FISHER COMMUNITY UNIT SCHOOL DISTRICT #1

BOARD OF EDUCATION POLICY MANUAL

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# Operational Services

## Fiscal and Business Management

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

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

Budget Planning

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

Preliminary Adoption Procedures

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

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

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

At the public hearing, the proposed budget shall be reviewed and the public shall be invited to comment, question, or advise the Board.

Final Adoption Procedures

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

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

The Superintendent or designee shall perform each of the following:

1. Post the District’s final annual budget, itemized by receipts and expenditures, on the District’s Internet website; notify parents/guardians that the budget is posted and provide the website’s address.
2. File a certified copy of the budget resolution and an estimate of revenues by source anticipated to be received in the following fiscal year, certified by the District’s Chief Fiscal Officer, with the County Clerk within 30 days of the budget’s adoption.
3. Make all preparations necessary in order for the Board to timely file its Certificate of Tax Levy, including preparations to comply with the Truth in Taxation Act, and file a Certificate of Tax Levy with the County Clerk on or before the last Tuesday in December. The Certificate lists the amount of property tax money to be provided for the various funds in the budget.
4. Submit the annual budget, a deficit reduction plan if one is required by State Board of education guidelines, and other financial information to the State Board of Education according to its requirements.

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

Budget Amendments

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

Implementation

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

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

LEGAL REF.: 35 ILCS 200/18-55 et seq.

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

23 Ill.Admin.Code Part 100.

CROSS REF.: 4:40 (Incurring Debt), 6:235 (Access to Electronic Networks)

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

ADOPTED: June 17, 2002

AMENDED: December 18, 2006

AMENDED: March 16, 2011

AMENDED: February 20, 2017

AMENDED: December 18, 2017

4:10

# Operational Services

## Identity Protection

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

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

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

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

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

LEGAL REF.: 5 ILCS 179/, Identity Protection Act.

50 ILCS 205/3, Local Records Act.

105 ILCS 10/, Illinois School Student Records Act.

CROSS REF: 2:250 (Access to District Public Records), 5:150 (Personnel Records), 7:340 (Student Records)

ADOPTED: April 18, 2011

AMENDED: July 15, 2013

AMENDED: May 15, 2017

AMENDED: December 18, 2017

# General Personnel

## Administrative Procedure - Protecting the Privacy of Social Security Numbers

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

| **Actor** | **Action** |
| --- | --- |
| Superintendent and business manager, and their designees | Identify the approved purposes for collecting SSNs, including:   1. Employment matters, e.g., income reporting to IRS and the IL Dept. of Revenue, tax withholding, FICA, and Medicare. 2. Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, and veterans’ programs. 3. Filing insurance claims. 4. Internal verification or administrative purposes. 5. Other uses authorized and/or required by State law including, without limitation, in the following circumstances (5 ILCS 179/10(c)): 6. Disclosing SSNs to another governmental entity if the disclosure is necessary for the entity to perform its duties and responsibilities; 7. Disclosing SSNs pursuant to a court order, warrant, or subpoena; and 8. Collecting or using SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, or to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act.   Identify a method for documenting the need and purpose for the SSN before its collection. 5 ILCS 179/10(b)(l).  Inform all employees of the District’s efforts to protect the privacy of SSNs. See Exhibit 4:15-E1, *Letter to Employees Regarding Protecting the Privacy of Social Security Numbers*.  While State law does not specifically require this step, the law contains mandates applicable to all employees that they need to know. Moreover, this letter provides an opportunity to increase awareness of the confidential nature of SSNs.  Maintain a written list of each staff position that allows or requires access to SSNs.  The existence of a written list, even though not required, is important for recordkeeping and accountability purposes.  Require that employees who have access to SSNs in the course of performing their duties be trained to protect the confidentiality of SSNs. 5 ILCS 179/35(a)(2).  Direct that only employees who are required to use or handle information or documents that contain SSNs have access to such information or documents. 5 ILCS 179/35(a)(3).  Require that SSNs requested from an individual be provided in a manner that makes the SSN easily redacted if the record is otherwise required to be released as part of a public records request. 5 ILCS 179/35(a)(4).  Require that, when collecting SSNs or upon request a *statement of the purpose(s)* for which the District is collecting and using the SSN be provided. 5 ILCS 179/35(a)(5). See Exhibit 4:15-E2, *Statement of Purpose for Collecting Social Security Numbers*.  Require that, when employees who are required to use or handle information or documents that contain SSNs learn of a breach, they:   1. Notify District administrators immediately, and 2. Ensure that notifications to the proper individuals occur, including the notifications listed within the Illinois Attorney General’s guidance document on pages 7-11 at:   www.illinoisattorneygeneral.gov/consumers/Security\_Breach\_Notification\_Guidance.pdf.  Enforce the requirements in Board policy 4:15, *Identity Protection*, and this procedure. |
| Records Custodian and Head of Information Technology (IT) | Develop guidelines for handling social security numbers in electronic systems. These guidelines should address:   1. The display of SSNs on computer terminals, screens, and reports; 2. The security protocol for storing SSNs on a device or system protected by a password or other security system and for accessing SSNs that are included in part of an electronic database; 3. The security protocol for deleting SSNs that are stored in electronic documents or databases; and 4. Alternate mechanisms for integrating data other than the use of SSNs. |
| Staff Development Head | Design and execute a training program on protecting the confidentiality of SSNs for employees who have access to SSNs in the course of performing their duties.  The training should include instructions on the proper handling of information that contains SSNs from the time of collection through the destruction of the information. 5 ILCS 179/35(a)(2). |
| Assistant Superintendents, Directors, Building Principals, and/or Department Heads | Require each staff member whose position allows or requires access to SSNs to attend training on protecting the confidentiality of SSNs.  Instruct staff members whose positions allows or require access to SSNs to:   1. Treat SSNs as confidential information. 2. Never publically post or display SSNs or require any individual to verbally disclose his or her SSN. 3. Dispose of documents containing SSNs in a secure fashion, such as, by shredding paper documents and by deleting electronic documents as instructed by the IT Department. 4. Use SSNs as needed during the execution of their job duties and in accordance with the training and instructions that they received.   Instruct staff members whose positions do not require access to SSNs to notify a supervisor and/or the IT Department whenever SSNs are found in a document or other material, whether in paper or electronic form. |
| Freedom of Information Officer | Redact every SSN before allowing public inspection or copying of records responsive to a FOIA request. 5 ILCS 179/15. |
| Employees | Do not collect, use, or disclose another individual’s SSN unless directed to do so by an administrator.  **If the employee is in a position that requires access to SSNs:** Treat SSNs as confidential information and follow the instructions learned during training.  **If the employee is not in a position that requires access to SSNs:** Notify his or her supervisor and/or the IT Department whenever the employee comes across a document or other material, whether in paper or electronic form, that contains SSNs. |

ADOPTED: April 18, 2011

AMENDED: December 14, 2016

AMENDED: May 15, 2017

# Operational Services

## Exhibit - Letter to Employees Regarding Protecting the Privacy of Social Security Numbers

*On District Letterhead*

Date

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

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

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

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

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

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

Sincerely,

Superintendent

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

**Section 10. Prohibited Activities.**

1. Beginning July 1, 2010, no person or State or local government agency may do any of the following:
2. Publicly post or publicly display in any manner an individual's social security number.
3. Print an individual's social security number on any card required for the individual to access products or services provided by the person or entity.
4. Require an individual to transmit his or her social security number over the Internet, unless the connection is secure or the social security number is encrypted.
5. Print an individual's social security number on any materials that are mailed to the individual, through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the social security number to be on the document to be mailed. Notwithstanding any provision in this Section to the contrary, social security numbers may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the Unemployment Insurance Act, any material mailed in connection with any tax administered by the Department of Revenue, and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the social security number. A social security number that may permissibly be mailed under this Section may not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope or be visible on an envelope without the envelope having been opened.
6. Except as otherwise provided in this Act, beginning July 1, 2010, no person or State or local government agency may do any of the following:
7. Collect, use, or disclose a social security number from an individual, unless (i) required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the social security number is otherwise necessary for the performance of that agency's duties and responsibilities; (ii) the need and purpose for the social security number is documented before collection of the social security number; and (iii) the social security number collected is relevant to the documented need and purpose.
8. Require an individual to use his or her social security number to access an Internet website.
9. Use the social security number for any purpose other than the purpose for which it was collected.
10. The prohibitions in subsection (b) do not apply in the following circumstances:
11. The disclosure of social security numbers to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the governmental entity must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under this Act on a governmental entity to protect an individual's social security number will be achieved.
12. The disclosure of social security numbers pursuant to a court order, warrant, or subpoena.
13. The collection, use, or disclosure of social security numbers in order to ensure the safety of: State and local government employees; persons committed to correctional facilities, local jails, and other law-enforcement facilities or retention centers; wards of the State; and all persons working in or visiting a State or local government agency facility.
14. The collection, use, or disclosure of social security numbers for internal verification or administrative purposes.
15. The disclosure of social security numbers by a State agency to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.
16. The collection or use of social security numbers to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the federal Gramm Leach Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.
17. If any State or local government agency has adopted standards for the collection, use, or disclosure of social security numbers that are stricter than the standards under this Act with respect to the protection of those social security numbers, then, in the event of any conflict with the provisions of this Act, the stricter standards adopted by the State or local government agency shall control.

**Section 15. Public inspection and copying of documents.**

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

**Section 20. Applicability.**

1. This Act does not apply to the collection, use, or disclosure of a social security number as required by State or federal law, rule, or regulation.
2. This Act does not apply to documents that are recorded with a county recorder or required to be open to the public under any State or federal law, rule, or regulation, applicable case law, Supreme Court Rule, or the Constitution of the State of Illinois. Notwithstanding this Section, county recorders must comply with Section 35 of this Act.

**Section 25. Compliance with federal law.**

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

**Section 30. Embedded social security numbers.**

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

**Section 45. Violation.**

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

ADOPTED: April 18, 2011

# Operational Services

## Exhibit - Statement of Purpose for Collecting Social Security Numbers

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

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

Employment matters, e.g., income reporting to IRS and the IL Department of Revenue, tax withholding, FICA, or Medicare.

Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, or veterans’ programs.

Filing insurance claims.

Internal verification or administrative purposes.

Other:

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

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

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

ADOPTED: April 18, 2011

AMENDED: December 14, 2016

# Operational Services

## Exhibit - Statement for Employee Manual or District Website Describing the District’s Purpose for Collecting Social Security Numbers

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

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

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

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

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

ADOPTED: Apirl 18, 2011

AMENDED: December 14, 2016

# Operational Services

## Fund Balances

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

The School District seeks to maintain year-end fund balances no less than the range of 15-20 percent of the annual expenditures in each fund.

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

ADOPTED: November 18, 2013

AMENDED: July 16, 2018

# Operational Services

## Revenue and Investments

Revenue

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

Investments

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

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

Investment Objectives

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

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

Authorized Investments

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

1. Bonds, notes, certificates of indebtedness, treasury bills, or other securities now or hereafter issued, that are guaranteed by the full faith and credit of the United States of America as to principal and interest.
2. Bonds, notes, debentures, or other similar obligations of the United States of America, its agencies, and its instrumentalities.

The term “agencies of the United States of America” includes: (i) the federal land banks, federal intermediate credit banks, banks for cooperative, federal farm credit banks, or any other entity authorized to issue debt obligations under the Farm Credit Act of 1971 and Acts amendatory thereto, (ii) the federal home loan banks and the federal home loan mortgage corporation, and (iii) any other agency created by Act of Congress.

1. Interest-bearing savings accounts, interest-bearing certificates of deposit or interest-bearing time deposits or any other investments constituting direct obligations of any bank as defined by the Illinois Banking Act.
2. Short term obligations of corporations organized in the United States with assets exceeding $500,000,000 if: (i) such obligations are rated at the time of purchase at one of the 3 highest classifications established by at least 2 standard rating services and that mature not later than 270 days from the date of purchase, (ii) such purchases do not exceed 10% of the corporation’s outstanding obligations, and (iii) no more than one-third of the District’s funds may be invested in short term obligations of corporations.
3. Money market mutual funds registered under the Investment Company Act of 1940, provided that the portfolio of any such money market mutual fund is limited to obligations described in paragraph (1) or (2) and to agreements to repurchase such obligations.
4. Interest-bearing bonds of any county, township, city, village, incorporated town, municipal corporation, school district, the State of Illinois, any other state, or any political subdivision or agency of the State of Illinois or any other state, whether the interest earned is taxable or tax-exempt under federal law. The bonds shall be (a) registered in the name of the municipality, county, or other governmental unit, or held under a custodial agreement at a bank, and (b) rated at the time of purchase within the 4 highest general classifications established by a rating service of nationally recognized expertise in rating bonds of states and their political subdivisions.
5. Short term discount obligations of the Federal National Mortgage Association or in shares or other forms of securities legally issuable by savings banks or savings and loan associations incorporated under the laws of this State or any other state or under the laws of the United States. Investments may be made only in those savings banks or savings and loan associations, the shares, or investment certificates that are insured by the Federal Deposit Insurance Corporation. Any such securities may be purchased at the offering or market price thereof at the time of such purchase. All such securities so purchased shall mature or be redeemable on a date or dates prior to the time when, in the judgment of the Chief Investment Officer, the public funds so invested will be required for expenditure by the District or its governing authority.
6. Dividend-bearing share accounts, share certificate accounts, or class of share accounts of a credit union chartered under the laws of this State or the laws of the United States; provided, however, the principle office of any such credit union must be located within the State of Illinois. Investments may be made only in those credit unions the accounts of which are insured by applicable law.
7. A Public Treasurers’ Investment Pool created under Section 17 of the State Treasurer Act. The District may also invest any public funds in a fund managed, operated, and administered by a bank, subsidiary of a bank, or subsidiary of a bank holding company or use the services of such an entity to hold and invest or advise regarding the investment of any public funds.
8. The Illinois School District Liquid Asset Fund Plus.
9. Repurchase agreements of government securities having the meaning set out in the Government Securities Act of 1986, as now or hereafter amended or succeeded, subject to the provisions of said Act and the regulations issued there under. The government securities, unless registered or inscribed in the name of the District, shall be purchased through banks or trust companies authorized to do business in the State of Illinois.

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

1. The securities, unless registered or inscribed in the name of the District, are purchased through banks or trust companies authorized to do business in the State of Illinois.
2. The Chief Investment Officer, after ascertaining which firm will give the most favorable rate of interest, directs the custodial bank to “purchase” specified securities from a designated institution. The “custodial bank” is the bank or trust company, or agency of government, that acts for the District in connection with repurchase agreements involving the investment of funds by the District. The State Treasurer may act as custodial bank for public agencies executing repurchase agreements.
3. A custodial bank must be a member bank of the Federal Reserve System or maintain accounts with member banks. All transfers of book-entry securities must be accomplished on a Reserve Bank’s computer records through a member bank of the Federal Reserve System. These securities must be credited to the District on the records of the custodial bank and the transaction must be confirmed in writing to the District by the custodial bank.
4. Trading partners shall be limited to banks or trust companies authorized to do business in the State of Illinois or to registered primary reporting dealers.
5. The security interest must be perfected.
6. The District enters into a written master repurchase agreement that outlines the basic responsibilities and liabilities of both buyer and seller.
7. Agreements shall be for periods of 330 days or less.
8. The Chief Investment Officer informs the custodial bank in writing of the maturity details of the repurchase agreement.
9. The custodial bank must take delivery of and maintain the securities in its custody for the account of the District and confirm the transaction in writing to the District. The custodial undertaking shall provide that the custodian takes possession of the securities exclusively for the District; that the securities are free of any claims against the trading partner; and that any claims by the custodian are subordinate to the District’s claims to rights to those securities.
10. The obligations purchased by the District may only be sold or presented for redemption or payment by the fiscal agent bank or trust company holding the obligations upon the written instruction of the Chief Investment Officer.
11. The custodial bank shall be liable to the District for any monetary loss suffered by the District due to the failure of the custodial bank to take and maintain possession of such securities.
12. Any investment as authorized by the Public Funds Investment Act, and Acts amendatory thereto. Paragraph 11 supersedes paragraphs 1-10 and controls in the event of conflict.

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

Selection of Depositories, Investment Managers, Dealers, and Brokers

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

In order to be an authorized depository, each institution must submit copies of the last 2 sworn statements of resources and liabilities or reports of examination that the institution is required to furnish to the appropriate State or federal agency. Each institution designated as a depository shall, while acting as such depository, furnish the District with a copy of all statements of resources and liabilities or all reports of examination that it is required to furnish to the appropriate State or federal agency.

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

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

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

Collateral Requirements

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

Safekeeping and Custody Arrangements

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

Controls and Report

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

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

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

Ethics and Conflicts of Interest

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

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

LEGAL REF.: 30 ILCS 235/.

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

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

ADOPTED: June 17, 2002

AMENDED: May 17, 2010

AMENDED: April 21, 2014

4:30

# Operational Services

## Incurring Debt

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

Bonds Issue Obligations

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

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

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

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

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

17 C.F.R. §240.15c2-12.

Bond Authorization Act, 30 ILCS 305/2.

Bond Issue Notification Act, 30 ILCS 352/1.

Local Government Debt Reform Act, 30 ILCS 350/.

Tax Anticipation Note Act, 50 OLCS 420/.

105 ILCS 5/17-16, 5/17-17, 5/18-18, 5/19-1 et seq.

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

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

ADOPTED: June 17, 2002

AMENDED: December 18, 2006

AMENDED: May 17, 2010

AMENDED: April 16, 2018

4:40

# Operational Services

**Administrative Procedure – Preparing and Updating Disclosures**

Pursuant to the District’s responsibilities under the securities laws, including its continuing disclosure undertakings *(Undertakings*) under Rule 15c-12 of the Securities Exchange Act of 1934, as amended, and the Securities and Exchange Commission’s Statements in enforcement actions, it is necessary and in the District’s best interest that the District comply in all material respects with federal securities laws regarding its (i) preliminary and final official statements or offering circulars and any supplements or amendments thereto (collectively, the *Official Statements*), disseminated by the District in connection with any bonds, notes, certificates or other obligations, (ii) Annual Financial Information, as required by and defined in the Undertakings (the *Annual Financial Information*)

To be filed with the Municipal Securities Rulemaking Board’s (*MSRB*) Electronic Municipal Market Access (*EMMA*) system, and (iii) notices of Material Events or Reportable Events, each as defined in the Undertakings, and any other required or voluntary disclosures to EMMA (each, an *EMMA Notice*). These procedures are designed to enable the District to create accurate disclosures with respect to its (i) Official Statements, (ii) Annual Financial Information, and (iii) EMMA Notices, which are collectively referred to herein as *Disclosures*.

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

1. *Disclosure Officer*. Consistent with Board Policy 4:40, *Incurring Debt*, the Superintendent (*Disclosure Officer*) is hereby designated as the officer responsible for the procedures related to Disclosers as hereinafter set forth (collectively, *Disclosure Procedures*).
2. Disclosure Procedures: Official Statements. Whenever an Official Statement will be disseminated in connection with the issuance of obligations by the District, the Disclosure Officer will oversee the process of preparing the Official Statement pursuant to the following procedures:

1. The District shall select (a) the working group for the transaction, which group may include outside professionals such as disclosure counsel, a municipal advisor, and an underwriter (the Working Group), and (b) the member of the Working Group responsible for preparing the first draft of the Official Statement.

2. The Disclosure Officer shall review and make comments on the first draft of the Official Statement. Such a review shall be done to determine that the Official Statement does not include any untrue statement of a material fact or omit a material fact necessary to make the statements made in the Official Statement not misleading. Particular attention shall be paid to the accuracy of all descriptions, significant information, and financial data regarding the District. Examples include confirming that information relating to the District, including but not limited to demographic changes, the addition or loss of major employers, the addition or loss of major taxpayers or any other material information within the knowledge of the Disclosure Officer, is included and properly disclosed. The Disclosure Officer shall also be responsible for ensuring that the financial data presented with regard to the District is accurate and corresponds with the financial information in the District’s possession, including but not limited to information regarding bonded indebtedness, notes, certificates, outstanding leases, tax rates or any other financial information of the District presented in the Official Statement.

3. After completion of the review set forth in 2, above, the Disclosure Officer shall (a) discuss the first draft of the Official Statement with the members of the Working Group and such staff and officials of the District as the Disclosure Officer deems necessary and appropriate, and (b) provide comments, as appropriate, to the members of the Working Group. The Disclosure Officer shall also consider comments from members of the Working Group and whether any additional changes to the Official Statement are necessary or desirable to make the document complaint with the requirements set forth in 2, above.

4. The Disclosure Officer shall continue to review subsequent drafts of the Official Statement in the manner set forth in 2 and 3, above.

5. If, in the Disclosure Officer’s reasonable judgment, the Official Statement does not include any untrue statement of a material fact or omit a material fact necessary to make the statements made in the Official Statement not misleading, the Official Statement may, in the reasonable discretion of the Disclosure Officer, be released for dissemination to the public; *provided, however*, that the use of the Official Statement must be ratified, approved, and authorized by the Board.

1. *Disclosure Procedures: Annual Financial Information*. The Disclosure Officer will oversee the process of preparing the Annual Financial Information pursuant to these procedures:
2. By December 20th of each year (the same being at least 30 days prior to the last date on which the Annual Financial Information is required to be disseminated pursuant to the related Undertaking) the Disclosure Officer shall begin to prepare (or hire an agent to prepare) the Annual Financial Information. The Disclosure Officer shall also review the audited or unaudited financial statements, as applicable, to be filed as part of the Annual Financial Information (*Financial Statements*). In addition to the required updating of the Annual Financial Information, the Disclosure Officer should consider whether additional information needs to be added to the Annual Financial Information to make the Annual Financial Information, including the Financial Statements, taken as a whole, correct and complete in all material respects. For example, if disclosure of events that occurred subsequent to the date of the Financial Statements would be necessary to clarify, enhance or correct information presented in the Financial Statements, in order to make the Annual Financial information taken as a whole, correct and complete in all material respects, disclosure of such subsequent events should be made.
3. If, in the Disclosure Officer’s reasonable judgment, the Annual Financial Information, including the Financial Statements, is correct and complete in all material respects, the Disclosure Officer shall file the Annual Financial Information with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.
4. *Disclosure Procedures: EMMA Notices*. Whenever the District determines to file an EMMA Notice, or whenever the District decides to make a voluntary filing to EMMA, the Disclosure Officer will oversee the process of preparing the EMMA Notice pursuant to these procedures:
5. The Disclosure Officer shall prepare (or hire an agent to prepare) the EMMA Notice. The EMMA Notice shall be prepared in the form required by the MSRB.
6. In the case of a disclosure required by an Undertaking, the Disclosure Officer shall determine whether any changes to the EMMA Notice are necessary to make the document compliant with the Undertaking.
7. If, in the Disclosure Officer’s reasonable judgment, the Emma Notice is correct and complete and, in the case of a disclosure required by an Undertaking, complies with the Undertaking, the Disclosure Officer shall file the EMMA Notice with EMMA (or confirm that such filing is completed by any agent hired by the District for such purpose) within the timeframe allowed for such filing.
8. *Additional Responsibilities of the Disclosure Officer*. The Disclosure Officer, in addition to the specific responsibilities outlined above, shall have general oversight of the entire disclosure process, which shall include:
9. Maintaining appropriate records of compliance with these Disclosure Procedures (including proofs of EMMA filings) and decisions made with respect to issues that have been raised;
10. Evaluating the effectiveness of the procedures contained in these Disclosure Procedures; and
11. Informing the Board when substantive revisions or modifications are made to this Disclosure Procedures.
12. *General Principles.*
13. All participants in the disclosure process should be encouraged to raise potential disclosure items at all times in the process.
14. The process of revising and updating the Disclosures should not be viewed as a mechanical insertion of current numbers. While it is not anticipated that there will be major changes in the form and content of the Disclosures at the time of each update, the Disclosure Officer should consider whether such changes are necessary or desirable to make sure the Disclosure does not make any untrue statement of a material fact or omit a material fact necessary or desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading at the time of each update.
15. Whenever the District releases information, whether in written or spoken form, that may reasonable be expected to reach investors, it is said to be “speaking to the market.” When speaking to the market, District officials must be sure that the released information does not make any untrue statement of a material fact or omit a material fact necessary o desirable, in order to make the statements made, in light of the circumstances in which they were made, not misleading.
16. While care should be taken not to shortcut or eliminate any steps outlined in these Disclosure procedures on an ad hoc basis, the review and maintenance of the Disclosures is a fluid process and recommendations for improvement of these Disclosure Procedures should be solicited and regularly considered.
17. The Disclosure Officer is authorized to request and pay for attendance at relevant conferences or presentations or annual training sessions conducted by outside counsel, consultants or experts in order to ensure a sufficient level of knowledge for the effective administration of these Disclosures Procedures.

