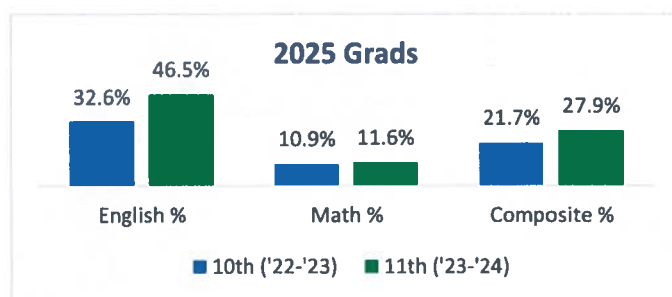
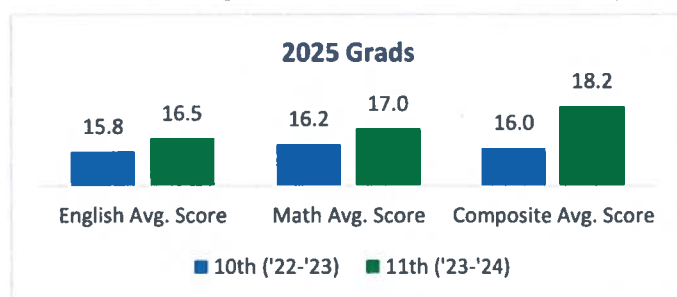
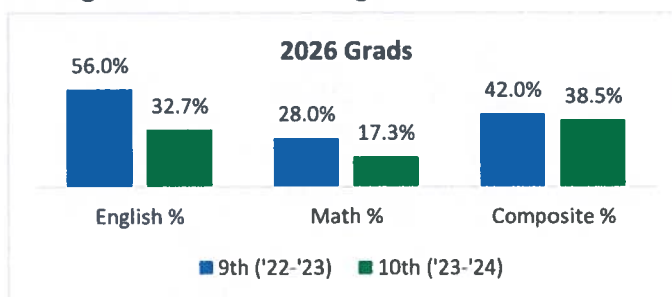
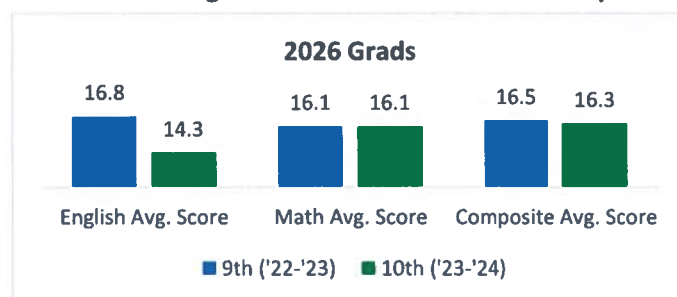


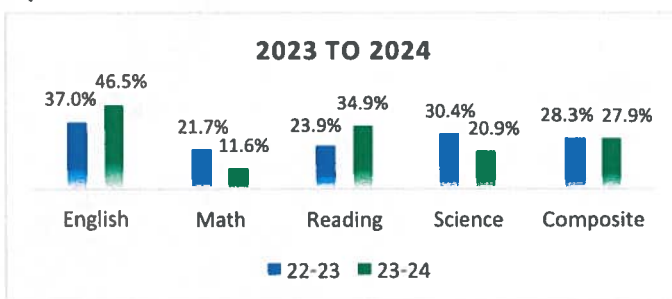
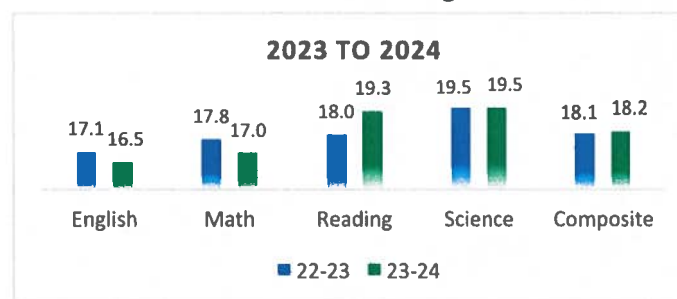
Avg. Student Score & % advanced & proficient on 10th grade Pre-ACT and 11th grade ACT



Avg. Student Score & % advanced & proficient on 9th grade Pre-ACT and 10th grade Pre-ACT



Avg. Score & % advanced & proficient Year to Year



Portrait of a Pirate Pillars

90% Attendance

Attendance is 8 times more predictive of course failure than test scores.

Class of 2023 78%
Class of 2024 96%

2.8 G.P.A.

71% more likely to reach the American middle class.

Class of 2023 63%
Class of 2024 65%

Co-Curricular

Promotes positive achievement, engagement, attitudes, and habits.

Class of 2023 85%
Class of 2024 86%

College Path

Earn a C or better in Algebra II

Twice as likely to complete a 4-year degree

Class of 2023 55%
Class of 2024 67%

AP course completion & score 3+

Indicator of academic rigor and college readiness

Course	3+ Score
Class of 2023	8% 100%
Class of 2024	35% 89%

Dual Credit College English or Math Course

17% more likely to complete 4-year & 30% in 2-year

Class of 2023 13%
Class of 2024 15%

Career Path

Earn Industry Credential

Knowledge & skills for jobs in industry

Class of 2023 0
Class of 2024 0

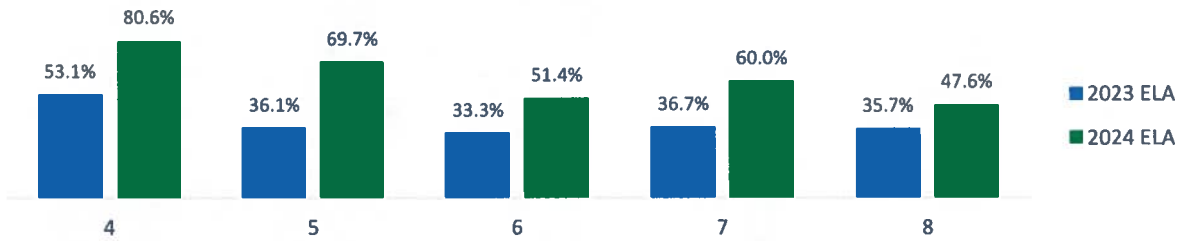
Dual credit career pathway course

Specific courses on a pathway to career

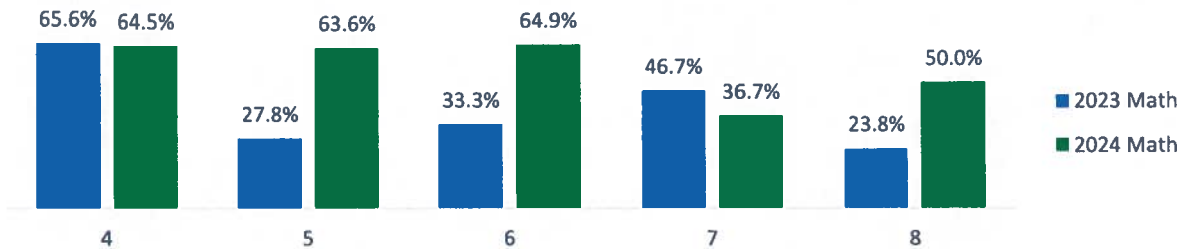
Class of 2023 40%
Class of 2024 28%

Forward exam student-to-student comparison of % proficient & advanced

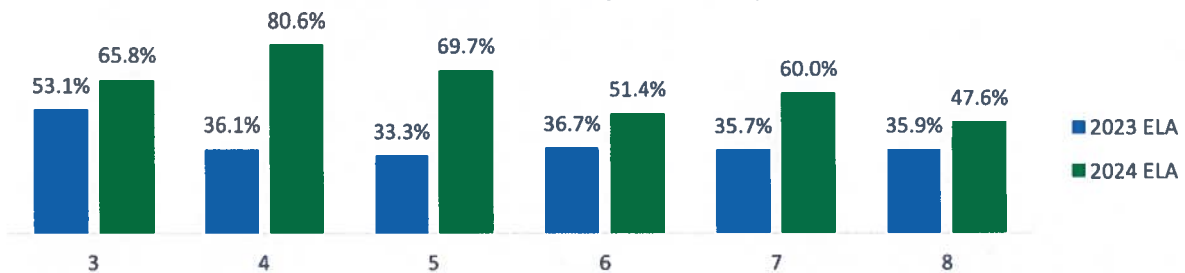
Student to Student English (Prof. & Adv.)



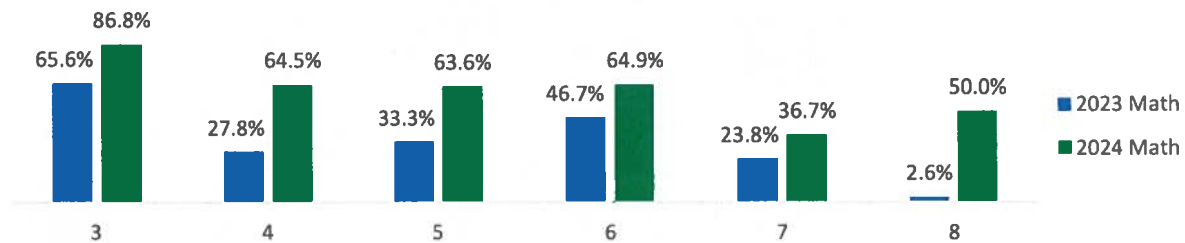
Student to Student Math (Prof. & Adv.)



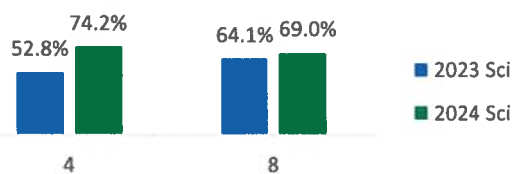
Grade to Grade (Prof. & Adv.)



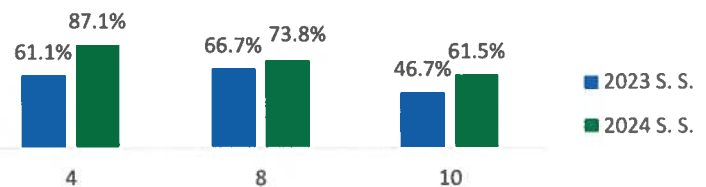
Grade to Grade (Prof. & Adv.)



Grade to Grade (Prof. & Adv.)



Grade to Grade (Prof. & Adv.)



IN THE NEWS

- Cochrane HS celebrates 70th reunion
- Treasure Trove thank you to sponsors & Grove for help in raising \$3,500
- Dittrick family at the Northern WI State Fair

Caleb Ellis is a National Finalist in Diversified Agricultural Production

4-H made a great sign for the stuff the bus campaign



Book	School Board Policies
Section	100 Series: Board of Education
Title	Nondiscrimination In District Programs, Activities, And Operations
Code	113
Status	Active
Adopted	August 19, 2020 _____

The Cochrane-Fountain City School District prohibits all forms of unlawful discrimination against students, employees, and other persons in all aspects of the District's programs, activities, and operations. The term "unlawful discrimination" encompasses any unlawful policy, practice, conduct, or other unlawful denial of rights, benefits, or privileges that is based on any legally-protected status or classification (e.g., race, national origin, sex, **sexual orientation**, disability, religion, **age**, etc.). Various state and federal laws establish the actions that do (and do not) constitute unlawful discrimination with respect to each protected status or classification. Where applicable, unlawful harassment that is based on a legally-protected status is one form of unlawful discrimination. **To the extent encompassed by the applicable laws, discrimination based on "sex" can include any unlawful discrimination that is based on sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, or gender identity.**

The District requires and will enforce nondiscrimination in a manner that is consistent with applicable constitutional provisions and with the rights and obligations that are established under all applicable state and federal civil rights laws, including but not limited to the current provisions of the following federal laws, which jointly serve to identify and protect the rights of students, employees, and other persons:

- Title IX of the Education Amendments of 1972 (sex discrimination).
- Section 504 of the Rehabilitation Act (disability discrimination).
- The Americans with Disabilities Act (including both the employment-related provisions of the ADA as well as Title II of the ADA, which broadly prohibits discrimination on the basis of disability in state and local government services).
- Titles IV and VI of the Civil Rights Act of 1964 (addressing discrimination based on race, color, national origin, sex, or religion).
- The Age Discrimination Act of 1975 (age discrimination).
- The nondiscrimination provisions of the Elementary and Secondary Education Act.
- The civil rights provisions associated with the District's participation in federal nutrition programs.

There are a significant number of additional state and federal nondiscrimination laws that are not listed above that further establish the rights of students and/or employees. In recognition of such laws, the District maintains additional nondiscrimination policies and rules that specifically and uniquely cover students (see, for example, Policy 411 and Policy 411.1 within the District's policy manual) and all aspects of employment and personnel administration within the District (see, for example, Policy 511 and Policy 512).

Special Statement Regarding Sex Discrimination under Title IX

As mandated by the federal Title IX statutes and the regulations set forth in Chapter 106 of Title 34 of the Code of Federal Regulations ("the federal Title IX regulations"), the District does not unlawfully discriminate on the basis of sex **and prohibits all forms of unlawful sex discrimination in any education program or activity** that the District operates. Title IX's requirement not to discriminate **on the basis of sex** in any education program or activity **includes, but is not limited to, discrimination affecting discrimination in extends to District students certain admissions processes, and discrimination in** District employment. Inquiries regarding how Title IX and the federal Title IX regulations apply to the District may be referred to the District's Title IX Coordinator (as designated below), to the Assistant Secretary for Civil Rights at the U.S. Department of Education, or to both.

Designation and Authorization of Nondiscrimination Coordinator(s)

~~Any questions concerning the District's nondiscrimination and equal opportunities policies, the application of any nondiscrimination law to the District, or the District's discrimination-related reporting and complaint procedures should be directed to the Assistant Principal who the District's~~

Title IX Coordinator. The individual in the following position serves as the District's designated Title IX Coordinator, who has responsibility for coordinating the District's efforts to comply with and carry out the District's responsibilities under Title IX and the federal Title IX regulations, including serving as the primary point of contact for any reports, complaints, questions, or concerns related to unlawful sex discrimination in any education program or activity of the District:

Assistant **Elementary** Principal
 S2770 State Road 35, Fountain City WI 54629
 608-687-7771 x106
aschaefer@cfc.k12.wi.us

In his/her capacity as a Title IX Coordinator, the above identified individual is authorized to coordinate the District's efforts to comply with the the District's responsibilities under Title IX and the federal Title IX regulations. This same individual also serves as the employee who is designated to receive any student discrimination complaints arising under section 118.13 of the state statutes and Chapter PI 9 of the Wisconsin Administrative Code. The Title IX Coordinator is also an appropriate person to contact regarding (1) reports, complaints, questions, or concerns regarding sex discrimination as prohibited under any other applicable state or federal law that applies to the District; and (2) any concern or allegation of prohibited retaliation that arises in connection with a report, allegation, investigation, or proceeding related to sex discrimination or possible sex discrimination.

Section 504/ADA Coordinator. The individual in the following position serves as the District's designated Section 504 and Americans with Disabilities Act Coordinator (for disability rights and disability-based discrimination issues).

School Psychologist
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x256
kdemers@cfc.k12.wi.us

The Section 504/ADA Coordinator is also an appropriate person to contact regarding reports, complaints, questions, or concerns regarding unlawful discrimination based on disability as defined under any other applicable state or federal law.

Nondiscrimination Coordinator(s) in other Areas. Except for matters relating to unlawful sex-based or disability-based discrimination that have been assigned to the specific coordinators identified above, any other questions concerning the District's nondiscrimination and equal opportunities policies, general compliance with the District's nondiscrimination obligations, the application of a state and/or federal nondiscrimination law to the District, or the District's discrimination reporting and complaint procedures may be directed to the following District-designated nondiscrimination and equal opportunity coordinator:

JH/HS School Principal
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x102
stevestoppelmoor@cfc.k12.wi.us

The nondiscrimination and equal opportunity coordinator identified immediately above is also designated to receive any student discrimination complaints arising under section 118.13 of the state statutes and Chapter PI 9 of the Wisconsin Administrative Code. The individual is also specifically designated to coordinate the District's efforts to comply with and carry out the District's responsibilities under the federal Age Discrimination Act.

District Responses to Information, Reports, and Complaints about Unlawful Discrimination

Applicable laws require the District, the District's designated nondiscrimination coordinator(s), and all District employees to be responsive to known information about possible unlawful discrimination or any related acts of prohibited retaliation. The Board's general expectations for responding to such information include the following:

1. Any time the District has knowledge of conduct that reasonably may constitute unlawful discrimination or prohibited retaliation occurring within the District's programs, activities, or operations, the District—primarily through the District's designated nondiscrimination coordinators and the Board's other administrative-level and supervisory agents—will respond promptly and effectively in a manner that is consistent with District policies and procedures and with the specific obligations that are defined in applicable state and federal nondiscrimination laws.
 - a. Some of the District's legal duties and obligations apply based solely on the District having sufficient notice of the conduct, even if no complaint is ever submitted/pursued.
 - b. When a District-designated Title IX Coordinator has been notified of conduct that reasonably may constitute sex discrimination or prohibited retaliation under Title IX, the Title IX Coordinator must perform, or ensure that another authorized agent of the District who is acting as a designee performs, all applicable Title IX Coordinator duties specified in the Title IX regulations, including the duties specified in section 106.44(f) of the regulations.
2. All District employees are required to notify the appropriate nondiscrimination coordinator when the employee has information about conduct that reasonably may constitute unlawful discrimination (or any related acts of prohibited retaliation) within the District's programs, activities, or operations. As a limited exception, an employee is strongly encouraged, but not strictly obligated, to report information about an incident or situation in which the employee, but **not** any student, was personally subject to conduct that reasonably may constitute unlawful discrimination or prohibited retaliation against that employee.
 - a. If an employee has information concerning possible sex discrimination in violation of Title IX, the employee shall fulfill the obligation described in the previous paragraph by notifying a District Title IX Coordinator of the information.
 - b. In a situation in which the employee believes the appropriate coordinator would have a conflict of interest, such as in a situation where the coordinator is alleged to have personally engaged or participated in prohibited conduct, the

employee shall directly notify the District Administrator of the relevant information.

