that it undermines the school’s basic educational mission; is libelous or defamatory; constitutes hate speech; promotes illegal drug use; is aimed at inciting an individual to engage in unlawful acts or to cause a substantial disruption or material interference with Cooperative operations; or interferes with the rights of others. The Cooperative may exercise editorial control over the style and content of student speech on Cooperative-approved social media, if reasonably related to legitimate pedagogical concerns. Staff or students who post prohibited content shall be subject to appropriate disciplinary action. (**x**) Volunteers who post prohibited content may be prohibited from future volunteer opportunities. **[END OF OPTION]**

The Cooperative is committed to protecting the privacy rights of students, parents/guardians, staff, volunteers, Board members, and other individuals on Cooperative-approved social media sites. Cooperative employees (☒) and volunteers **[END-OF-OPTION]** are prohibited from posting or releasing confidential information about students, employees, volunteers, or Cooperative operations through social media, without appropriate consent (i.e., express written consent from the parent of a student, the affected employee or volunteer, or the Director concerning Cooperative operations).

Cooperative communications that occur through the use of Cooperative-approved social media platforms/sites – including staff members' (☒) /volunteers' **[END OF OPTION]** use of social media with school-sponsored activities, and comments, replies, and messages received from the general public – may constitute public records or student records, and all such communications will be maintained (i.e., electronically archived) in accordance with the Board's adopted record retention schedule and all applicable State statutes. **[] - (See AG 8310A— Requests for Access to Public Records) [END-OF-OPTION] [Drafting Note: select this option only if you subscribe to Neola's administrative guidelines.]**

[DRAFTING NOTE: Cooperative's should choose the following Option only if they intend to approve individual Cooperative employees/volunteers using social media platforms, like Facebook or Twitter, that require professional pages to be linked to personal pages as Cooperative-approved social media platforms. Cooperatives are advised to discuss this Option with their local legal counsel before selecting it. Selection of this Option is not covered by Neola's warranty.]

(☒) Staff members (☒) and **Cooperative-approved** volunteers **[END-OF-OPTION]** cannot rely on social networking platforms (e.g., Facebook, Twitter, etc.) to sufficiently fulfill potential records retention requirements because these platforms, in general, do not guarantee retention and are unlikely to assist in the production of third-party comments and communications that have been edited, deleted, or are otherwise no longer available. Consequently, Cooperative employees (☒) and volunteers **[END-OF-OPTION]** who use such social media accounts for professional communications must operate them in accordance with the general archiving practices and technology instituted by the Cooperative so records remain within the Cooperative's control and are appropriately retained.

[END-OF-OPTION]

If a staff member uses Cooperative-approved social media platforms/sites in the classroom for educational purposes (i.e., classroom instruction), the staff member must consult with the Principal concerning whether such use may result in the creation of public and/or education records that must be maintained (i.e., electronically archived) for a specific period of time.

[DRAFTING NOTE: Select Option 5, 6, 7, 8, or 9]

Employee's Use of Cooperative Technology Resources to Access Social Media for Personal Use

☐ [OPTION 5]

~~Employees () and Cooperative-approved volunteers [END OF OPTION] are prohibited from using Cooperative technology resources (as defined in Bylaw 0100) to access social media for personal use.~~

☐ [OPTION 6]

~~Employees () and Cooperative-approved volunteers [END OF OPTION] are prohibited from using Cooperative technology resources (as defined in Bylaw 0100) to access social media for personal use during work hours.~~

They are reminded that the Cooperative may monitor their use of Cooperative technology resources.

☒ [OPTION 7]

Employees (☒) and ~~Cooperative-approved~~ volunteers ~~[END OF OPTION]~~ are permitted to use Cooperative technology resources (as defined in Bylaw 0100) to access social media for personal use during breaks, mealtimes, and before and after scheduled work hours.

They are reminded that the Cooperative may monitor their use of Cooperative technology resources.

☐ [OPTION 8]

~~Employees () and Cooperative-approved volunteers [END OF OPTION] are permitted to use Cooperative technology resources (as defined in Bylaw 0100) to access social media for personal use during work hours, provided it does not interfere with the employee's () /volunteer's [END OF OPTION] job performance.~~

They are reminded that the Cooperative may monitor their use of Cooperative technology resources.

☐ [OPTION 9]

~~Employees () and Cooperative-approved volunteers [END OF OPTION] are permitted to use Cooperative technology resources (as defined in Bylaw 0100) to access social media for personal use, provided the employee's () /volunteer's [END OF OPTION] use during work hours does not interfere with his/her their job performance.~~

~~They are reminded that the Cooperative may monitor their use of Cooperative technology resources.~~

~~[END OF OPTIONS 5-9]~~

[DRAFTING NOTE: Select Option 10, 11, or 12]

Employees' Use of Personal Communication Devices at Work To Access Social Media for Personal Use

[] [OPTION 10]

~~Employees are prohibited from using personal communication devices to access social media for personal use during work hours.~~

[] [OPTION 11]

Employees are permitted to use personal communication devices to access social media for personal use during breaks and mealtimes.

[] [OPTION 12]

~~Employees are permitted to use personal communication devices to access social media for personal work during work hours, provided it does not interfere with the employee's job performance.~~

[END OF OPTIONS 10-12]

Employees (☒) and ~~Cooperative-approved~~ volunteers - **[END OF OPTION]** - are prohibited from posting or engaging in communication that violates State or Federal law, Board policies, or administrative guidelines. If an employee/volunteer's communication interferes with ~~his/her~~ their ability to effectively perform ~~his/her job ,~~ their job/responsibilities or violates State or Federal law, Board policies, or administrative guidelines, the Cooperative may impose disciplinary action and/or refer the matter to appropriate law enforcement authorities.

This policy and its corresponding administrative guideline will be reviewed and updated (☒) as necessary ~~(-) on an annual basis.~~ **[END OF OPTION]**

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Legal

Protecting Children in the 21st Century Act, Pub. L. No. 110-385, Title II, Stat. 4096 (2008)
Children's Internet Protection Act (CIPA), Pub. L. No. 106-554 (2001)