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

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

17 C.F.R. §240.15c2-12.

ADOPTED: April 16, 2018

# Operational Services

## Insufficient Fund Checks and Debt Recovery

Insufficient Fund Checks

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

Delinquent Debt Recovery

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

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

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

1. Providing a District-wide, uniform, method of notice and due process to the individual or entity against whom a claim for delinquent debt payment (*claim*) is made. Written notice and an opportunity to be heard must be given to the individual or entity responsible for paying a delinquent debt before the claim is certified to the IOC for offset. The notice must state the claim’s amount, the reason for the amount due, the claim’s date or time period, and a description of the process to challenge the claim. An individual or entity challenging a claim shall be provided an informal proceeding to refute the claim’s existence, amount, or current collectability; the decision following this proceeding shall be reviewable. If a waiver of student fees is requested as a challenge to paying the claim, and the waiver of student fees is denied, an appeal of the denial of a fee waiver request shall be handled according to 4:140, *Waiver of Student Fees*. If no waiver of student fees is requested, reviews regarding payment of the claim shall be handled according to this policy before certification to the IOC for offset.
2. Certifying to the IOC that the debt is past due and legally enforceable, and notifying the IOC of any change in the status of an offset claim for delinquent debt.
3. Responding to requests for information from the IOC to facilitate the prompt resolution of any administrative review requests received by the IOC.

LEGAL REF.: 15 ILCS 405/10.05 and 10.05d.

810 ILCS 5/3-806.

ADOPTED: June 17, 2002

AMENDED: January 22, 2013

AMENDED: January 20, 2015

AMENDED: August 17, 20154:45

# Operational Services

## Administrative Procedure - Insufficient Fund Checks

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

1. The Superintendent or designee will contact the individual by telephone as soon as the check is returned to the District. The individual will be asked to pay the returned check and the $25.00 returned check fee.
2. If the amount due is not paid after initial contact, the Superintendent or designee will send a letter by certified mail, return receipt requested, demanding payment within 30 days of mailing the letter, and shall include notice of liability for the costs and expenses. A written demand is necessary to become eligible for any costs and expenses in excess of the $25.00 collection fee (810 ILCS 5/3-806).
3. If the amount due is not paid within 30 days of mailing the demand letter, the Superintendent or designee will contact the Board Attorney for further collection action.

ADOPTED: September 24, 2012

AMENDED: November 17, 2014

# Operational Services

## Administrative Procedure - Local Debt Recovery Program Implementation Procedures

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

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

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

|  |  |
| --- | --- |
| **Actor** | **Action** |
| Superintendent | Establishes a District-wide Delinquent Debt Recovery Committee to operate as a Superintendent committee. Considers including the following individuals on the Committee:   1. District’s School Business Official(s) and District Bookkeeper, 2. Building Principals (Building Principals are mandatory for the successful implementation of notice and due process), and 3. Building-level staff members responsible for managing bills, collection and recording of payments, and fee waiver processing.   Consults the Board Attorney about implementing a District-wide process for delinquent debt recovery with the goal of entering into an IGA with, and once entered into, certifying unsatisfied debts to the IOC for offset. Issues to address include, but are not limited to:   1. Aligning the delinquent debt recovery process to the District’s policy 4:140, *Waiver of Student Fees*. **Note**: The relevant staff must check the adopted board policy to ensure that this procedure and the student fee waiver policy, procedures and applications for fees are aligned. See f/n 1 of 4:140-AP, *Fines, Fees, and Charges - Waiver of Student Fees*. 2. Uniform training for Building Principals about the District’s procedures for the recovery of delinquent debt.   Ensures uniform District-wide training with the Board Attorney for the Delinquent Debt Recovery Committee about the requirements of the IOC’s debt recovery program.  Informs Building Principals when delinquent debt should be referred to the District’s Business Office for recovery through the IOC. This includes training about types of debt: student, parent, vendor, etc., along with training about how to determine whether a particular delinquent debt should be pursued and ultimately recovered through the IOC. **Note**: These determinations may trigger the Constitution’s Equal Protection Clause. As a general rule, school officials can avoid constitutional problems and still recover delinquent debt by using uniform rules that do not discriminate against a specific group.  Documents training for Building Principals about implementing District-wide delinquent debt recovery procedures. |
| School Business Official or designee | Manages the process to seek offset from the IOC pursuant to the IGA and District-wide delinquent debt recovery processes. |
| Building Principal | Requests permission from the Superintendent to consult the Board Attorney about implementing building-specific procedures that align with both (a) the District’s IGA with the IOC, and (b) policy 4:140, *Waiver of Student Fees*.  Informs individuals or entities owing money to the District that their payments are overdue and need to be paid.  Follows the District’s procedures and training for the recovery of delinquent debt.  Ensures uniform training about the District’s procedures for the collection of debt for building-level staff members who manage bills, collection and recording of payments, and fee waiver processes.  Documents training(s) about implementing District-wide delinquent debt recovery procedures for building-level staff who manage collection of debt owed to the District.  Upon determining further recovery action is necessary, refers delinquent debt to the District’s Business Office. |

# ADOPTED: January 20, 2015

# Operational Services

## Exhibit - Cover Page Documenting the Process to Seek Offset from the Illinois Office of the Comptroller (IOC)

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

**Confidential Inter-Office Information**

Definitions

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

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

*Claim* means the demand for payment of a delinquent debt.

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

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

*IOC* means Illinois Office of the Comptroller.

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

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

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|  |  |  |
| Debtor |  | Contact information |

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

| **Step** | **Date** | **Initials** |
| --- | --- | --- |
| Building Principal sent written documentation referring a claim for further recovery proceedings. This documentation is placed in the claim folder. |  |  |
| Superintendent or designee has inspected the Building Principal’s written documentation above and agrees that the claim should be referred for recovery through the IOC. **Note**: Consult the Board Attorney. Treating claims differently, i.e., referring some and not others, may trigger the Constitution’s Equal Protection Clause. |  |  |
| District sent the Notice of Claim; certified mail, return receipt requested. **Note**: While certified mail is not required, it is a best practice. |  |  |
| Receipt of certificated receipt showing delivery of the Notice of Claim on . |  |  |
| Receipt of the Debtor’s challenge to the claim. *If no challenge is received by the deadline in the Notice of Claim, send the claim folder to the Superintendent’s office for review and continued processing.* |  |  |
| Receipt of Debtor’s written explanation and/or any documentation. |  |  |
| Arrangements made for informal proceeding with Debtor; scheduled for .  Telephone or  In-person |  |  |
| Informal proceeding held with Debtor.  Telephone or  In-person  Attendees: |  |  |
| **Decision of the Business Office**  Business office *[name]* , found that the claim should be considered:  Satisfied or  Enforceable (*check boxes below that apply*).  Debtor asserted waiver of student fees as a challenge to paying the claim.  4:140-E1, *Application for Fee Waiver* was provided to Debtor and documented in the claim folder.  4:140-E2, *Response to Application for Fee Waiver, Appeal, and Response to Appeal* is placed in folder.  Debtor fee waiver request was:  Granted or  Denied. If denied, did Debtor appeal the denial? Yes or No. **Note**: Fee waivers satisfy a claim. |  |  |
| Business office *[name]* , forwarded the claim folder to the Superintendent’s office. |  |  |
| If the Business office found that the claim is satisfied, the Superintendent or designee notified the Debtor that the claim is considered satisfied. He or she closed this claim folder and checked the “**claim is satisfied**” box above. |  |  |
| **Review by Superintendent or designee**  If the Business office found the debt to be enforceable, the Superintendent or designee independently reviewed the claim and made the following finding:  **Satisfied.** Debtor sent a notification on .  **Enforceable.** Debtor notified on that the claim must be paid by to void further collection efforts. |  |  |
| **Certification of Past Due Debt to the IOC**  The Superintendent or designee certifies the debt as required in the terms of the IGA between District and the IOC. |  |  |
| **Offset Processing with the IOC**  The Superintendent or designee updates a Debtor’s records as required by the terms of the IGA between the District and the IOC. |  |  |

ADOPTED: January 22, 2013

ADOPTED: January 20, 2015

# Operational Services

## Exhibit - Notice of Claim and Intent to Seek Debt Recovery; Challenge; and Response to Challenge

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

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

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

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| --- | --- | --- | --- |
| To: |  |  |  |
|  | Name |  | Address |
| Our records show that you owe the School District $ for: [*Describe the reason for the debt and date(s) incurred]* | | | |
| **After attempts at the school-building level to notify you of this debt and obtain payment, your debt has been referred to the District’s Business Office. This debt is past due and legally enforceable**. Unless this debt is paid on or before , the District will seek collection to the fullest extent of the law. That means that you may see a decrease in a future payment(s) that the State makes to you by the amount of the debt that you owe the District, plus a recovery fee until your debt is paid.  You may challenge this claim any time before by completing Section 2 below and returning this *Notice* *of Claim* to the Superintendent’s office. If you challenge the debt, you will be invited to an informal proceeding in which the District Business Office will describe the claim and you can explain why you believe the claim is invalid and/or the amount is wrong. A decision finding the debt enforceable will be automatically reviewed by me or my designee (who is not a subordinate of the individual making the enforceability finding). | | | |
|  | |  |  |
| Superintendent | |  | Date |

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

|  |  |  |
| --- | --- | --- |
| **I am challenging the claim.** *Please check all that apply.*  I am submitting with this Notice of Claim a written explanation of why I believe the claim is invalid or the amount is wrong.  I would like to explain why I believe the claim is invalid or the amount is wrong during an informal proceeding by telephone or at a meeting in the District office.  I am requesting a copy of this Challenge to my Notice of Claim. | | |
|  |  |  |
| Individual or entity challenging the claim |  | Date |
|  |  |  |
| Contact Number | | |
|  | | |
|  | | |

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

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

**Enforceable.**

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Business Office |  | Date |
|  | | |

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

|  |  |  |
| --- | --- | --- |
| **This debt is satisfied.**  **Your challenge is denied.** You must pay the debt by to avoid further collection efforts. | | |
|  |  |  |
| Superintendent |  | Date |
|  | | |

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

# ADOPTED: January 22, 2013

AMENDED: January 20, 2015

# Operational Services

## Payment Procedures

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

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

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

LEGAL REF.: 105 ILCS 5/8-16, 5/10-7, and 5/10-20.19.

23 Ill.Admin.Code§100.70

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

ADOPTED: June 17, 2002

AMENDED: March 16, 2011

AMENDED: November 16, 2015

4:50

# Operational Services

## Exhibit – School District Payment Order

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

Order Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The Treasurer, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_School

District in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_County, shall pay to the order of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ the sum of $ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

By order of the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ School Board.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Board President Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Secretary Date

## Use of Credit and Procurement Cards

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

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

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

1. Credit and/or procurement cards may only be used to pay certain job-related expenses or to make purchases on behalf of the Board or District or any student activity fund, or for purposes that would be otherwise be addressed through a conventional revolving fund.
2. The Superintendent or designee shall instruct the issuing bank to block the cards’ use at unapproved merchants.
3. Each cardholder, other than the Superintendent, may charge no more than $500 in a single purchase and no more than $1,000 with a given month without prior authorizations from the Superintendent.
4. The Superintendent or designee must approved the use of a District credit or procurement card whenever such use is by telephone, fox, and the Internet. Permission shall be withheld when the use violates any Board policy, is from a vendor whose reputation has not been verified, or would be more expensive than if another available payment method were used.
5. The consequences for unauthorized purchases include, but are not limited to, reimbursing the District for the purchase amount, loss of cardholding privileges, and, if made by an employee, discipline up to and including discharge.
6. All cardholders must sign a statement affirming that they are familiar with this policy.
7. The Superintendent shall implement a process whereby all purchases using a District credit or procurement card are reviewed and approved by someone other than the cardholder or someone under the cardholder’s supervision.
8. Cardholders must submit the original, itemized receipt to document all purchases.
9. No individual may use a District credit or procurement card to make purchases in a manner contrary to State law, including, but not limited to, the bidding and other purchasing requirements in 105 ILCS 5/10-20.21, or any Board policy.

LEGAL REF.: 105 ILCS 5/10-20.21.

23 Ill.Admin.Code §100.70(d).

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

ADOPTED: December 15, 2008

AMENDED: February 20, 2017

# Operational Services

## Administrative Procedure - Controls for the Use of District Credit and Procurement Cards

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

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

1. Require prior authorization before issuing a card to any individual.
2. Have cardholders sign 4:55-E, *Cardholder’s Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards*.
3. Instruct cardholders:
4. In the proper use of cards, and;
5. How to document purchases, including the need to: (a) present an itemized receipt in addition to a credit or procurement card receipt for each item, (b) indicate the date, purpose, and nature of the charge on the receipt, and (c) identify the names of individuals for whom expenditures were incurred on the receipt.

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

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

**Safeguard District credit and procurement cards.**

1. Keep all cards in a secure location.
2. Issue cards only for the time period that they are needed.
3. Issue cards in the names of specific individuals to help maintain accountability.
4. Prohibit a card’s use by anyone other than the individual to whom a card is issued.
5. Develop and follow procedures to cancel cards when lost or stolen and when individuals leave employment.
6. Cancel existing cards that are not needed or accounted for.
7. Review and update master credit card lists annually.

**Monitor credit and/or procurement card statements.**

1. Review statements and watch for suspicious activity, such as, unusual destinations or items, purchases from a vendor whose reputation has not been verified, or purchases that would have been less expensive if another available payment method had been used.
2. Have billing statements broken down by individual user.
3. Have a reconciliation process and timetable. This includes:
4. Reconciling credit card statements to itemized receipts and invoices;
5. Examining the documentation supporting purchases to ensure charges are authorized and reasonable;
6. Delegating approval, verification, and payment of bills to different individuals; and
7. Requiring someone other than the cardholder or an individual supervised by the cardholder to review and approve transactions.
8. In exceptional circumstances when the Superintendent approved a charge that would otherwise be disallowed, maintain a record documenting the Superintendent’s approval as well as all other pertinent information about the charge.
9. Review all uses of a card via telephone, fax, and the Internet to be sure they were approved by the Superintendent or designee.
10. Establish a way of recouping inappropriate charges.
11. Do not use automatic payment deductions to pay credit or procurement card bills.
12. Pay bills on time to avoid paying fees and late charges.
13. Appropriately follow up on any discrepancies.
14. Verify that the items purchased were actually received.

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

| **Employment Position** | **Authorized Use and Other Limitations** |
| --- | --- |
| Superintendent | Actual and necessary expenses incurred in the performance of the Superintendent’s duties.  Expenses related to professional development. |
| Transportation Director | Expenses for maintaining and fueling District vehicles. |
| Assistant Superintendents | Actual and necessary expenses incurred in the performance of the job duties.  Expenses related to professional development. |
| Building Principals | Purchases of materials and supplies for his or her building that must be made quickly and/or are too small to process through the regular procedure.  Expenses from student activity funds for educational, recreational, or cultural purposes.  Expenses related to professional development. |

# ADOPTED: December 17, 2008

# Operational Services

## Exhibit - Cardholder’s Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Cardholder’s name |  |  |
|  |  |  |
| Cardholder’s address |  |  |
|  |  |  |
| Position |  |  |
|  |  |  |
| Name of individual who authorized issuance of card. | | |
|  | | |

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

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Cardholder’s signature |  | Date |

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

ADOPTED: December 15, 2008

AMENDED: November 18, 2013

AMENDED: July 16, 2018

# Operational Services

## Purchases and Contracts

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

Standards for Purchasing and Contracting

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

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

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

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

1. Supplies, materials, or work involving an expenditure in excess of $25,000 must comply with the State law bidding procedure, 105 ILCS 5/10-20.21, unless specifically exempted.
2. Construction, lease, or purchase of school buildings must comply with State law and Board policy 4:150, *Facility Management and Building Programs*.
3. Guaranteed energy savings must comply with 105 ILCS 5/19b-1 et seq.
4. Third party non-instructional services must comply with 105 ILCS 5/10-22.34c.
5. Goods and services that are intended to generate revenue and other remunerations for the District in excess of $1,000, including without limitation vending machine contracts, sports and other attire, class rings, and photographic services, must comply with 105 ILCS 5/10-20.21. The Superintendent or designee shall keep a record of: (1) each vendor, product, or service provided, (2) the actual net revenue and non-monetary remuneration from each contract or agreement, and (3) how the revenue was used and to whom the non-monetary remuneration was distributed. The Superintendent or designee shall report this information to the Board by completing the necessary forms that must be attached to the District’s annual budget.
6. Any contract to purchase food with a bidder or offeror must comply with 105 ILCS 5/10-20.2(b-10).
7. The purchase of paper and paper products must comply with 105 ILCS 5/10-20.19c and Board policy 4:70, *Resource Conservation*.
8. Each contractor with the District is bound by each of the following:
9. In accordance with 105 ILCS 5/10-21.9(f): (1) prohibit any of its employees who is or was found guilty of a criminal offense listed in 105 ILCS 5/10-21.9© and 5/21B-80(c) to have direct, daily contact at a District school or school-related activity with one or more student(s); (2) prohibits any of the contractor’s employees from having direct, daily contract with one or more students if the employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee’s sentence for the criminal offense; and (3) require each of its employees who will have direct, daily contact with student(s) to cooperate during the District’s fingerprint-based criminal history records check on him or her.
10. In accordance with 105 ILCS 5/24-5: (1) concerning each employee who begins providing services in the District after June 16, 2014, provide the District with evidence of physical fitness to perform the duties assigned and freedom from communicable disease if the employee will have direct, daily contact with one or more student(s); and (2) require any new or existing employee who has and will have direct, daily contact with one or more student(s) to complete additional health examinations as required by the District and be subject to additional health examinations, including tuberculosis screening, as required by the Illinois Department of Public Health rules or order of a local health official.

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

LEGAL REF.: 105 ILCS 5/10-20.19c, 5/10-20.21, 5/10-21.9, 5/10-22.34c, 5/19b-1 et seq., and 5/24-5.

820 ILCS 130/.

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

ADOPTED: June 17, 2002

AMENDED: January 20, 2009

AMENDED: May 17, 2010

AMENDED: November 17, 2014

AMENDED: February 20, 2017

4:60

# Operational Services

## Administrative Procedure - Purchases

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

Requirements for Purchases and Contracts

1. Each of the following requirements describes the type of purchase and/or contract to which it applies; requirements in Sections B and C may also apply to a specific purchase or contract.
2. All purchases of goods or services must be made through the use of contracts or purchase orders, except for those purchases made from petty cash funds or the Imprest Fund, or as otherwise specifically authorized by the Superintendent.
3. Illinois Use Tax Act compliance (105 ILCS 5/10-20.21(b) and 35 ILCS 105):
4. Persons bidding for and awarded a contract, and all affiliates of the person, must collect and remit Illinois Use Tax on all sales of tangible personal property into the State of Illinois in accordance with the provision of the Illinois Use Tax Act.
5. All bids and contracts must include: (1) a certification that the bidder or contractor is not barred from bidding for or entering into a contract, and (2) an acknowledgment that the Board may declare the contract void if the certification is false.
6. All entities seeking to enter into a contract with the District must provide written certification to the District that it will provide a drug free workplace by complying with the Illinois Drug Free Workplace Act, 30 ILCS 580. All contractors must comply with the notification mandates and other requirements in the Illinois Drug Free Workplace Act. “Contractor” is defined in the Illinois Drug Free Workplace Act as “a corporation, partnership, or other entity with 25 or more employees at the time of letting the contract, or a department, division, or unit thereof, directly responsible for the specific performance under a contract of $5,000 or more.”
7. Before soliciting bids or awarding a contract for supplies, materials, equipment, or services, a certified education purchasing contract that is already available through a State education purchasing entity (as defined in the Education Purchasing Program, Article 28A of the School Code), may be considered as a bid. 105 ILCS 5/10-20.21(d).
8. All contracts must include provisions required by State or federal law, as applicable. Topics commonly requiring a provision include equal opportunity employment, prevailing wage, minimum wage, and performance bond.
9. The procurement of architectural, engineering, and land surveying services is governed by the Local Government Professional Services Selection Act, 50 ILCS 510/, implemented by 2:170-AP, *Administrative Procedure - Qualified Based Selection*.
10. A list must be posted on the District’s website, if any, of all contracts in excess of $25,000 and any contract with an exclusive bargaining representative. 105 ILCS 5/10-20.44.
11. Each contractor with the District must comply with 105 ILCS 5/10-21.9(f) and agree to: (a) not allow any of its employees to have direct, daily contact with one or more students if the employee was found guilty of any offense listed in 105 ILCS 5/10-21, 9(c) or 5/21B-80(c); (b) prohibits any its employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee’s sentence for the criminal offense; (c) require each of its employees who will have direct, daily contact with one or more student(s) to cooperate during the District’s fingerprint-based criminal history records check on him or her; and (d) reimburse the District for the cost of the fingerprint-based criminal history records check that the District obtains on each employee of a contractor who will have direct, daily contact with a student(s). See 4:60-AP3, *Criminal History Records Check of Contractor Employees*.
12. Each contractor with the District must comply with 105 ILCS 5/24-5, amended by P.A. 98-716 (eff. 7-16-2014) and agree: (a) concerning each employee who begins providing services in the District after June 16, 2014 who will have direct, daily contact with one or more student(s), to provide the District with evidence of physical fitness to perform the duties assigned and freedom from communicable disease; and (b) to require any new or existing employee who has and will have direct, daily contact with one or more student(s) to complete additional health examinations as required by the District and be subject to additional health examinations, including tuberculosis screening, as required by the Illinois Department of Public Health rules or order of a local health official.
13. Any contract to purchase food with a bidder or offeror must comply with 105 ILCS 5/10-20.21(b-10) (food donations).
14. To the extent feasible, the following govern all purchases and/or the award of contracts for supplies, materials, or work, and/or contracts with private carriers for transporting students, involving: (a) an expenditure of $25,000 or less, or (b) in an emergency, an expenditure in excess of $25,000, provided such expenditure is approved by three-quarters of the Board. See 105 ILCS 5/10-20.21 (3/4s of the Board must approve an emergency expenditure in excess of $25,000 when the bidding process is not used) and 5/29-6.1 (time limitations for transportation contracts).
15. Telephone quotations, verbal quotations, or catalog prices are used to purchase materials that are needed urgently, or small quantity orders.
16. Written quotations are used to purchase materials or services when time requirements allow. Whenever possible, quotations should be received from at least two competitors. The Superintendent or designee may negotiate with vendors at any time, including after receiving quotations.
17. The following govern all purchases and/or the award of contracts involving an expenditure in excess of $25,000 for supplies and materials or work. 105 ILCS 5/10-20.21(a).
18. Contracts are awarded to the lowest responsible bidder, considering conformity with specifications, terms of delivery, quality and serviceability, except contracts or purchases for:
19. Services of individuals possessing a high degree of professional skill where the ability or fitness of the individual plays an important part;
20. Printing of finance committee reports and departmental reports;
21. Printing or engraving of bonds, tax warrants, and other evidences of indebtedness;
22. Purchase of perishable foods and perishable beverages;
23. Materials and work that have been awarded to the lowest responsible bidder after due advertisement, but due to unforeseen revisions, not the fault of the contractor for materials and work, must be revised causing expenditures not in excess of 10% of the contract price;
24. Maintenance or servicing of, or provision of repair parts for, equipment which are made with the manufacturer or authorized service agent of that equipment where the provision of parts, maintenance, or servicing can best be performed by the manufacturer or authorized service agent;
25. Use, purchase, delivery, movement, or installation of data processing equipment, software, or services and telecommunications and interconnect equipment, software, and services;
26. Duplicating machines and supplies;
27. Natural gas when the cost is less than that offered by a public utility;
28. Equipment previously owned by some entity other than the District itself;
29. Repair, maintenance, remodeling, renovation, or construction, or a single project involving an expenditure not to exceed $50,000 and not involving a change or increase in the size, type, or extent of an existing facility;
30. Goods or services procured from another governmental agency;
31. Goods or services that are economically procurable from only one source, such as for the purchase of magazines, books, periodicals, pamphlets and reports, and for utility services such as water, light, heat, telephone, or telegraph;
32. Emergency expenditures when such an emergency expenditure is approved by three-quarters of the members of the Board;
33. Goods procured through an education master contract, as defined in the Education Purchasing Program, Article 28A of the School Code; and
34. Providing for the transportation of students, which contracts must be advertised in the same manner as competitive bids and awarded by first considering the bidder(s) most able to provide safety and comfort for the students, stability of service, and any other factors set forth in the request for proposal regarding quality of service, and then price.
35. Competitive bidding process:
36. An invitation for bids is advertised, where possible, by public notice at least ten days before the bid date in a newspaper published in the District, or if no newspaper is published in the District, in a newspaper of general circulation in the area of the District. 105 ILCS 5/10-20.21(a).
37. The following information should be included in the advertisement for bids:
38. A description of the materials, supplies, or work involved;
39. Completion or delivery date requirements;
40. Requirements for bids, bonds, and/or deposits;
41. Requirements for performance, labor, and material payment bonds;
42. Date, time, and place of the bid opening;
43. The approximate time period between the opening of bids and the award of the contract; and
44. Any other useful information.
45. If specifications are available, the advertisement for bids describes where they may be obtained and/or inspected.
46. All bids must be sealed by the bidder. 105 ILCS 5/10-20.21(a).
47. A Board member or District employee opens the bids at a public bid opening at which time the contents are announced. 105 ILCS 5/10-20.21(a). With the exception of bids for construction purposes, bids may be communicated, accepted, and opened electronically. The following safeguards apply to an electronic bid opening (105 ILCS 5/10-20.21):
48. On the date and time of a bid opening, the primary person conducting the electronic bid process shall log onto a specified database using a unique username and password previously assigned to the bidder to allow access to the bidder’s specific bid project number.
49. The specified electronic database must be on a network that: (i) is in a secure environment behind a firewall; (ii) has specific encryption tools; (iii) maintains specific intrusion detection systems; (iv) has redundant systems architecture with data storage back-up, whether by compact disc or tape; and (v) maintains a disaster recovery plan.
50. Each bidder is given at least three days’ notice of the time and place of the bid opening. 105 ILCS 5/10-20.21(a).
51. Conduct that promotes deception and collusion during the bidding process is prohibited and may violate the Ill. Criminal Code, 720 ILCS 5/33E-1 et seq. Examples include interference with public contracting, bid-rigging, and acquisition or disclosure of bidding information by a public official.
52. Following the opening of bids, the Superintendent (and Board Attorney, if needed) determines the lowest responsible bidder and verifies the bidders’ qualifications. Contracts are awarded at a properly called open meeting of the Board. If the Superintendent recommends a bidder other than the lowest bidder, the Superintendent must provide the Board with the factual basis for the recommendation in writing. The Board, if it accepts a bid from a bidder other than the lowest, records the factual basis for its decision in its minutes. A contract arises only when the Board votes to accept a bid, although written notice of the award will later be given to the successful bidder.
53. Notwithstanding the foregoing, the District is relieved from bidding when making joint purchases with other public entities in compliance with the Governmental Joint Purchasing Act (30 ILCS 525/0.01).