A report of possible unlawful discrimination or prohibited retaliation under this policy is to be treated as a "complaint" if (1) the report can be objectively understood as a request for the District to investigate and make a determination about alleged unlawful discrimination or prohibited retaliation under one of the District's anti-discrimination complaint/grievance procedures, and (2) the person making the report is authorized by law or by District policy to initiate the applicable complaint/grievance procedures.

The Board's general expectations for responding to complaints and other reports of conduct that reasonably may constitute unlawful discrimination or prohibited retaliation include the following:

1. If a report constitutes a "complaint," then the complaint will be processed according to the anti-discrimination complaint/grievance procedures that the District determines are most applicable to the facts and circumstances. Such procedures may allow for the use of an informal resolution process in some circumstances
2. For other "reports" of possible unlawful discrimination or retaliation (e.g., when the person reporting the information is **not** requesting an investigation and determination or when the person reporting the information is **not** authorized by law or District policy to use a complaint to initiate any of the District's complaint/grievance procedures), the following apply:
 - a. The District is **not** required to (but may sometimes choose to) initiate District-established complaint/grievance procedures based on the person's report.
 - b. If the information reported by such a person could reasonably constitute unlawful discrimination or retaliation, then the expectation is that the District—usually through a designated nondiscrimination coordinator—will at least respond to the information/allegations(s) in a prompt and reasonable manner that is calculated to further determine whether unlawful discrimination may be occurring and, if so, to take prompt and effective steps intended to ensure that any discrimination is ended and does not recur.
 - c. In addition, in some situations, such as under the federal Title IX regulations, applicable law may require the District's designated nondiscrimination and equal opportunity coordinators or other agents of the District to take other specific actions in response to being notified of conduct or other reported information or allegations that could reasonably constitute unlawful discrimination.

Any Person May Submit a Complaint or Report of Discrimination to the District

The District is committed to the appropriate resolution of any complaint or other ~~and~~ report that alleges or otherwise presents information to the District about conduct, or about a District policy or practice, that may reasonably constitute (1) unlawful discrimination or a violation of a District nondiscrimination policy, including any form of prohibited harassment that is based on a legally-protected status; or (2) any type of retaliation that is prohibited by a nondiscrimination law or a District nondiscrimination policy.

Accordingly, except as otherwise required by law, any person (including a witness or other person who has not been harmed/victimized by the alleged conduct or challenged policy) may report a concern or allegation of prohibited discrimination or prohibited retaliation to the Assistant Principal/Title IX Coordinator, using the contact information provided above and any of the following methods:

1. By U.S. mail, by electronic mail, or by telephone, at any time; or
2. By any other means that results in the Assistant Principal/Title IX Coordinator actually receiving the person's verbal or written report, including by submitting the report to the Assistant Principal/Title IX Coordinator in person (e.g., at an arranged meeting or when the coordinator is otherwise reasonably available during normal working hours).
3. As an exception to the above reporting procedure, if the report or complaint identifies the District nondiscrimination coordinator ~~Assistant Principal/Title IX Coordinator~~ as a person responsible for the alleged prohibited conduct, or if the District nondiscrimination coordinator ~~Assistant Principal/Title IX Coordinator~~ is affected by a conflict of interest or otherwise unavailable, then the ~~person making the report may be filed directly with the District Administrator submit it to the Principal~~ either in person, by mail, by telephone, or by electronic mail. The contact information for the District Administrator ~~Principal~~ is as follows:

District Administrator ~~Principal~~
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x313
twhite@cfc.k12.wi.us

Individuals submitting a report or complaint of prohibited discrimination under this policy are strongly encouraged to contact the District to confirm that their report was received as intended.

Deadline for Filing an Initial Report or Complaint

There is no absolute deadline for the initial filing of a report or complaint of discrimination under this policy. The District always has an interest in being made aware of potential concerns with prohibited discrimination, harassment, or retaliation. However, any person who has a complaint or concern involving such a matter is encouraged to notify the District or pursue a complaint as soon as reasonably possible after the occurrence of the relevant events. A material gap in pursuing a complaint or concern can affect the extent to which it is practical to investigate the matter, and a delay may also limit the range of remedies and resolutions that are reasonably available.

The following apply to any report or complaint of discrimination or retaliation that has been filed under this policy, except for formal complaints of possible unlawful sexual harassment discrimination (including sex-based harassment) or prohibited retaliation under Title IX, which are instead subject to the dismissal and appeal provisions of the grievance process that the District has adopted for such complaints:

1. At least one of the following administrators, acting in consultation as needed with District legal counsel, must authorize the dismissal or other alternative disposition of a report or complaint due to a lack of timeliness: District Administrator
2. Any actual party in interest to the allegations raised by the report or complaint (i.e., any alleged victim or any person alleged to be responsible for the discrimination) may appeal a decision authorized under the previous paragraph to the District Administrator. Or, if the District Administrator authorized the initial decision, the party may request reconsideration.

Confidentiality of Reports and Complaints

Although absolute confidentiality cannot be assured, the District will maintain the confidentiality of discrimination reports and complaints to the extent required by any applicable law, and the District will otherwise make efforts to maintain confidentiality where non-disclosure does not interfere with the District's ability to appropriately process and respond to the report or complaint. Nonetheless, investigating a matter often involves disclosing (directly or indirectly) the identity of persons involved in the particular events/issues. Individuals who have specific concerns about confidentiality should arrange to discuss those concerns with the District as early as possible in the process.

Retaliation Prohibited

No official, employee, or agent of the District or any other person may intimidate, threaten, coerce, or unlawfully discriminate against any individual (1) for the purpose of interfering with any right or privilege secured by any nondiscrimination statute or related regulation, or (2) because the individual has made a report or complaint, or testified, assisted, participated, or exercised a legal right to refuse to participate in any manner in an investigation or proceeding conducted under the this policy or any other District nondiscrimination policy. This non-retaliation provision does not preclude the District from (1) requiring an employee or other authorized agent of the District to participate as a witness in, or otherwise assist with, an investigation, proceeding, or hearing; or (2) imposing consequences for an employee's or agent's refusal to cooperatively participate or otherwise assist in such matters.

Prohibition on Bad Faith Conduct/Abuse of Process

To the extent permitted by law, the District prohibits and reserves authority to appropriately address and impose consequences for bad-faith conduct by individuals who make a report or complaint, testify, assist, or participate in any manner in an investigation or proceeding conducted under the this policy or any other District nondiscrimination policy. For example, the District may impose lawful consequences for making a materially false statement in bad faith in the course of any proceeding that is conducted under this policy or any other District nondiscrimination policy. Examples of abuse of process include, but are not limited to, the pursuit of allegations that the complaining party knows to be wholly frivolous or the use of dilatory tactics that have the purpose or reasonably foreseeable result of unreasonably interfering with a prompt and equitable resolution of alleged discrimination or retaliation.

Consequences for Violations

Any person who is determined to be responsible for any form of unlawful discrimination, any act of prohibited retaliation, or other violation of this policy is subject to appropriate disciplinary action and/or other appropriate consequences that are within the District's lawful authority.

In addition, any employee or authorized agent of the District who, considering the duties, responsibilities, and expectations established for their position/role, fails to reasonably respond to complaints or reports of alleged discrimination or retaliation, or who otherwise fails to reasonably act on their knowledge of a possible violation of a nondiscrimination law or a District nondiscrimination policy, is also subject to possible disciplinary action.

Nondiscrimination Notices; Dissemination of Policy and Complaint/Reporting Procedures

The District Administrator and the District's designated nondiscrimination coordinators share joint responsibility for ensuring that the District prepares and issues, on a timely basis, all legally-required general notices of (1) the rights of students,

employees, and other persons under the state and federal nondiscrimination laws; (2) the District's nondiscrimination policies; and (3) applicable reporting and complaint procedures. Beyond meeting legal requirements and any local policy requirements, the administration is encouraged to further disseminate such information using such methods as the administration deems appropriate.

Maintenance of Complaint Records; Report Preparation

The District Administrator and the District's designated nondiscrimination coordinators share joint responsibility for ensuring that the District maintains adequate records of reports and complaints of discrimination and retaliation, including records of the District's response and disposition. Such records shall meet applicable legal requirements for documentation and records retention. The District Administrator and the applicable coordinators shall also direct and oversee the timely preparation of all annual or other reports and evaluations regarding nondiscrimination initiatives/compliance that the District is required to provide to the Department of Public Instruction or to any other oversight entity.

Legal References:

Wisconsin Statutes:

[Subch. III of Ch. 106](#)

[state equal rights programs, some of which can apply to school districts in at least some circumstances]

[Subch. II of Ch. 111](#)

[the state fair employment and nondiscrimination statutes, including specific prohibited bases of discrimination (sections 111.31 to 111.395)]

[Section 118.13](#)

[student nondiscrimination; policy/procedures required]

[Section 118.134](#)

[race-based nicknames, logos, mascots]

[Section 118.195](#)

[discrimination against teachers with disabilities]

[Section 118.20](#)

[teacher/administrator discrimination prohibited]

Wisconsin Administrative Code

[PI 9](#)

[student nondiscrimination; policy, procedures, notices, and reporting required]

[PI 41](#)

[accommodating student religious beliefs; policy required]

Federal Laws

[20 U.S.C. §1681 et seq.](#)

[Title IX of the Education Amendments of 1972, as amended, prohibiting sex discrimination in federally-supported educational programs; implementing regulations at [34 C.F.R. Part 106](#)]

[20 U.S.C. §1400 et seq.](#)

[The Individuals with Disabilities Education Act, providing for programs, services, and rights for students with disabilities; implementing regulations at [34 C.F.R. Part 300](#)]

[20 U.S.C. §6312\(e\)\(3\)\(D\)](#)

[addressing nondiscrimination in admission to federally-assisted education programs on the basis of surname or language-minority status]

[42 U.S.C. §2000e et seq.](#)

[Title VII of the Civil Rights Act of 1964, as amended, prohibiting employment discrimination based race, color, national origin, sex, pregnancy, and religion; implementing regulations at [29 C.F.R. Ch. XIV](#)]

[42 U.S.C. §2000d et seq.](#)

[Title VI of the Civil Rights Act of 1964, as amended, prohibiting discrimination on the basis of race, color, or national origin in any program or activity that receives federal funds; implementing regulations at [28 C.F.R. Part 42, Subpart C](#)]

[42 U.S.C. §12111 et seq.](#)

[The Americans with Disabilities Act, Title I, as amended, prohibiting employment discrimination based on a qualifying disability; implementing regulations at 29 C.F.R. [Part 1602](#) and [Part 1630](#)]

[42 U.S.C. §12131 et seq.](#)

[The Americans with Disabilities Act, Title II, as amended, nondiscrimination based on disability by state and local governments; implementing regulations at [28 C.F.R. Part 35](#)]

[29 U.S.C. §794 et seq.](#)

[Section 504 of the Rehabilitation Act of 1973, as amended, prohibiting discrimination based on a qualifying disability by recipients of federal funds; implementing regulations at [34 C.F.R. Part 104](#), [28 C.F.R. Part 42, Subpart G](#), and [29 C.F.R. Part 1640](#)]

[42 U.S.C. §6101 et seq.](#)

[the federal Age Discrimination Act, as applicable to federally assisted programs; implementing regulations at [34 C.F.R. Part 110](#)]

[29 U.S.C. §621 et seq.](#)

[Age Discrimination in Employment Act, as amended; implementing regulations at [29 C.F.R. Parts 1625 to 1627](#)]

[8 U.S.C. §1324b\(a\)](#)

[prohibiting employment discrimination based on national origin and citizenship status; implementing regulations at [28 C.F.R. Part 44](#)]

[42 U.S.C. §2000gg et seq.](#)

[Pregnant Workers Fairness Act; implementing regulations at [29 C.F.R. Part 1636](#)]

Cross References: SP2 7/23/2020; Board Policy 411; 411.1; 511; 512

Book	School Board Policies
Section	100 Series: Board of Education
Title	Nondiscrimination in District Programs, Activities, and Operations
Code	113 Exhibit
Status	_____
Adopted	_____

**COCHRANE – FOUNTAIN CITY SCHOOL DISTRICT
NOTICE OF NONDISCRIMINATION BASED ON SEX UNDER FEDERAL TITLE IX**

Title IX Nondiscrimination Policy Statement – As mandated by the current provisions of Title IX of the Education Amendments of 1972 and under the regulations set forth in Part 106 of Title 34 of the Code of Federal Regulations (“the federal Title IX regulations”), the District does not unlawfully discriminate on the basis of sex and prohibits all forms of unlawful sex discrimination in any education program or activity that the District operates. Title IX’s requirement not to discriminate on the basis of sex in any education program or activity includes, but is not limited to, discrimination affecting students and discrimination in District employment.

Inquiries regarding how Title IX and the federal Title IX regulations apply to the District may be referred to a District Title IX Coordinator (as designated below), to the Assistant Secretary for Civil Rights at the U.S. Department of Education, or to both. The District’s commitment to nondiscrimination under Title IX and under other state and federal laws is further defined in the following policies of the School Board: Policy 113, Policy 411, Policy 411.1, Policy 511, and Policy 512. The District’s grievance procedures for addressing complaints of sex discrimination under Title IX are designated as 113-Rule.

District Title IX Coordinator – Each District employee holding the position(s) identified below serves as a Title IX Coordinator for the District:

Elementary Principal
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x106
aschaefer@cfc.k12.wi.us

How to Report or Make a Complaint of Sex Discrimination – Any person (including a person who is not claiming to have been personally harmed/victimized by the alleged conduct or challenged policy) may report information about or, if eligible, a person may submit a complaint alleging sex discrimination (or prohibited retaliation) as follows:

1. To any District Title IX Coordinator, using the contact information designated above.
2. By any other means that results in a District Title IX Coordinator actually receiving the person’s verbal or written report.

**COCHRANE – FOUNTAIN CITY SCHOOL DISTRICT
NOTICE OF NONDISCRIMINATION BASED ON DISABILITY UNDER
SECTION 504 OF THE FEDERAL REHABILITATION ACT**

Nondiscrimination Policy Statement – As mandated by Section 504 of the federal Rehabilitation Act and by the regulations set forth in Part 104 of Title 34 of the Code of Federal Regulations (“the Section 504 regulations”), the District does not unlawfully discriminate on the basis of disability and prohibits all forms of unlawful disability discrimination in any program or activity that the District operates, including but not limited to admission or access to, and employment in, any District program or activity. Inquiries regarding how Section 504 and the Section 504 regulations apply to the District, including inquiries regarding filing a report or complaint of possible violations of Section 504, may be referred to the District’s Section 504 Coordinator (as designated below). The District’s commitment to nondiscrimination against qualified individuals on the basis of disability under Section 504 and under other applicable state and federal laws is further defined in the following policies of the School Board: Policy 113, Policy 411, Policy 411.1, Policy 511, and Policy 512.

District Section 504 Coordinator – The contact information for the District employee(s) who serve as the District’s designated Section 504 Coordinator(s) is as follows:

School Psychologist
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x256
kdemers@cfc.k12.wi.us

The employee(s) designated above shall coordinate the District's efforts to comply with and carry out its responsibilities under Section 504 and the federal regulations that implement and enforce Section 504. The District's compliance responsibilities include investigating any complaints that the District receives alleging any actions that are prohibited by Section 504 or by the applicable federal regulations.

**COCHRANE – FOUNTAIN CITY SCHOOL DISTRICT
NOTICE OF NONDISCRIMINATION BASED ON AGE UNDER
THE FEDERAL AGE DISCRIMINATION ACT**

Nondiscrimination Policy Statement – As mandated by the federal Age Discrimination Act and by the regulations set forth in Part 110 of Title 34 of the Code of Federal Regulations, the District does not unlawfully discriminate on the basis of age and prohibits all forms of unlawful age discrimination in any program or activity that the District operates. Inquiries regarding how the Age Discrimination Act and its implementing regulations apply to the District, including inquiries regarding filing a report or complaint of possible violations of the Act, may be referred to the District's Age Discrimination Act Coordinator (as designated below). The District's commitment to avoid unlawful discrimination based on age under the federal Act and under other applicable state and federal laws is further defined in the following policies of the School Board: Policy 113, Policy 411, Policy 411.1, Policy 511, and Policy 512.

Age Discrimination Act Coordinator(s) – The contact information for the District employee(s) who serve as the District's designated Age Discrimination Act Coordinator(s) is as follows:

JH/HS School Principal
S2770 State Road 35, Fountain City WI 54629
608-687-7771 x102
stevestoppelmoor@cfc.k12.wi.us

The District employee(s) identified above coordinate the District's efforts to comply with the Age Discrimination Act and the applicable federal regulations. Those compliance responsibilities include investigating any complaints that the District receives alleging any actions that are prohibited by the Age Discrimination Act or by the federal regulations that implement and enforce the Act.

Book	School Board Policies
Section	100 Series: Board of Education
Title	District Response to Alleged Sexual Harassment Under Title IX
Code	113 RULE 1
Status	Active
Adopted	

This rule has been established to facilitate the District's compliance with requirements of the federal regulations issued under Title IX of the Education Amendments of 1972 ("Title IX"). Specifically, this rule establishes expectations and procedures for promptly, effectively, and equitably responding to complaints, reports and other notice of any conduct or policies that reasonably may constitute unlawful sex discrimination or retaliation, as prohibited in the District's education program and activities pursuant to Title IX and the federal Title IX regulations. Sex-based harassment is one form of sex discrimination that is prohibited under Title IX. The existence of this rule, as a reflection of federal regulatory mandates, is not intended to suggest that discrimination on the basis of sex is any more or any less serious, or any more or any less of a concern to the District, than harassment that is based on any other legally-protected status (e.g., race, national origin, disability, religion, etc.).