LEGAL REF.: 30 ILCS 580/, Ill. Drug Free Workplace Act.

50 ILCS 510/, Local Government Professional Services Selection Act.

105 ILCS 5/10-20.21 and 5/10-20.44.

ADOPTED: November 21, 2005

AMENDED: January 20, 2009

AMENDED: March 16, 2011

AMENDED: September 24, 2012

AMENDED: January 22, 2013

AMENDED: November 17, 2014

AMENDED: February 20, 2017

# Operational Services

## Administrative Procedure - Third Party Non-Instructional Contracts

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

Name of proposed contractor:

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

Effective date of proposed contract:

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

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

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

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

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

1. Evidence of liability insurance in scope and amount equivalent to the liability insurance provided by the Board pursuant to 105 ILCS 5/10-22.3;
2. A benefits package for the third party’s employees who will perform the non-instructional services comparable to the benefits package provided to District employees who perform those services;
3. A list of the number of employees who will provide the non-instructional services, the job classifications of those employees, and the wages the proposed contractor will pay those employees;
4. A minimum three-year cost projection, using generally accepted accounting principles, and which the proposed contractor is prohibited from increasing if the bid is accepted by the Board, for each and every expenditure category and account for performing the non-instructional services;
5. Composite information about the criminal and disciplinary records, including alcohol or other substance abuse, Ill. Dept. of Children and Family Services complaints and investigations, traffic violations, and license revocations or any other licensure problems, of any employees who may perform the non-instructional services, provided that the individual names and other identifying information of employees need not be provided with the submission of the bid, but must be made available upon request of the Board; and
6. An affidavit, notarized by the president or chief executive officer of the proposed contractor, that each of its employees has completed a criminal background check as required by 105 ILCS 5/10-21.9 within three months prior to submission of the bid, provided that the results of such background checks need not be provided with the submission of the bid, but must be made available upon request of the Board.

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

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

Date of Board meeting:

Each of the following occurred:

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

Date of hearing:

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

Date and manner of notice:

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

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

ADOPTED: July 15, 2013

AMENDED: July 16, 2018

## Administrative Procedure - Criminal History Records Check of Contractor Employees

| **Actor** | **Action** |
| --- | --- |
| Firm contracting with the District, referred to herein as “contractor” | Prohibits any of the contractor’s employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 105 ILCS 5/10-21.9(c) or 5/21B-80(c), amended by P.A. 99-667.  Prohibits any of the contractor’s employees from having direct, daily contact with one or more students if the employee was found guilty of any offense in 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee’s sentence for the criminal offense.  Requires each employee who will have direct, daily contact with student(s) to cooperate during the District’s fingerprint-based criminal history records check on him or her. 105 ILCS 5/10-21.9(f).  Reimburses the District for the cost of the fingerprint-based criminal history records check that the District obtains on each employee of a contractor who will have direct, daily contact with student(s). |
| Superintendent or designee | Requires that the following paragraph be included in each contract with any firm whenever any employee of the firm will have direct, daily contact with one or more students.  The contractor shall not send to any school building or school property any employee or agent who has been convicted of a crime listed in 105 ILCS 5/10-21.9 and/or 5/21B-80, as amended from time to time, or who is listed in the Illinois Sex Offender Registry or the Illinois Murderer and Violent Offender Against Youth Registry. The contractor shall not send to any school building or school property any employee or agent who has been convicted of a crime listed in 105 ILCS 5/21B-80(b) (certain drug offenses) until seven years following the end of the employee’s sentence for the criminal offense. The contractor shall make every employee who will have direct, daily contact with one or more students available to the District for the purpose of submitting to a fingerprint-based criminal history records check. The check shall occur before any employee or agent is sent to any school building or school property. The contractor will reimburse the District for the cost of each check. The District must also provide a copy of the report to the individual employee of the contractor, but is not authorized to release it to the contractor. Additionally, at least quarterly, the contractor shall check if any of its employees or agents having direct, daily contact with one or more students is listed on the Illinois Sex Offender Registry or the Illinois Murderer and Violent Offender Against Youth Registry.  Completes the required forms to request a fingerprint-based criminal history record check on each contractor’s employee who will have direct, daily contact with one or more students. 105 ILCS 5/10-21.9(f). See 5:30-AP2, *Investigations*. Screens the individual’s name and address against the: (1) Illinois Sex Offender Registry, www.isp.state.il.us/sor/, and (2) the Violent Offender Against Youth Registry maintained by the Ill. State Police, www.isp.state.il.us/cmvo/.  Whenever a contractor sends an employee who will have direct, daily contact with a student(s) to the District for the first time, **ASKS** the contractor:   1. Will this employee be assigned to more than one school district? **IF YES**, may request the applicable Regional Superintendent to be responsible for obtaining a fingerprint-based criminal history records check and checking the Statewide Sex Offender Database for each such employee. The Regional Superintendent is required to promptly report to the District any information concerning the employee’s record of conviction and identification as a sex offender. 105 ILCS 5/10-21.9(f). 2. Has another Illinois school district already conducted a fingerprint-based criminal history records check on the employee within the last year? **IF YES**, may request a copy of it for that contractor’s employee from the school district where the contractor’s employee worked or works. The District may rely on a check done by another district within the last year. 105 ILCS 5/10-21.9(h).   **Note**: State law does not define “within the last year.”  Upon a request from any school, school district, community college district, or private school for a copy of a fingerprint-based criminal history records check for an employee of a contractor, **FIRST** determines if the District conducted the check within the last year. **IF YES**, provides a copy of it to the requesting entity. 105 ILCS 5/10-21.9(h).  **Note**: An immunity provision, contained in 20 ILCS 2635/7(A)(3), makes the District not liable to an individual for its reasonable actions taken in reliance on the individual’s criminal history records information (CHRI) report. The District will lose the immunity if it was notified by the individual or by the ISP that the CHRI report is inaccurate or incomplete. |

Cross reference and resource:

1. ISBE’s non-regulatory guidance document, Criminal History Records Information (CHRI) Checks for Certified and Non-certified School Personnel, at:

www.isbe.net/pdf/guidance\_chr.pdf.

1. **Criminal History Records Check** in 5:30-AP2, *Investigations*.

ADOPTED: August 18, 2014

AMENDED: February 20, 2017

# Operational Services

## Administrative Procedure - Federal Award Procurement Procedures

In addition to the State legal requirements for purchases and contracts set forth in Board policy 4:60, *Purchases and Contracts*, and 4:60-AP1, *Purchases*, the following procedures apply to District procurement under federal awards.

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

Code of Conduct

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

General Procurement Standards

1. The District shall avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. **Note:** A conflict between this regulation’s requirements and the Illinois Criminal Code of 2012 may exist. See 720 ILCS 5/33E-2(i-5) and 5/33E-18 (prohibits bid stringing; violation is a Class 4 felony) and 720 ILCS 5/33E-3 (prohibits bid rigging, a Class 3 felony).
2. To foster greater economy and efficiency, the District may enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.
3. The District may use federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
4. The District may use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost. **Note:** A conflict between this regulation’s requirements and the Illinois Criminal Code of 2012 may exist. See 720 ILCS 5/33E-2(i-5) and 5/33E-18 (defines and prohibits bid stringing, a Class 4 felony).
5. The District shall only award contracts to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. **Note:** State law requires award to the “lowest responsible bidder.”
6. The District shall maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
7. The District may use a time and materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. **Note:** The Illinois Criminal Code of 2012 (720 ILCS 5/33E-9) requires approval of the Board or designee when a contract cost increases or decreases by $10,000, a/k/a *change orders*. If a change order will exceed the original contract price by 10%, it must be rebid.
8. The District shall be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

Competition

1. All procurement transactions shall be conducted in a manner providing full and open competition consistent with the standards of State law (105 ILCS 10-20.21) and policy 4:60 and this section. To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Situations considered to be restrictive of competition include, but are not limited to:
2. Placing unreasonable requirements on firms in order for them to qualify to do business;
3. Requiring unnecessary experience and excessive bonding;
4. Noncompetitive pricing practices between firms or between affiliated companies;
5. Noncompetitive contracts to consultants that are on retainer contracts;
6. Organizational conflicts of interest;
7. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
8. Any arbitrary action in the procurement process.
9. The District shall conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. **Note:** State law may also encourage or discourage these preferences. Discuss these with the Board Attorney. See also Doyle Plumbing and Heating Co. v. Bd. of Educ., Quincy Pub. Sch. Dist. No. 172, 291 Ill.App. 3d 221 (4th Dist. 1997); Cardinal Glass v. Bd. of Educ. of Mendota Comm. Consol. Sch. Dist. 289, 113 Ill.App. 3d 442 (3rd Dist. 1983). Nothing in this section preempts State licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract. **Note:** The Board must also follow the Local Government and Professional Services Selection Act (50 ILCS 510/).
10. Procurement Transactions. All solicitations will:
11. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.
12. Such description must not, in competitive procurements, contain features which unduly restrict competition.
13. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
14. Detailed product specifications should be avoided if at all possible.
15. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated.
16. Identify all requirements which offerors must fulfill and all other factors to be used in evaluating bids and proposals.
17. The District shall ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. **Note:** State laws may conflict with this provision. See 105 ILCS 5/10-20.21 and 50 ILCS 510/.
18. The District shall not preclude potential bidders from qualifying during the solicitation period.

Methods of Procurement

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

1. Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. To the extent practicable, the District shall distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the Board considers the price to be reasonable. **Note:** See 105 ILCS 5/10-20.21 and sample policy 4:60, *Purchases and Contracts*.
2. Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.
3. Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. **Note:** 105 ILCS 5/10-20.21 requires “lowest responsible bidder.” The sealed bid method is the preferred method for procuring construction, if the conditions in 2 C.F.R. §200.320(c)(1) apply. If sealed bids are used, the requirements in 2 C.F.R. §200.320(c)(2) apply. **Note:** 105 ILCS 5/10-20.21 requires sealed bids.
4. Procurement by competitive proposals. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the requirements in 2 C.F.R. §200.320(d) apply. **Note:** 105 ILCS 5/10-20.21 requires sealed bids.
5. Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the circumstances in §200.320(f) apply. **Note:** 50 ILCS 510/ may conflict with this regulation.

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

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

1. Placing qualified small and minority businesses and women’s business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women’s business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (A) through (E) of this section.

Contract Cost and Price

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

Federal Awarding Agency or Pass-Through Entity Review

The District shall make available, upon request of the federal awarding agency or pass-through entity (ISBE):

1. Technical specifications on proposed procurements where the federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition; and
2. Procurement documents (such as requests for proposals or invitations for bids, or independent cost estimates) for pre-procurement review when one or more of the circumstances in §200.324(b) apply.

Bonding Requirements

1. For construction or facility improvement contracts or sub contracts exceeding the Simplified Acquisition Threshold, the federal awarding agency or pass-through entity may accept the bonding policy and requirements of the District provided that the federal awarding agency or pass-through entity has made a determination that the federal interest is adequately protected.
2. If such a determination has not been made, the minimum requirements shall be as follows:
3. A bid guarantee from each bidder equivalent to five percent of the bid price. The *bid guarantee* must consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute such contractual documents as may be required within the time specified.
4. A performance bond on the part of the contractor for 100 percent of the contract price. A *performance bond* is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.
5. A payment bond on the part of the contractor for 100 percent of the contract price. A *payment bond* is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

Contract Provisions

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

ADOPTED: May 15, 2017

# Operational Services

## Exhibit - Internal Procedures for Procurement Transactions

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

# ADOPTED: May 15, 2017

# Operational Services

## Exhibit - Notice to Contractors

*On District letterhead*

Notice to contractor:

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

This notice applies to the “public works” described as: .

The Prevailing Wage Act requires contractors and subcontractors to pay laborers, workers, and mechanics performing services on public works projects no less than the *“prevailing rate of wages”* (hourly cash wages plus fringe benefits) in the county where the work is performed. Any prevailing rate of wages as they are revised by the Dept. of Labor shall apply to this contract. You are notified that any rate changes to the prevailing wage rate are available on the Dept.’s official website. For information regarding current prevailing wage rates, please see the Illinois Dept. of Labor’s website at: [www.state.il.us/agency/idol/rates/rates.HTM](http://www.state.il.us/agency/idol/rates/rates.HTM) and www.illinois.gov/idol/Laws-Rules/CONMED/Pages/Rates.aspx.

All contractors and subcontractors rendering services for the “public works” must comply with all requirements of the Prevailing Wage Act, including but not limited to, all wage, notice, and record- keeping duties.

# The above paragraph was or will be included in the project specifications and the contract. 820 ILCS 130/4(a-1). If the work is awarded without a public bid, contract, or project specification, the notice was or will be included in the purchase order related to the work or in a separate document, such as this notification. 820 ILCS 130/4(a-2).

Adopted: December 15, 2010

AMENDED: January 22, 2013

AMENDED: October 16, 2017

# Operational Services

## Resource Conservation

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

1. Periodic review of procurement procedures and specifications to ensure that purchased products and supplies are reusable, durable, or made from recycled materials, if economically and practically feasible.
2. Purchasing recycled paper and paper products in amount that will, at a minimum, meet the specification in The School Code, if economically and practically feasible.
3. Periodic review of procedures on the reduction of solid waste generated by academic, administrative, and other institutional functions. These procedures shall: (a) require recycling the District’s waste stream, including landscape waste, computer paper, and white office paper, if economically and practically feasible; (b) include investigation of the feasibly for potential markets for other recyclable materials that are present in the District’s waste stream; and (c) be designed to achieve, before July 1, 2020, at least a 50% reduction in the amount of solid waste that is generated by the District.
4. Adherence to energy conservation measures.

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

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

ADOPTED: June 17, 2002

AMENDED: May 4, 2009

AMENDED: October 16, 2017

4:70

# Operational Services

## Administrative Procedure - Resource Conservation

Definitions

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

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

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

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

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

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

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

*Recycled paperboard* - Includes paperboard products, folding cartons and pad backings.

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

*Unbleached packaging* - Includes corrugated and fiber storage boxes.

Procurement Procedures and Specifications for Products and Supplies

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

Recycled Paper and Paper Products Purchases

I. Whenever economically and practically feasible, recycled paper and paper products shall be purchased according to the following minimum percentages of the District’s total dollar value of paper and paper products:

Beginning July 1, 2014 50%

Beginning July 1, 2020 75%

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

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

* Recycled high grade printing and writing paper shall contain at least 50% recovered paper material and shall consist of the following percentages of deinked stock or postconsumer material on the dates listed:

Beginning July 1, 2014 50%

* Recycled tissue products shall contain at least 45% postconsumer material.
* Recycled newsprint shall contain at least 80% postconsumer material.
* Recycled unbleached packaging shall contain at least 55% postconsumer material.
* Recycled paperboard shall contain at least 95% postconsumer material.

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

Solid Waste Reduction

The Superintendent will appoint a team of interested individuals representing various District departments to direct the District’s efforts to achieve, before July 1, 2020, at least a 50% reduction in the amount of solid waste that the District generates. The team shall:

1. Periodically review methods and procedures to reduce solid waste generated by academic, administrative, and other institutional functions. These procedures must be designed to, when economically and practically feasible, recycle the District’s waste stream, including without limitation landscape waste, computer paper, and white office paper.
2. Identify indicators to monitor the District’s progress toward achieving the solid waste reduction goal. As necessary, the procedures and methods shall be adjusted and refined.
3. Make periodic progress reports to the Superintendent or designee.

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

1. Staff members actively pursue waste reduction and prevention activities. Examples include:
2. Printing and copying individual documents on both sides of the page.
3. Setting computer software for default two-sided printing including word processing, spreadsheets, electronic mail, and others.
4. Printing or copying only the pages needed.
5. Routing memos and newsletters.
6. Providing trays to collect and reuse one-sided paper.
7. Reducing unwanted mail and eliminate excess mailings.
8. Staff members and students seek to reuse or recycle materials to divert them from the waste stream whenever possible.
9. A training plan instructs staff members and students in waste reduction and recycling practices.
10. The District’s solid waste reduction program is publicized and its benefits are emphasized, including cost savings by lowering supply acquisition and disposal costs.
11. An incentive program to reduce solid waste exists, e.g., through school recognition programs.
12. Staff and students are encouraged to be innovative and suggest improvements to procedures and practices.

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

ADOPTED: May 4, 2009

AMENDED: November 17, 2014

# Operational Services

## Accounting and Audits

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

Annual Audit

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

Annual Financial Report

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

Inventories

The Superintendent or designee is responsible for establishing and maintaining accurate inventory records. The inventory record of supplies and equipment shall include a description of each item, quantity, location, purchase date, and cost or estimate of replacement cost.

Disposition of District Property

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

Taxable Fringe Benefits

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

Controls for Revolving Funds and Petty Cash

Revolving funds and petty cash system are established in Board policy 4:50, *Payment Procedures*. The Superintendent shall: (1) designate a custodian for each revolving fund and petty cash fund, (2) obtain a bond for each fund custodian, and (3) maintain the funds in compliance with this policy, State law, and ISBE rules. A check for the petty cash may be drawn payable to the designated petty cash custodian. Bank accounts for revolving funds are limited to a maximum balance of $500. All expenditures from these bank accounts must be directly related to the purpose for which the account was established and supported with documentation, including signed invoices or receipts. All deposits into these bank accounts must be accompanies with a clear description of their intended purpose. The Superintendent or designee shall include checks written to reimburse revolving funds on the Board’s monthly listing of bills indicating the recipient and including an explanation.

Control Requirements for Checks

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

Internal Controls

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

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

LEGAL REF.: 105 ILCS 5/2-3.27, 5/2-3.28, 5/3-7, 5/3-15.1, 5/5-22, 5/10-21.4, 510-20.19, 5/10-22.8 and 5/17-1 et seq.

23 Ill. Admin. Code Part 100.

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

ADOPTED: June 17, 2002

AMENDED: March 16, 2011

AMENDED: May 21, 2012

AMENDED: February 20, 2017

AMENDED: December 18, 2017

AMENDED: July 16, 2018

4:80

# Operational Services

## Administrative Procedure - Checklist for Internal Controls

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

1. All financial transactions must be properly authorized and documented. This includes:

* No check is issued without pre-approved documentation for the expenditure pursuant to the Local Government Travel Expense Control Act, 50 ILCS 150/10, added by P.A. 99-604 e.g., 2:125-E1, *Board Member Expense Reimbursement Form*; 2:125-E2, *Board Member Estimated Expense Approval Form*; 5:60-E1, *Employee Expense Reimbursement Form*; and 5:60-E2, *Employee Estimated Expense Approval Form*.
* No bank account is opened or established in the District’s or a District school’s name or with the District’s Federal Employer Identification Number without pre-approved documentation.
* No credit or procurement card is assigned to an individual without pre-approved documentation. All use of a credit or procurement card must be in compliance with Board policy 4:55, *Use of Credit and Procurement Cards* and administrative procedure 4:55-AP, *Controls for the Use of District Credit and Procurement Cards*.
* Every receipt to and expenditure from a revolving fund and a petty cash fund are supported with clear documentation and otherwise comply with Board policies 4:50, *Payment Procedures* and 4:80, *Accounting and Audits*.
* A record is made of all checks issued and all payments made by credit or procurement cards that includes descriptive information sufficient to allow assignment of the appropriate code.

1. Financial records and data must be accurate and complete. This includes:

* Data entries are timely made.
* Cash handling is properly recorded.
* Checks are sequentially numbered and missing checks are accounted for.
* Financial reporting deadlines are followed.

1. Accounts payable must be accurate and punctual. This includes:

* Payments are made on a timely basis.
* A thorough explanation is provided for any over/underpayments.
* Payroll and benefits are reviewed and continually updated.

1. District assets must be protected from loss or misuse. This includes:

* The District implements a Fraud, Waste, and Abuse Awareness Program. See 4:80-AP2, *Fraud, Waste and Abuse Awareness Program*.
* Valuable technology assets are safeguarded from theft or loss.
* A backup and recovery system is developed for electronic systems.
* Only authorized individuals have access to various systems.
* Passwords are kept secure and frequently changed.
* Keys are kept secure and accounted for.
* District property is not *borrowed* or otherwise used for private purposes.
* District personal property having a monetary value (excluding, for example, trash, out-dated equipment, consumed consumables, and spoilage) is discarded only with the Board’s prior approval.

1. Incompatible duties should be segregated, if possible. This includes:

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

1. Accounting records are periodically reconciled. This includes:

* All accounts are balanced monthly.
* All statements from checking accounts and credit cards are reconciled monthly.
* Expenses are verified against receipts.
* Out-of-balance conditions are investigated.

1. Equipment and supplies must be safeguarded. This includes:

* Inventories are periodically taken and inspections are frequently made.
* A reliable record is kept identifying what technology assets have been provided to specific employees.
* Access to supplies is limited and controlled.

1. Staff members with financial or business responsibilities must be properly trained and supervised, and must perform their responsibilities with utmost care and competence.

* Responsibilities match job descriptions.
* If required by State law, staff members are appropriately bonded.
* Staff members are held accountable for complying with Board policies and administrative processes or procedures that have been established to safeguard the District’s financial condition.
* Staff members are appropriately trained and evaluated.
* Staff members are encouraged to notify their supervisors or the Superintendent of risks, losses, and/or concerns.

1. Any unnecessary weaknesses or financial risks must be promptly corrected. This includes:

* Internal control concerns raised by the District’s independent auditor in connection with the annual financial audit or by Ill. State Board of Education in connection with its administration of the Grant Accountability and Transparency Act or a monitoring visit are properly addressed.
* Internal or external auditors are annually engaged to assess risk and/or test existing internal controls for those areas not included within the scope of the annual financial audit; concerns are promptly addressed.

ADOPTED: November 18, 2013

AMENDED: February 20, 2017

AMENDED: July 16, 2018

# Operational Services

## Administrative Procedure – Fraud, Waste, and Abuse Awareness Program

The Grant Accountability and Transparency Act (GATA) (30 ILCS 708/) and federal regulation (2 CFR 200.113) require grant fund recipients to timely disclose, in writing, all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal awarding agency or pass0through entity, e.g., Ill. State Board of Education (ISBE).

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

Reporting

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

Enforcement

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

Definitions

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

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

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

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

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

Roles, Responsibilities, and Reporting Procedures

|  |  |
| --- | --- |
| **Actor** | **Action** |
| Any Staff Member | Staff members who suspect fraud, waste, and/or abuse should do the following:   1. Make an oral or written report to the Superintendent that describes the factual basis of the suspicion, including any employees involved, a description of the alleged misconduct, and any supporting evidence. Oral reports shall be followed up in writing by the staff member or Superintendent. 2. If the staff member does not feel comfortable identifying himself/herself in making a report, the employee may deliver the report anonymously to the attention of the Superintendent or make an anonymous call to the Superintendent. 3. If the report concerns alleged misconduct by the Superintendent, the report may either by made to a Complaint Manager identified in Board Policy 2:260, Uniform Grievance Procedure, who will notify the Board President of the report, or directly to the Board President. 4. If the reporting staff member has evidence of fraud, waste, and/or abuse, he/she must preserve the evidence and provide it to the Superintendent or designee (or designated Complaint Manager or Board President, if the report concerns the Superintendent) charged with investigating the suspected fraud, waste, or abuse. |
| **Actor** | **Action** |
| Superintendent and/or Designee (or Complaint Manager/Board President, for cases concerning the Superintendent) | Manages actual or suspected fraud, waste, or abuse in the District. With respect to any investigation, the Superintendent and/or designee (or Complaint Manager/Board President, for cases concerning the Superintendent) shall:   1. Ensure all reported instances of fraud, waste, or abuse are investigated by the District, and, if appropriate, reported to the proper authorities for further investigation and potential prosecution. 2. Consult with the board attorney as needed regarding any investigation. 3. Keep the Board informed o any ongoing investigations. 4. Ensure the District cooperates with law enforcement in any criminal fraud investigations. 5. Make all reasonable efforts to ensure the preservation of evidence relevant to an investigation. 6. Effectuate (or recommend to the Board) discipline of employees who engage in fraud, waste, or abuse in accordance with Board policies and any applicable collective bargaining agreement(s). 7. Manage communications with the media regarding investigations, as needed. 8. Manage District efforts to seek recovery of wrongfully obtained assets, as appropriate. |
| Superintendent and/or Designee | 1. Manage annual communication of the District’s Fraud, Waste, and Abuse Awareness Program to staff and grant sub-recipients/subcontractors, including how employees should report suspected fraud, waste, or abuse. 2. Manage ethics and standards of conduct training for all District employees. 3. Periodically review the District’s Fraud, Waste, and Abuse Awareness Program and related reporting procedures. |

ADOPTED: July 18, 2018

# Operational Services

## Activity Funds

The School Board, upon the Superintendent or designee’s recommendation, establishes student activity funds to be managed by student organizations under the guidance and direction of a staff member for educational, recreational, or cultural purposes.

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

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

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

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

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

ADOPTED: June 17, 2002

AMENDED: December 15, 2008

AMENDED: March 16, 2011

AMENDED: November 17, 2014

4:90

# Operational Services

## Insurance Management

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

The insurance program shall include each of the following:

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

Student Insurance

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

LEGAL REF.: Consolidated Omnibus Budget Reconciliation Act, P. L. 99-272, ¶ 1001, 100 Stat. 222, 4980B(f) of the I.R.S. Code, 42 U.S.C. §300bb-1 et seq.

105 ILCS 5/10-20.20, 5/10-22.3, 5/10-22.3a, 5/10-22.3b, 5/10-22.3f, 5/10-22.34, 5/10-22.34a, 5/10-22.34b, and 5/22-15.

215 ILCS 5/.

750 ILCS 75/.

820 ILCS 305/.

ADOPTED: June 17, 2002

AMENDED: January 22, 2013

AMENDED: February 18, 2014

AMENDED: August 18, 2014

4:100

# Operational Services

## Transportation

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

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

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

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

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

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

Pre-Trip and Post-Trip Vehicle Inspection

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

LEGAL REF.: Elementary and Secondary Education Act, 20 U.S.C. §6312©(5)(B). McKinney Homeless Assistance Act, 42 U.S.C. §11431 et seq.

105 ILCS 5/10-22.22 and 5/29-1 et seq.

105 ILCS 45/1-15 and /1-17.

625 ILCS 5/1-148.3a-5, 5/1-182, 5/11-1414.1, 5/12-813, 5/12-813.1, 5/12-815, 5/12-816, 5/12-821, and 5/13-109.

23 Ill.Admin.Code §§1.510 and 226.750; Part 120.

92 Ill.Admin.Code §440-3.

CROSS REF.: 4:170 (Safety), 5:100 (Staff Development), 5:120 (Ethics and Conduct), 5:280 (Educational Support Personnel - Duties and Qualifications), 6:140 (Education of Homeless Children), 7:220 (Bus Conduct)

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

ADOPTED: June 17, 2002

ADMENDED: January 19, 2004

AMENDED: December 15, 2008

AMENDED: March 16, 2011

AMENDED: May 21, 2012

AMENDED: January 20, 2015

AMENDED: February 20, 2017

AMENDED: December 18, 2017

4:110

# Operational Services

## Administrative Procedure - School Bus Post-Accident Checklist

Driver Post-Accident Procedures

1. The first consideration is whether it is safer to evacuate the students or to have them remain on the bus. 23 Ill.Admin.Code §1.510(l)(1).
2. Immediately notify the pre-designated emergency and police services, and administer first aid. As soon as possible, notify the District or transportation office.
3. When notifying the District or transportation office, give the following information:

Seriousness of the accident

Location and time of incident

Bus number and route number

School

Number of students on board

Extent of any injuries

Weather/road conditions

Any other pertinent information

1. Never leave your vehicle, either to check traffic or set out reflectors, when children are on board. Stay with the children until help arrives. Do not release any student, even to parents, unless instructed to do so by the District or transportation office.
2. Set out reflectors, flares, flags, etc. only when the safety of all children is secure.
3. Stay vigilant for the continued safety of everyone at the scene and:

**Never** attempt to direct traffic.

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

**Never** discuss liability or fault, or sign anything until someone from the District or transportation office arrives.

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

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

Information Gathering

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

1. Obtain the name and age of every passenger on the bus.
2. Obtain the name and address of all witnesses.
3. Regarding other vehicles involved in the accident, obtain the:

Other drivers’ names

Other drivers’ license numbers

Other drivers’ addresses and phone numbers

Make, model, year, and license plate numbers of other involved vehicles

Other drivers’ insurance carrier information

Name, address, and phone numbers of passengers in other involved vehicles

District or Transportation Office Responsibilities

1. Confirm that police and emergency services as appropriate were notified. An ambulance need not be called to the accident scene unless there are obvious injuries or complaints.
2. Send a transportation supervisor to the accident scene to assist the bus driver.
3. Arrange for the parents of children on the bus to be contacted.
4. Arrange alternate transportation for the children.
5. Contact the District’s insurance carrier as soon as possible and follow its instructions.
6. Help the bus driver complete accident report forms, including insurance forms. Complete ISBE’s *School Bus Accident Report*, www.isbe.net/funding/pdf/50-26\_school\_bus\_accident.pdf, and forward to the Regional Superintendent immediately after any accident.
7. Obtain any accident reports completed by third parties, including police reports.

Post-Accident Alcohol and Drug Testing

1. This section’s provisions are required by 49 C.F.R. §382.303. For drug and alcohol testing requirements, see policy 5:285, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*; and administrative procedure 5:285-AP, *Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers*.
2. School bus drivers shall be provided the necessary post-accident alcohol and drug testing information, procedures, and instructions before operating a bus.
3. As soon as practicable after an accident involving a school bus, the driver shall be tested for alcohol and controlled substances if:
4. The accident involved the loss of human life;
5. The driver receives a citation for a moving traffic violation arising from the accident; or
6. A law enforcement officer directs that such a test be given. 625 ILCS 5/6-516.
7. If a required alcohol test is **not** administered:
8. Within 2 hours, the District must prepare and maintain a file or record stating why the test was not properly administered.
9. Within 8 hours, the District shall cease attempts to administer an alcohol test and shall prepare the same record.
10. If a required controlled substance test is **not** administered within 32 hours, the District shall cease attempts to administer the test, and shall prepare and maintain a file or record stating why the test was not properly administered.
11. No driver required to take a post-accident alcohol test shall use alcohol for 8 hours following the accident, or until undergoing a post-accident alcohol test.

Vehicle Inspection

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

AMENDED: December 15, 2008

AMENDED: March 16, 2011

AMENDED: November 17, 2014

# Operational Services

## Administrative Procedure - Bus Driver Communication Devices; Pre-Trip and Post-Trip Inspection; and Bus Driving Comments

Bus Driver Communication Devices

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

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

Bus/Vehicle Pre-Trip and Post-Trip Inspection All school bus drivers, whether employed by the School District or private sector school bus company, shall perform each of the following:

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

Vehicle-Inspection Unit Manager

Ill. Dept. of Transportation, Div. of Traffic Safety

1340 North 9th St.

P.O. Box 19212

Springfield, IL 62794-9212

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

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

Bus Driving Comments

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

TO COMMENT ON MY DRIVING, CALL *[217-897-6125]*

Driving comments shall be accepted in the following manner:

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

ADOPTED: December 15, 2008

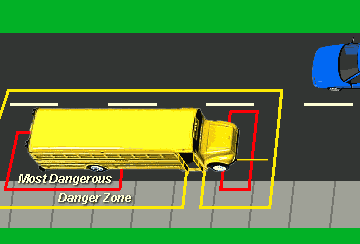
AMENDED: March 16, 2011

AMENDED: July 15, 2013

AMENDED: December 18, 2017

# Operational Services

## Administrative Procedure - School Bus Safety Rules



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

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

Additional resources follow:

National Highway Traffic Safety Administration - **Traffic Safety Toolkit**

www.nhtsa.gov/parents/parents-bus.html

National Safety Council - **School Bus Safety Rules**

www.nsc.org/news\_resources/Resources/Documents/School\_Bus\_Safety\_Rules.pdf

Illinois State Police - **School Bus Safety**

www.isp.state.il.us/docs/5-542.pdf

ISBE - **School Bus Safety What Parents Should Know**

www.isbe.net/funding/pdf/bus\_safety\_parents.pdf

ISBE - **Instructions To School Bus Riders** (pg. 102)

www.isbe.net/funding/pdf/bus\_safety\_teach\_guide.pdf

ILSOS - Parent information flyer, games etc.

www.cyberdriveillinois.com/departments/drivers/traffic\_safety/school\_bus\_safety/home.html

# ADOPTED: August 18, 2014

# Operational Services

## Exhibit - Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses

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

*To be completed by the student’s parent/guardian:*

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

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

|  |
| --- |
|  |
|  |
|  |

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

|  |
| --- |
|  |
|  |
|  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Medication and Where Kept** | **Dosage** | | | **Directions** |
|  |  | | |  |
|  |  | | |  |
|  |  | | |  |
|  | |  |  | |
| Parent/Guardian Signature | |  | Date | |

# ADOPTED: August 18, 2014

# Operational Services

## Food Services

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

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

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

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

LEGAL REF.: Russell B. National School Lunch Act, 42 U.S.C. §1751 et seq.

Child Nutrition Act of 1966, 42 U.S.C. §1771 et seq.

7 C.F.R. Parts 210 and 220, Food and Nutrition Service.

105 ILCS 125/.

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

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

ADOPTED: June 17, 2002

AMENDED: March 16, 2011

AMENDED: September 24, 2012

AMENDED: January 20, 2015

4:120

# Operational Services

## Administrative Procedure - Food Services; Competitive Foods; Exemptions

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

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

Definitions

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

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

Competitive Foods

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

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

Exempted Fundraising Days

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

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

LEGAL REF.: 42 U.S.C. §1779, 7 C.F.R. §210.11.

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

ADOPTED: March 16, 2011

AMENDED: January 20, 2015

AMENDED: December 16, 2015

# Operational Services

## Free and Reduced-Price Food Services

Notice

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

Eligibility Criteria and Selection of Children

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

Notification

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

Nondiscrimination Assurance

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

Appeal

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

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

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

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

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

105 ILCS 125/ and 126/.

23 Ill. Admin. Code § 1.520 and 305.10 et seq.

ADOPTED: June 17, 2002

4:130

AMENDED: November 21, 2005

AMENDED: March 16, 2011

AMENDED: February 20, 2017

# Operational Services

## Waiver of Student Fees

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

Fees for textbooks, other instructional materials, athletic fees, and driver education are waived for students who meet the eligibility criteria for a fee waiver as described in this policy. In order that no student is denied educational services or academic credit due to the inability of parents/guardians to pay student fees, the Superintendent will recommend to the Board which additional fees, if any, the District will waive for students who meet the eligibility criteria for fee waiver. Students receiving a fee waiver are not exempt from charges for lost and damaged books, locks, materials, supplies, and equipment.

Notification

The Superintendent shall ensure that applications for fee waivers are widely available and distributed according to State law and Ill. Board of Education (ISBE) rule and that provisions for assisting parents/guardians in completing the application are available.

Eligibility Criteria

A student shall be eligible for a fee waiver when the student currently lives in a household that meets the same income guidelines, with the same limits based on household size, that are used for the federal free meals program.

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

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

Verification

The Superintendent or designee shall establish a process for determining a student’s eligibility for a waiver of fees in accordance with State law requirements. The Superintendent or designee may require family income verification at the time an individual applies for a fee waiver and anytime thereafter but not more often than once every 60 calendar days. The Superintendent or designee shall not use any information from this or any independent verification process to determine free or reduced-price meal eligibility.

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

Determination and Appeal

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

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

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

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

ADOPTED: June 17, 2002

4:140

AMENDED: January 19, 2005

AMENDED: March 16, 2011

AMENDED: July 15, 2013

AMENDED: July 16, 2018

# Operational Services

## Administrative Procedure - Fines, Fees, and Charges - Waiver of Student Fees

|  |  |
| --- | --- |
| **Actor** | **Action** |
| Superintendent or designee | Prepares and recommends to the School Board a list of school fees to be charged to students for the use of textbooks, consumable materials, field trips, extracurricular activities, graduation fees, and similar items. See 23 Ill.Admin.Code §1.245(a) for a definition of *school fees*.  **Initial notice:** For all students enrolling in the District for the first time, notifies their parents/guardians that the District will waive school fees for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*.  The initial notice must at least describe: (1) the Board’s policy, including the criteria and other circumstances under which the District will waive school fees; (2) the school fees subject to a waiver; (3) the procedure to apply for a fee waiver, including the availability of a fee waiver request form and the documents whose use is required by the District in verifying income; and (4) the dispute resolution procedure. 23 Ill.Admin.Code §1.245(c)(2)A).  **Annual notice:** Includes a notice with the first statement sent to parents/guardians who owe school fees that the District will waive school fees for persons unable to afford them in accordance with policy 4:140, *Waiver of Student Fees*.  The annual notice must include a description of the fee waiver application process or the name, address and telephone number of the person to contact for information concerning a fee waiver. 23 Ill.Admin.Code §1.245(c)(2)(B).  Determines whether the required inclusions in these notices will be satisfied by providing parents/guardians with a written copy of Board policy 4:140, *Waiver of Student Fees*, and form 4:140-E1, *Application for Fee Waiver*. |
| Parent(s)/Guardian(s) seeking a school fee waiver | Completes 4:140-E1, *Application for Fee Waiver*, and returns it to the Building Principal along with documents that will verify the family’s income, such as, payroll stubs, tax returns, or evidence of receipt of food stamps or Temporary Assistance for Needy Families. 23 Ill.Admin.Code §1.245(d).  May apply for a waiver of school fees by completing 4:140-E1, *Application for Fee Waiver*, at any time. |
| Building Principal or designee | Determines the student’s eligibility for fee waiver based on policy 4:140, *Waiver of Student Fees*.  Notifies the parent(s)/guardian(s) within 30 calendar days if their *Application for Fee Waiver* is denied. 23 Ill.Admin.Code §1.245(c)(3).  A rejection notice must include: (1) the reason for the denial; (2) a notification of their right to appeal as well as the appeal process and timelines (4:140-E2, *Response to Application for Fee Waiver, Appeal, and Response to Appeal*); and (3) a statement that they may reapply at anytime if circumstances change. 23 Ill.Admin.Code §1.245(c)(3)(A).  Ensures that any completed 4:140-E1, *Application for Fee Waiver,* and the 4:140-E2, *Response to Application for Fee Waiver, Appeal, and Response to Appeal,* are confidentially treated and maintained. 23 Ill.Admin.Code §1.245(f). |
| Parent(s)/Guardian(s) seeking a school fee waiver | May appeal the denial of a fee waiver request.  If desired, meets with the person who will decide the appeal in order to explain why the fee waiver should be granted. 23 Ill.Admin.Code §1.245(c)(3)(B). |
| Superintendent or designee | Contacts the parent(s)/guardian(s) to determine if they want to meet to explain why the fee waiver should be granted. 23 Ill.Admin.Code §1.245(c)(3)(B). If so, meets with the parent(s)/guardian(s) at a prearranged date and time.  Ensures that the person who decides the appeal is not the person who initially denied the fee waiver or a subordinate of this person. 23 Ill.Admin.Code §1.245(c)(3)(B).  Responds in writing to the parent (s)/guardian(s) appeal within 30 calendar days of receipt of the appeal. 23 Ill.Admin.Code §1.245(c)(3)(B).  Ensures that no discrimination or punishment of any kind, including the lowering of grades or exclusion from classes, is exercised against a student whose parent(s)/guardian(s) are unable to purchase required textbooks or instructional materials or to pay required fees. 105 ILCS 5/28-19.2 (a). |

ADOPTED: November 21, 2005

AMENDED: March 16, 2011

AMENDED: December 14, 2016

# Operational Services

## Exhibit - Application for Fee Waiver

*This application for a school fee waiver is completely independent from the District process for determining eligibility for free meals. The information must be provided for your application to be considered. Submit completed application and income verification documents to the Building Principal.*

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Student’s Name *(please print)* |  | School |
|  |  |  |
| Parent/Guardian Name *(please print)* |  |  |
|  |  |  |
| Address *(please print)* |  |  |

1. The student named above lives in my household? Yes No
2. Total number of people living in my home
3. Total gross annual household income (before deductions) from all people living in my home

$

Income includes all:

Compensation for services, wages, salary, commissions or fees;

Net income from self-employment;

Social Security;

Dividends or interest on savings or bonds or income from estates or trusts;

Net rental income;

Public assistance or welfare payments;

Unemployment compensation;

Government civilian employee or military retirement, or pensions or veterans payments;

Private pensions or annuities;

Alimony or child support payments;

Regular contributions from persons not living in the household;

Net royalties; and

Other cash income (including cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources).

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

See www.isbe.net/nutrition/htmls/data.htm#income.

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

|  |  |  |
| --- | --- | --- |
|  |  |  |
|  |  |  |

Income Verification for Fee Waiver

You must present one of the following documents to verify income:

Two current pay stubs for all working members Disability statement showing benefits

of the household

Unemployment statement showing benefits Current tax returns

Medicaid Card showing case number Foster placement papers

Direct Certification letter from the State of Illinois Food Stamp Evidence

Temporary Food assistance for needy families

You may be requested to provide updated income verification at any time, but no more often than once every 60 calendar days.

Supplying false information to obtain a fee waiver is a Class 4 felony (720 ILCS 5/17-6).

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

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Parent/Guardian *(signature)* |  | Date |

ADOPTED: November 21, 2005

AMENDED: March 16, 2011

## Operational Services

## Exhibit - Response to Application for Fee Waiver, Appeal, and Response to Appeal

**Response to Application for Fee Waiver (**To parent/guardian):

|  |  |  |
| --- | --- | --- |
|  |  |  |
| **Student’s Name** *(please print)* |  | **School** |
| **Request granted**  **Request denied for the following reason(s):** | | |
|  | | |
|  | | |
| **If your request was denied**, you may appeal in writing by completing the following portion of this form and submitting it to the Superintendent of this decision. If you appeal this decision, you have the right to meet with the Superintendent or designee to explain why the fee waiver should be granted. You may reapply at any time if circumstances change. | | |
|  |  |  |
| Building Principal or Office Staff Member |  | Date |

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

|  |  |  |
| --- | --- | --- |
| I am exercising my right to appeal the Building Principal’s denial of my request to waive the school student fee described above.  I would like to explain why the fee waiver should be granted during a telephone conversation or during a meeting with the person who will decide my appeal. *(If you check this box, someone from the Superintendent’s office will contact you to make arrangements.)* | | |
|  |  |  |
| Parent/Guardian (*please print*) |  | Telephone Number |
|  |  |  |
| Signature |  | Date |
| The Superintendent’s office will notify you in writing of the results of your appeal within 30 calendar days of receipt of your appeal. | | |

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

|  |  |  |
| --- | --- | --- |
| Appeal received on: (insert date)\_\_\_\_.  I have reviewed your appeal.  **Request granted  Request denied for the following reason(s):** | | |
|  | | |
|  |  |  |
| Superintendent |  | Date |

ADOPTED: November 21, 2005

AMENDED: March 16, 2011

AMENDED: December 14, 2016

# Operational Services

## Exhibit - Resolution to Increase Driver Education Fees

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

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

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

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

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

THEREFORE, BE IT RESOLVED, that the School Board hereby increases the driver education fee to an amount not to exceed $250.00, effective on ­ *[date]* , and waives the increased fee for any student who is unable to pay for the course according to the provisions in Board policy 4:140, *Waiver of Student Fees*.

Attested by:

Board President

Attested by:

Board Secretary

# ADOPTED: May 21, 2012

# Operational Services

## Facility Management and Building Programs

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

Standards for Managing Buildings and Grounds

All District buildings and grounds shall be adequately maintained in order to provide an appropriate, safe, and energy efficient physical environment for learning and teaching. The Superintendent or designee shall provide the Board with periodic reports on maintenance data and projected maintenance needs that include cost analysis. Prior Board approval is needed for all renovations or permanent alterations to buildings or grounds when the total cost will exceed $5,000, including the cost equivalent of staff time. This policy is not intended to discourage efforts to improve the appearance of buildings or grounds that are consistent with the designated use of those buildings and grounds.

Standards for Green Cleaning

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

Standards for Facility Construction and Building Programs

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

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

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

Naming Buildings and Facilities

Recognizing that the name of a school building, facility, or ground or field reflects on its public image, the Board’s primary consideration will be to select a name that enhances the credibility and stature of the school or facility. Any request to name or rename an existing facility should be submitted to the Board. When a facility is to be named or renamed, the Board President will appoint a special committee to consider nominations and make a recommendation, along with supporting rationale, to the Board. The Board will make the final selection. The Superintendent or designee may name a room or designate some area on a school’s property in honor of an individual or group that has performed outstanding service to the school without using the process in this policy.