Confidentiality Requirements and Considerations Related to Title IX Compliance

No District official, District employee, or other person acting as an agent of the District may disclose personally identifiable information obtained in the course of complying with the District's obligations under the federal Title IX regulations, except in the following circumstances:

1. When the District has obtained prior written consent from a person with the legal right to consent to the disclosure;
2. When the information is disclosed to a parent, guardian, or other authorized legal representative with the legal right to receive disclosures on behalf of the person whose personally identifiable information is at issue;
3. To carry out the purposes of the Title IX regulations,* including action taken to address conduct that reasonably may constitute sex discrimination or retaliation prohibited under Title IX in the District's education program or activity;
4. As required by federal law, federal regulations,* or the terms and conditions of a Federal award, including a grant award or other funding agreement; or
5. To the extent such disclosures are not otherwise in conflict with Title IX or this part, when required by State or local law or when permitted under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g, or its implementing regulations, 34 C.F.R. part 99.

*Note: The federal Title IX regulations expressly provide that the obligation to comply with Title IX and the Title IX regulations is not obviated or alleviated by the student education record confidentiality provisions of FERPA or the federal FERPA regulations. See 34 C.F.R. §106.6(e). That is, when a disclosure of student record information is **necessary** to comply with the Title IX regulations, and a conflict with FERPA **cannot** be avoided, the Title IX regulations serve as an exception to student record confidentiality.

No District official, District employee, or other agent of the District may disclose information about any supportive measures to persons other than the person to whom they apply, including informing one party of supportive measures provided to another party, unless necessary to provide the supportive measure or restore or preserve a party's access to the education program or activity, or unless another exception to the confidentiality of personally identifiable information that is expressly allowed by the Title IX regulations applies.

In connection with the District's Title IX grievance procedures, the District and its designated employees and other agents are required to:

1. Take reasonable steps to protect the privacy of the parties and witnesses during the pendency of the District's Title IX grievance procedures, provided that the steps do not restrict the ability of the parties to (1) obtain and present evidence, including by speaking to witnesses (while still prohibiting retaliatory conduct); (2) consult with their family members, confidential resources, or advisors; or (3) otherwise prepare for or participate in the grievance procedures. See 34 C.F.R. § 106.45(b)(5).
2. Take reasonable steps to prevent and address the parties' unauthorized disclosure of information and evidence that the party obtained solely through the District's grievance procedures. See 34 C.F.R. § 106.45(f)(4)(iii).

Exclude, avoid seeking, and avoid the use and other disclosure of certain protected (i.e., impermissible) types of evidence, subject only to very limited express exceptions, as further set forth in the Title IX regulations. See 34 C.F.R.

§ 106.45(b)(7) (addressing, for example, medical records and information that is subject to a legally-protected privilege, such as an attorney-client privilege).

**Responding to reports or other notice Information that
May Reasonably Constitute Sex Discrimination or Prohibited Retaliation
under Title IX when a Title IX Complaint Is Not Pending**

Any time that a District Title IX Coordinator has been notified of conduct that may reasonably constitute sex discrimination or retaliation prohibited under Title IX, but when a “complaint” (as defined under the Title IX regulations) has **not** been made or has been withdrawn, the Title IX Coordinator (or a qualified designee whose responsibilities, in the absence of a conflict of interest or other extraordinary circumstances determined by the District Administrator, shall be overseen by the Title IX Coordinator) is responsible for the following:

1. Ensuring the equitable treatment of (1) any person alleged to have been subjected to conduct that may constitute a violation of Title IX, and (2) any person alleged to be responsible for such conduct.
2. Seeking clarity or confirmation, as needed, regarding the information being reported or the conduct that is being alleged so that the Title IX Coordinator will be able to fulfill the Coordinator’s role and responsibilities.
3. Notifying the person(s) alleged to have been subjected to conduct that may constitute a violation of Title IX of the District’s Title IX grievance procedures for resolving Title IX complaints, including any informal resolution process that may be available. If such person(s) are unknown and cannot reasonably be identified, then this notification shall be provided to the individual who reported the conduct.
4. Offering and coordinating supportive measures, as appropriate, to eligible person(s) alleged to have been subjected to the conduct that may constitute sex discrimination or retaliation in violation of Title IX, to the extent such persons can be identified.
 - a. Supportive measures shall be offered and coordinated in a manner that is consistent with subsection 106.44(g) and other applicable subsections of the Title IX regulations.
 - b. When no Title IX complaint has been made, the federal regulations allow (but do not require) the District to provide supportive measures to a person who is alleged to be responsible for conduct that may reasonably constitute prohibited sex discrimination or retaliation. (As discussed below, after a complaint has been made/initiated, the Title IX Coordinator is required to offer and coordinate, as appropriate, supportive measures for respondents.)
 - c. Additional procedures and requirements related to offering and coordinating supportive measures are established in a later section of this rule, below.
5. Ensuring, to the extent appropriate based on the information known to the Title IX Coordinator, that appropriate administrators become involved in considering the potential use of the emergency removal procedures and/or the employee administrative leave provisions that are found in or otherwise permitted by the Title IX regulations. See 34 C.F.R. §106.44(h) (regarding emergency removal) and §106.44(i)(regarding administrative leave).
 - a. Procedures and standards established under other laws or District policies may also need to be satisfied in connection with any such emergency removal or administrative leave decision.
 - b. With respect to individuals who are volunteers, non-employee agents, or other non-employees authorized by the District to provide an aid, benefit, or service, this may additionally include, for example, consideration of modifying or removing specific duties as a supportive measure that is instituted for non-punitive, non-disciplinary reasons.
 - c. All such decisions about emergency removal, administrative leave, etc. must adhere to the restriction found in the Title IX regulations that disciplinary sanctions for sex discrimination or prohibited retaliation under Title IX may be imposed on a respondent **only after the District has determined at the conclusion of the District’s Title IX grievance procedures** that the respondent violated the District’s prohibition on sex discrimination or retaliation.
6. In the absence of a complaint being made or upon the withdrawal by the complainant of any or all of the allegations in a complaint, and in the absence or termination of any informal resolution process, determining whether to self-initiate (i.e., as the Title IX Coordinator) a complaint of sex discrimination or retaliation for the purpose of pursuing the District’s Title IX grievance procedures.
 - a. The Title IX Coordinator’s determination whether to initiate a complaint must be made using the standards and procedures set forth in subsection 106.44(f)(1)(v) of the Title IX regulations. **It is critical to review and apply the regulatory standards prior to initiating a complaint.**
 - b. Except in situations where the District’s Title IX Coordinator is unavailable or affected by a conflict of interest or improper bias, the determination whether to initiate a complaint shall be made by the Title IX Coordinator and shall **not** be delegated to a designee. The District Administrator or district legal counsel shall authorize any such delegation.
 - c. **Prior to actually initiating a Title IX complaint under the authority granted to the Title IX Coordinator under subsection 106.44(f)(1)(v), the Title IX Coordinator is required to (1) notify the person(s) alleged to have been subjected to conduct that may constitute a violation of Title IX of the intent to initiate the complaint, and (2) appropriately address reasonable concerns about any such person’s safety or the safety of others, including by providing or modifying supportive measures.**

- d. Upon initiating a complaint, the Title IX Coordinator does **not** become a “complainant” or a party to the complaint. Any person who meets the definition of a “complainant” found in the Title IX regulations in relation to the allegations retains his/her status as a complainant.
7. Regardless of whether a complaint is initiated, taking appropriate, prompt, and effective steps (in addition to any remedies for sex discrimination that are provided to specific individuals) to ensure that any sex discrimination that is found to have occurred does not continue or recur within the District’s education program or activities.
8. Taking steps to ensure the proper documentation and appropriate retention of records that identify the actions that the District took to meet its obligations under section 106.44 of the Title IX regulations.

**Responsibilities of the Title IX Coordinator Once a Title IX Complaint
Has Been Made to the District (or Initiated by the Title IX Coordinator)**

A report of conduct that may reasonably constitute sex discrimination or retaliation prohibited under Title IX needs to be treated as a Title IX “**complaint**” when an eligible person (as identified in the federal Title IX regulations or in the District’s Title IX grievance procedures) has made an oral or written request to the District that objectively can be understood as a request for the District to investigate and make a determination about the alleged discrimination or retaliation. As further described in the previous section of this rule, above, a District Title IX Coordinator may also initiate a complaint in some situations. (Note: Not every person who is eligible to submit a Title IX “complaint” that initiates the District’s Title IX grievance procedures qualifies as a “complainant,” as the term “complainant” is specially defined in the Title IX regulations and used in this rule.)

If a complaint is made or initiated, the Title IX Coordinator (or a qualified designee whose responsibilities, in the absence of a conflict of interest or other extraordinary circumstances determined by the District Administrator, shall be overseen by the Title IX Coordinator) is responsible for the following:

1. Ensuring the equitable treatment of each “complainant” and “respondent,” as those terms are defined in the Title IX regulations.
2. Ensuring that the allegations presented as the complaint are sufficiently identified/documented, particularly when the complaint is presented orally, so that the Title IX Coordinator will be able to fulfill the Coordinator’s role and responsibilities (e.g., to provide notice of the allegations, to facilitate a prompt investigation, to consider the possible dismissal of any allegations, etc.). As needed, the Title IX Coordinator shall, without bias or favoritism and without serving as an advocate, seek confirmation of what is being alleged or request additional details or clarifications. This provision does not preclude the possibility of later changes to the scope of the allegations covered by a complaint.
3. If a complainant or respondent is a student with a disability, consulting with one or more members, as appropriate, of the student’s Individualized Education Program (IEP) team, if any, or one or more members, as appropriate, of the group of persons responsible for the student’s placement decision under Section 504 of the Rehabilitation Act, if any, to determine how to comply with the requirements of the Individuals with Disabilities Education Act and Section 504 throughout the implementation of the District’s Title IX grievance procedures.
4. Offering and coordinating supportive measures, as appropriate, for each complainant **and** respondent, in a manner that is consistent with subsection 106.44(g) and with other applicable subsections of the Title IX regulations. Additional procedures and requirements related to offering and coordinating supportive measures are established in a later section of this rule, below.
5. Ensuring, to the extent appropriate based on the information known to the Title IX coordinator, that appropriate administrators become involved in considering the potential use of the emergency removal procedures and/or the employee administrative leave provisions that are found in or otherwise permitted by the Title IX regulations. See 34 C.F.R. §106.44(h) (regarding emergency removal) and §106.44(i)(regarding administrative leave).
 - a. Procedures and standards established under other laws or District policies may also need to be satisfied in connection with any such emergency removal or leave decision.
 - b. With respect to individuals who are volunteers, non-employee agents, or other non-employees authorized by the District to provide an aid, benefit, or service, this may additionally include, for example, consideration of modifying or removing specific duties as a supportive measure that is instituted for non-punitive, non-disciplinary reasons.
 - c. All such decisions about emergency removal, administrative leave, etc. must adhere to the restriction found in the Title IX regulations that disciplinary sanctions for sex discrimination or prohibited retaliation under Title IX may be imposed on a respondent **only after the District has determined at the conclusion of the District’s Title IX grievance procedures** that the respondent violated the District’s prohibition on sex discrimination.
6. Initiating and following the District’s Title IX grievance procedures, subject to any decision to dismiss the complaint or utilize an informal resolution process.
 - a. As further covered in the District’s procedures, upon the initiation of the District’s Title IX grievance procedures, the Title IX Coordinator is required to provide “**notice of the allegations**” to each complainant **and** respondent whose identities are known. The notice of the allegations must include all of the information required by

subsection 106.45(c) of the federal Title IX regulations. (Note: When a complaint of sex discrimination alleges that a District policy or practice discriminates on the basis of sex, it is possible that there will be no “respondent” as the term is defined in the Title IX regulations and used in this rule.)

- b. If appropriate, available, and requested by all parties, an informal resolution process may be pursued as an alternative to completing such grievance procedures.
7. If there is a determination that sex discrimination or retaliation prohibited under Title IX occurred, then, as appropriate to the specifics of the situation, the Title IX Coordinator is responsible for:
 - a. Coordinating the provision and implementation of remedies to a complainant and other persons the District identifies as having had equal access to the District’s education program or activity limited or denied by sex discrimination.
 - b. Coordinating the imposition of any disciplinary sanctions on a respondent, including notifying the complainant of any such disciplinary sanctions.
 - c. Taking other appropriate, prompt, and effective steps (i.e., in addition to individually-targeted remedies and sanctions) to ensure that sex discrimination does not continue or recur within the District’s education program or activity.
8. Taking steps to ensure the proper documentation and appropriate retention of the following records:
 - a. For each complaint of sex discrimination or prohibited retaliation, records that are created through or that otherwise document the District’s use of the grievance procedures or, if applicable, an informal resolutions process and the resulting outcome of the complaint.
 - b. Records that otherwise identify the actions that the District took to meet its obligations under section 106.44 of the federal Title IX regulations.

Offering, Providing, and Coordinating “Supportive Measures” under Title IX

In this rule, the term “supportive measures” has the definition given in the federal Title IX regulations. See 34 C.F.R. § 106.2.

The District, through the Title IX Coordinator or a qualified designee, will offer and coordinate supportive measures for the parties to a Title IX matter when required by the Title IX regulations, in a manner that is consistent with subsection 106.44(g) and with other applicable subsections of the Title IX regulations.

As part of offering and coordinating supportive measures to a party (i.e., to a “complainant” or “respondent,” as defined by the Title IX regulations), the Title IX Coordinator (or a designee) will:

1. Make prompt initial contact regarding supportive measures with (1) each party to whom appropriate supportive measures must be offered, and (2) each party whom the District determines will be directly affected by the implementation of supportive measures that are offered to another party.
 - a. In making such initial contact, the Title IX Coordinator (or a designee) will (1) identify the purpose and function of supportive measures; (2) inform **complainants** of the availability of supportive measures **to complainants** with or without pursuing a complaint; (3) provide an opportunity for the party to communicate any initial requests or preferences with respect to supportive measures; and (4) identify the opportunities that the party has, consistent with the procedures defined below within this section, to request the modification or reversal of a District decision to provide, deny, modify, or terminate supportive measures that are applicable to the party.
 - b. This initial contact shall normally occur by no later than a date that is closely proximate to the date that the Title IX Coordinator (or a designee), pursuant to subsections 106.44(f)(1)(iii) and/or 106.45(c)(1)(i) of the Title IX regulations, notifies the party of the District’s Title IX grievance procedures. In some cases, earlier initial contact regarding supportive measures may be more appropriate.
2. If a complainant or respondent is a student with a disability, consult with one or more members, as appropriate, of the student’s Individualized Education Program (IEP) team, if any, or one or more members, as appropriate, of the group of persons responsible for the student’s placement decision under Section 504 of the Rehabilitation Act, if any, to determine how to comply with the requirements of the Individuals with Disabilities Education Act and Section 504 in the implementation of supportive measures.
3. Communicate relevant District decisions about supportive measures to the affected party in an ongoing manner, maintaining confidentiality to the extent required by subsection 106.44(g)(5) of the Title IX regulations. See also item “Confidentiality” in this list, below.
4. Coordinate the implementation of supportive measures, including reasonably acting on any knowledge that suggests a need to review the effectiveness of and/or make modifications to supportive measures, as well as determining whether and when it may be appropriate to terminate specific supportive measures.

Confidentiality. No District official, District employee, or other agent of the District may disclose information about any supportive measures to persons other than the person to whom they apply, including informing one party of supportive measures provided to another party, unless necessary to provide the supportive measure or restore or preserve a party’s

access to the education program or activity, or unless another exception to confidentiality that is expressly allowed by the Title IX regulations applies.

Requests by parties to modify or reverse decisions about supportive measures. Under the federal Title IX regulations, the District must provide an opportunity for a complainant or respondent to request that an appropriately trained and impartial District employee review a District decision to provide, deny, modify, or terminate any supportive measures that are applicable to the requesting party, and, if appropriate, modify or reverse the District decision. The opportunity to make such a request applies not only to the District's initial determination and initial implementation of supportive measures, but also when specific circumstances that are relevant to a challenged decision have materially changed. The District establishes the following procedures for submitting and responding to such requests:

1. The affected party (or a parent, guardian, or other authorized legal representative) shall submit such a request to a District-designated Title IX Coordinator. The request shall identify the specific change(s) that the party seeks, and the reason that the party is seeking the changes.
2. The request shall be submitted in writing, unless the Title IX Coordinator expressly waives the requirement (e.g., if the Title IX Coordinator agrees to personally document the request during an in-person meeting related to such a request).
3. Upon receipt of the request, the Title IX Coordinator or the District Administrator acting on behalf of the Title IX Coordinator, shall promptly refer the request and any relevant records to an impartial employee who has received appropriate training covering the District's Title IX obligations and, specifically, decisions and procedures related to supportive measures. The employee assigned to make a determination with respect to the request must be someone other than the employee who made the challenged decision. A Title IX Coordinator can serve as the impartial employee if the Coordinator did not make the challenged decision.
4. Upon a review of the request, the relevant records, and other any relevant information that the employee obtains related to the request, the impartial employee shall make a determination with respect to the request and notify the requesting party and (unless the impartial employee is a Title IX Coordinator) the Title IX Coordinator, in writing, of the decision.
5. Such decisions shall be made in a prompt manner that, under the fact-specific circumstances presented by the request, reflects the District's obligation to provide equitable treatment to all parties. If the impartial employee determines that the decision will not be made and communicated within 10 business days after the date the party submitted the request/challenge, the employee shall notify the requesting party and, if applicable, the Title IX Coordinator of the expected timing of the decision and the reason for the timing.