LEGAL REF.: 42 U.S.C. § 12101 et seq., Americans with Disabilities Act of 1990, implemented by 28 C.F.R. Parts 35 and 36. 20 ILCS 3130/, Green Building Act. 105 ILCS 5/2-3.12, 5-10-20.49, 5/10-22.36, 5/10-20.60 (P.A. 100-163, final citation pending), 5/17-2.11.\

105 ILCS 140/, Green Cleaning Schools Act.

105 ILCS 230/ , School Construction Law.

410 ILCS 25/, Environmental Barriers Act. 820 ILCS 130/0.01 et seq. 23 Ill.Admin.Code Part 151, School Construction Program, Part 180, Health/Life Safety Code for Public Schools; and Part 2800, Green Cleaning for Elementary and Secondary Schools. Ill.Admin.Code Part 400, Ill. Accessibility Code.

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

ADOPTED: June 17, 2002

AMENDED: December 15, 2008

AMENDED: April 18, 2011

AMENDED: January 20, 2015

AMENDED: February 20, 2017

AMENDED: December 18, 2017

4:150

# Operational Services

## Environmental Quality of Buildings and Grounds

The Superintendent shall take all reasonable measures to protect: (1) the safety of District personnel, students, and visitors on District premises from risks associated with hazardous materials, and (2) the environmental quality of the District’s buildings and grounds. Before pesticides are used on District premises, the Superintendent or designee shall notify employees and parents/guardians of students as required by the Structural Pest Control Act, 225 ILCS 235/, and the Lawn Care Products Application and Notice Act, 415 ILCS 65/.

LEGAL REF.: 29 C.F.R. §1910.1030, Occupational Exposure to Bloodborne Pathogens, as adopted by the Illinois Department of Labor, 56 Ill.Admin.Code §350.300(c).

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

20 ILCS 3130/, Green Buildings Act.

105 ILCS 5/10-20.17a; 5/10-20.48; 135/; and 140/, Green Cleaning School Act.

225 ILCS 235/, Structural Pest Control Act.

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

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

23 Ill.Admin.Code §1.330, Toxic Materials Training.

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

ADOPTED: June 17, 20024:160

AMENDED: April 18, 2011

AMENDED: August 18, 2014

# Operational Services

## Administrative Procedure - Environmental Quality of Buildings and Grounds

Hazardous and/or Infectious Materials

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

Pesticide Application on School Grounds

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

1. Provide an annual schedule of pesticide application to the supervisor of each District building.
2. In coordination with the supervisor of each District building (including each Building Principal), notify employees and students and their parents/guardians in each building. The notification must:
3. Be provided at least 4 business days before a pesticide application on school grounds.
4. Be written or by telephone. If written, the notice may be included in newsletters, calendars, or other correspondence currently being published.
5. Identify the intended date of the application.
6. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

An exception to this notification is permitted if there is an imminent threat to health or property, in which case the Lawn Care Products Application and Notice Act shall control. If such a situation arises, the Building and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written or telephonic notice is provided as soon as practicable.

Pesticide Application in School Buildings and Structures

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

1. Provide an annual schedule of pesticide application to the supervisor of each District building.
2. In coordination with the supervisor of each District building (including each Building Principal):
3. Maintain a registry of all employees and parents/guardians of students.
4. Notify those employees and parents/guardians of students before pesticides are applied in or on each building. The notification must:
5. Be provided at least 2 business days before a pesticide application in or on school buildings.
6. Be written. The notice may be included in newsletters, bulletins, calendars, or other correspondence currently being published.
7. Identify the intended date of the application.
8. Provide the name and telephone contact number for the Buildings and Grounds Supervisor or other school personnel responsible for the pesticide program.

An exception to this notification is permitted if there is an imminent threat to health or property, in which case the Structural Pest Control Act shall control. If such a situation arises, the Building and Grounds Supervisor must sign a statement describing the circumstances that gave rise to the health threat and ensure that written notice is provided as soon as practicable.

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

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

The Buildings and Grounds Supervisor or designee shall: (1) develop and implement a program incorporating the Department of Public Health guidelines; (2) notify the Department, on forms provided by the Department, that a program is being implemented; (3) repeat the notification every 5 years after the initial notification; and (4) keep copies of all notifications and all written integrated pest management program plans.

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

The Buildings and Grounds Supervisor or designee shall: (1) notify the Department, on forms provided by the Department, that the development and implementation of an integrated pest management program is not economically feasible; (2) include in the notification the projected pest control costs for the term of the pest control program and projected costs for implementing a program for that same time period; (3) repeat this notification every 5 years after the initial notification until a program is developed and implemented; and (4) attend a training course, approved by the Department, on integrated pest management and repeat attendance every 5 years thereafter until a program is developed and implemented in the District’s schools.

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

Training and Necessary Equipment

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

Before an employee is given an assignment where contact with blood or bodily fluids or other hazardous material is likely, the employee must be provided the necessary training, including training in the universal precautions and other infection control measures to prevent the transmission of communicable diseases and/or to reduce potential health hazards as required by 23 Ill.Admin.Code §1.330. The appropriate supervisor shall maintain an attendance record of an employee’s participation in the training.

Substitute Non-Hazardous Materials

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

Infectious Materials

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

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

Emergency Response Plan

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

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

Evacuation

The Building Principal shall ensure compliance with the School Safety Drill Act, 105 ILCS 128/. This includes, among other things, ensuring that evacuation rules are posted in each room and discussed with each class using the room during the first days of the school year. The evacuation rules indicate the primary and alternate exits and the evacuation area to which students should proceed upon leaving the building.

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

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

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

105 ILCS 5/10-20.17a, Hazardous Materials Training; 5/10-20.46, Compliance with Chemical Safety Acts; 135/, Toxic Art Supplies in School Act; and 140/, Green Cleaning School Act.

225 ILCS 235/, Structural Pest Control Act.

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

23 Ill.Admin.Code §1.330, Toxic Materials Training.

ADOPTED: January 20, 2009

AMENDED: April 18, 2011

AMENDED: August 18, 2014

# Operational Services

## Safety

Safety and Security

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

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

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

School Safety Drill Plan

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

1. Three school evacuation drills to address and prepare students and school personnel for fire incidents. One of these three drills shall require the participation of the local fire department or district.
2. One bus evacuation drill.
3. One severe weather and shelter-in-place drill to address and prepare students and school personnel for possible tornado incidents.
4. One law enforcement drill to address a school shooting incident.

Annual Review

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

Automated External Defibrillator (AED)

The Superintendent or designee shall implement a written plan for responding to medical emergencies at the District’s physical fitness facilities in accordance with the Fitness Facility Medical Emergency Preparedness Act and shall file a copy of the plan with the Ill. Dept. of Public Health (KDPH). The plan shall provide for at least one automated external defibrillator (AED) to be available at every physical fitness facility on the premises according to State law requirements.

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

Carbon Monoxide Alarms

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

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

Soccer Goal Safety

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

Unsafe School Choice Option

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

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

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

Lead Testing in Water

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

Emergency Closing

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

Annual Review

The Board or its designee will annually review each school building’s safety and security plans, protocols, and procedures, as well as each building’s compliance with the school safety drill plan.

LEGAL REF.: 105 ILCS 5/10-20.2, 5/10-20.56, 5/18-12, 5/18-12.5, and 128/.

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

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

ADOPTED: June 17, 2002

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AMENDED: December 18, 2017

# Operational Services

## Administrative Procedure - Comprehensive Safety and Security Plan

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8. **Material to be Included in Each School EOP**
9. **Managing Communications During and About an Emergency or Crisis**
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11. **Resources**

**Attachment - School Emergency Operations Plan Format**

1. **Safety and Security Related Administrative Procedures and Forms**

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

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

4:110-AP1 *School Bus Post-Accident Checklist*

4:110-AP3 *School Bus Safety Rules*

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

4:160-AP *Environmental Quality of Buildings and Grounds*

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

4:170-AP1, E2 *Memo to Staff Members Regarding Contacts by Media About a Crisis*

4:170-AP2 *Routine Communications Concerning Safety and Security*

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

4:170-AP2, E2 *Letter to Parents/Guardians Regarding Educational Programs About the Dangers of Underage Drinking*

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

4:170-AP4 *National Terrorism Advisory System*

4:170-AP5 *Unsafe School Choice Option*

4:170-AP6 *Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED*

4:170-AP6, E1 *School Staff AED Notification Letter*

4:170-AP6, E2 *Notification to Staff and Parents/Guardians of CPR and AED Video*

4:170-AP7 *Targeted School Violence Prevention Program*

4:170-AP7, E1 *Threat Assessment Decision Tree*

4:170-AP7, E2 *Threat Assessment Documentation and Response*

4:170-AP7, E3 *Targeted School Violence Prevention and Threat Assessment Education*

4:170-AP8 *Movable Soccer Goal Safety*

4:175-AP1 *Criminal Offender Notification Laws; Screening*

4:175-AP1, E1 *Informing Parents/Guardians About Offender Community Notification Laws*

4:180-AP1 *School Action Steps for Pandemic Influenza*

4:180-AP2 *Pandemic Influenza Surveillance and Reporting*

6:235-E4 *Keeping Yourself and Your Kids Safe On Social Networks*

6:235-E5 *Children’s Online Privacy Protection Act*

7:280-AP *Managing Students with Communicable or Infectious Disease*

7:290-AP *Resource Guide for Implementation of Suicide and Depression Awareness and Prevention Program*

1. **Definitions**

*EOP* is an Emergency Operations Plan (formerly *site-based safety plan*). Each school or facility has an EOP.

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

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

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

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

*SRO* means school resource officer.

1. **District Safety Coordinator and Safety Team; Responsibilities**

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

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

The District Safety Coordinator and each school’s Safety Team are responsible for developing, implementing, and maintaining a **School Emergency Operations Plan** (school EOP) with the following objectives as explained in FEMA’s *Guide to Developing High-Quality School Emergency Operations Plans* *(2013),* at [rems.ed.gov/docs/REMS\_K-12\_Guide\_508.pdf](http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf):

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

1. **Safety Team Meetings**

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

* Review the agenda and determine who will take meeting notes.
* Review the notes from the previous meeting.
* Discuss the status of previously submitted recommendations.
* Receive, review, and discuss individual and Safety Team committee reports and recommendations concerning one or more items below.

1. Safety and security data from incidents, investigations, audits, etc.
2. Recommendations received from stakeholders and first responders
3. Emerging issues
4. Status of the school EOP
5. Status of the safety and security communication system
6. Status of training programs
7. Status of programs to build awareness of, and enthusiasm for, the school’s EOP (contests, posters, drives, etc.)

* Clarify information and recommendations for a report to the Superintendent.
* Confirm the Safety Team meeting schedule and review upcoming meeting dates.

1. **Annual Safety Review**

The District Safety Coordinator facilitates the annual safety review meeting conducted by the School Board or its designee, as required by 105 ILCS 128/25 and 128/30. During the annual safety review, the law requires the School Board or its designee to “review each school building’s emergency and crisis response plans, protocols, and procedures and each building’s compliance with the school safety drill programs.” If the school board uses a designee, it should preferably be someone other than the District Safety Coordinator to assure an unbiased audit. The District Safety Coordinator assists the Board or its designee to comply with annual review requirements, including without limitation, the completion of a report certifying that the review took place. See ISBE’s website for an annual review checklist and report at [www.isbe.net/safety/guide.htm](http://www.isbe.net/safety/guide.htm). The Open Meetings Act allows the Board to enter closed session to discuss security procedures, school building safety and security, and the use of personnel and equipment to respond to an actual, a threatened, or a reasonably potential danger to the safety of employees, students, staff, the public, or public property (5 ILCS 120/2(c)(8), amended by P.A. 99-235, eff. 1-1-16). Consult the Board Attorney for assistance with this Open Meetings Act exception.

1. **School Safety Drill Plan**

The School Safety Drill Act (105 ILCS 128/, amended by P.A. 98-48) and any implementing State administrative rules shall supersede this procedure in the event of a conflict.

The Building Principal shall keep the Superintendent or designee informed of when drills are scheduled and/or accomplished. ISBE’s fillable form for documenting the completion of minimum drill requirements may be used (see [www.isbe.state.il.us/safety/pdf/91-02\_school\_drill\_documentation.pdf](http://www.isbe.state.il.us/safety/pdf/91-02_school_drill_documentation.pdf)).

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

1. **Three school evacuation drills.** These drills prepare students and personnel for situations that occur when conditions outside of a school building are safer than inside a school building. Evacuation may be necessary depending on the circumstances. They may include a fire, suspicious item or person, or incident involving a hazardous material, including but not limited to a chemical, incendiary, explosive, and bomb threat.

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

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

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

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

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

1. **One severe weather and shelter-in-place drill.** This drill prepares students for situations involving severe weather emergencies or the release of external gas or chemicals. Severe weather and shelter-in-place drills must address and prepare students and school personnel for possible tornado incidents. Other drills shall be based on the needs and environment of particular communities, including severe weather (such as tornadoes, wind shears, lightning, and earthquakes), incidents involving hazardous materials, and incidents involving weapons of mass destruction.
2. **One law enforcement drill.** This drill addresses a school shooting incident and prepares school personnel for situations calling for the involvement of law enforcement when conditions inside a school building are safer than outside of a school building, and it is necessary to protect building occupants from potential dangers in a school building. Law enforcement drills may involve reverse evacuation or the lockdown of a school building. Evacuation or reverse evacuation incidents include a shooting incident. A law enforcement drill may be conducted on days and times when students are not present in the school building. A law enforcement drill must meet each of the following criteria:

* During each calendar year, the appropriate law enforcement agency contacts the Building Principal to request participation in the law enforcement drill. The Building Principal and the law enforcement agency shall set, by mutual agreement, a date for the drill.
* The drill involves the onsite participation of the local law enforcement agency, provided that an agreeable date can be reached between the Building Principal and the local law enforcement agency. If the parties cannot reach an agreeable date, the school shall hold the drill without participation from the law enforcement agency.
* After a drill in which local law enforcement participated, the Building Principal should request a certification from local law enforcement that the law enforcement drill was conducted. The law enforcement agency shall also notify the school of any deficiencies noted during the drill.

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

1. **School Emergency Operations Plan (School EOP)**

Each Safety Team shall develop, implement, and maintain a school EOP using the process below, as explained in FEMA’s *Guide to Developing High-Quality School Emergency Operations Plans* *(2013),*at [rems.ed.gov/docs/REMS\_K-12\_Guide\_508.pdf](http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf):

1. Develop a schedule and invite the participation of first responders.
2. Identify threats and hazards, assess risks, and prioritize threats and hazards.
3. Determine goals and objectives.
4. Develop, review, evaluate, and maintain the EOP.
5. Share the EOP with stakeholders and train them. This includes, without limitation, having the EOP accessible in a digital format.

Each school EOP shall be in the format suggested by and explained in FEMA’s *Guide to Developing High-Quality School Emergency Operations Plans* *(2013)*, at [rems.ed.gov/docs/REMS\_K-12\_Guide\_508.pdf](http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf). See the **Attachment** to this procedure.

1. **Material to be Included in Each School EOP**

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

1. Building evacuation protocol. The Principal or designee shall: (a) keep a comprehensive evacuation map - describing main and alternate routes - in the main office, (b) post signs containing main and alternate evacuation routes for each occupied area in a conspicuous place, preferably near the exit, (c) prepare evacuation plans for outdoor areas (playgrounds and stadiums), and (d) keep all staff informed of the evacuation plans.
2. Documents concerning safety drills. The Principal shall schedule, execute, and document safety drills as per the School Safety Drill Act (105 ILCS 128/) and this procedure.
3. Maps and layouts, including (a) campus map, (b) building floor plan, (c) location of first aid kits, AEDs, and fire extinguishers, and (d) map or plan describing the areas to be used in the event of an emergency or crisis for triage, emergency helicopter landing, media center, non-victim students, and parents/guardians. The Safety Team or Principal shall annually give a copy of these to first responders.
4. A protocol to secure a list of people present in the building at any time.
5. Tornado response plan, including a map showing tornado wall locations (105 ILCS 128/25).
6. Carbon monoxide alarm or detector activation plans, protocols and procedures (105 ILCS 5/10-20.56, amended by P.A. 99-470, eff. 1-1-16 and 430 ILCS 135/).
7. The safety equipment’s maintenance schedule and the person(s) responsible.
8. An emergency early dismissal protocol.
9. A plan for inviting warnings or tips, e.g., a hotline or website for individuals to make anonymous tips.
10. A protocol for student supervision in the event of an emergency or crisis.
11. A safety patrol plan (105 ILCS 5/10-22.28).
12. Bicycle use rules.
13. Roadway and parking rules.
14. Procedures on student illness and injuries at school and school events (23 Ill.Admin.Code §1.530(c).
15. A plan for giving students instructions on safe school bus riding practices, including the operation and use of emergency doors and windows (as a means of escape), seat belts, and fire extinguisher (105 ILCS 128/20(b). The District’s parent-teacher advisory committee, in cooperation with school bus personnel, establishes and maintains bus safety rules (105 ILCS 5/10-20.14). See 4:110-AP3, *School Bus Safety Rules*.
16. Safety and security related administrative material. See section A, above.
17. Other documents identified by the Safety Team.
18. **Managing Communications During and About an Emergency or Crisis**

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

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

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

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

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

1. Avoiding speculation as to the cause.
2. Avoiding allocation of blame.
3. Helping school and law enforcement officials gather the facts.
4. Sticking to the facts during discussions.
5. Deferring all media requests to the spokesperson.
6. Comforting and supporting each other.
7. **Required Notices**

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

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

Upon receiving a report on any of the above, the Building Principal or designee shall immediately notify local law enforcement. See 3:60-E, *Reporting Requirements for Building Principals Concerning School Safety and Security*. In addition, he or she must notify the Superintendent and, within 1 to 3 days of the incident’s occurrence, one or both of them must notify the Ill. State Police (ISP). Notification to the ISP may be accomplished using ISBE’s web-based School Incident Reporting System (SIRS) to report incidents electronically. SIRS is available at [www.isbe.state.il.us/research/htmls/sch\_incident.htm](http://www.isbe.state.il.us/research/htmls/sch_incident.htm) or by going to ISBE’s home page and accessing the District’s Web Application Security (IWAS) account.

1. **Resources**

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center; Guides for Developing Emergency Operations Plans [rems.ed.gov/EOPGuides.aspx](http://rems.ed.gov/EOPGuides.aspx)

Guide for Developing High-Quality School Emergency Operations Plans: At a Glance [rems.ed.gov/K12GuideForDevelHQSchool.aspx](http://rems.ed.gov/K12GuideForDevelHQSchool.aspx)

Guide for Developing High-Quality School Emergency Operations Plans [rems.ed.gov/docs/REMS\_K-12\_Guide\_508.pdf](http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf)

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center [rems.ed.gov/toolbox.aspx](http://rems.ed.gov/toolbox.aspx%20)

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute [www.alicetraining.com/](http://www.alicetraining.com/)

SBE/OSFM All Hazard Preparedness Guide for Illinois Schools [www.isbe.net/safety/guide.htm](http://www.isbe.net/safety/guide.htm)

Illinois Emergency Management Agency (IEMA) [www.illinois.gov/ready/](http://www.illinois.gov/ready/)

Schools/Campus - Resources [www.illinois.gov/ready/plan/Pages/schools-resources.aspx#violence](http://www.illinois.gov/ready/plan/Pages/schools-resources.aspx#violence)

School Safety Information Sharing Program (SSISP) [www.illinois.gov/ready/plan/Pages/schools-sharing.aspx](http://www.illinois.gov/ready/plan/Pages/schools-sharing.aspx)

Illinois Law Enforcement Alarm System (ILEAS) [www.ileas.org/main/ileas-supports-school-safety-information-sharing-program](http://www.ileas.org/main/ileas-supports-school-safety-information-sharing-program%20)

Illinois Terrorism Task Force [iema.illinois.gov/iema/ittf/publications/IMT\_brochure.pdf](https://iema.illinois.gov/iema/ittf/publications/IMT_brochure.pdf%20)

National Association of School Psychologists (NASP) - Recommendations for Comprehensive School Safety Policies [www.nasponline.org/communications/press-release/NASP\_School\_Safety\_Recommendations\_January%202013.pdf](http://www.nasponline.org/communications/press-release/NASP_School_Safety_Recommendations_January%202013.pdf)

LEAD & MANAGE MY SCHOOL - Emergency Planning Office of Safe and Healthy Students [www2.ed.gov/admins/lead/safety/emergencyplan/index.html](http://www2.ed.gov/admins/lead/safety/emergencyplan/index.html%20)

U.S. Secret Service (USSS) Active Shooter Related Research Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack [www.secretservice.gov/ntac/bystander\_study.pdf](http://www.secretservice.gov/ntac/bystander_study.pdf)

Bomb Threat Response Planning Tool, developed by the U.S. Dept. of Justice’s Bureau of Alcohol, Tobacco, Firearms and Explosives and the U.S. Dept. of Education’s Office of Safe and Drug Free Schools [www.threatplan.org/default.htm](http://www.threatplan.org/default.htm)

School Crisis Guide - Help and Healing in a Time of Crisis, published by NEA Health Information Network [crisisguide.neahin.org/crisisguide/images/SchoolCrisisGuide.pdf](http://crisisguide.neahin.org/crisisguide/images/SchoolCrisisGuide.pdf%20)

**Attachment**

**School Emergency Operations Plan Format**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Basic Plan** | |  |  | |  |
| 1. | Introductory Material | | 2.4 | Planning Assumptions | |
| 1.1 | Promulgation Document and Signatures | | 3. | Concept of Operations | |
| 1.2 | Approval and Implementation | | 4. | Organization and Assignment of Responsibilities | |
| 1.3 | Record of Changes | | 5. | Direction, Control, and Coordination | |
| 1.4 | Record of Distribution | | 6. | Information Collection, Analysis, and Dissemination | |
| 1.5 | Table of Contents | | 7. | Training and Exercises | |
| 2. | Purpose, Scope, Situation Overview, and Assumptions | | 8. | Administration, Finance, and Logistics | |
| 2.1 | Purpose | | 9. | Plan Development and Maintenance | |
| 2.2 | Scope | | 10. | Authorities and References | |
| 2.3 | Situation Overview | |  |  | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Functional Annexes** | |  |  | |  |
| Note: This is not a complete list, but it is recommended that all EOP’s include at least the following functional annexes: | | | | | |
| 1. | Communications | | 6. | Reunification | |
| 2. | Evacuation | | 7. | Continuity of Operations (COOP) | |
| 3. | Shelter-in-Place | | 8. | Security | |
| 4. | Lockdown | | 9. | Recovery | |
| 5. | Accounting for All Persons | | 10. | Health and Medical | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Threat- or Hazard-Specific Annexes** | |  | |  |
| Note: This is not a complete list. Each school’s annexes will vary based on its hazard analysis. | | | | |
| 1. | Hurricane or Severe Storm | 5. | Mass Casualty Incident | |
| 2. | Earthquake | 6. | Active Shooter | |
| 3. | Tornado | 7. | Pandemic or Disease Outbreak | |
| 4. | Hazardous Materials Incident |  |  | |

ADOPTED: August 18, 2014

AMENDED: December 16, 2015

# Operational Services

## Administrative Procedure - Routine Communications Concerning Safety and Security

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

| **Form, Memo, or Letter** | **Explanation** |
| --- | --- |
| 4:15-E1 - *Letter to Employees Regarding Protecting the Privacy of Social Security Numbers*  4:15-E2 - *Statement of Purpose for Collecting Social Security Numbers*  4:15-E3 - *Statement for Employee Manual or District Website Concerning the District’s Purpose for Collecting Social Security Numbers* | Board policy makes the Superintendent responsible for ensuring that the District complies with the Identity Protection Act, 5 ILCS 179/. The letter informs staff members about their obligation to protect the privacy of social security numbers. 4:15-E2 and 4:15-E3 fulfill the requirement in the Identity and Protection Act to provide a statement of the purposes for which the District is collecting and using social security numbers. |
| 4:110-E - *Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses* | The parent/guardian of a student with special needs or medical conditions completes this form to provide information to bus drivers and emergency medical technicians. One copy is kept at the school and another copy on the student’s school bus in a secure location. 105 ILCS 5/10-20.35 encourages, but does not require, this communication. |
| 4:170-AP1, E1 - *Accident or Injury Form* | This form documents an accident or injury. It provides useful information for examining and evaluating risks. Many insurance companies require completion of their own forms. |
| 4:170-AP1, E2 - *Memo to Staff Members Regarding Contacts by Media About a Crisis* | This memo is intended to encourage staff members to refer questions from the media to the District spokesperson to avoid disseminating incomplete or inaccurate information, or unintentionally violating student privacy rights. |
| 4:170-AP2, E1 - *Letter to Parents/Guardians Regarding Student Safety* | This letter is intended to gain the support and cooperation of parents/guardians concerning the District’s safety and security plan. It should align with 4:170-AP1, *Comprehensive Safety and Security Plan*. |
| 4:170-AP2, E2 - *Letter to Parents/ Guardians Regarding Educational Programs About the Dangers of Underage Drinking* | This letter informs parents/guardians about: (1) the dangers of underage drinking, (2) the prohibition on serving alcohol to minors, and (3) the punishment for violating these laws. House Resolution 98-162 encourages, but does not require, this communication. |
| 4:170-AP2, E3- *Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers* | This letter informs parents/guardians about social media apps that can be harmful and disruptive. It describes *hyperlocal* social media apps, e.g., YikYak, that use GPS on cell phones to target groups in specific areas and *temporary* social media apps that offer a false sense of anonymity or a false belief that content *disappears* after a certain set time limit, e.g., *ask.fm* and *Snapchat*. |
| 4:170-AP6, E1 - *School Staff AED Notification Letter* | This letter informs staff members of AED locations and instructions for responding to medical emergencies, as required by 77 Ill.Admin.Code §527.800(b). |
| 4:170-AP6, E2 - *Notification to Staff* *and Parents/Guardians of CPR and AED Video* | This notification informs parents/guardians and staff of the training video on hands-only cardiopulmonary resuscitation and automated external defibrillators available on the Ill. High School Association’s website. Required by 105 ILCS 25/1.10, added by P.A. 98-305. |
| 4:175-AP1, E1 - *Informing Parents/Guardians About Offender Community Notification Laws* | This notification informs parents/guardians that information about sex offenders and violent offenders against youth is available on the Ill. State Police’s website. It is provided during school registration or parent-teacher conferences, as required by 730 ILCS 152/. |
| 6:235-AP1 - *Acceptable Use Electronic Networks*  6:235-AP1, E1 - *Student Authorization for Electronic Network Access*  6:235-AP1, E2 - *Staff Authorization for Electronic Network Access*  6:235-E3 - *Online Privacy Statement* | Internet safety is promoted by wide distribution of the District’s rules and guidelines. |
| 6:235-E4 - *Keeping Yourself and Your Kids Safe on Social Networks* | Many parents/guardians are unaware that the Children’s Online Privacy Protection Act gives them control over the types of information that websites can collect from their children. This document’s purpose is to provide information to parents/guardians about this Act. |
| 6:250-E - *Resource Person and Volunteer Information Form and Waiver of Liability* | Board policy makes the Superintendent responsible for establishing procedures for securing and screening resource persons and volunteers. This form is completed by an individual who wants to be a resource person and/or volunteer in a school. |
| 7:180-AP1, E2 - *Be a Hero by Reporting Bullying and School Violence* | The District’s anti-bullying program seeks to stop bullying and school violence. This exhibit’s purpose is to encourage reporting by both witnesses and victims. |
| 7:180-AP1, E3 - *Memo to Staff Regarding Bullying and School Violence* | The District’s anti-bullying program seeks to stop bullying and school violence. This exhibit informs staff members about the District’s anti-bullying program and its expectations of staff members. |
| 7:180-AP1, E4 - *Memo to Parents/Guardians Regarding Bullying and School Violence* | The District’s anti-bullying program seeks to stop bullying and school violence. This exhibit informs parents/ guardians of the District’s anti-bullying program and encourages them to help the District identify students who are being bullied. |
| 7:180-AP1, E5 - *Report Form for Bullying and School Violence* | The District’s anti-bullying program seeks to stop bullying and school violence. This form is completed by the bullying target, witness, or other person and submitted to the Building Principal’s office. Its purpose is to expedite bullying reports. |
| 7:185-E - *Memo to Parents/Guardians Regarding Teen Dating Violence* | This memo informs students and their parents/guardians about the Board’s policy prohibiting teen dating violence. Required by 105 ILCS 110/3.10(b)(5). |
| 7:190-AP6, E1 - *Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting* | Informing parents/guardians about sexting may help gain their support and cooperation to end sexting and its resulting disruption to the educational environment. |
| 7:270-E - *School Medication Authorization Form* | This form offers a systematic process for parents/guardians to provide notice and instructions to the school nurse or other staff member regarding medications, asthma inhalers, and/or epinephrine auto-injectors. |
| 7:280-E3 - *Preventing Staphylococcal Infections for Schools* | This exhibit contains information for students and their parents/guardians and staff members concerning preventing staphylococcal infections in schools. |
| 7:300-E1 - *Agreement to Participate* | This exhibit documents that a student athlete and his or her parent/guardian were informed about the risks inherent in sports and received IHSA’s: (1) information about performance enhancing substances testing program, and (2) Concussion Information Sheet. It also asks the parent/guardian for emergency contacts. |
| 7:300-E2 - C*ertificate of Physical Fitness for Participation in Athletics* | This certificate provides documentation that the parent/guardian believes that his or her student athlete is in good health and capable of participating in the sport or activity. The parent/guardian also provides a short medical history and current medications for the student athlete. |
| 7:300-E3 - *Authorization for Medical Treatment* | Parents/guardians sign this form to authorize medical treatment of their child who is a student athlete. |
| 8:30-E1 - *Letter to Parent Regarding Visits to School by Child Sex Offenders* | This exhibit informs parents/guardians that State law restricts when a child sex offender may be on school property. It provides instructions to any parent/guardian who is a child sex offender. |
| 8:30-E2 - *Child Sex Offender’s Request for Permission to Visit School Property* | A child sex offender uses this exhibit to request permission to visit school property. He or she must provide the reason(s) for seeking permission to visit school property. |

ADOPTED: August 18, 2014

# Operational Services

## Exhibit - Letter to Parents/Guardians Regarding Student Safety

*On District letterhead*

Date

Re: Student Safety

Dear Parents/Guardians:

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

School Emergency Operations Plan (EOP)

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

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

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

Communications to Stakeholders

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

Emergency Responses

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

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

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

Cooperation and Assistance Request

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

Defamatory or disruptive behavior will only lessen our response effectiveness.

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

Website Address:

Information Hotline Number:

Sincerely,

Superintendent

# ADOPTED: August 18, 2014

# Operational Services

## Exhibit - Letter to Parents/Guardians Regarding Educational Programs About the Dangers of Underage Drinking

*On District letterhead*

Date

Re: Underage Drinking

Dear Parent(s)/Guardian(s):

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

According to the National Institute of Health (NIH), in cases of alcohol-involved drivers, the rate of fatal crashes for drivers between 16 and 20 years old is more than twice that for drivers older than 20. The NIH and the Centers for Disease Control and Prevention indicate that regular alcohol consumption by minors also corresponds to increased rates of suicide, sexual assault, high-risk sex, fighting, crime, and alcohol dependence. No one fully understands the lifetime consequences of alcohol consumption on the developing brain, but studies have shown weakened memory and worsening of school performance due to increased truancy and learning impairments.

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

Zero Tolerance

Any person under the age of 21 who has consumed alcohol and operated or been in actual physical control of a motor vehicle may be requested to submit to tests to determine alcohol content. If that person refuses the test or has an alcohol concentration greater than .00, his or her driver’s license will be suspended for 3 months to one year (625 ILCS 5/11-501.1(c).

Consumption of Alcohol by Minor

Consumption of alcohol by a minor is a Class C misdemeanor. Minors convicted of alcohol possession in a public space face up to six months in jail and a $500 fine, plus court costs and court-ordered evaluations and counseling. If a person under the age of 21 pleads guilty to, or is found guilty of, consuming alcohol while under the age of 21, he or she will lose his or her driving privileges for at least 3 months, even if the person was not driving, and even if he or she gets court supervision (a non-conviction sentence) (235 ILCS 5/10-1(e) and 625 ILCS 5/6-206(a)(43).

Fake Identification

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

Criminal Liability for Parent(s)/Guardian(s)

Any parent/guardian or other adult who furnishes alcohol to a minor, or who allows his or her residence to be used for the unlawful possession or consumption of alcohol by minors, may be charged with a Class A misdemeanor punishable by a fine and/or jail for up to 1 year. Where a violation directly or indirectly results in great bodily harm or death to any person, the crime is a class 4 felony, punishable by 1 to 3 years in prison and up to a $25,000 fine (235 ILCS 5/6-16(a-1).

Civil Liability for Parent(s)/Guardian(s)

Any parent/guardian or other adult who provides alcohol (such as at a home party) may be liable in a civil action for monetary damages totaling up to $100,000. The action may be sought by someone who suffers personal injury, loss of support, or property loss through the actions of an intoxicated minor whose intoxication resulted from a parent/guardian or another adult giving the minor alcohol (235 ILCS 5/6-21).

Driving Under the Influence (DUI)

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

Illegal Transportation of Open Liquor

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

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

pubs.niaaa.nih.gov/publications/MakeADiff\_HTML/makediff.htm

www.centurycouncil.org/underage-drinking/parents

www.samhsa.gov/underagedrinking/

Sincerely,

Superintendent

# ADOTPED: August 18, 2014

# Operational Services

## Exhibit - Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers

*On District letterhead or via the District’s electronic communications management system*

Date

Re: Disruptive Social Media Apps; Dangers

Dear Parents/Guardians:

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

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

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

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

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

**Resources about Social Media Apps and Protecting Your Child Online**

www.ParentingTodaysKids.com, educates parents/guardians to help them close the technology gap that may exist between themselves and their children.

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

cell-phone-parental-control-software-review.toptenreviews.com/learning-center.html, reviews recent electronic device monitoring software (current as of May 2014).

Sincerely,

Building Principal

ADOPTED: August 18, 2014

# Operational Services

## Exhibit - Letter to Parents/Guardians About Preventing and Reducing Incidences of Sexting

*On District letterhead*

Re: Preventing and Reducing Incidences of Sexting

Dear Parent(s)/Guardian(s):

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

Discussing sexting and its legal and social consequences with your children may prevent and reduce incidences of it at school and elsewhere. A recent survey revealed that about 20 percent of teen boys and girls have sent sext messages. It can cause enormous emotional pain for the students involved, often with legal implications. The following talking points from the American Academy of Pediatrics may help start the discussion:

* Introduce the issue as soon as a child is old enough to have a cell phone. Even if the issue hasn’t directly impacted your school building’s community, ask “have you heard of sexting?” “Tell me what you think it is.” Learn what your child’s understanding is and add an age appropriate explanation. For more information about starting age appropriate discussions, see *The New Problem of Sexting* subhead on the American Academy of Pediatrics website at: www.aap.org/advocacy/releases/june09socialmedia.htm.
* Make sure children of all ages understand that the District’s student discipline policy prohibits sexting at school, and that it is further punishable in Illinois through the Juvenile Court Act and The Criminal Code of 2012.
* Collect cell phones at gatherings of tweens and teens. Experts have noted that peer pressure can play a major role in sexting, with attendance at parties being a major contributing factor.
* Monitor the media for stories about sexting that illustrate the consequences for both senders and receivers of these images. Ask “Have you seen this story?” “What did you think about it?” “What would you do if you were this child?”
* Rehearse ways your child can respond if asked to participate in sexting.

For more information on sexting and how to talk to your children about it, please see the following links:

www.aap.org/advocacy/releases/june09socialmedia.htm;

www.education.com/magazine/article/child-sexting-parents/;

www.athinline.org.

Sincerely,

Superintendent

ADOPTED: November 17, 2014

# Operational Services

## Administrative Procedure - National Terrorism Advisory System

The National Terrorism Advisory System (NTAS) is designed to convey timely information to the American public about terrorist threats. NTAS issues two types of advisories: *Bulletins and Alerts*, which are described below:

**Bulletins** – Communicate developments or trends about terrorism threats without necessarily indicating a specific threat. This means a Bulletin provides broad terrorism threat information that allows recipients to quickly take protective measures.

**Alerts –** Are onlyissued when specific, credible information about a terrorist threat is available. An Alert may include information pertaining to the threat’s nature, the geographic region, mode of transportation, or critical infrastructure potentially affected by the threat, as well as steps that individuals and communities can take to protect themselves and help prevent, mitigate, or respond to the threat. Alerts carry an expiration date and will be automatically canceled on that date. Updates to an Alert, as well the cancelation of an alert, will be distributed in the same way as the original Alert.

Alerts will state whether a threat is elevated o imminent as follows:

A threat is elevated if there is no specific information about the timing or location.

A threat is imminent if the threat is believed to be impending or occurring very soon.

NTAS advisories are issued by the U.S. Dept. Of Homeland Security at : www.dhs.gov/alerts.

District Response Measures

The Superintendent or designee is responsible for tracking Bulletins and Alerts and disseminating those that merit administrative review.

After receiving an NTAS advisory, each the Superintendent, Building Principal or other appropriate administrator (*administrator*) will review it and determine what response measures, if any, should be taken. To determine the appropriate response, the administrator should assess the threat to the District activities for which he or she is responsible and consider reviewing the threat with other administrators and/or public safety officials. A range of potential response measures are listed below in the column entitled **Potential Response Measures in Additions to Any Suggested by the NTAS Advisory**.

The Superintendent and Building Principal(s) should strongly consider closing school(s) and canceling activities whenever there is an imminent threat to the District or one of its buildings.

| **Response Category** | **Potential Response Measures in Addition to Those Suggested by the NTAS Advisory** |
| --- | --- |
| Emergency Planning and Preparedness | Update the school site-based safety plans, specifically the emergency and disaster response procedures.  Address critical emergency needs under the direction of public safety officials.  Coordinate emergency plans with county, State, and federal agencies.  Inventory emergency supplies and equipment.  Maintain current emergency communication lists for employees and students.  Test alternative communication capabilities.  Designate and alternative communications center located off school property.  Review parent/guardian notification procedures.  Review procedures to reunite students with their parents/guardians should schools close mid-day. |
| Communication/Activities with Employees | Instruct employees to report suspicious activities or persons to the administrative office.  Conduct emergency and disaster response training for all employees.  Disseminate emergency communications methods and resources, e.g., where to get information, to employees.  Review school emergency operations plans with all employees.  Update employee emergency contact numbers. |
| Communication/Activities with Students | Instruct students to report suspicious activities or persons to any employee.  Conduct school safety drills with students. |
| Classes and School Activities | Close school(s) early.  Cancel classes.  Cancel outside activities and field trips.  Cancel all activities.  Cancel regular and/or extracurricular bus service. |
| Building and Grounds Security | Reassess facility security measures, e/g/, lock exterior doors.  Increase building security throughout the school system.  Implement visitor control procedures.  Limit visitor access to school.  Prohibit visitor access to school.  Request police department to increase patrols around school.  Take additional precautions during events and activities, e/g/. hiring additional security staff, restricting public access, or canceling the event/activity.  In case of a building lockdown, ensure each school building has a reasonable supply of food, drinking water, medical supplies, back-up communication equipment, generator, batteries, etc. |
| Parent/Guardian Communication | Disseminate emergency communications methods and  resources, e.g., where to get information, to parent/guardians and the community.  Update student emergency contact numbers.  Test parent/guardian notification procedures.  Increase communication with parents/guardians and community via website and e-mail distribution.  Inform parents/guardians of procedures to reunite students with parents/guardians should schools close mid-day. |

Resources

Access NTAS Bulletins or Alerts at: www.dhs.gov/alerts

Sign up tp receive NTAS Bulletins and Alerts via email at:

public.govdelivery.com/accounts/USDHS/subscriber/new?topic\_id=USDHS\_164

To add NTAS Bulletins and Alerts to a website see:

www.dhs.gov/files/programs/ntas-developer-resources.shtm

For further information on the NTAS see:

www.dhs.gov/files/programs/ntas.shtm

[www.dhs.gov/files/publications/ntas-questions-answers.shtm](http://www.dhs.gov/files/publications/ntas-questions-answers.shtm)

For a sample NTAS Bulletin see:

www.dhs.gov/sites/default/files/publications/15\_1214\_ntas\_sample\_bulletin.pdf.

For a sample NTAS Alert see:

# www.dhs.gov/sites/default/files/publications/15\_1214\_ntas\_sample\_elevated\_alert.pdf

ADOPTED: May 21, 2012

AMENDED: October 16, 2016

# Operational Services

## Administrative Procedure - Unsafe School Choice Option

Illinois public school districts must comply with the following two statutes: (1) 105 ILCS 5/2-3.134 requires ISBE to maintain data and publish a list of *persistently dangerous schools*, and (2) 105 ILCS 5/10-21.3a requires each school board to adopt a policy governing the transfer of students within the district from a *persistently dangerous school* to another public school in the district. Board policy 4:170, *Safety*, fulfills this requirement with its section on *Unsafe School Choice Option*. This administrative procedure implements the policy. It incorporates the guidance given by the U.S. Department of Education, *Unsafe School Choice Option*, *Non-Regulatory Guidance,* www2.ed.gov/policy/elsec/guid/unsafeschoolchoice.pdf.

**Unsafe School Choice Option.**

This procedure implements the policy. It incorporates guidance issued by the U.S. Department of Education (DOE), *Unsafe School Choice Option, Non-Regulatory Guidance*, www2.ed.gov/policy/elsec/guid/unsafeschoolchoice.pdf, when NCLB was in effect. NCLB was repealed. A new law took its place called the Every Student Succeeds Act (ESSA), which amended ESEA on December 10, 2015. ESEA, as amended by ESSA, still requires states to implement an unsafe school choice option; however, the DOE has not updated its guidance to be consistent with this new law. This procedure incorporates DOE guidance to the extent that it is consistent with the new law. Frequent ESSA implementation guidance is expected as states implement the new law.

Unsafe School Choice Option for Students in Persistently Dangerous Schools

| **Actor** | **Action** |
| --- | --- |
| ISBE | Identifies each Illinois school that is a *persistently dangerous school* as defined in 105 ILCS 5/10-21.3a (b) (attached).  As of May 2014, ISBE has not identified a *persistently dangerous school*. |
| Building Principal or designee | Within ten calendar days of identification, or longer time if necessary, notifies by U.S. mail, the parents/guardians of students attending a *persistently dangerous school*, of that school’s status as *persistently dangerous*. |
| Superintendent | Keeps the Board informed as appropriate.  Determines which, if any, schools will receive students assigned to a *persistently dangerous school*.  If a recipient school is not available in the District, the Superintendent will explore other appropriate options, e.g., intergovernmental agreements with another district to accept transfer students.  The needs and preferences of affected students and parents/guardians will be considered.  Develops and implements a corrective action plan. |
| Building Principal or designee | Within 20 calendar days of identification, or longer time if necessary, informs parents/guardians of the following:   1. The status of the corrective action plan; and 2. The identities of any available school or public charter school into which students may transfer. |
| Parents/guardians | As soon as possible after being informed of the unsafe school choice option, confers with the Building Principal concerning whether to exercise the transfer option. |
| Building Principal or designee | Executes any requested transfers as soon as possible. Transfers will be in effect at least while the original school is identified as *persistently dangerous*. When determining the transfer length, the Principal considers the student’s educational needs as well as other factors affecting the student’s ability to succeed if returned to the transferring school. |
| Superintendent or designee | Upon corrective action plan’s completion, requests that ISBE remove the school from the list of *persistently dangerous schools*. |

Unsafe School Choice Option for Any Student Who Is a Victim of a Violent Criminal Offense Occurring on School Grounds During Regular School Hours or During a School-Sponsored Event

| **Actor** | **Action** |
| --- | --- |
| Building Principal or designee | Notifies the Superintendent that a student was a victim of a violent crime, as defined by 725 ILCS 120/3 (attached), occurring on school grounds during regular school hours or during a school-sponsored event. |
| Superintendent | As soon as possible, determines which, if any, schools are available recipients for a student who was a victim of a violent crime while in school or on school grounds.  The recipient school may be a public charter school.  If a recipient school is not available in the District, the Superintendent will explore other appropriate options, e.g., an agreement with a neighboring district to accept the student.  The needs and preferences of the affected student and his or her parents/guardians shall be considered.  Keeps the Board informed as appropriate. |
| Building Principal or designee | As soon as possible, notifies the student’s parents/guardians that the student may transfer to another school, provided another school is available. |
| Parents/guardians | As soon as possible after being informed of the unsafe school choice option, confers with the Building Principal concerning whether to exercise the transfer option. |
| Building Principal or designee | Executes any requested transfer as soon as possible. When determining the transfer length, considers the student’s educational needs as well as other factors affecting the student’s ability to succeed if returned to the transferring school. |

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**Definitions for “Persistently Dangerous School”**

105 ILCS 5/10-21.3a

**§10-21.3a(b).** In order to be considered a persistently dangerous school, the school must meet all of the following criteria for 2 consecutive years:

1. Have greater than 3% of the students enrolled in the school expelled for violence-related conduct;
2. Have one or more students expelled for bringing a firearm to school as defined in 18 U.S.C. 921;
3. Have at least 3% of students enrolled in the school exercise the individual option to transfer schools pursuant to subsection (c) of this section. [105 ILCS 5/10-21.3a(c), see the second section of this procedure]

**Definitions for “Crime Victim” and “Violent Crime”**

725 ILCS 120/3 (current as of May 2014)

**§ 3.** The terms used in this Act, unless the context clearly requires otherwise, shall have the following meanings:

(a) "**Crime victim**" and “**victim**” means (1) a person physically injured in this State as a result of a violent crime perpetrated or attempted against that person or (2) a person who suffers injury to or loss of property as a result of a violent crime perpetrated or attempted against that person or (3) a single representative who may be the spouse, parent, child or sibling of a person killed as a result of a violent crime perpetrated against the person killed or the spouse, parent, child or sibling of any person granted rights under this Act who is physically or mentally incapable of exercising such rights, except where the spouse, parent, child or sibling is also the defendant or prisoner or (4) any person against whom a violent crime has been committed or (5) any person who has suffered personal injury as a result of a violation of Section 11-501 of the Illinois Vehicle Code, or of a similar provision of a local ordinance, or of Section 9-3 of the Criminal Code of 1961 or the Criminal Code of 2012, or (6) in proceedings under the Juvenile Court Act of 1987, both parents, legal guardians, foster parents, or a single adult representative of a minor or person with a disability who is a crime victim.

(c) "**Violent Crime**" means any felony in which force or threat of force was used against the victim, or any offense involving sexual exploitation, sexual conduct or sexual penetration, or a violation of Section 11-20, 11-20.1B, or 11-20.3 of the Criminal Code of 2012, domestic battery, violation of an order of protection, stalking, or any misdemeanor which results in death or great bodily harm to the victim or any violation of Section 9-3 of the Criminal Code of 1961 or the Criminal Code of 2012, or Section 11-501 of the Illinois Vehicle Code, or a similar provision of a local ordinance, if the violation resulted in personal injury or death, and includes any action committed by a juvenile that would be a violent crime if committed by an adult. For the purposes of this paragraph, "personal injury" shall include any Type A injury as indicated on the traffic accident report completed by a law enforcement officer that requires immediate professional attention in either a doctor's office or medical facility. A Type A injury shall include severely bleeding wounds, distorted extremities, and injuries that require the injured party to be carried from the scene; [.]