The impartial employee assigned to conduct the review of a request to modify or reverse a District decision with respect to supportive measures shall apply the following standards:

1. The employee assigned to review the request is authorized to **unilaterally** modify or reverse the challenged decision upon a determination that the challenged decision was **inconsistent** with the definition of supportive measures found in section 106.2 of the federal Title IX regulations.
2. If the employee concludes that the challenged decision was **consistent** with the Title IX regulations, but that a modification or reversal of the decision may be a more reasonable and comparably effective approach, the employee may **not** unilaterally modify or reverse the challenged decision. However, the employee may present the alternative approach as a recommendation for consideration to the District employee who is responsible for District decisions about the supportive measures that are applicable to the party.

Grievance Procedures for Addressing Complaints of Sex Discrimination or Retaliation as Prohibited under Title IX

Introduction

Cochrane – Fountain City School District has adopted these grievance procedures that provide for the prompt and equitable resolution of complaints made by (1) students, employees, or certain other individuals who are participating or attempting to participate in the District's education program or activities, (2) by a parent, guardian, or certain other legal representatives of person eligible to make a complaint, or (3) by the Title IX Coordinator, alleging any conduct that, if proven, could reasonably constitute sex discrimination (including sex-based harassment) or retaliation prohibited under Title IX or the Title IX regulations. Collectively, such complaints may be referred to as "Title IX complaints."

Except to the extent that a Title IX complaint is dismissed (in whole or in part), withdrawn, or resolved through an informal resolution process, the District is obligated to investigate a Title IX complaint and reach a determination regarding the allegations of sex discrimination or retaliation using these grievance procedures.

When more than one complainant or more than one respondent is involved in a Title IX complaint, references to a "party," "complainant," or "respondent" include the plural, unless the context clearly requires otherwise. Also, U.S. Department of Education guidance accompanying the Title IX regulations states that prohibited retaliation is considered to

be a type of prohibited discrimination under Title IX. Therefore, a reference to prohibited discrimination can normally be understood to include prohibited retaliation, even if retaliation is not expressly mentioned.

Assignment of Roles and Responsibilities Necessary for the Implementation of the Grievance Procedures

Upon initiating the District's grievance procedures in response to a Title IX complaint, the Title IX Coordinator shall ensure that the District designates individuals to perform the roles needed to implement the grievance procedures on a timely basis.

1. All such individuals, whether or not District employees, must be appropriately trained to perform their role.
2. For any complaint for which the authority to make role assignments may be unclear, a Title IX Coordinator shall consult with the District Administrator or the District Administrator's administrative-level designee to determine who will make final decisions about role assignments for that complaint.
3. The District will assign roles, as needed. The assigned roles will be performed by different persons at least to the extent mandated by the federal Title IX regulations.
4. In assigning roles for a complaint, the District will determine whether one person (who may or may not also be the Title IX Coordinator) will serve as both the complaint investigator and the decisionmaker for the same complaint, or whether those roles will be performed by different people.
 - a. The choice between the approaches shall be made in an unbiased manner and for reasons that are not improperly prejudicial to any party.
 - b. The administrator determining the appropriate approach for a given complaint shall consider factors such as the nature and complexity of allegations, the specific skills and experience of the individuals being considered for the roles, the current workload limitations of the individuals being considered for the role, whether one approach or the other may mitigate perceptions of bias or perceived conflicts of interest in a given case, and the possible value to the District of having a non-employee agent with particular expertise serve as an investigator and/or decisionmaker in the specific case.
 - c. By default, the District intends to normally use a model under which the investigator also serves as the decisionmaker who determines whether sex discrimination or other violations occurred. If the District deviates from the default, the Title IX Coordinator shall ensure that the administrator who makes that decision documents in the record of the complaint the reasons that the roles were separated for that complaint.
5. The District may reassign the roles or assign multiple qualified individuals to perform specific roles if deemed appropriate in a particular case.

General Standards and Requirements Applicable to District and the District Agents Involved in Implementing the Title IX Grievance Process

The District, the District's Title IX Coordinator(s), and, as applicable to their role(s), any District employee or other person authorized to act as agents of the District—including especially any employee or agent who is responsible for implementing the District's Title IX grievance procedures, authorized to modify or terminate supportive measure, or facilitating an informal resolution process, are required to:

1. Avoid making any credibility determinations based on a person's status as a complainant, respondent, or witness. Treat complainants and respondents equitably.
2. Not have any conflict of interest or bias that would impermissibly inhibit the person's objectivity, impartiality, or independent and good-faith judgment.
 - a. This includes neither having nor exhibiting any bias in favor of or against (1) complainants or respondents generally or (2) any individual complainant or respondent in a specific matter.
 - b. Upon being informed of a complaint, any District employee or other person who may act as an agent of the District in connection with the implementation of the District's grievance procedures shall self-report (1) any known pre-existing relationships (familial, social, etc.) to parties or material witnesses and (2) any other known circumstances that relate to a formal the complaint and that may reasonably cause the District to disqualify the person from performing a particular role as an agent of the District in the grievance process due to concerns with a conflict of interest or bias. Such a report may be made to a Title IX Coordinator or to the District Administrator. Previous interactions with a complainant, respondent, or material witness in a professional capacity, standing alone and in the absence of other specific circumstances, would normally be insufficient to raise a material concern about a conflict of interest or bias.
3. Avoid prejudgment of the facts at issue.
4. Apply a presumption, throughout the course of performing their designated role(s), that the respondent is not responsible for the alleged discriminatory conduct until a determination regarding responsibility is made at the conclusion of the grievance procedures.
5. Adhere to the restrictions found in the Title IX regulations that:

- a. Any disciplinary sanctions for engaging in sex discrimination or prohibited retaliation under Title IX may be imposed on a respondent only after the District has determined, at the conclusion of the District's Title IX grievance procedures, that the respondent violated the District's prohibition on sex discrimination or retaliation.
- b. No person acting on behalf of the District may discipline a party, witness, or others participating in a District's grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the District's determination whether sex discrimination occurred.
6. Engage in an objective evaluation of all relevant, permissible evidence—including both inculpatory and exculpatory evidence.
7. Exclude, avoid seeking, and avoid the use and any further disclosure of certain protected (i.e., impermissible) types of evidence, subject only to very limited express exceptions, as further set forth in the Title IX regulations. See 34 C.F.R. § 106.45(b)(7). The following types of evidence are **impermissible**, unless an expressly stated exception applies:
 - a. Evidence that is protected under a privilege recognized by Federal or State law (e.g., attorney-client privilege), unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality.
 - b. A party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness, unless the District obtains that party's or witness's voluntary, written consent for use in its grievance procedures. If a party or witness is under 18 years old, then the District must obtain the voluntary, written consent of a parent or guardian.
 - c. Evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about the complainant's prior sexual conduct is offered to prove that someone other than the respondent committed the alleged conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to the alleged sex-based harassment. The fact of prior consensual sexual conduct between the complainant and respondent does not by itself demonstrate or imply the complainant's consent to the alleged sex-based harassment or preclude determination that sex-based harassment occurred.
8. Use "preponderance of the evidence" as the standard of proof when making findings of fact and when determining whether sex discrimination or other alleged violations or misconduct encompassed by the allegations has occurred.
9. Take reasonable steps to protect the privacy of the parties and witnesses during the pendency of the District's Title IX grievance procedures. These steps will not restrict the ability of the parties to (1) obtain and present evidence, including by contacting witnesses (while still prohibiting the party from engaging in retaliation, such as intimidation or coercion of a witness); (2) consult with their family members, confidential resources, or advisors; or (3) otherwise prepare for or participate in the grievance procedures.
 - a. These steps may include, for example, directing the parties, and any advisor(s) to a party, to refrain from further disseminating certain evidence, records, or information connected to proceedings under these grievance procedures. (Note: In some situations, a state or federal law may independently prohibit the further dissemination of particular evidence/records, particularly by parties who are District employees.)
 - b. As a related obligation, the District and District agents involved in implementing these grievance procedures are required to take reasonable steps to **prevent and address** the parties' unauthorized disclosure of information and evidence obtained solely through the grievance procedures. See 34 C.F.R. § 106.45(f)(4)(iii).
10. Comply with the restrictions on the disclosure of personally identifiable information that is obtained in the course of complying with the federal Title IX regulations and the District's grievance procedures, as such restrictions and limited exceptions are set forth subsection 106.44(j) of the Title IX regulations.
11. Recognize that nothing in Title IX or in the federal Title IX regulations may be read in derogation of any legal right of a parent, guardian, or other authorized legal representative to act on behalf of a complainant, respondent, or other person, including but not limited to making a complaint through the District's grievance procedures for complaints of sex discrimination.

Individuals Who May Make a Title IX Complaint that is Subject to these Grievance Procedures

An eligible person can submit a Title IX complaint using any of the methods identified in Board Policy 113, including submitting the complaint to a District-designated Title IX Coordinator using the contact information that is posted in the District's public Title IX Notice and any of the following methods:

1. By in-person delivery at the District (whether the report is made verbally or delivered in writing);
2. By U.S. mail to the Coordinator's District office location;
3. By telephone, using the Coordinator's District-issued telephone number; or
4. By electronic mail, using the Coordinator's District issued email address.

The following people have a right to make a complaint of alleged sex discrimination or prohibited retaliation, **including complaints of sex-based harassment**, requesting that the District investigate and make a determination about the allegations under Title IX:

1. A “complainant,” which includes:
 - a. Any District student or District employee who is alleged to have been subjected to conduct that could constitute sex discrimination or prohibited retaliation under Title IX; or
 - b. Any other person (i.e., other than a District student or District employee) who is alleged to have been subjected to conduct that could constitute sex discrimination or prohibited retaliation under Title IX at a time when that individual was participating or attempting to participate in the District’s education program or activity.
2. A parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant.
3. Any District-designated Title IX Coordinator, to the extent consistent with the procedures and standards defined in subsection 106.44(f)(1)(v) of the Title IX regulations.

With respect to **complaints of sex discrimination** (including prohibited retaliation) under Title IX **other than sex-based harassment**, in addition to the people listed above, the following persons also have a right to make a complaint:

1. Any District student or District employee.
2. A person other than a District student or District employee, provided that the person was participating or attempting to participate in the District’s education program or activity at the time of the alleged sex discrimination.

Under the above provisions, a person is entitled to make a **complaint of sex-based harassment** that is prohibited under Title IX only if they themselves are alleged to have been subjected to the harassment, if they have a legal right to act on behalf of such person, or if the Title IX Coordinator initiates a complaint consistent with the requirements of subsection 106.44(f)(1)(v) of the Title IX regulations.

The Main Steps of Processing a Title IX Complaint

Subject to the later provisions, below, regarding (1) voluntary informal resolution processes, and (2) the dismissal of complaints or any individual allegations within a complaint, the following are the main steps involved in processing a Title IX complaint under these grievance procedures.

I. Notice of the allegations, the grievance procedures, and certain rights

Upon initiation of the District’s Title IX grievance procedures following the receipt of a Title IX complaint, a Title IX Coordinator or designee will notify the known parties (including the parent or guardian of a party who is a minor) of the following:

1. The District’s Title IX grievance procedures and any informal resolution process that may be available.
2. Sufficient information about the complaint and allegations to allow the parties to respond to the allegations, including at least all of the following to the extent that the information is available to the District at the time:
 - a. The identities of the parties involved in the incident(s).
 - b. The conduct alleged to constitute sex discrimination (or, if applicable, prohibited retaliation) under Title IX.
 - c. The date(s) and location(s) of the alleged incident(s).
3. The District’s prohibition on retaliation.
4. The parties’ right, prior to the end of the investigation phase of the procedures, to an equal opportunity to access the relevant and not otherwise impermissible evidence, or to receive an accurate description of that evidence. In addition, to the extent the District provides or offers to provide a description of the relevant and permissible evidence, a party may request, and the District shall then provide, an equal opportunity to access the evidence.
5. the District prohibits a person from knowingly making false statements or knowingly submitting false information during the grievance procedures.

The following may also apply in some cases:

1. If, in the course of an investigation, the District decides to investigate additional allegations of sex discrimination (or retaliation) by the respondent toward the complainant that were not part of the original notice of the allegations or that are added due to the consolidation of related complaints, the District must notify the appropriate parties of the additional allegations.
2. If the District specifically intends to use an investigative interview or other meeting or proceeding under the Title IX grievance procedures to investigate additional alleged conduct that is not fairly encompassed by the alleged conduct of the which party already has notice, and if that additional alleged conduct could subject the party to disciplinary consequences or other punitive adverse action, the Title IX Coordinator, investigator, or a designee shall appropriately notify the affected party that the interview, meeting, or other proceeding will address such additional, potentially-disciplinary matters as part of a concurrent investigation.

To the extent consistent with the general principle of treating the parties equitably, the need for a prompt and effective response to a complaint, and the need to avoid interfering with a party's reasonable opportunity to prepare to respond to the allegations, the following apply to providing notice of the allegations and related information, as mandated by the Title IX regulations:

1. Beyond the requirement that the initial notice of the allegations must be provided upon the initiation of the District's Title IX grievance procedures, there is not a specific or always-applicable deadline for providing the notice.
 - a. After receiving a Title IX complaint, the Title IX Coordinator or a designee responsible for providing the notice has some discretion to reasonably and promptly attempt to address some preliminary matters before moving forward with the notice of the allegations. Such preliminary matters may relate, for example, to (1) initial safety concerns; (2) initial issues regarding supportive measures; (3) obtaining relevant information concerning a student with a disability; (4) evaluation of grounds for potential dismissal of any allegations in the complaint; or (5) clarifying or confirming the identity of the parties or other particulars about the allegations.
 - b. In no case will the District conduct an investigative interview or investigative meeting with a party under these grievance procedures without first providing notice of the allegations.
2. The notice of the allegations does not necessarily have to be provided to each party simultaneously.
3. The District will typically provide notice of the allegations (and the related information that is required to be included with the notice) in writing, but written notice is not strictly required. If notice is given orally (e.g., in connection with a complaint over a District policy for which there is no respondent), the individual responsible for providing the notice shall document that the notice was given orally.

II. Investigation of the allegations

The District will designate an investigator for each Title IX complaint that is processed under the Title IX grievance procedures. The investigator is charged with conducting an adequate, reliable, and impartial investigation of the relevant allegations. An investigator may be assisted in the investigation by one or more other persons. However, the investigator retains ultimate responsibility for the investigation, and if any such assistant provides other than clerical and ministerial support, then the assistant must have completed all of the training required for an investigator. In the investigation process, the District has the burden to conduct an investigation that gathers sufficient evidence, both inculpatory and exculpatory, to make a determination with respect to the allegations. Most typically, this means sufficient evidence to determine whether sex discrimination or retaliation prohibited by Title IX occurred or did not occur. The parties themselves do **not** have the burden to affirmatively put forth the evidence that would be necessary to either prove or defeat the allegations.

When conducting the investigation, an investigator will:

1. Adhere to the "General standards and Requirements Applicable to the District and the District Agents" for the District's grievance procedures, as listed and described above.
2. Reasonably attempt to conduct one or more investigative interviews of the complainant(s), the respondent(s), and such witnesses as the investigator determines may provide relevant evidence that is able to be considered and that is not unduly duplicative.
3. Provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence. Witness testimony/statements and other evidence must be relevant and not otherwise impermissible.
 - a. Neither a party nor, if applicable, any party's representative or advisor will be permitted to conduct direct, in-person questioning of another party or of any third-party witness at any investigative interview or meeting called by the District as part of the grievance procedures.
 - b. A party may, if they desire, request that the investigator interview specific persons and/or propose questions to be asked of specific persons. The investigator shall determine whether to attempt to conduct such interviews and ask such questions in light of the District's burden to gather sufficient relevant evidence, the obligation to conduct an adequate and reliable investigation, and the obligation to provide parties an equal opportunity to present witnesses and evidence.
 - c. If the investigator declines to interview a witness identified by a party or is unable to interview a party or a witness (e.g., because the party or witness refuses to participate or is not reasonably available), then the investigator shall document the reason the witness was not interviewed.
 - d. If the investigator declines to accept evidence proffered by a party (e.g., due to lack of relevance), then the investigator shall document the reason for that evidentiary ruling.
 - e. Investigations under the grievance procedures are not subject to the rules of evidence that apply in court proceedings. Accepting evidence into the record does not, by itself, constitute a decision that the evidence is relevant, reliable, or persuasive.