ADOPTED: August 18, 2014

AMENDED: February 20, 2017

# Operational Services

## Exhibit - School Staff AED Notification Letter

*On District letterhead*

Date:

To: Staff members

Re: Notification to School Staff of the Physical Fitness Facility Medical Emergency Response Instructions and AED Availability

We would like to notify you about our plan for responding to medical emergencies that might occur in our physical fitness facilities. This plan includes access to an Automated External Defibrillator (AED) in the following locations in these buildings:

|  |  |  |
| --- | --- | --- |
| Facility |  | Location |
|  |  |  |
|  |  |  |

The AEDs are strategically placed and readily accessible to predetermined AED users to maximize rapid use. The AED is available during school hours and after school during and activity or program organized by the school and supervised by a school employee. The predetermined AED users are school nurses and any other person who has received AED training (American Heart Association, American Red Cross, or equivalent training) and has a completion card on file with the Superintendent. Any anticipated rescuers or users should now also be trained and certified.

The following information is posted with each AED:

1. Instructions to immediately call 9-1-1 and instructions for emergency care.
2. Instructions for using an AED.

Please contact me if you would like information on becoming a trained AED user. If you anticipate that your duties make you more likely to use an AED, you should become trained and certified. It is important to note that the Physical Fitness Facility Medical Emergency Preparedness Act and the Local Governmental and Governmental Employees Tort Immunity Act protest staff members from liability**.** We appreciate your support.

Sincerely,

Superintendent

Attachments: Step-by-Step Emergency Response Plan (bottom of page 4 or 4:170-AP6, *Plan for Responding to a Medical Emergency at a Physical Fitness Facility)*

Adopted: October 17, 2005 Amended: April 18, 2011

# Operational Services

## Exhibit - Notification to Staff and Parents/Guardians of CPR and AED Video

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

Date:

To: Parents/Guardians and Staff

Re: CPR and AED Video

State law requires the Illinois High School Association to post a hands-only cardiopulmonary resuscitation and automated external defibrillators training video on its website. The law also requires the District to notify staff members and parents/guardians about the video. You are encouraged to view the video, which will take less than 15 minutes of your time, at:

www.ihsa.org/Resources/SportsMedicine/CPRTraining.aspx.

Adopted: October 17, 2005

AMENDED: April 18, 2011

AMENDED: August 18, 2014

# Operational Services

## Administrative Procedure - Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED

The following operations implement School Board policy 4:170, *Safety*, requiring a plan for responding to medical emergencies at a physical fitness facility. These operations shall be completed consistent with the Physical Fitness Facility Medical Emergency Procedures Act, 210 ILCS 74/, and the Illinois Department of Public Health Rules, Part 527, Physical Fitness Medical Emergency Preparedness Code. Any definitions of terms found in this Act and IDPH implementing rules are used as the definitions of those terms in this procedure. 77 Ill.Admin.Code Part 527.

| **Actor** | **Action** |
| --- | --- |
| Superintendent or designee | Appoints a staff member to coordinate the operations in this Procedure who will be known as the *Plan Coordinator*.  Plan Coordinator:    Name Position  Files this plan with the Dept. of Public Health, Division of EMS & Highway Safety, 500 E. Monroe - 8th Floor, Springfield, IL 62701. Files an updated plan with the IDPH after a change in the facility that affects the ability to comply with a medical emergency, such as the facility was closed for more than 45 days. 77 Ill.Admin.Code §527.400(a)&(c).  Dates plan submitted:      Decides, with input from the Plan Coordinator, the schedule for purchasing new AEDs. 210 ILCS 74/50.  If the AED becomes inoperable, the district must replace or repair it within 30 days. Persons using the facility must be notified if an operable AED is not on the premises. 77 Ill.Admin.Code §527.600.  Designates each Building Principal as the individual who must be notified in the event of a medical emergency. 77 Ill.Admin.Code §527.400(a).  Building Office Contact        Follows the requirements of 77 Ill.Admin.Code §525.500 upon receiving a completed report that an AED was used. |
| Plan Coordinator | **Responsibilities Concerning Emergency Responders**  With the Building Principal, identifies all staff members who, through their education or training, are appropriate emergency responders for specific facilities. If possible, train all emergency responders in CPR and AED use.  Facility Emergency Response Providers        **Responsibilities Concerning AED Users**  Determines the appropriate number of trained AED users and anticipated rescuers or users needed for each facility equipped with an AED. Each facility with an AED must have at least one trained AED user on staff during staffed business hours (210 ILCS 74/15 and 77 Ill.Admin.Code §527.600) and take reasonable measures to ensure that anticipated rescuers or users are trained pursuant to 410 ILCS 4/15 and 77 Ill.Admin.Code §527.800.  Working with the Building Principal, identifies trained AED users and requests that other appropriate staff members and anticipated rescuers or users become trained.  Facility Trained AED Users        **Responsibilities Concerning AED Registration**  Coordinates with local emergency medical services systems. 77 Ill.Admin.Code §527.500.  Notifies an agent of the local emergency communications or vehicle dispatch center of the existence, location, and type of the automated external defibrillator (410 ILCS 4/20(b); 77 Ill.Admin.Code §527.500).  Cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete the Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code § 515.350). 77 Ill.Admin.Code §525.500.  **Responsibilities Concerning Location of AED and Other First Aid Equipment**  **Indoor Facility -** Decides, with input from the Building Principal or designee, where to place the AED and other first aid equipment so that their location will be conspicuous, easily accessible, and convenient; the AED must be mobile and accessible at all times. 77 Ill.Admin.Code §527.600.  **Outdoor Facility -** Ensures that the AED is placed within 300 feet of the outdoor facility in an open building with unimpeded access that has marked directions to the location of the AED at its entrances. 77 Ill.Admin.Code §527.600 (c).  Facility First Aid & AED Location        Keeps a copy of the AED’s manual with the AED. 77 Ill.Admin.Code §527.700(b).  **Responsibilities Concerning Notification and Posting**  Along with the Building Principal, notifies all staff members of the location of any AEDs as well as the instructions for responding to medical emergencies. 77 Ill.Admin.Code §527.800(b).  **Responsibilities Concerning Training**  Coordinates, with input from the Building Principal, the training of: (1) all staff members who regularly supervise students in physical fitness facilities in the use of CPR and, if appropriate, AEDs, and (2) any non-employee coaches, instructors or other similarly situated anticipated rescuers or users. 77 Ill.Admin.Code §527.800 and 210 ILCS 74/15(b-5) and (b-10).  **Responsibilities Concerning Instructions for Responding to Medical Emergencies**  Along with the Building Principal, notifies all facility staff of the location of any AEDs and the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.800(b).  Coordinates, along with the Building Principal, the posting of the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.800(b).  **Responsibilities Concerning Maintenance and Testing of AEDs**  Ensures that all AEDs are maintained and tested according to manufacturer’s guidelines. 77 Ill.Admin.Code §527.700(a).  Keeps a copy of the maintenance and testing manual at the facility and keeps a copy of the manual with each AED. 77 Ill.Admin.Code §527.700(b). |
| Building Principal | In a conspicuous place in the physical fitness facility, posts: (1) the list of all staff members who are emergency responders, and (2) the *Step-by-Step Emergency Response Plan* described below. 77 Ill.Admin.Code §527.400(a).  Posts a notice at the facility’s main entrance stating that an AED is located on the premises.  Receives notice in the event of a medical emergency. 77 Ill.Admin.Code §527.400(a). |
| School Nurse(s) | Along with the Plan Coordinator, helps staff members understand the instructions for responding to medical emergencies.  These instructions must provide that the AED should be operated only by trained AED users, unless the circumstances do not allow time to be spent waiting for a trained AED user to arrive. 77 Ill.Admin.Code §527.800(c). |
| Trained AED User(s) and/or Other Emergency Responder(s) | According to their training, uses appropriate emergency responses upon the occurrence of any sudden, serious, and unexpected sickness or injury that would lead a reasonable person, possessing an average knowledge of medicine and health, to believe that the sick or injured person required urgent or unscheduled medical care. 77 Ill.Admin.Code §527.400(a).  According to their training, uses the AED to help restore a normal heart rhythm. 77 Ill.Admin.Code §527.400(a).  Calls 9-1-1 for medical emergencies and whenever an AED is used. 77 Ill.Admin.Code §527.400(b).  Informs the Building Principal whenever the AED or other emergency response is used. 77 Ill.Admin.Code §527.400(b).  Whenever an AED is used, cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete a Data Collection and Submission report about the use of the AED (77 Ill.Admin.Code §515.350). 77 Ill.Admin.Code §525.500. |
| All Facility Staff Members and Users | Follow the *Step-by-Step Emergency Response Plan* described below:   1. Immediately notify the building’s emergency responder(s) whose contact information is posted in the facility. Under life and death circumstances call 9-1-1 without delay. 2. Bring the first aid equipment and AED to the emergency scene. The AED should be operated only by trained AED users for the intended purpose of the AED, unless the circumstances do not allow time for a trained AED user to arrive. 3. Immediately inform the Building Principal or designee of the emergency. 4. The emergency responder will take charge of the emergency. This person will apply first aid, CPR, and/or the AED, as appropriate. 5. If necessary, the emergency responder instructs someone to call 9-1-1, providing the location in the building and which entrance to use. This person should make sure someone is sent to open the door for paramedics and guide them to the scene. 6. When paramedics arrive and assume care of the victim, the emergency responder or other staff person notifies the victim’s parent/guardian or relative. 7. If an AED was used, the person using it cooperates and provides any information requested by the local emergency communications or vehicle dispatch, so they can complete the Data Collection and Submission report about the use of the AED. If appropriate, a supervising staff member completes an accident report. 8. If an adult refuses treatment, the emergency responder documents the refusal and, if possible, asks the adult to sign a statement stating that he or she refused treatment. |

Adopted: October 17, 2005

Amended: April 18, 2011

AMENDED: May 21, 2012

AMENDED: July 15, 2013

AMENDED: August 18, 2014

# Operational Services

## Administrative Procedure - Targeted School Violence Prevention Program

Threat assessment procedures work best when incorporated into an overall Targeted School Violence Prevention Program (Program) strategically developed and collectively implemented by local school officials, District staff, student body members, and the community. Under a properly implemented Program, schools can respond to student behavior that raises safety concerns. This administrative procedure contains four sections as follows:

1. Glossary of Terms
2. Targeted School Violence Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery
4. Threat Assessment (Three Phases):

Phase One: Identification

Phase Two: Investigation

Phase Three: Response

Glossary of Terms

**Threat -** An expression of intent to harm someone that may be spoken, written, or communicated in some other way.

**Targeted School Violence -** Includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity.

**Targeted School Violence Prevention Program (Program) -** The overall process used to create a District and school environment that is conducive to learning by identifying, managing, and preventing threats and acts of Targeted School Violence.

**Targeted School Violence Prevention Plan (TSVP Plan) -** The strategic procedures used to integrate a Targeted School Violence Prevention Program into a District’s existing policies and procedures.

**School Violence Prevention Team (SVP Team) -** A District level team that the Superintendent creates to develop a Targeted School Violence Prevention Plan and oversee the District’s Targeted School Violence Prevention Program and anti-bullying program. The SVP team utilizes the expertise of its members to ensure that the District develops school violence prevention plans that comply with applicable civil rights and other federal and State laws.

**Threat Assessment -** A rational approach to prevent school violence through evaluating students that demonstrate potentially dangerous behavior. Developed by the U.S. Secret Service and adapted for use in school settings, it aims to first assess the seriousness of the threat and then the appropriate response to resolve it and ultimately prevent an act of Targeted School Violence.

**Threat Assessment Team -** A building-level team that performs a threat assessment when activated by the Building Principal.

It may include the Building Principal, Assistant Building Principal, School Resource Officer, School Psychologist, and School Counselor or Social Worker.

Targeted School Violence Prevention Plan

Following are the strategic procedures to integrate a Targeted School Violence Prevention Program into the District’s existing policies and procedures.

| **Actor** | **Action** |
| --- | --- |
| Superintendent | Select a School Violence Prevention Team (SVP Team) from throughout the community to include:  Building Principals (Building Principals are mandatory for successful implementation of a TSVP Plan).  District Safety Coordinator (see 4:170-AP1, *Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities*)  Teachers  Law enforcement representatives  Board attorney  District psychologist(s)  Mental health workers and/or social service agencies  Faith leaders  Community members  Students  Chair and convene SVP Team meetings for the purpose of completing a District-level TSVP Plan.  Determine whether to recommend that the Board assess the District’s conditions for development and learning (see 7:180-AP1, *Prevention, Identification, Investigation, and Response to Bullying and School Violence* for resources and more discussion).  Inform School Board of the SVP Team’s progress and needs by adding information item to Board’s agendas as needed. |
| SVP Team | Develop processes to identify, assess, and manage threatening communications and situations.  Identify policies and procedures that possibly affect a TSVP Plan, including but not limited to:  1:20, *District Organization, Operations, and Cooperative Agreements*  2:150, *Committees*  2:240, *Board Policy Development*  3:40, *Superintendent*  3:60, *Administrative Responsibility of the Building Principal*  4:170, *Safety*  5:100, *Staff Development Program*  5:130, *Responsibilities Concerning Internal Information*  5:230, *Maintaining Student Discipline*  6:65, *Student Social and Emotional Development*  6:120, *Education of Children with Disabilities*  6:235, *Access to Electronic Networks*  7:20, *Harassment of Students Prohibited*  7:130, *Student Rights and Responsibilities*  7:140, *Search and Seizure*  7:150, *Agency and Police Interviews*  7:170, *Vandalism*  7:180, *Preventing Bullying, Intimidation, and Harassment*  7:190, *Student Discipline*  7:200, *Suspension Procedures*  7:210, *Expulsion Procedures*  7:230, *Misconduct by Students with Disabilities*  7:250, *Student Support Services*  7:340, *Student Records*  8:10, *Connection with the Community*  8:95, *Parental Involvement*  8:100, *Relations with Other Organizations and Agencies*  Recommend, through the Superintendent, all policy changes to the School Board for consideration. See policy 2:240, *Board Policy Development.*  Appoint Building Principals or designees as a “point of contact” to encourage and accept reports of threats. |
| Building Principal | Establishes and leads building-level Threat Assessment Teams consisting of available personnel such as the Assistant Principal, School Counselor/School Psychologist, and School Law Enforcement/Resource Officer. (The building-level team composition can be adapted to meet the staffing patterns for different schools and may include other disciplines.)  Ensures 4:170-AP1, *Administrative Procedure - Comprehensive Safety and Security Plan, Part G, School Emergency Operations Plan (EOP)*, is available throughout schools (do **not** limit to office); distributes to and discusses with local law enforcement; regularly reviews plan with the building staff.  Publicizes and educates staff, parents/guardians, students, and community members: (1) to report students and situations of concern to any school administrators or other authorities (i.e., local law enforcement), and (2) how school officials will address these concerns. This can be accomplished by distributing 4:170-AP7, *Targeted School Violence Prevention Program* and 7:180-AP1, E2, *Be a Hero by Reporting Bullying and School Violence*, and discussing what Threat Assessment Teams are and what they do when they learn of threats and/or school violence.  Assess the feasibility of forming an anonymous tip line and organizing its management.  When a tip or concern is raised, proceed with **Threat Assessment** - **Phase One: Identification of Threat** procedures.  Provide follow-up acknowledgements to those who provide information, e.g., “we appreciate your bringing this situation to our attention” or “we have carefully considered the information you shared with us.” |
| School Board | Monitor 4:170, *Safety,* and make changes recommended by the SVP Team. See policy 2:240, *Board Policy Development.*  Provide both the SVP and Threat Assessment Teams with appropriate resources. This may include providing resources to and access for staff to professional development opportunities. These opportunities should train staff to properly respond to students who provide them with information about a threat or school safety concern. |
| Superintendent/Building Principal | Ensures the student disciplinary policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See 7:180, *Preventing Bullying, Intimidation, and Harassment* and7:190, *Student Discipline*.  Ensures that staff responds to students who provide them with information about a threatening or disturbing situation. |

Preparedness for a Targeted School Violence Crisis, Response, and Recovery

This portion follows 4:170-AP1, *Comprehensive Safety and Security Plan* and suggests additional steps specific to preparing for a Targeted School Violence crisis that school officials may want to incorporate in the District’s existing Safety and Crisis Plan.

| **Actor** | **Action** |
| --- | --- |
| Superintendent, Building Principal, and SVP Team | Examines 4:170-AP1, *Comprehensive Safety and Security Plan* procedures and recommend any changes to existing procedures to Superintendent or District Safety Coordinator. |
| District Safety Coordinator | Meet with SVP Team to foster an understanding of what additional items the District’s Safety Team might add to its procedures to accomplish a response and recovery.  Add an agenda item to the 4:170-AP1, *Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities.* Safety Team meetings specific to Targeted School Violence; consider inviting the Board Attorney and local law enforcement and emergency responders to this meeting.  **Note**: During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District; local law enforcement’s familiarity with the identity of the District’s legal counsel *before* a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it.  Consider designating a trained public relations and communication manager to inform parents and the community during a crisis and to keep pace with social media information. |
| Superintendent and Building Principal(s) | For crisis preparedness and response, ensure:  4:170-AP1, *Comprehensive Safety and Security Plan, Part G, School Emergency Operations Plan (EOP)* reflects each individual building’s needs.  4:170-AP1, *Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan*, supports a TSVP Plan, specifically consider whether to add a law enforcement drill if the school does not already participate.  4:170-AP1, *Comprehensive Safety and Security Plan, Parts G and H,* reflects each building’s needs. It also ensures that multiple copies of these plans exist, and it directs that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal’s office is insufficient.  For crisis recovery, ensures:  4:170-AP1, *Comprehensive Safety and Security Plan, Parts I, J, and K,* reflects District needs and that the Board Attorney is aware of the plans.  Recommend to the District Safety Coordinator any other additional crisis recovery items that the safety team deems necessary. |

Threat Assessment

The procedures of this section rely heavily upon Building Principals to lead Threat Assessment Teams through the use of 4:170-AP7, E1, E2, and E3 to identify, assess, and manage threatening behavior.

**Phase One: Identification of Threat**

| **Actor** | **Action** |
| --- | --- |
| Anyone | Identifies student or situation to applicable Building Principal. |
| Building Principal (alone or with Threat Assessment Team) | Assesses the question: “How much time do we have?” If time is critical, proceeds directly to the crisis management procedures outlined in 4:170-AP1, *Comprehensive Safety and Security Plan* (this procedure outlines when to involve law enforcement).  Notifies the Superintendent.  If 4:170-AP1, *Comprehensive Safety and Security Plan* is not immediately necessary, uses 4:170-AP7, E1, *Threat Assessment Decision Tree,* and follows steps to evaluate the threat (generally, a Building Principal can quickly resolve the first three steps without engaging the full Threat Assessment Team in a comprehensive threat assessment).  **Step 1: Evaluate threat.**  Using 4:170-AP7, E2, *Threat Assessment Documentation and Response*, thoroughly and promptly collects information and evaluates threat by:   1. Interviewing student with a standard set of questions and documenting the facts; 2. Notifying the student’s parent(s)/guardian(s) (use 7:190-E1, *Aggressive Behavior Reporting Letter and Form,* when appropriate); 3. Notifying the parent(s)/guardian(s) of the target(s); and 4. Assessing the need for confidentiality of the information gathered from students and other witnesses during the threat assessment investigation and response phases.   **Step 2: Decide whether threat is clearly transient or substantive.**  Considers the context of how the threat was made and categorizes the level of risk as transient or substantive. The most important distinction between transient and substantive threats is that substantive threats require protective action to prevent the threat from being carried out. Serious discipline violations do not always constitute substantive threats.  Transient threats proceed to **Step 3: Respond to transient threat.**  Substantive threats **skip** **Step 3** and proceeding directly to **Step 4**: **Assess whether the substantive threat is serious or very serious,** below using **Threat Assessment - Phase Two: Investigation.**  **Step 3: Respond to transient threat.**  When the threat is transient, the full threat assessment team does not need to perform a comprehensive threat assessment; determines appropriate management and discipline considerations and responds accordingly. When a transient threat is sparked by an argument or conflict, may involve other Threat Assessment Team members to determine the appropriate management and discipline considerations to resolve the problem.  See policies 7:190, *Student Discipline*; 7:180, *Preventing Bullying, Intimidation, and Harassment*; and/or 6:120, *Education of Children with Disabilities*. |

**Phase Two: Investigation**

| **Actor** | **Action** |
| --- | --- |
| Building Principal and Threat Assessment Team | **Step 4: Assess substantive threat as serious or very serious.**  Keep Superintendent informed.  Assess whether the threat is *serious* or *very serious* by examining the intended severity of the threatened injury/action. Consult with notes on 4:170-AP7, E2, *Threat Assessment Documentation and Response*.  *Serious threats* (generally threats to physically harm) proceed to **Step 5**.  *Very serious threats* (generally threats involving the use of a weapon, murder, sexual assault, or severe injury to others) **skip** **Step 5,** proceeding directly to **Step 6** below in **Threat Assessment - Phase Three: Response**, Local Law Enforcement.  Manage the student of concern; consider contacting the Board Attorney; and ensure discreteness of situation. See, 7:130, *Student Rights and Responsibilities*; 7:140, *Student Search and Seizure*; 7:180, *Preventing Bullying Intimidation and Harassment*; 7:250 *Student Support Services*; and 7:250-AP2 *Protocol for Responding to Students with Social Emotional, or Mental Health Problems*.  **Step 5: Respond to serious substantive threat.**  Notify and protect all potential target(s) and notify their parent(s)/guardian(s). Use 4:170-AP7, E2, *Threat Assessment Documentation and Response*, to ensure that protective action reflects the circumstances of the threat.  Caution the student about the consequences of carrying out the threat and keep student’s parent(s)/guardian(s) informed.  Determine the appropriate management and discipline considerations to resolve the problem. See 6:120, *Education of Children with Disabilities*; 7:190, *Student Discipline*; 7:200, *Suspension Procedures*; and 7:210, *Expulsion Procedures*. |

**Phase Three: Response**

| **Actor** | **Action** |
| --- | --- |
| Building Principal and Threat Assessment Team in conjunction with Local Law Enforcement Investigators | **Step 6: Respond to Very Serious Threat**  Determine whether to conduct safety evaluation, psychological assessment, or law enforcement investigation.  Consider suspension to ensure immediate protection of all potential targets and notify their parent(s)/guardian(s).  Use 4:170-AP7, E2, *Threat Assessment Documentation and Response*, to ensure that protective action reflects the circumstances of the threat.  Refer student(s) for mental health evaluation; manage student(s); contact Board attorney; and ensure discreteness of situation. 7:200, *Suspension Procedures*; 7:250, *Student Support Services*; and 7:250-AP2, *Protocol for Responding to Students with Social, Emotional, or Mental Health Problems*.  Refer matter to the school resource officer and/or local law enforcement to investigate and engage other resources within the community. |
| School Resource Officer and/or Local Law Enforcement | Issue findings and recommendations of investigation to Threat Assessment Team. |
| Building Threat Assessment Team | Determine appropriate management and discipline; recommend suspension or expulsion based upon the findings and recommendations of local law enforcement. See 7:200, *Suspension Procedures*; 7:210, *Expulsion Procedures*; 7:250, *Student Support Services*; and 7:250-AP2, *Protocol for Responding to Students with Social, Emotional, or Mental Health Problems*.  **Step 7: Implement a written safety plan.**  If student returns to school, integrate findings and recommendations of investigation to create a written safety plan that responds to the incident through management and protection of potential target(s) while addressing students’ educational needs. The plan should, among other things:   * Describe conditions the student must meet to return and stay in school; * Implement procedures to monitor the student if he or she returns to the school; * Include feedback from the student(s)’ parent(s)/guardian(s) (when appropriate); and * Include other items as deemed appropriate by the Threat Assessment Team.   See 6:120, *Education of Children with Disabilities*; 7:250, *Student Support Services*; and 7:250-AP2, *Protocol for Responding to Students with Social, Emotional or Mental Health Problems*. |

ADOPTED: November 18, 2013

AMENDED: August 18, 2014

# Operational Services

## Exhibit - Threat Assessment Decision Tree

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**Step 1. Evaluate threat.**

*  Interview student target of threat, and other witnesses; notify all parents/guardians involved.
*  Document all interviews.
*  Consider the circumstances of the threat and the student’s intentions.

**Step 2. Decide whether threat is clearly transient or substantive.**

Consider collected information, student’s age, credibility, and previous discipline history.