4. If a person whose participation in an investigative interview or other meeting held as part of the investigation is either invited or expected, and the person objects to the proposed date, time, or location of the interview or meeting, give due consideration to the person's reason for the objection. The investigator shall treat requests to reschedule under the standards of reasonableness, good cause, and avoiding undue delay that would jeopardize a prompt investigation, as set forth in the later section (below) regarding timelines and extensions of timelines.
5. Allow the parent or guardian of a party who is a minor or who is otherwise subject to legal guardianship to accompany the party during any investigative interview or other meeting held as part of the investigation to exercise rights on behalf of the party. To the extent that an investigator permits any personal advisor to be present during any investigative interview or other meeting held as part of the investigation, the investigator shall treat all parties equally. The investigator may place reasonable and lawful conditions on any such additional person's (i.e., parent, guardian, or advisor) presence during the proceedings, including conditions that limit their active participation and conditions intended to appropriately protect confidentiality and privacy, consistent with requirements established in the Title IX regulations.
6. Review all evidence gathered through the investigation and determine what evidence is relevant and what evidence, even if relevant, is nonetheless impermissible for use or consideration. The term "relevant" is defined by the Title IX regulations, and impermissible evidence (and limited exceptions) is as described in 34 C.F.R. § 106.45(b)(7).
7. If the investigator is also serving as the decisionmaker for the complaint, ensure that the investigation included sufficient opportunities, or attempts to provide opportunities, for the investigator to question parties and witnesses to assess credibility to the extent that credibility is both in dispute and relevant to evaluating one or more allegations of sex discrimination or retaliation.
8. Prior to the end of the investigation phase of the grievance procedures, provide an equal opportunity for the parties to access either (1) the relevant and not otherwise impermissible evidence gathered through the investigation, or (2) an accurate description of such evidence.
 - a. If the investigator provides access or offers to provide access to a description of the evidence, then the investigator must further provide the parties with an equal opportunity to have direct access to the evidence **upon the request of a party**.
 - b. The opportunity to access the evidence or a description of the evidence shall include a reasonable opportunity for the parties to provide a response to the evidence. Any response provided by a party shall become part of the record of the proceedings and shall be considered by the investigator prior to ending the investigation phase (e.g., to determine if any further investigation would be appropriate).
 - i. The investigator shall normally allow at least [ten (10) calendar days], starting from the date the investigator informs the parties that the evidence or description of the evidence is accessible for review, for the parties to provide a response to the evidence.
 - c. A party may decline to exercise these opportunities to access and provide a response to the evidence.
9. Any supplemental processes or procedures instituted by an investigator must not conflict with the District's written Title IX grievance procedures and must be applied to all parties equally.

After the investigator completes the process of gathering evidence and closes the investigation:

1. If the investigator is also serving as the decisionmaker regarding the allegations, the investigator will proceed to make the findings and conclusions, including making any applicable credibility determinations, that are necessary to make a determination of the allegations.
2. If the investigator is **not** serving as the decisionmaker for the complaint:
 - a. The investigator shall complete a written investigative report or personally meet with the District-designated decisionmaker to fairly summarize the relevant and permissible evidence—both inculpatory and exculpatory. To assist the decisionmaker, the investigator's written or oral report may also:
 - i. Highlight what the investigator considers to be disputed or undisputed facts.
 - ii. Convey evidence, observations, or impressions that address (1) the credibility of parties or witnesses and/or (2) the reliability or persuasiveness of other evidence. However, any such assessments are in no way binding on the decisionmaker(s). Decisionmakers have an obligation to apply their independent judgment to all such decisions/issues.
 - iii. Include recommended findings of fact and/or recommended conclusions. Even if an investigator chooses to convey recommended findings or recommended conclusions (which is neither required nor, the designated decisionmaker(s) retain an obligation to objectively evaluate the relevant evidence, apply their independent judgment, and reach a determination. A decisionmaker shall not simply defer to any recommendations made by the investigator.
 - b. The investigator shall **not** advocate for the imposition or non-imposition of specific remedies or sanctions.

- c. The investigator shall provide the complete evidentiary record and the other records from the investigation phase of the grievance procedures to the decisionmaker (or to the Title IX Coordinator on behalf of the decisionmaker).
3. At the discretion of the investigator, a written investigative report may be clarified, corrected, or amended prior to the conclusion of the grievance procedures provided that the investigator documents the reason for the change(s) and provides immediate notice of any such changes to the decisionmaker.

III. Pre-determination procedures that apply if the investigator does not also serve as the decisionmaker

At the District's discretion, the designated investigator for a complaint may serve as the designated decisionmaker for the same complaint. However, the following procedures apply if the investigator does **not** also serve as the decisionmaker:

1. To the extent the credibility of any party or witness is both in dispute and relevant to evaluating one or more allegations of sex discrimination or retaliation, the decisionmaker **shall** arrange an opportunity for the relevant individuals to appear for questioning by the decisionmaker, the responses to which shall supplement the evidentiary record.
 - a. At the discretion of decisionmaker, but giving the same opportunities to all parties, any such appearance may be in person, by telephone, or via an online meeting. However, reasonable efforts to arrange for an in-person appearance should normally be attempted before considering the other options.
 - b. The decisionmaker may additionally request a party or witness to respond to one or more written questions, but written questions may not be entirely substituted for reasonable attempts to arrange an in-person, telephonic, or online appearance.
 - c. If such questioning to assess credibility results in the submission of new evidence that, in the judgment of the decisionmaker, is highly material to the allegations and beyond what the parties had a reasonable opportunity to address during the investigation phase, then the decisionmaker shall provide an opportunity for each party to respond to the new evidence
2. Any supplemental processes or procedures instituted by the decisionmaker, such as providing an opportunity for a party to provide new evidence or to further respond to evidence must not conflict with the District's Title IX grievance procedures and must be offered to all parties equally. "However, neither a decisionmaker nor any person acting as the decisionmaker's designee may hold a live, adversarial hearing involving the parties under these grievance procedures.
3. The decisionmaker may consult with the investigator regarding the evidentiary record and/or ask the investigator to clarify statements included in an investigative report. If appropriate and with immediate notice to the decisionmaker, the investigator may amend the investigative report for purposes of clarity, accuracy, or completeness, with documentation of the reason for the change(s).

IV. Determination of the allegations

A decisionmaker designated by the District will make a determination regarding the allegations that have been subject to an investigation under these grievance procedures, based on an evaluation of the relevant and permissible evidence and using the preponderance of the evidence standard of proof.

The designated decisionmaker shall notify the parties, in writing, of the following:

1. The determination whether sex discrimination or prohibited retaliation occurred under Title IX.
2. The rationale for any such determination(s).
3. If applicable, the permissible bases for the complainant and respondent to appeal the determination(s) made under Title IX.

If applicable, the decisionmaker shall also notify the appropriate parties, in writing, of the following:

1. Any conclusion regarding whether any of the conduct encompassed by the allegations brought under Title IX and that is found to have occurred violated other laws or District policies or otherwise constituted misconduct within the scope of the District's disciplinary jurisdiction. In the event a decisionmaker defers making or neglects to make any such additional conclusions, the District may still make such additional conclusions after the conclusion of the Title IX grievance procedures using the evidence gathered during the investigation phase of the Title IX grievance procedures.
2. The determination regarding any alleged conduct that, although not a component of any of the Title IX allegations, was investigated using the grievance procedures and assigned to the same decisionmaker, except that any such determination may be shared with a party only if the determination is relevant to that party and if applicable law permits the disclosure of the determination to that party.

3. To the extent expressly required by any applicable law (such as under Chapter PI 9 with respect to a determination of allegations of pupil discrimination prohibited under state law), notice of any right of a party to appeal any determinations made under item 1. or 2. in this list.

The decisionmaker shall provide a copy of the written determination to the Title IX Coordinator and to the District Administrator. If no timely appeal requesting reconsideration of the determination is filed, the determination serves as the final District decision as of the last day for submitting such an appeal.

V. Appeals of the determination of allegations of sex discrimination or retaliation under Title IX

If any party to the complaint is dissatisfied with the decisionmaker's determination, the party may, within [ten (10) calendar days] of the date of delivery of the determination decision, file a written request for reconsideration with the office of the District Administrator. At the District's discretion (e.g., if the appeal is based on new evidence that was not reasonably available), limited additional fact-finding may occur.

Prior to reaching a decision that would modify the challenged determination, the District will give the other parties to the matter at least [five (5) calendar days] to submit a statement regarding the asserted grounds for modification. Giving due consideration to the overall time frames established for completing the grievance procedures, the District Administrator will normally issue a written decision on reconsideration to the parties within [twenty (20) calendar days] of the District Administrator's receipt of the request, unless the District Administrator determines that there is good cause for an extension of that timeline. The District shall notify the parties of any extension of the timeline. If the District Administrator is a party to the complaint or otherwise affected by a conflict of interest or improper bias, the District would need to designate an alternate person or body to make the decision on reconsideration.

A decision on reconsideration is the final District determination of the complaint. If the Title IX complaint encompassed allegations that, if proven, would separately constitute a violation of the state pupil nondiscrimination provisions set forth in section 118.13 of the state statutes and Chapter PI 9 of the Wisconsin Administrative Code, the decision on reconsideration will include appropriate information about a complainant's right under Chapter PI 9 to appeal an adverse determination made under state law to DPI.

A decision on reconsideration is the final District determination of the complaint. If the Title IX complaint encompassed allegations that, if proven, would separately constitute a violation of the state pupil nondiscrimination provisions set forth in section 118.13 of the state statutes and Chapter PI 9 of the Wisconsin Administrative Code, the decision on reconsideration will include appropriate information about a complainant's right under Chapter PI 9 to appeal an adverse determination made under state law to DPI.

VI. Provision of remedies and sanctions after a determination becomes final

If there is a determination that sex discrimination or retaliation prohibited by Title IX occurred, the Title IX Coordinator (or a qualified designee) shall:

1. As needed to address any uncertainty, contact the District Administrator to determine who will authorize specific remedies and sanctions that are responsive to the determination of sex discrimination or retaliation.
2. Ensure that District decisions regarding remedies and sanctions are appropriately documented for the record of the complaint.
3. Coordinate the provision and implementation of remedies to a complainant and other persons the District identifies as having had equal access to the District's education program or activity limited or denied by sex discrimination or prohibited retaliation.
4. Coordinate the imposition of any disciplinary sanctions on a respondent, **including providing notification to the complainant of any such disciplinary sanctions.**
 - a. In some cases, the sanctions may involve the initiation of disciplinary proceedings that are subject to separate and additional procedural requirements (such as for the expulsion of a student or for the termination from employment for an employee, if applicable).
5. Take other appropriate prompt and effective steps to ensure that sex discrimination does not continue or recur within the District's education program or activity.

If District has concluded that misconduct other than a violation of Title IX occurred, remedies and any disciplinary consequences for such other misconduct (or recommendations to initiate specific disciplinary proceedings) shall be determined by an appropriate administrator or supervisor. These grievance procedures are not intended to otherwise address any remedies or disciplinary consequences for such other misconduct.

Other Elements, Requirements, and Limitations of the Grievance Process

I. Dismissals of complaints

Following the receipt of a Title IX complaint made through the District's Title IX grievance procedures that alleges or purports to allege unlawful sex discrimination or retaliation that is prohibited under Title IX, including at points following the initiation of the District's Title IX grievance procedures, the District has authority to determine whether, consistent with the federal Title IX regulations, to dismiss a complaint in whole or in part for purposes of Title IX and the District's Title IX grievance procedures. The District expects its Title IX Coordinator(s) and its designated complaint investigators and decisionmakers to promptly raise the issue of dismissal as needed.

1. **Mandatory dismissal for purposes of Title IX.** For purposes of Title IX and the District's Title IX grievance procedures, the District will dismiss a complaint that was initially identified as a complaint of sex discrimination or retaliation under Title IX if the District concludes that either the following applies:
 - a. The complaint does not present any allegation that, even if proved, would constitute sex discrimination or prohibited retaliation under Title IX. This includes dismissal due to none of the allegations, even if proved, having a sufficient connection to the District's education program or activity.
 - b. The complainant voluntarily withdraws any or all of allegations in the complaint; the District's Title IX Coordinator declines to initiate a Title IX complaint on any of the withdrawn allegations; and, as to any remaining conduct that has been alleged, the District concludes that the remainder of the complaint does not present any allegation that, even if proved, would constitute sex discrimination or prohibited retaliation under Title IX.

Except in the case of the complainant's voluntarily withdrawal of all allegations, prior to dismissing a complaint on the basis that no allegations (or remaining allegations) would constitute sex discrimination or prohibited retaliation, the Title IX Coordinator or a designee must make a reasonable effort to clarify the allegations (or remaining allegations) with the complainant.

2. **Discretionary dismissal of the complaint or specific allegations.** The District may dismiss a complaint or dismiss specific allegations within a complaint, for purposes of Title IX and the District's Title IX grievance procedures, if the District concludes that any of the following apply:
 - a. The relevant respondent is not participating in the District's education program or activity and is not employed by the District.
 - b. The District is unable to identify the relevant respondent (if any) after taking reasonable steps to do so.
 - c. The complainant voluntarily withdraws one or more, but not all, of the allegations presented in the complaint, and the District's Title IX Coordinator declines to initiate a Title IX complaint on the withdrawn allegations. In this instance, the withdrawn allegations will be dismissed, but the remaining allegations will proceed, subject to the rules set forth above regarding mandatory dismissals.
 - d. The District determines that specific allegations made in the complaint, even if proven, would not constitute sex discrimination or prohibited retaliation under Title IX **and** elects to dismiss those specific allegations from the complaint even though other allegations are **not** being dismissed. Prior to dismissing any allegation on this basis, the Title IX Coordinator or a designee must make a reasonable effort to clarify the allegations with the complainant.

3. Dismissal procedures.

- a. At least one of the following administrators, acting in consultation as needed with District legal counsel, must authorize the dismissal of a complaint made through the District's Title IX grievance procedures or any individual allegations included in such a complaint: The District Administrator, the Title IX Coordinator, or an administrative-level designee acting on behalf of the Title IX Coordinator.
 - b. The administrator authorizing the dismissal shall ensure that District Administrator and Title IX Coordinator are notified of a decision to dismiss a complaint, in whole or in part.
 - c. The administrator authorizing the dismissal, the Title IX Coordinator, or their designee must:
 - i. Promptly notify the complainant of the basis for the dismissal and that the dismissal may be appealed on any of the bases set forth in subsection 106.46(i)(1) of the federal Title IX regulations (i.e., certain procedural irregularities, new evidence, or conflicts of interest/bias).
 - ii. If the dismissal occurs after the respondent has been notified of the allegations, promptly notify the respondent of the dismissal and the basis for the dismissal, as well as that dismissal may be appealed on any of the bases set forth in subsection 106.46(i)(1). When required, notice to the respondent shall be provided promptly after notification is given to the complainant, or, any time the notification is provided in writing, it shall be provided simultaneously to both parties.
4. **Appeal of a dismissal.** A dismissal of the complaint or the dismissal of a specific allegation is an appealable decision to the extent required by the federal Title IX regulations. See 34 C.F.R. §§106.45(d)(3) and 106.46(i)(1).

- a. A party receiving notice of a dismissal decision that wishes to appeal the dismissal of a complaint or the dismissal of specific allegations shall notify the Title IX Coordinator of the appeal in writing, including providing a statement of the specific grounds for the appeal, within five (5) business days of the date that the District provides the notice of dismissal.
 - b. The permissible grounds for an appeal of the dismissal decision are limited and are set forth in subsection 106.46(i)(1) of the federal Title IX regulations.
 - c. If a dismissal decision is appealed, the Title IX Coordinator or a designee shall coordinate the processing of the appeal according to all of the appeal procedures and requirements set forth in subsection 106.45(d)(3) of the federal Title IX regulations.
5. **Ongoing obligations to offer supportive measures and take steps to ensure that any sex discrimination does not continue.** If a complaint that has been dismissed, in whole or in part, leaves the District with notice of conduct that, although **not** being pursued as a complaint, may reasonably constitute sex discrimination or retaliation prohibited under Title IX, then the District and the Title IX Coordinator have ongoing obligations to:
- a. Offer and coordinate supportive measures as required under subsections 106.44(f)(1)(ii) and 106.45(g).
 - b. Take other appropriate, prompt, and effective steps to ensure that sex discrimination does not continue or recur within the District's education program or activity, as required under § 106.44(f)(1)(vii).
6. **Status of dismissed allegations.** If a complaint or any specific allegation within a complaint is dismissed for purposes of Title IX, the District retains discretion, to the extent permitted or required by law, to take action with respect to the dismissed allegations or related conduct under other District policies and procedures. However, there may be limits on the District's authority to pursue disciplinary consequences or sanctions with respect to any dismissed allegation that could have constituted sex discrimination or retaliation under Title IX. The administration may need to seek legal advice in such scenarios.

II. Voluntary informal resolution of Title IX complaints

To the extent permitted by the Title IX regulations and not prohibited by any other law, the District may elect to offer and facilitate a strictly voluntary informal resolution process that attempts to resolve the allegations of a complaint of sex discrimination or prohibited retaliation under Title IX, in whole or in part, without a full investigation and determination under the District's Title IX grievance procedures. **By law, an informal resolution process may not be used in connection with allegations that a District employee engaged in sex-based harassment of a student.**

The following apply to the use of an informal resolution process:

1. **Notice of informal resolution process.** Before the initiation of an informal resolution process, the District must provide to the parties with notice of all of the information required under subsection 106.44(k)(3) of the federal Title IX regulations.
2. **Voluntary consent to participate.** The District must obtain the parties' voluntary consent to participate in the informal resolution process for the specific complaint. A party may withdraw their consent at any time prior to approving a resolution agreement and pursue (or resume) the District's grievance procedures.
3. **Facilitator requirements.** The district must designate a trained facilitator for the informal resolution process. The facilitator may not be the same person as either the investigator or decisionmaker for the complaint.
4. **Timelines.** If an attempt to reach a voluntary informal resolution has not reached a conclusion within twenty-one (21) calendar days of the date that the District received the consent of the parties, the District and the parties may mutually and voluntarily agree to extend the timeframe for attempting an informal resolution. In the absence of a mutual agreement to extend the timeframe, the District will provide reasonably prompt written notice to the parties that the informal process is being abandoned and that the District will resume the standard grievance procedures.
5. **Resolution agreements.** If a voluntary resolution of any of the allegations of the complaint is reached, the resolution shall be documented in a written resolution agreement that, upon being approved by the parties, is binding on the parties and has some preclusive effect regarding the resolved allegations.
6. **Ongoing obligations to take steps to ensure that any sex discrimination does not continue.** If the parties' participation in an informal resolution process and the approval of a resolution agreement leaves the District with notice of conduct that, although **not** being pursued as a complaint, may reasonably constitute sex discrimination or retaliation prohibited under Title IX, then the District and the Title IX Coordinator have ongoing obligations, to the extent necessary, to take other appropriate, prompt, and effective steps to ensure that sex discrimination does not continue or recur within the District's education program or activity. See 34 C.F.R. §§ 106.44(f)(1)(vii) and 106.44(k)(1).