**Transient** - low level, dissipates quickly, anger or frustration, inappropriate humor.

**Substantive** -medium/high level, sustained intent to harm beyond immediate incident, meaning unclear.

**Step 3. Respond to transient threat.**

Typical responses are parental notification, mandated mediation and/or counseling, and low-level discipline (e.g., reprimand, apology, or other disciplinary action).

**Step 4. Assess substantive threat as serious or very serious.**

**Serious threat** - assault, strike, or beat-up someone

**Very serious threat** - weapons, kill, sexual assault, or inflict severe injury.

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**Manage the student.**

**Consider contacting Board attorney.**

**Step 5. Respond to serious threat.**

*  Protect potential targets and notify parents.
*  **Consider** contacting law enforcement.
*  Refer student for counseling, dispute mediation, or other appropriate intervention.
*  Discipline student as appropriate to severity and chronicity of situation.

**Step 6. Respond to very serious threat.**

*  Refer to School Resource Officer or law enforcement for investigation.
*  Ensure immediate protection of potential targets, notify the target and target’s parents.
*  Refer to School Resource Officer or law enforcement for investigation.
*  Begin a mental health evaluation of the student.
*  Conduct safety evaluation, psychological assessment, law enforcement investigation.

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**Step 7. Implement a written safety plan.**

*  Discipline student as appropriate to findings.
*  Maintain contact with the student.
*  Revise plan as needed.

# Operational Services

## Exhibit - Threat Assessment Documentation and Response

Below is a sample threat assessment documentation and response form. Each section contains investigation questions designed to help threat assessment teams gather information to evaluate, manage and prevent threats of violence at or related to school. School threat assessment teams should modify the questions and spacing of the form to fit their needs. Consult Board policy, 7:340, *Student Records*, for appropriate recordkeeping procedures for placement of this information in the student’s temporary record. Adapted from Cornell, D., Sheras, P., (Sopris West 2006). *Guidelines for Responding to Student Threats of Violence*, p. 110.

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Your name |  | Title |
|  |  |  |
| Student who made threat |  | School |
|  |  |  |
| Date learned of threat |  | Date threat occurred |
|  |  |  |
| Threat reported by (or circle anonymous) |  | Location of threat |
| **Threat type:** TransientSerious SubstantiveVery Serious Substantive | | |
| What student said or did to express a threat (quote student if possible, write exact content of threat): | | |

Interview Guidelines

|  |
| --- |
| **Interview of Student who made threat**  *Use interview for investigation; modify and use additional pages as needed and attach to this form.* |
| 1. Do you know why I wanted to talk with you? Tell me. |
| 1. What happened today when you were (refer to place of incident)? |
| 1. What exactly did you say? And what exactly did you do? (write down student’s exact words) |
| 1. What did you mean when you said/did that? (ascertain the student’s motives/goals) |
| 1. How do you think (target) feels about what you said/did? (determine whether student believes it frightened or intimidated the target of threat) |
| 1. What was the reason you made this threat? (Find out if there is prior conflict or history to this threat, e.g., bullying between the target and the student.**Note**: Identification of bullying incidents will require an additional investigation, see policy 7:180, *Preventing Bullying, Intimidation, and Harassment,* and exhibits 7:180-AP1, E5, *Report Form for Bullying and School Violence* and/or 7:180-AP1, E6, *Interview Form for Bullying and School Violence Investigation.*) |
| 1. What are you going to do now that you have made this threat? (*determine whether the student intends to carry out threat*) |
| 1. Can you think of a different, more desirable and acceptable, effective way to address this conflict? |

|  |
| --- |
| **Witness Interview** Target of threat or Witness to threat, but not target  *Use as another component of investigation; modify and use additional pages as needed and attach to this form*. |
| Witness name and grade/title:   1. What exactly happened today when you were (Refer to place of incident)? 2. What exactly did (target) you say/do? (Write down student’s exact words.) 3. What do you think he/she meant when he/she said/did that? 4. How did you feel about what he/she said/did? Are you concerned he/she might really do it? 5. What was the reason he/she said/did that? |

Assessment of Threat

|  |  |
| --- | --- |
| **Risk Factors for Violence** **of Student Who Made Threat**  *Use these questions when threat is substantive.* | |
| Family Dynamics   1. Does student have access to guns at home? 2. Is there evidence at home of preparations for an attack at school? 3. What is the home life of the student like?   School Dynamics   1. What do we know about the student at school? 2. Does his or her locker harbor a weapon? 3. Was the student angry or brooding when he or she made a threat? 4. What else can be learned?   Social Dynamics   1. What do we know about the student’s life in the community? 2. Does he or she have a juvenile record? Criminal record? Prior station adjustments? For what?   Personal Dynamics   1. What do the student’s closest acquaintances know about him or her? 2. Does the student have a fascination with violent electronic media or weapons? 3. Is the student showing outward signs of the need for mental health services? | |
| **Student Who Made Threat** | **Target of Threat** |
| Grade: Gender: M F  Race:  SPED (if applicable): LD OHI MR  ED Other:  Y N Had or sought accomplices  Y N Reported threat as a specific plan  Y N Written plans/list, engaged in attack related behaviors  Y N Repeated threat over time  Y N Weapon mentioned or used in threat  Y N Inappropriate interest in school attacks, attackers, mass violence, terrorism  Y N Student’s “story” consistent with actions  Y N Student & target had prior conflict (>1 day)  Y N Student previously bullied the target  Y N Reported threat as a specific plan | # of Targets:  Primary target: Student Teacher  Administrator Parent  Other  Grade: Gender: M F  Race:  SPED (if applicable): LD OHI MR  ED Other:  Y N Target witnessed threat  Y N Target previously bullied the student  Y N Student previously bullied by target  Y N Concerns about student’s potential to carryout act or potential for violence  Y N Target(s) previously bullied the student |

|  |  |
| --- | --- |
| **Threat Responses** *(*Management and prevention*)* | |
| **Disciplinary Action**  Y N Parent conference  Y N In school time-out  Y N Detention (# of days):  Y N Suspension (# of days):  Y N Expulsion recommended  Y N Other response |  |
| **Interventions and Safety Precautions**  Y N Law enforcement consulted  Y N Law enforcement contact with student who made threat  Consequence of legal action (Station adjustment, supervision, conditional discharge, adjudication of delinquent minor, release into parents custody)  Y N Student might be eligible for special education services, referred for evaluation  Y N Student already receiving special education services, referred to IEP team for review  Y N Student referred for 504 plan  Y N Mental health assessment conducted by school-based staff  Y N Mental health assessment conducted by outside agency (court, Dept. of Probation, DCFS, other psychologist)  Y N Parents of threat target notified of threat  Y N Conflict mediation  Y N School based counseling  Y N Alter student’s schedule to increase supervision or minimize contact with target  Y N Alternative educational placement (alternative school, day treatment program)  Y N Change in transportation (bus suspension, special transportation, etc.)  Y N Inpatient mental health services  Y N Outpatient mental health services (counseling/therapy with outside mental health provider)  Y N Other mental health services  Y N Other safety precautions (*if yes, please list them.*) | |

ADOPTED: November 20, 2013

# Operational Services

## Exhibit - Targeted School Violence Prevention and Threat Assessment Education

*On District letterhead*

Date:

To: District Staff and Parents

From: Building Principal

Re: Targeted School Violence Prevention Program

Student safety is our District’s top priority. To maximize safety, the District must have a process to identify *threats* and prevent *targeted school violence*. This process is part of the Targeted School Violence Prevention Program (Program). The Program is a portion of the preparedness and response phases of the District’s Safety Plan for emergency operations plans and disaster management.

The District wishes to create a climate that encourages sharing *any* information about a safety concern with a trusted adult who can help. Sharing information about threats and safety concerns is everyone’s responsibility: students, parents, staff, and community members. The question and answer section below is designed to help students, staff and parents understand when school officials want individuals to share information about a safety concern with the Building Principal.

What Is a Threat?

A threat expresses intent to harm someone or something. It may be spoken, written, or expressed in another way. Threats may be direct (“I’m going to beat you up” or “I’m going to blow this place up!”) or indirect (“Come and watch what I am going to do to him/her.”). A threat can be vague (“I’m going to hurt him.”) or implied (“You better watch out.”). Any possession of a weapon or mention of one is a possible threat. Sometimes students make threats that may seem funny or “just kidding,” but sometimes a threat is very serious and/or criminal. When you are in doubt as to whether the statement is kidding or serious, the responsible thing to do is to tell a trusted adult who can help.

What Is Targeted School Violence?

Targeted School Violence includes school shootings and other school-based attacks where the school was deliberately selected as the location for the attack and was not simply a random site of opportunity.

What Is the Connection Between Targeted School Violence and Bullying?

The Ill. State Board of Education’s School Bullying Prevention Taskforce report identifies bullying and targeted school violence as “part and parcel of the same issue: *interpersonal aggression*.” In all its forms, interpersonal aggression negatively impacts students, school personnel, and communities and should be reported, investigated, and responded to with appropriate interventions.

What Can Staff and Parents Do?

Educate students about what a threat is, encourage students not to make threats or “just kidding” statements in the first place, and reiterate that seeking help to prevent someone from getting hurt or hurting another is appropriate. See 7:180 AP1, E2, *Be a Hero by Reporting Bullying and School Violence*.

ADOPTED: November 18, 2013

# Operational Services

## Administrative Procedure - Movable Soccer Goal Safety

| **Actor** | **Action** |
| --- | --- |
| Superintendent | Requires all Building Principals to:   1. Identify any movable soccer goal that is on school grounds, and 2. Ensure that supervisors comply with the Movable Soccer Goal Safety Act (430 ILCS 145/). |
| Building Principal | Reviews the Ill. Department of Public Health’s assistance materials found at www.idph.state.il.us/soccer\_goal\_safety/index.htm.  Identifies any movable soccer goals on school grounds, or that the school owns or controls.  Implements the Movable Soccer Goal Safety Act (430 ILCS 145/) by, among other things, instructing staff members to properly secure or anchor a movable soccer goal when installing, setting up, maintaining, or moving one. |

ADOPTED: September 24, 2012

AMENDED: August 18, 2014

# Operational Services

## Convicted Child Sex Offender; Screening; Notifications

Persons Prohibited on School Property without Prior Permission

State law prohibits a child sex offender from being present on school property or loitering within 500 feet of school property when persons under the age of 18 are present, unless the offender meets either of the following two exceptions:

1. The offender is a parent/guardian of a student attending the school and has notified the Building Principal of his or her presence at the school for the purpose of: (i) attending a conference with school personnel to discuss the progress of his or her child academically or socially, (ii) participating in child review conferences in which evaluation and placement decisions may be made with respect to his or her child regarding special education services, or (iii) attending conferences to discuss other student issues concerning his or her child such as retention and promotion; or
2. The offender received permission to be present from the School Board, Superintendent, or Superintendent’s designee. If permission is granted, the Superintendent or Board President shall provide the details of the offender’s upcoming visit to the Building Principal.

In all cases, the Superintendent or designee shall supervise a child sex offender whenever the offender is in a child’s vicinity. If a student is a sex offender, the Superintendent or designee shall develop guidelines for managing his or her presence in school.

Screening

The Superintendent or designee shall perform finger-based criminal history records information checks and/or screening required by State law or Board policy for employees; student teachers; students doing field or clinical experience other than student teaching; contractors’ employees who have direct, daily contact with one or more children; and resource persons and volunteers. He or she shall take appropriate action based on the result of any criminal background check and/or screen.

Notification to Parents/Guardians

The Superintendent shall develop procedures for the distribution and use of information from law enforcement officials under the Sex Offender Community Notification Law and the Murderer and Violent Offender Against Youth Community Notification Law. The Superintendent or designee shall serve as the District contact person for purposes of these laws. The Superintendent and Building Principal shall manage a process for schools to notify the parents/guardians during school registration that information about sex offenders is available to the public as provided in the Sex Offender Community Notification Law. This notification must occur during school registration and at other times as the Superintendent or Building Principal determines advisable.

LEGAL REF.: 20 ILCS 2635/, Uniform Conviction Information Act.

720 ILCS 5/11-9.3.

730 ILCS 152/, Sex Offender Community Notification Law.

730 ILCS 154/75-105, Murderer and Violent Offender Against Youth Community Notification Law.

CROSS REF.: 5:30 (Hiring Process and Criteria), 5:20 (Student Teachers), 6:250 (Community Resource Persons and Volunteers), 8:30 (Visitors to and Conduct on School Property), 8:100 (Relations with Other Organizations and Agencies)

ADOPTED: August 18, 2014

AMENDED: February 20, 2017

# Operational Services

## Administrative Procedure - Criminal Offender Notification Laws; Screening

Laws Protecting Students on School Grounds

The following list describes laws protecting students on school grounds from individuals convicted of serious crimes:

1. A child sex offender is prohibited from being present on school property or loitering within 500 feet of school property when persons under the age of 18 are present unless specifically permitted by statute (720 ILCS 5/11-9.3). See School Board policies 4:175, *Convicted Child Sex Offender; Screening; Notifications*; 8:30, *Visitors to and Conduct on School Property*; and administrative procedure 8:30-AP, *Definition of Child Sex Offender*.
2. Law enforcement must notify schools of offenders who reside or are employed in the county. See: (a) Sex Offender Community Notification Law, 730 ILCS 152/ and (b) Murderer and Violent Offender Against Youth Community Notification Law, 730 ILCS 154/75-105. These laws are hereafter referred to as “offender notification laws.” See also policy 4:175, *Convicted Child Sex Offender; Screening; Notifications*.
3. The School Code (105 ILCS 5/10-21.9, 5/21B-5 and 5/21B-80) lists criminal offenses that disqualify an individual from District employment if the individual was convicted. 105 ILCS 5/20-21.9 requires any person hired by the District to submit to a fingerprint-based criminal history records check through (a) the Illinois State Police (ISP) for an individual’s *Criminal History Records Information* (CHRI) and (b) the FBI’s national crime information databases. The law also requires a school district to check two Illinois offender databases for each applicant, which are (a) the Statewide Sex Offender Registry, [www.isp.state.il.us/sor/](http://www.isp.state.il.us/sor/) and (b) the Statewide Murderer and Violent Offender Against Youth Registry, [www.isp.state.il.us/cmvo/](http://www.isp.state.il.us/cmvo/). Obtaining the results of the fingerprint-based criminal history records check and review of the database registries is a *complete criminal history records check* as required by the School Code. See Board policy 5:30, *Hiring Process and Criteria*; administrative procedure 5:30-AP2, *Investigations*, and ISBE’s non-regulatory guidance document, *Criminal History Records Information (CHRI) Checks for Certified and Non-certified School Personnel*, at:

[www.isbe.net/pdf/guidance\_chr.pdf](http://www.isbe.net/pdf/guidance_chr.pdf).

1. **Note**: A District may also check the National Sex Offender Public Registry, [www.nsopr.gov](http://www.nsopr.gov); however, the same information will likely appear in the information furnished by the FBI.
2. The provisions in the School Code described above also apply to employees of persons or firms holding contracts with a school district who have direct, daily contact with students (105 ILCS 5/10-21.9(f)). See administrative procedures 4:60-AP3, *Criminal History Records Check of Contractor Employees*, and 5:30-AP2, *Investigations*.
3. Conviction of an offense listed in 105 ILCS 5/21B-80(c) results in the automatic suspension or revocation of the individual’s license. Conviction of an offense listed in 105 ILCS 5/21B-80(b), depending upon whether the individual’s sentence has been satisfactorily completely and seven years have passed since that date, may result in automatic suspension or revocation of the individual’s license.
4. The offender notification laws require law enforcement to ascertain whether a juvenile sex offender or violent offender against youth is enrolled in a school and, if so, to provide a copy of the registration form to the Building Principal and any guidance counselor designated by him or her. This registration form must be kept separately from any and all school records maintained on behalf of the juvenile sex offender. See Board policy 4:175, *Convicted Child Sex Offender; Screening; Notifications*.

Receipt of Information from Law Enforcement

**Offender Notification Laws**: The Superintendent or designee shall notify the local law enforcement official or county sheriff that he or she is the District’s official contact person for purposes of the offender notification laws. The Superintendent and/or Building Principal may at any time request information from law enforcement officials regarding sex offenders or violent offenders against youth.

The Superintendent will provide Building Principals and other supervisors with a copy of all lists received from law enforcement officials containing the names and addresses of sex offenders and violent offenders against youth.

The Building Principal or designee shall provide the lists to staff members in his or her building on a need-to-know basis, but in any event:

* A teacher will be told if one of his or her students, or a student’s parent/guardian, is on a list.
* The school counselor, nurse, social worker, or other school service personnel will be told if a student or the parent/guardian of a student for whom he or she provides services is on a list.

No person receiving a list shall provide it to any other person, except as provided in these procedures, State law, or as authorized by the Superintendent. Requests for information should be referred to the local law enforcement officials or State Police.

**Juvenile Delinquency Adjudication Notifications**: The Superintendent or designee shall contact the Juvenile Division of the County State’s Attorney Office(s) having jurisdiction over the District’s school(s) to discuss how the State’s Attorney shall inform the Superintendent or designee of any students adjudicated as delinquent minors for offenses that would be felonies and/or certain weapons offenses under the Criminal Code of 2012 (705 ILCS 405/5-9.01(8). The Superintendent and/or designee(s) shall ensure the dissemination of such information is limited to the Building Principal and any guidance counselor designated by the Building Principal (Id.)

Informing Staff Members and Parents/Guardians About the Law

Building Principals or their designees shall inform parents/guardians about the availability of information concerning sex offenders during school registration and, if feasible, during parent-teacher conferences. Information should be distributed about the Statewide Sex Offender Registry, [www.isp.state.il.us/sor/](http://www.isp.state.il.us/sor/), and the Statewide Murderer and Violent Offender Against Youth Registry, [www.isp.state.il.us/cmvo/](http://www.isp.state.il.us/cmvo/). Information may also be included in the Student Handbook. See the Sex Offender Community Notification Law, 730 ILCS 152/, and exhibit 4:175-AP1, E1, *Informing Parents/Guardians About Offender Community Notification Laws.*

Requests for additional information shall be referred to local law enforcement officials.

Screening Individuals Who Are Likely to Have Contact with Students at School or School Events

The law is silent with regard to screening volunteers and individuals in the proximity of a school. Screening is not the same as the School Code’s requirement to perform a fingerprint-based criminal history records check through (a) the Illinois State Police (ISP) for an individual’s Criminal History Records Information (CHRI) and (b) the FBI’s national crime information databases (105 ILCS 5/10-21.9).

Screening involves checking an individual’s name and address against the: (1) Illinois Sex Offender Registry, [www.isp.state.il.us/sor/](http://www.isp.state.il.us/sor/), and (2) the Violent Offender Against Youth Registry maintained by the State Police, [www.isp.state.il.us//cmvo/](http://www.isp.state.il.us//cmvo/). 105 ILCS 5/10-21.9 (a), (a-6).

1. For employees and student teachers, the Superintendent or Building Principal(s):
   1. Completes the required forms to request the fingerprint-based criminal history records check; see 5:30-AP2, *Investigations*.
   2. Screens the individual’s name and address against the: (1) Illinois Sex Offender Registry, [www.isp.state.il.us/sor/](http://www.isp.state.il.us/sor/), and (2) the Violent Offender Against Youth Registry maintained by the State Police, [www.isp.state.il.us/cmvo/](http://www.isp.state.il.us/cmvo/). 105 ILCS 5/10-21.9.
   3. Reviews the lists of sex offenders and violent offenders against youth as the lists are received from law enforcement. If a match is found, the Superintendent immediately contacts the local police officials to confirm or disprove the match. The Superintendent immediately notifies the Board if a match is confirmed. The Board President will contact the Board Attorney and the Board will take the appropriate action to comply with State law that may include terminating the individual’s employment.
   4. May request the individual to authorize a clearance of his or her name through the Ill. Dept. Of Children and Family Services (DCFS) CANTS system. This check documents that the person does not have an indicated report or record on DCFS’ registry of child abuse and/or neglect. 325 ILCS 5/11.1(a)(11) and (c). Clearances must be requested using the DCFS form at www.illinois.gov/dcfs/aboutus/notices/Documents/cfs\_689\_authorization\_for\_background\_check\_for\_programs\_not\_licensed\_by\_dcfs\_(fillable).pdf.

If an indicated report is found, contact the Board Attorney for guidance.

1. For students doing field or clinical experience other than student teaching, the Superintendent or Building Principal(s):
2. May require the same fingerprint-based criminal history records check required of student teachers. The cost of this check will be reimbursed by the student seeking the experience.
3. Performs the responsibilities listed in 1. b. & c., above.
4. For volunteers, see 6:250-AP, *Securing and Screening Resource Persons and Volunteers.* The Superintendent or Building Principal(s):
5. May require the same fingerprint-based criminal history records check required of student teachers.
6. Performs the responsibilities listed in 1. b. & c., above.
7. For contractors’ employees, see 4:60-AP3, *Criminal History Records Check of Contractor Employees*; 5:30-AP2, *Investigations*.
8. For individuals in the proximity of a school or bus stop, the Building Principal(s) review(s) the lists of sex offenders and violent offenders against youth as they are received from law enforcement. The Building Principal or designee shall: (a) notify staff members according to the section of this procedure on **Receipt of the Information from Law Enforcement**, and (b) attempt to alter school bus stops and the route students travel to and from school in order to avoid contact with an individual on such a list.

CROSS REF.: 4:175 (Convicted Child Sex Offender; Screening; Notifications), 5:30 (Hiring Process and Criteria), 6:250 (Community Resource Persons and Volunteers), 8:30 (Visitors to and Conduct on School Property)

ADMIN. PROC.: 4:60-AP3 (Criminal History Records Check of Contractor Employees), 4:175-AP1, E1 (Informing Parents/Guardians About Offender Community Notification Laws), 5:30-AP2 (Investigations), 6:250-AP (Securing and Screening Resource Persons and Volunteers), 6:250-E (Resource Person and Volunteer Information Form and Waiver of Liability), 8:30-AP (Definition of Child Sex Offender), 8:30-E1 (Letter to Parent Regarding Visits to School by Child Sex Offenders), 8:30-E2 (Child Sex Offender’s Request for Permission to Visit School Property)

ADOPTED: August 18, 2014

AMENDED: August 17, 2015

AMENDED: February 20, 2017

# Operational Services

## Exhibit - Informing Parents/Guardians About Offender Community Notification Laws

*On District letterhead, website, and/or in student handbook*

Date:

To: Parents/Guardians

Re: Offender Community Notification Laws

State law requires schools to notify parents/guardians during school registration or parent-teacher conferences that information about sex offenders and violent offenders against youth is available to the public on the Illinois State Police’s website. The Illinois State Police website contains the following:

Illinois Sex Offender Registry, www.isp.state.il.us/sor/

Illinois Murderer and Violent Offender Against Youth Registry, www.isp.state.il.us/cmvo/

Frequently Asked Questions Concerning Sex Offenders, www.isp.state.il.us/sor/faq.cfm

ADOPTED: August 18, 2014

# Operational Services

## Pandemic Preparedness

The School Board recognizes that the District will play an essential role along with the local health department and emergency management agencies in protecting the public’s health and safety if an influenza pandemic occurs. A pandemic influenza is a worldwide outbreak of a virus for which there is little or no natural immunity and no vaccine; it spreads quickly to people who have not been previously exposed to the new virus.

To prepare the School District community for a pandemic, the Superintendent or designee shall: (1) learn and understand the roles that the federal, State, and local government would play in an epidemic; (2) form a pandemic planning team consisting of appropriate District personnel and community members to identify priorities and oversee the development and implementation of a comprehensive pandemic influenza school action plan; and (3) build awareness of the final plan among staff, students, and community.

Emergency School Closing

In the case of a pandemic, any decision for an emergency school closing will be made by the Superintendent in consultation with and, if necessary, at the direction of the District’s local health department, emergency management agencies, and Regional Office of Education.

LEGAL REF.: 105 ILCS 5/10-16.7 and 5/10-20.5.

115 ILCS 5/1 et seq.

CROSS REF.: 1:20 (District Organization, Operations, and Cooperative Agreements), 2:20 (Powers and Duties of the School Board), 4:170 (Safety), 7:90 (Release During School Hours), 8:100 (Relations with Other Organizations and Agencies)

Adopted: April 18, 2011