III. Timeframes and extensions

The District normally intends to conclude the grievance procedures within approximately 90 calendar days of the date that a Title IX complaint is made by a party or initiated by a Title IX Coordinator, recognizing that in certain circumstances it may be practical to complete the process in less time, and in other circumstances the process may reasonably require more time.

The following are general timeframes that apply to the major stages of the grievance procedures, unless tolled by the parties' voluntary attempt to reach an informal resolution or unless materially extended for good cause and with notice to the parties (as further described below):

Pre-investigation screening and evaluation of the complaint:	15 calendar days from the date the complaint is made
Investigation and determination:	
1. When the same person serves as the investigator and decisionmaker:	60 calendar days from the date the notice of the allegations is provided to the complainant
2. When assigned to different individuals:	
• Investigation:	• 40 calendar days from the date the notice of the allegations is provided to the complainant.
• Determination:	• 20 calendar days from the date the decisionmaker receives the investigatory record and report and evidence.
Appeal:	20 calendar days from the date a request for an appeal is filed.

Regarding the general timeframes identified above:

1. Notice of an extension decision does not need to be provided for any de minimis deviation from the general timeframes provided above (e.g., a deviation of one or two days to account for a deadline that would otherwise fall on a weekend, holiday, etc.).
2. The 90-day approximation for typical completion of the grievance procedures assumes that, in the typical case, one or more of the major stages will be finished earlier than general timeframe established for that stage, and it also assumes that not every determination of a complaint will be appealed.
3. If it is known at the outset of the grievance procedures that the general timelines for the major stages will be materially affected by, for example, school break schedules, the Title IX Coordinator may immediately notify the parties of the expected adjustments to the general timeframes. However, the District will continue to process pending complaints during the summer months.
4. It is expected that the general timeframes for the investigation stage (or the joint investigation and determination stage) will have the greatest variability and is particularly likely to encounter good cause for an extension.
5. If the target date for completing a major stage of the grievance procedures passes and if a party has not received a notice of an extension and a reason for the extension, the party's primary remedy is to contact the Title IX Coordinator, who will ensure that the District communicates a prompt update regarding the timeframes to all parties.

Any party or witness may, for good cause, request (1) the rescheduling of an investigative interview or other meeting; or (2) a limited extension of a specific deadline that applies to the party or witness. Any such request shall be submitted in writing to the Title IX Coordinator, investigator, decisionmaker, or appeal decision-maker, as applicable to the relevant stage of the proceedings. Upon request, the Title IX Coordinator will assist a party or witness in making and routing such requests to the appropriate person.

The Title IX Coordinator, investigator, decisionmaker, or appeal decisionmaker (as applicable to the specific stage of the proceeding) may grant such a request, and may also self-initiate such a delay, rescheduling, or extension, upon determining that there is good cause and that approving the request would not be unduly prejudicial to any of the parties or unreasonably extend the conclusion of the grievance procedures.

The appropriate agent of the District or a designee shall provide the complainant and respondent with prompt written notice of any decision to extend a timeline or to grant or deny a request for an extension of a specific deadline. Such notice shall include the reason(s) for the action. To the extent a given deadline applies to multiple parties, any extension of the deadline automatically applies to all such parties.

If a complaint of sex discrimination under Title IX also constitutes a complaint of pupil discrimination under Chapter PI 9 of the Wisconsin Administrative Code, and if a requested or contemplated delay/extension would prevent the District from reaching a determination of the complaint within 90 calendar days, the District's agents shall evaluate whether it is necessary or appropriate to request the parties' consent to the delay/extension.

IV. Consolidation of complaints

When the allegations of sex discrimination or retaliation arise out of the same facts or circumstances, the District may elect to consolidate complaints of sex discrimination and/or retaliation (1) against more than one respondent; (2) by more than one complainant against one or more respondents; or (3) by one party against another party (e.g., multiple allegations that were made separately or counter-allegations). When the identity of the parties is not identical, efficiency advantages associated with possible consolidation must be weighed against any privacy rights and against the privacy concerns of the different parties.

V. Concurrent investigation and consideration of multiple potential grounds for a determination of responsibility/misconduct

If the allegations sex discrimination or retaliation set forth in Title IX complaint could also constitute or fairly encompass allegations of conduct that could constitute (1) discrimination under a different law, or (2) a violation of a District policy or rule (including any District code of conduct that may be applicable to the respondent), or (3) any other established grounds for the imposition of possible disciplinary sanctions, then the District may, at its discretion, investigate the facts and circumstances related to such other legal or policy standards using these grievance procedures and apply the facts, as found through the investigation, to all potential grounds for a finding of responsibility/misconduct and possible discipline. Similarly, if alleged conduct arising out of the same facts or circumstances as the conduct that is alleged to constitute sex discrimination or prohibited retaliation may be grounds for a finding of a violation of law or policy or other potential misconduct, the District may elect to concurrently investigate such related conduct or charges via the investigation initiated under these grievance procedures. Unless otherwise required by law, the investigation and determinations reached through the Title IX grievance procedures shall constitute sufficient processing of any such related, overlapping, or intertwined complaint(s), allegations, or charges that may arise out of the same facts or circumstances as the allegation(s) of Title IX discrimination.

In all cases involving such concurrent investigation and concurrent consideration of such additional allegations or charges, the District's agents implementing the grievance procedures are responsible for appropriately notifying each affected party that an investigative interview, meeting, or other proceeding will address such additional, potentially-disciplinary matters as part of a concurrent investigation. At the determination stage of these grievance procedures, if an agent of the District reaches a conclusion that any party committed any violation or engaged in any misconduct that is **not** a determination of whether sex discrimination or retaliation occurred under Title IX, then the District's agents are also responsible for adequately identifying the rationale and any specific basis (e.g., any federal law, state law, and/or a local policy or rule) for any such additional, non-Title IX determinations or conclusions.

VI. Retaliation is prohibited

No official, employee, or agent of the District, student, or any other person over whom the District exercises some authority may intimidate, threaten, coerce, or unlawfully discriminate against any individual (1) for the purpose of interfering with any right or privilege secured by Title IX or the Title IX regulations, or (2) because the individual has made a report or complaint, or testified, assisted, participated, or exercised a legal right to refuse to participate in any manner in an investigation or proceeding conducted under a District nondiscrimination policy or these grievance procedures. This non-retaliation provision does **not** preclude the District from (1) requiring an employee or other authorized agent of the District to participate as a witness in, or otherwise assist with, an investigation, proceeding, or hearing; or (2) imposing consequences for an employee's or agent's refusal to cooperatively participate or otherwise assist in such matters.

VII. Bad faith conduct is prohibited

To the extent permitted by law, the District reserves authority to appropriately address and impose consequences for bad-faith conduct by individuals who make a report or complaint, testify, assist, or participate in any manner in a Title IX investigation or other Title IX proceeding. For example, the District may impose lawful consequences for making a materially false statement in bad faith in the course of any proceeding that is conducted under the auspices of the District's Title IX obligations. However, a determination that a report or complaint of sex discrimination or prohibited retaliation was not substantiated, standing alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

VIII. Supportive measures relating to allegations of sex-based harassment

Supportive measures, as described and defined in the Title IX regulations and elsewhere in this rule, are to be offered and coordinated based on notice to the Title IX Coordinator of conduct that reasonably may constitute sex discrimination or prohibited retaliation under Title IX. When a complaint alleging sex discrimination (including sex-based harassment) or retaliation has been made, the obligation to consider, offer, and coordinate supportive measures extends to both “complainants” and “respondents.” Supportive measures are available at least through the resolution of a pending complaint.

Supportive measures are intended to be individualized and context-sensitive. The range of possible supportive measures that, in appropriate cases and when consistent with Title IX, may be available to complainants and respondents in connection with a **complaint of sex-based harassment** includes the following:

1. Possible changes in class schedules, for a student.
2. Extensions of time for coursework, rescheduling of tests and examinations, or the provision of alternatives for course completion or other academic support or accommodations, including providing support in structuring academic support or accommodations with applicable District staff.
3. Possible changes in work schedules, work locations, or work duties, for an employee.
4. Modified participation by a party in a District-sponsored activity.
5. Permitting/approving an authorized temporary leave of absence.
6. The imposition of “no contact” directives between or among parties.
7. Adjustments to the supervision provided by the District.
8. The creation of a personal safety plan.
9. The provision of counseling services or referrals for professional support services.
10. Scheduled “check ins” between the party and an appropriate administrator or supervisor to discuss current circumstances and any new or modified needs.
11. Jointly planned and District facilitated communications to specific persons that are intended to facilitate meeting the party’s individual needs for support and/or to help protect the party’s privacy.
12. Individualized prevention and awareness training.
13. Such other supportive measures as may be appropriate and consistent with the definition and purpose of supportive measures as set forth in the federal Title IX regulations.

In addition, as described elsewhere in this rule, the parties to a complaint of sex-based harassment or other forms of sex discrimination may submit requests to have a District decision relating to supportive measures reviewed by an impartial employee, and, if appropriate, having the District decision modified or reversed.

IX. Range of disciplinary sanctions for sex-based harassment

After a determination through these grievance procedures that a party is responsible for sex-based harassment prohibited under Title IX, any disciplinary sanctions that the District may impose will depend on the nature of the misconduct and the individual’s then-current status as a student, employee, or other person connected to the District’s education program or activity. Disciplinary sanctions that are issued or recommended as a result of such a determination of responsibility are intended as consequences for past misconduct and/or as a deterrent against any future sex-based harassment.

1. **Students.** The range of possible disciplinary sanctions or recommended sanctions for students includes but is not limited to suspension from school, expulsion from school, and disciplinary suspension of eligibility to participate in District-sponsored extracurricular activities. The District may also prohibit the student from being present on District property or at certain District-sponsored events or activities to an extent that exceeds actions that would be allowable as supportive measures. A disciplinary no-contact directive may be put in place. This provision does not modify any student’s rights under the Individuals with Disabilities Education Act or Section 504 of the Rehabilitation Act of 1973.
2. **Employees.** The range of possible disciplinary sanctions or recommended sanctions for employees includes but is not limited to a formal reprimand, an indefinite demotion or salary reduction, a disciplinary reassignment exceeding what may be allowed as a supportive measure, an unpaid suspension, contract nonrenewal, and termination of employment. At the District’s discretion, such sanctions may be structured with or without special conditions, such as notice of a zero-tolerance policy for any prospective related violations, or a directive prohibiting the employee from being present on District property or at certain District-sponsored events or activities to an extent that exceeds actions that would be allowable as supportive measures. A disciplinary no-contact directive may be put in place.
14. **Other persons.** The range of possible disciplinary sanctions or recommended sanctions for other persons includes but is not limited to suspension from or the termination of a District-authorized role (e.g., volunteer),

termination or nonrenewal of contracts, and a directive prohibiting the individual from being present on District property or at certain District-sponsored events or activities to an extent that exceeds actions that would be allowable as supportive measures. A disciplinary no-contact directive may be put in place.

X. Range of remedies for sex-based harassment

Remedies are measures provided, as appropriate, to a complainant or any other person who the District has identified as having had their equal access to the District's education program or activity limited or denied by sex discrimination, including sex-based harassment. The measures are provided to restore or preserve that person's equal access after the District makes a determination that that sex discrimination occurred.

Remedies are intended to be context-sensitive. The range of possible remedies that the District may provide includes but is not limited to measures that might have been provided or available as supportive measures. However, in some cases, remedies may burden a respondent to a greater extent than is permissible in connection with supportive measures. Remedies can also include measures that, for example, target ongoing prevention and awareness among persons participating in District programs and activities or that attempt to monitor and improve the quality of the workplace, school, or program environment so that students, employees, and others are safe and free from sex-based discrimination and harassment.

Definitions

Within the Title IX grievance procedures set forth in this rule:

- **Business days** means days that the main administrative office of the District is staffed, in person or virtually, for responding to regular business and public contacts. Business days never include Saturday or Sunday.
- The terms "**written**" or "**in writing**" include a notice or communication provided in hard copy format via hand delivery or via U.S. Mail to the address of record or in an electronic format via an email sent to an email address that has been issued by the District or that has been provided by the intended recipient.
- With respect to a communication sent by electronic mail, an email is deemed to be **delivered** when it was first electronically available to be accessed by the recipient, and delivery presumptively occurs on the same day as the email was sent. With respect to a communication sent by U.S. Mail, the communication is deemed **delivered** on (1) the date reflected on any confirmation of delivery or delivery receipt; or (2) three business days after the communication was sent by First Class Mail if no delivery confirmation was requested.
- **Proof by a preponderance of the evidence** means that a decision-maker must determine, based on an evaluation of all relevant and permissible evidence, whether alleged facts are more likely than not to be true.

In connection with any report or complaint that alleges a sexual assault and when (1) the absence of the consent of the alleged victim is a relevant element of the alleged offense, and (2) the alleged victim is considered legally competent to potentially give consent:

- Unless otherwise required by law in connection with the District's evaluation, investigation, or determination of the alleged conduct, the terms **consent** and **without consent** shall be determined using the definition found in section 940.225(4) of the state statutes, subject to the following for these District-related purposes: (1) a finding that conduct occurred without the consent of the alleged victim needs to be proven by the evidentiary standard established in these grievance procedures; and (2) the words and actions of the alleged victim are to be evaluated from the perspective of what a reasonable person would understand them to mean, such that if the conduct is found to have occurred without the consent of the alleged victim under the relevant standard, then a showing that the respondent had formed a subjective belief that the alleged victim had consented is not a defense that defeats the finding of an absence of consent.

The following terms within this rule have the definitions specified in the federal Title IX regulations, including all applicable exclusions, exceptions, and clarifications of scope found in the federal regulations. See 34 C.F.R. Part 106; see especially 34 C.F.R. §§106.2 and 106.10. Paraphrasing the applicable regulatory provisions:

- **Complainant** means:
 - A **student or employee** who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or the Title IX regulations; or
 - A person other than a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or the Title IX regulations and who was participating or attempting to participate in the District's education program or activity at the time of the alleged sex discrimination.
- **Respondent** means a person who is alleged to have violated the District's prohibition on sex discrimination.
- **Party** means a complainant or respondent.

- **Complaint** means an oral or written request to the District that objectively can be understood as a request for the District to investigate and make a determination about alleged discrimination under Title IX or the Title IX regulations.
- **Supportive measures** means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:
 - Restore or preserve that party's access to the District's education program or activity, including measures that are designed to protect the safety of the parties or the District's educational environment; or
 - Provide support during the District's grievance procedures under § 106.45, and if applicable § 106.46, or during the informal resolution process under § 106.44(k).
- **Disciplinary sanctions** means consequences imposed on a respondent following a determination under Title IX that the respondent violated the District's prohibition on sex discrimination (or retaliation as prohibited under Title IX).
- **Remedies** means measures provided, as appropriate, to a complainant or any other person the District identifies as having had their equal access to the District's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to the District's education program or activity after the District determines that sex discrimination occurred.
- **Relevant** means related to the allegations of sex discrimination under investigation as part of the District's Title IX grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decisionmaker in determining whether the alleged sex discrimination occurred.
- **Discrimination on the basis of sex**, for purposes of the federal Title IX regulations and to the extent required by federal law, includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.
- **Sex-based harassment** prohibited by the Title IX regulations is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the bases described in § 106.10, that is any of the following:
 - **Quid pro quo harassment.** An employee, agent, or other person authorized by the District to provide an aid, benefit, or service under the District's education program or activity explicitly or impliedly conditioning the provision of such an aid, benefit, or service on a person's participation in unwelcome sexual conduct.
 - **Hostile environment harassment.** Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the District's education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:
 1. The degree to which the conduct affected the complainant's ability to access the District's education program or activity;
 2. The type, frequency, and duration of the conduct;
 3. The parties' ages, roles within the District's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
 4. The location of the conduct and the context in which the conduct occurred; **and**
 5. Other sex-based harassment in the District's education program or activity.
 - **Sexual assault** meaning an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, including but not limited to rape, sexual assault with an object, and groping.
 - **Dating violence** meaning violence committed by a person:
 1. Who is or has been in a social relationship of a romantic or intimate nature with the victim; **and**
 2. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship.
 - **Domestic violence** meaning felony or misdemeanor crimes committed by a person who:
 1. Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the District, or a person similarly situated to a spouse of the victim;
 2. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
 3. Shares a child in common with the victim; **or**
 4. Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

- **Stalking** meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 1. Fear for the person's safety or the safety of others; or
 2. Suffer substantial emotional distress.

Book	School Board Policies
Section	100 Series: Board of Education
Title	Expectations for Employees to Report Discrimination and Harassment
Code	113 RULE 2
Status	Active
Adopted	September 16, 2020

Expectations for employees to report discrimination and harassment

113 Policy, Rule 2

The guidelines and expectations established in this rule apply to all District employees and to all non-employee authorized agents of the District who perform a compensated role for the District that requires a DPI license (e.g., licensed professionals working for the District in the capacity of contracted service provider) The District may further apply this rule to other non-employees who provide services to the District by including appropriate provisions in any applicable contract, memorandum of understanding, or other agreement, or by issuing any other sufficient notice or directives to such persons.

In the remainder of this rule:

1. "Agent" means any non-employee agent, contractor, or service-provider to whom the guidelines and expectations established in this rule apply.
2. "District nondiscrimination policy" includes the following School Board policies: 113, 411, 411.1, 511, 512

Reporting Responsibilities

Any employee or agent of the District who has knowledge of conduct by any other person that constitutes, or is reasonably suspected to constitute, unlawful discrimination in violation of a legal obligation of the District, or in violation of any District nondiscrimination policy, is responsible for promptly reporting such conduct. Similarly, an employee or agent who reasonably suspects that any District policy or District operating procedure unlawfully discriminates against any person in violation of a legal obligation of the District, or in violation of any District nondiscrimination policy, is also responsible for promptly reporting that knowledge, claim, or concern.

The District's established procedures for making a report or complaint of prohibited discrimination, or alleged discrimination, are found in Policy 113. Employees and agents of the District may, and generally should, use those established methods to satisfy the reporting obligations established in this rule. However, an employee or agent may also satisfy the reporting obligations established in this rule if they submit the relevant report directly to the School Principal, Assistant School Principal, or the District Administrator, provided that the person to whom the report is made is someone other than a person who is alleged to be responsible for the reported discrimination. Particularly if such a report was not submitted in person (e.g., it was submitted via mail or electronic mail), employees and agents are strongly encouraged to personally contact the intended recipient to confirm that the report was received as intended.

The obligation established in this Rule to report conduct by any other person that constitutes, or that is reasonably suspected to constitute, unlawful discrimination (including unlawful harassment) applies to such conduct occurring within any aspect of the District's programs, activities, or operations and also applies regardless of:

1. Whether the person alleged to be responsible for the conduct is a student, an employee, a supervisor/administrator, a School Board member, or other person over whom the District exercises relevant authority, control, or responsibility;
2. Whether the person alleged to be the victim of the conduct is a student, an employee, or other person who is legally protected from the alleged discrimination;
3. How the employee or agent obtained their knowledge of the conduct or alleged conduct (e.g., as a direct witness to the conduct/incident, as a victim or target of the conduct, or after receiving a report or other relevant information from a third-party); and

4. Whether the employee or agent making the report considers (or does not consider) themselves to be an alleged victim or target of the conduct, or to have been otherwise harmed in some way by the conduct, except that an employee or agent who is an alleged victim of conduct that could constitute sexual harassment, as defined under section 106.30 of the federal Title IX regulations, is permitted, at their discretion, to make their report in a manner that either does, or does not, constitute a "formal complaint" of sexual harassment, as defined in section 106.30.

As further established in the Board's nondiscrimination policies, an employee or agent is protected from any form of unlawful retaliation for making a good-faith report of known, alleged, or reasonably suspected discrimination under this rule.

The reporting obligations established in this Rule do not apply when the employee or agent has direct and certain knowledge that the relevant conduct or other allegations of unlawful discrimination have already been reported to at least to the School Principal, Assistant School Principal, or the District Administrator. For example, an employee or agent is not required to submit another report of the same conduct, incident, or allegation when they have knowledge that the District has already started an investigation into (or otherwise initiated an appropriate response to) the same matter.

To the extent applicable to the employee's or agent's position/role and to the facts of a specific situation, employees and agents of the District remain responsible for adhering to any other mandatory reporting requirements established under a District policy and/or under state or federal law (e.g., reports of child abuse or neglect, threats of school violence, or educator misconduct).

In the course of their duties and in attempting to adhere to the expectations established by this rule, employees and agents will witness or otherwise become aware of incidents involving conduct that may be inappropriate, but that may or may not also constitute unlawful harassment or some other form of discrimination that is prohibited by law and/or District policy. In some situations, the relevant conduct (or alleged conduct) will be so severe or pervasive, or present such a significant threat to someone's health, safety, or wellbeing, that reporting as required by this rule will clearly be the necessary course of action. However, it is also the case that not every unkind action, statement that someone might find offensive, ill-advised attempt at humor, or incident of interpersonal conflict, teasing, or name-calling amounts to unlawful harassment that requires a report to be submitted under this rule.

Due to the continuum of potentially problematic incidents and conduct that employees and agents may encounter, the District recognizes that there will be borderline situations where employees and agents will need to exercise reasonable professional judgment when deciding whether the situation should be further reported as possible discrimination under this rule. In exercising such judgment, under a reasonable person standard for someone holding the employee's or agent's position/role, the employee or agent is expected to:

1. Make efforts to be reasonably consistent in making such reporting decisions;
2. Refer to and apply any policy-based standards that may be relevant to the situation, including considering whether policies in addition to the District's nondiscrimination policies may be relevant, e.g. 411, 511, 512, as well as any reporting expectations that may apply with respect to such other policies;
3. Seek assistance from appropriate supervisory or administrative personnel, including but not limited to any District-designated nondiscrimination coordinator, whenever the employee or agent encounters any questions regarding the scope or application of this rule, and the employee or agent is unsure how to fully assess or otherwise handle the situation; and
4. Follow any lawful supervisory or administrative directives or guidance that they may receive.

Cross Reference SR2 7/24/20

Book	School Board Policies
Section	300: Instruction
Title	Reading Instruction
Code	341.1
Status	
Adopted	11-15-2023

The District Administrator, working in conjunction with other administrators and appropriate instructional staff, including the certified reading specialist(s) with primary authority for the monitoring of the district's reading curriculum, shall propose for School Board approval a program of reading goals for grades kindergarten to 12. Such a proposal shall be submitted upon request by the Board or whenever the administration determines that it would be beneficial or prudent to revisit existing goals.

Following approval by the Board, the District's reading goals shall be a part of the District's annual evaluation of the reading curriculum and the District's regular assessment of reading-related needs across all instructional levels.

The 4K through grade twelve (12) reading program shall contribute to the total development of students. The program shall be designed to help students acquire reading competence, which enables them to experience success as citizens of the community. The program will prohibit three-cuing instruction and consist of all the following:

- Phonological awareness
- Phonemic awareness
- Phonics
- Oral language development
- Vocabulary building
- Instruction in writing
- Instruction in comprehension
- Reading fluency

The goals for the Cochrane-Fountain City School District 4K through grade twelve (12) reading program shall be as follows:

- To guide each student toward a level of achievement in reading **at or above their grade level that approaches the limit of his/her full potential.**
- To help students develop functional reading skills in addition to interrelated speaking, listening, writing, and thinking skills.
- To help each student apply reading skills which are directly related to his/her needs in practical situations.
- To help build student attitudes toward an interest in reading as a recreational and functional skill.
- **Every 5K-3rd grade student is administered the state-determined reading readiness screener three times a year.**
- **Students who score below the 25th percentile on this assessment will have diagnostic assessments administered and a personal reading plan developed.**
- To provide interventions and remedial reading services for students in need of such services in grades 4-12.
- To evaluate the reading program and student achievement annually.

State-Mandated Early Literacy Reading Readiness Assessments

The District Administrator, or a designee who is licensed either as a reading specialist or as an administrator with curricular and instructional responsibilities, shall (1) determine the annual dates (or date ranges) during which the District will administer the early reading screening assessments required by state law and (2) establish procedures to facilitate and monitor the timely administration and scoring of the screening assessments and, as applicable, any state-mandated reading diagnostic assessments. All District-selected dates for the administration of reading readiness assessments must meet the timing parameters found in state law.

** Note: The references to state-mandated reading readiness assessments in this policy should not be interpreted to prohibit the use or administration of additional assessments, evaluations, or diagnostic resources that identify, diagnose, provide interventions/services, and monitor the progress of students who are experiencing difficulty with reading.*

Early Literacy Remediation Plan (effective beginning in the 2024-25 school year)

The District Administrator is responsible for overseeing the development and future maintenance of the Early Literacy Remediation Plan required by state law. The district administrator shall directly involve one licensed reading specialist or other licensed administrator who has direct professional training in the measurement of students' reading skills and the diagnosis of reading difficulties in formulating the substantive content of the plan, including any future substantive amendments.

Subject to any subsequent Board directive(s), the Board authorizes the District Administrator to give final approval to the District's Early Literacy Remediation Plan and to any future amendments to the plan. However, the District Administrator may also elect to bring the plan document and/or any future amendments to the Board for direct Board approval. Further, at a minimum, the District Administrator shall provide the members of the Board with notice and copies of the final initial plan and any future substantive amendments.

As required by state law, the District's current Early Literacy Remediation Plan shall be posted on the District website.

State Mandates and Prohibitions Regarding Reading Curriculum, Related Instructional Materials, and Instructional Practices

By state law:

1. Neither the District nor the operator of any District-authorized charter school may purchase curricula or instructional materials that include "3-cueing" (as defined in the statutes).
2. Beginning in the 2024-25 school year, no District school may provide instruction that incorporates "3-cueing" (as defined in the statutes) in the core reading curriculum for grades kindergarten to 3 or in supplemental materials, including materials used for reading intervention, for students in grades kindergarten to 3.
3. The interventions or services provided to a student who is determined to be "at risk" following a universal screening assessment or a diagnostic assessment delivered under section 118.016(3) of the state statutes must include the components of "science-based early reading instruction" (as defined in the statutes). This includes a requirement that a personal reading plan created for such a student must include the programming, using science-based early reading instruction, that the student's teacher will use to provide reading instruction to the student, addressing the areas of phonemic awareness, phonics, fluency, vocabulary, and comprehension.

If any employee identifies a concern that District compliance with any of the state law requirements listed immediately above may conflict with the District's federal obligations to a specific student (such as the District's obligation to provide the special education and services expressly defined within the Individualized Education Program (IEP) of a student with disabilities), the employee shall promptly elevate the concern to the District Administrator and the District's Director of Special Education for further evaluation and direction.

Legal References:

Wisconsin Statutes

<u>Section 118.015</u>	[reading instruction]
<u>Section 118.016</u>	[assessments of reading readiness]
<u>Section 121.02(1)(c)</u>	[school district standards; remedial reading and interventions]
<u>Section 118.30(1g)(a)1</u>	[board adoption of academic standards, including in reading]
<u>Section 121.02(1)(c)</u>	[school district standards; remedial reading and interventions]
<u>Section 121.02(1)(k)</u>	[school district standards; curriculum plans]
<u>Section 121.02(1)(r)</u>	[school district standards; annual third grade standardized reading test]

Wisconsin Administrative Code

<u>PI 8.01(2)(c)</u>	[school district standards; remedial reading and interventions]
<u>PI 8.01(2)(k)</u>	[curriculum plan requirements for school districts]

Book	School Board Policies
Section	300: Instruction
Title	Early Literacy Remediation Plan
Code	341.1 - Exhibit
Status	_____
Adopted	_____

Cochrane – Fountain City School District Early Literacy Remediation Plan

This *Early Literacy Remediation Plan*, which is required by state law, addresses reading instruction, assessment, and remediation with a primary, but not exclusive, focus on five-year-old kindergarten through third grade. See § [118.016\(6\)](#).

The plan is intended to help the District and staff achieve district-established goals for reading, identify students struggling with reading and literacy development, structure and provide literacy interventions, and improve the District's reading curriculum and instructional practices.

The Cochrane-Fountain City School District is committed to high levels of learning for every student. As developed and approved pursuant to School Board authority, the following are the District's current reading and literacy-related goals:

- Students are provided grade-level instruction in literacy using approved literacy resources.
- The grade level teacher(s) provide additional instruction for students who are not meeting essential learning outcomes in a unit of study.
- 4-year-old Kindergarten
 - Every student is administered the state-determined reading readiness screener twice, once mid-year and once in the spring.
 - Guardians are notified of the assessment results within 15 calendar days after the assessment is scored.
- 5-year-old Kindergarten – 3rd grade
 - Every student is administered the state-determined reading readiness screener once in the fall, once mid-year, and once in the spring.
 - Guardians are notified of the assessment results within 15 calendar days after the assessment is scored.
- All Students 4K – 3rd Grade
 - Students scoring below the 25th percentile on this assessment will have additional diagnostic assessments administered.
 - Guardians are notified of the assessment results within 15 calendar days after the assessment is scored.
 - Students who receive diagnostic assessments will have a Personal Reading Plan developed. This plan will be developed by a qualified reading teacher through collaboration with guardians. This plan will include a student-specific goal, a progress monitoring plan, and an action plan. This plan may include research-based interventions for the student in addition to their daily grade-level instruction.
 - Students on a personal reading plan who, by the end of the school year, still perform below the 25th percentile, will be recommended for a summer intervention program.
 - Students who, by the end of their third-grade year, do not complete their learning plan and are performing below the 25th percentile, will be recommended for a summer intervention program and provided a continuing intervention plan for their 4th-grade school year.
- To provide interventions and remedial reading services for students in need of such services in grades 4-12.
- To evaluate the reading program and student achievement annually.

Fundamental Skills Screening Assessment (4K)

Assessment Tool – AIMS web is the fundamental skills screening assessment administered to students enrolled in four-year-old kindergarten (4K). This is the state-required benchmark and progress monitoring assessment to measure reading. It is a state-mandated and state-selected reading readiness screening tool. See § [118.016\(2\)](#). State law does not allow families to choose whether to have their child(ren) participate in this assessment.

Purpose – To evaluate students on phonemic awareness and letter-sound knowledge.

Timing – The District administers the fundamental skills screening assessment to 4K students at least two times* during each school year. The first administration takes place within 45 calendar days of the start of the school term for students each fall. The second administration occurs in the second half of the school year, at least 45 calendar days before the last day of the regular annual school term.

** Note: In the 2024-25 school year, the District is required to administer the assessment only one time.*

Notice of Assessment Results

Parents/guardians will be notified of the assessment results within 15 calendar days after the assessment is scored.

Use of Assessment Results

It is not unusual for students enrolled in 4K to be at many different levels of reading readiness. With that in mind:

- The results of a fundamental skills screening assessment do not automatically trigger either a mandatory “diagnostic assessment” or mandatory learning interventions.
- The District will use the assessment results as one data point to determine if a student should be monitored, referred for any type of further evaluation, or considered for instructional modifications or interventions.

Universal Screening Assessment (5K through Third Grade)

Assessment Tool – AIMS web is the fundamental skills screening assessment administered to students enrolled in five-year-old kindergarten (5K) through third grade. This is the state-required benchmark and progress monitoring assessment to measure reading. It is a state-mandated and state-selected reading readiness screening tool. See § [118.016\(2\)](#). State law does not allow families to choose whether to have their child(ren) participate in this assessment.

Purpose – To evaluate students on phonemic awareness, decoding skills, alphabet knowledge, letter-sound knowledge, and oral vocabulary.

Timing – The District administers the universal screening assessment to 5K through third grade students at least three times* during each school year. The first administration takes place within 45 calendar days of the start of the school term for students each fall. The second is administration near the middle of the annual school term. The third occurs in the second half of the school year, at least 45 calendar days before the last day of the regular annual school term.

** Note: In the 2024-25 school year, the District is required to administer the assessment only two times.*

Notice of Assessment Results

Parents/guardians will be notified of the assessment results within 15 calendar days after the assessment is scored.

Use of Assessment Results – As defined in state law, a student is considered to be “at-risk” with respect to early literacy learning if the student scores below the 25th percentile on a universal screening assessment. For each 5K to third-grade student who is determined to be “at-risk” of reading difficulty based on the results of the screener, the District will:

- Administer a diagnostic literacy assessment to help further evaluate the student’s skills and needs.
- Start or, if applicable, continue the process of developing and implementing a personal reading plan for the student.

For students who are not considered “at-risk,” the District will use the assessment results as one data point to help determine if a student should be monitored, further evaluated, or considered for possible interventions or remedial reading services.

Diagnostic Literacy Assessment (5K through Third Grade)

Assessment Tool – The District has selected the use of a suite of assessment including Fastbridge, DIBELS, Heggerty, and Really Good Reading for the diagnostic literacy assessment tool. These assessments has its individual focus on phonological awareness, phonemic awareness, phonics, fluency, vocabulary, and comprehension that determine student performance on important reading skills. The specific assessment will be chosen based on the deficiency identified by the screener. The benchmark assessments generally take less than 10 minutes to give, depending on the student's age and the time of year. In instances where section [118.016\(3\)\(b\)](#) requires the District to administer a diagnostic assessment, state law does not provide families with an opportunity to choose to opt their child(ren) out the assessment.

Purpose – To evaluate students on phonemic awareness, decoding skills, alphabet knowledge, letter-sound knowledge, oral vocabulary, Rapid naming, Phonological awareness, word recognition, spelling, vocabulary, listening comprehension, and when developmentally appropriate, oral reading fluency and reading comprehension.

See §§ [118.016\(1\)\(b\)](#) and [118.016\(3\)\(b\)](#). As an assessment of skills, a diagnostic assessment can help to identify a child’s potential learning gaps with greater precision. However, the District’s diagnostic literacy assessments do not determine whether a student may have any medical or developmental condition or disability that may be affecting the child’s learning.

Family History Survey – In connection with a diagnostic assessment, the District will also provide an opportunity for the student’s parent to complete a family history survey to provide additional information about any learning difficulties in the student’s family.

Eligible Students and Timing – The District must administer a diagnostic assessment to a student if either of the following applies:

- The results of a universal screening assessment indicate that the student is “at-risk” for early literacy learning.
 - If the student’s “at-risk” status relates to the first screening assessment of the school term, then the diagnostic assessment is to be completed by the second Friday of November.
 - If the student’s “at-risk” status relates to the second or third screening assessment of the school term, then the diagnostic assessment is to be completed within 10 calendar days of the screener.
- A teacher or parent who suspects that the student may be demonstrating characteristics of dyslexia submits a request for a diagnostic assessment.*
 - The assessment must be conducted within 20 calendar days of the request. ** Note: This requirement applies to requests submitted beginning January 1, 2025.*

The District may determine that other students could benefit from completing a diagnostic assessment that is not mandatory under state law.

Notice of Assessment Results

Parents/guardians will be notified of the assessment results within 15 calendar days after the assessment is scored. The District will provide information about dyslexia to the parent/guardian of each student the District is required to assess using a diagnostic assessment. If a student’s score on a diagnostic assessment places the student in the “at-risk” classification, then the District is also required to provide special education referral information to the student’s parent.

Use of Assessment Results – As defined in state law, a student is considered to be “at-risk” with respect to early literacy learning if the student scores below the 25th percentile on a diagnostic assessment. For each student who is “at-risk” the District will start or, if applicable, continue the process of developing and implementing a personal reading plan for the student. If a student already has a personal reading plan in place at the time that the student completes a diagnostic assessment, the results of the diagnostic assessment will be used to inform possible changes to the plan and may be used to help monitor the student’s progress. For students who are not considered “at-risk,” the District will use the assessment results as one data point to help determine if the student should be monitored or otherwise further considered for possible interventions or services.

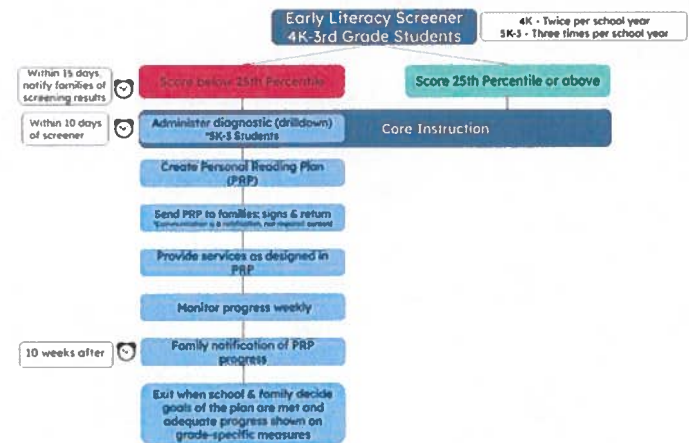
Early Literacy Learning Supports and Interventions

What are Interventions

Research-based support is provided to students in need of additional support. C-FC maintains a menu of interventions used in our response to intervention (RTI) process. This is a menu of possible interventions to be used for academic interventions. This list should not be seen as an exhaustive list or in limiting School Intervention Team options for intervention. However, interventions outside of this list should be vetted to ensure research-based validity. (*) Denotes that the intervention is considered for use in a personal reading plan following our early literacy remediation plan.

Universal Interventions

- Delivering instruction through multimodal strategies, such as audible, verbal, visual, and tactile methods (i.e., tracing, writing, using manipulatives, etc.).
- Using targeted repetition and reinforcement of explicit instruction through re-teaching, teaching using alternative strategies, and/or using alternative materials.
- Identifying critical points during instruction for providing the student with prompts, coaching, learning checks, and specific feedback.
- Making ongoing adjustments to a student’s placement in instructional groups (whole group, small group, and/or individual) for different learning objectives and skill practice.



Targeted Interventions

- Guided Reading – A small-group intervention for students who are reading at the emergent to transitional levels but are lagging behind their classmates in Fluency and Comprehension.
- **Comprehension Focus Group** – A supplemental small group intervention designed for transitional readers who are struggling with comprehension. The intervention is organized around units of study that require readers to apply higher-level comprehension strategies to analyze relationships within and across texts.
- **Strategic Processing Intervention** – This incorporates the four essential elements of research-based reading interventions: 1) phonological awareness, decoding, and word study, 2) independent reading of progressively more difficult texts, 3) writing activities, and 4) comprehension practice with meaningful texts.

Interventions to Address Characteristics of Dyslexia

Dyslexia is generally recognized as a neurobiological condition that exists on a continuum. At a very general level, the condition is often characterized by difficulties, at varying degrees of severity, with accurate and fluent word recognition, spelling, and decoding. Those difficulties can detract from the child's reading experience, impede comprehension, and affect the growth of key literacy-related skills. Some children without dyslexia demonstrate some of the characteristics that are associated with dyslexia. Due to the broad range of severity of "characteristics of dyslexia" and due to the many different underlying causes or reasons that students may exhibit those characteristics in connection with reading and other literacy-related skills, there is no single, standardized program or schedule of interventions that can be applied to appropriately address the needs of all students with dyslexia, with related conditions, or who have demonstrated characteristics of dyslexia. Interventions for such students should reflect individual needs. The Early literacy learning supports or interventions identified for a student with dyslexia or with characteristics of dyslexia will:

- Be based on the components of "science-based early reading instruction," as defined in state law, including both addressing any proficiency gaps in foundational skills (e.g., phonemic awareness and phonics) and incorporating instruction in other critical reading skills (e.g., fluency, vocabulary, and comprehension).
- Be comprehensive in relation to the student's needs so that the learning leads to reading comprehension and engagement.
- Be explicit so that the student understands what needs to be learned and why.
- Build upon the student's strengths as a bridge to addressing needs.
- Provide guided and monitored practice.
- Be coordinated with whole-group/universal instruction with the pace, sequencing, and goals of universal instruction.
- Be assessed frequently to monitor learning, to guide ongoing instruction, and to determine when interventions should be modified or when an intervention can be discontinued.

Personal Reading Plans for "At-Risk" Students (5K through Third Grade)

Eligibility for a Personal Reading Plan

If a student is identified as "at-risk" based on the results of either a universal screening assessment or a diagnostic assessment, then the District will develop and implement a written personal reading plan for the student. An assessment score below the 25th percentile qualifies a student as "at-risk." In direct consultation with the student's parent and based on re-screening, a diagnostic assessment, or some other evidence-based evaluation, the District may make a determination that an "at-risk" result on a screening assessment was inaccurate or invalid and that the student is not in need of a personal reading plan. Such decisions will be addressed on a case-by-case basis with the involvement of a licensed District reading specialist.

Required Content

A personal reading plan for an "at-risk" student will include **at least** all of the following:

- A statement of the student's specific early literacy learning needs, as identified by skills that were evaluated on the applicable assessment.
- Goals and benchmarks for the student's progress toward grade-level literacy skills.
- A description of the interventions and any additional instructional services that will be provided to the student to address the student's learning needs and promote the growth of the student's early literacy skills.
- The programming using "science-based early reading instruction," as defined in state law, that the student's teacher will use to provide reading instruction to the student, addressing the areas of phonemic awareness, phonics, fluency, vocabulary, and comprehension.
- A description of how the student's progress will be monitored.
IMPORTANT: Monitoring activities must occur on at least a **weekly basis**.
- Strategies and activities that the student's parent is encouraged to use to help the student achieve grade-level literacy skills.
- Any additional programs or services that may be available and appropriate to help accelerate the student's early literacy skill development.

Plan Creation and Implementation

The District will follow any applicable statutory deadlines for the initial creation of a personal reading plan for an “at-risk” student. As of the date this Early Literacy Remediation Plan was written, the statutory deadlines were as follows:

- By no later than the 3rd Friday of November* if the student is identified as “at-risk” based on the results of either (1) the first universal screening assessment that is administered in any school year or (2) the results of a diagnostic assessment that was administered due to the results obtained from that first universal screening assessment.
- Within 10 calendar days after the administration of any other universal screening or diagnostic assessment required by state law that has identified the student as “at-risk” (i.e., excluding the assessments that are covered by the November deadline specified in the previous paragraph).

* Note: This deadline is inapplicable during the 2024-25 school year.

Once a personal reading plan has been created for an “at-risk” student, the District shall begin providing the interventions described in the plan as soon as practicable. To the extent permitted by applicable law and when not in conflict with other possible obligations (e.g., under the IDEA for a student with a disability), the District retains discretion to modify the content of a student’s personal reading plan.

Administrative Procedures and Oversight

The elementary principal or designee will have primary administrative responsibility for the creation, dissemination, and monitoring of administrative procedures and protocols that District staff will use to create and manage the implementation of student personal reading plans. Changes to such supplemental procedures and protocols would not be considered amendments to the Plan. Those procedures and protocols will address the format/template, authority to modifying a student’s plan, expectations for documentation of intervention delivery, expectations for documentation of progress monitoring activities, format and standards for relevant parent notifications, content and format of 10-week progress reports, and standards and procedures for determining plan completion and “exiting” a student from interventions.

Monitoring Activities for Students Receiving Reading Interventions

Purpose of Monitoring

As a student receives literacy-related interventions or remedial reading services, it is critical to monitor the student’s learning to (1) assess the student’s progress, (2) confirm and better understand the student’s learning needs, and (3) evaluate the effectiveness of the interventions.

Examples of Monitoring Methods and Tools

Monitoring activities during the implementation of reading interventions for a student may include activities such as:

1. A review of relevant schoolwork completed by the student.
2. Observations of the student’s demonstration of knowledge and skills that are relevant to the student’s area(s) of deficiency and to the goals and benchmarks that may be defined for the interventions.
3. Structured curriculum and assessments of specific knowledge and skills.
 - Heggerty – Explicit, systematic instruction covering all 8 phonological awareness skills plus 3 early literacy skills, including phoneme-grapheme connections.
 - AIMSweb Plus – A brief and valid assessment system for screening and monitoring a combination of fluency measures.
 - i-Ready Diagnostic – A brief, computer-delivered, periodic adaptive assessment in reading/English language arts (ELA) for students in grades K–8, assessing Phonological Awareness, Phonics, High-Frequency Words, Vocabulary, Comprehension of Informational Text, and Comprehension of Literature.

Frequency of Monitoring under a Personal Reading Plan for an “At-Risk” Student

When any “at-risk” student is receiving reading interventions defined in a personal reading plan, monitoring activities shall occur on at least a weekly basis, as further described in the student’s plan.

- The primary focus of the weekly monitoring will be on specific skill areas, goals, and benchmarks that were targets of recent interventions, services, and instruction.
- Each week’s monitoring activities do not need to address all skill areas, goals, and benchmarks identified within the student’s plan.

In the aggregate, the weekly monitoring activities shall be structured to permit timely determinations of whether the student is demonstrating an adequate rate of progress toward reaching grade-level literacy skills, including for purposes of the initial 10-week progress report and any follow-up reports of the student’s overall progress. Under state law, decisions whether the student is demonstrating an adequate rate of progress under a personal reading plan (and, therefore, at least some of the planned monitoring activities) must include an assessment of the following:

- For a student enrolled in 5K, an assessment of the student's "nonword" or "nonsense word" fluency and the student's phoneme segmentation fluency.
- For a student enrolled in first grade, second grade, or third grade, an assessment of the student's oral reading fluency.

Frequency of Monitoring for a Student When Literacy Interventions Are Not Provided under a Personal Reading Plan

This subsection applies to any student in kindergarten through fourth grade who is determined to qualify for reading interventions or remedial reading services under section [120.02\(1\)\(c\)1](#) (due to not sufficiently meeting curricular goals) or section [121.02\(1\)\(c\)2](#) (due to performance on the state's standardized third grade reading exam), but who does **not** also have a personal reading plan as an "at-risk" student and who did **not** have a noncompleted personal reading plan in place as an "at-risk" student at the end of third grade.

For such a student, District staff will engage in monitoring activities that are targeted to assess the student's progress in overcoming the student's identified skill deficiencies and learning gaps at least three times, at reasonable intervals, during each full quarterly grading/assessment period. The following also apply:

- The specific frequency of monitoring activities should account for (1) the learning needs being addressed by the interventions and (2) the specific tools/procedures that are being used (i.e., to use the tool/procedures with fidelity and to preserve the validity of the data).
- The schedule of monitoring activities may be reasonably adjusted to account for the date that any interventions or services were first initiated and for other elements of the school calendar.

Parent Notifications

Legal Requirement

State law requires this *Early Literacy Remediation Plan* to include a "parent notification policy." See § [118.016\(6\)\(e\)](#). This section (including all of the subsections in this section) serves as that mandatory policy. For emphasis and clarity, some of the parent notifications addressed in this section are also mentioned in other parts of this Plan.

Meaning of the Term "Parent" within this Plan

Unless expressly defined differently, when the term "parent" appears in this section and in other sections of this Plan, the term means a person to whom **both** of the following apply:

1. The person falls under the definition of "parent" that is set forth in section [115.76\(12\)\(a\)](#) of the state statutes; and
2. When a Plan provision involves the District's disclosure of personally-identifiable information from the student's education records, the person is authorized to receive or review the information in question under the federal Family and Educational Rights and Privacy Act (FERPA) and its implementing regulations. For example, the person may satisfy FERPA's definition of a parent, or the District may have received written consent for the disclosure to the person.

In general, this will normally **include**, but not necessarily be limited to, a biological parent, an adoptive parent, a legal guardian, certain foster parents, or a person who is lawfully "acting as a parent of a child" (e.g., a person acting as a parent for school purposes in the absence or unavailability of a biological/adoptive parent or legal guardian, such as under a documented delegation of parental authority). It does **not include**, for example, a person whose parental rights have been terminated or a person who has lost the right to access or receive the student's pupil records due to the outcome of court proceedings.

Electronic Format Generally Permissible

The notifications and communications required to be provided to a parent "in writing" under this Plan may be provided to the parent in an electronic format **unless** any of the following applies:

1. Any statute, regulation, or authoritative interpretation of the applicable law prohibits the use of an electronic format for the specific notice.
2. Providing the notice or information in an electronic format would be insufficient to meet the District's obligations to effectively communicate with a parent who has a disability.
3. An administrator with oversight responsibility for a particular communication directs District staff to provide the specific communication in other than an electronic format.

District staff may also elect to provide certain notices to a parent in more than one format (e.g., both a paper copy and an electronic copy).

Language Assistance Related to Parent Notifications

"Limited English proficient" (LEP) individuals' primary language is one other than English and who have limited proficiency with speaking, reading, writing, or audibly understanding English. The District will provide notification of the results of any reading readiness assessment (i.e., screening or diagnostic assessment) in a language that the student's parent is able to understand.

Specific Notifications Relating to Assessments

• Notice of the Results of Reading Readiness Assessments

- “Reading readiness assessments” include the fundamental skills screening assessment (4K), the universal screening assessment (5K through third grade), **and** any diagnostic assessments (5K through third grade).
- The District will provide the results of each reading readiness assessment, in writing, to each student’s parent no later than 15 calendar days after the student’s assessment is scored.
- The notification of results will include at least all of the information required under state law. (See § [118.016\(4\)](#).)

• Notice of Special Education Referral Information

- If a **diagnostic assessment** indicates that a student is “at-risk,” then information about how to make a special education referral under section [115.777](#) of the state statutes must be included **with the results** of the diagnostic assessment.

• Parent Notification of Information about Dyslexia

- The District will provide a notice of information about dyslexia, in writing, to the parent of each student that the District is required to assess for early literacy development using a diagnostic assessment.
- When required, the information about dyslexia may be provided any time after it is known that the parent’s child will be taking a diagnostic assessment, but it shall be provided no later than the date on which the District provides the parent with notice of the results of the diagnostic assessment
- The notification will cover at least all information specified in state law.

Specific Notifications Relating to Student Personal Reading Plans

• Parent Copy of a Personal Reading Plan; Parent Signature

- The District will promptly provide a copy of an initial personal reading plan that has been developed for an “at-risk” student to the student’s parent.
- The District will promptly notify the student’s parent of any substantive modifications to a personal reading plan by providing a copy of the amendment(s) or an entire revised copy of the plan.
- The District expects that a copy of an “at-risk” student’s personal reading plan (or an amended plan) will normally be provided to a parent within 5 school days after District staff have finalized the plan (or a substantive amendment to the plan).
- State law requires a parent to return a signed copy of the student’s personal reading plan to the school. Unless otherwise required by the Department of Public Instruction, a signed acknowledgement of receipt of the plan shall be sufficient.

• Parent Notification of Pupil Progress under a Personal Reading Plan

- After the school has been providing the interventions described in an “at-risk” student’s personal reading plan for 10 weeks, a member of the District’s instructional staff shall prepare a written progress report and provide the report to the student’s parent.
- Subsequent reports of overall progress under a personal reading plan.
 - Subject to a determination that the student has completed the plan, the initial 10-week progress report and each subsequent report of a student’s overall progress under a personal reading plan shall specify a date by which the school will provide the next overall progress report.
 - The date of the next progress report shall normally be no later than a date that is promptly after the interventions have been provided for another 10 school weeks, but it may be an earlier date.
- The reports of overall progress described in this subsection will include at least the following content:
 - A summative determination as to whether the student is making an adequate or inadequate rate progress with their literacy skills under the personal reading plan. (Note: State law defines the term “inadequate rate of progress” and establishes criteria for measuring progress. See §§ [118.016\(1\)\(g\)](#) and [118.016\(5\)\(c\)](#).)
 - A brief summary of the information that supports the determination of the student’s overall progress.
 - A statement of specific changes or recommendations that the school is making (if any) with respect to interventions, monitoring, etc.
 - Subject to a determination that the student has completed the personal reading plan, a date by which the school will provide the next overall progress report. (See above for timing expectations).

• Parent Notification of Completion of a Personal Reading Plan

- The District will promptly notify the student’s parent if the District determines that a student has successfully completed a personal reading plan and that the student will “exit” the plan and plan interventions.

- **Parent Notification of Noncompletion of Personal Reading Plan as of the End of Third Grade**

- If, as of the end of third grade, an “at-risk” student has **not** successfully completed a personal reading plan that was in place for the student during that third-grade school year, District staff shall make a determination of the student’s status for the subsequent school year under applicable District policies and promptly inform the student’s parent of **all** of the following:
 - The noncompletion of the student’s third-grade personal reading plan.
 - The District’s intended approach to reading instruction and support for the student in the subsequent school year.
 - If the student is being promoted to fourth grade, any additional information that the District is required to provide under section [118.33\(5m\)](#) of the state statutes and/or under the District’s related **third-to-fourth-grade promotion policy**, once that policy has been adopted and takes effect. (Note: The District’s approach to implementing section 118.33(5m) and the District’s third-to-fourth-grade promotion policy, required beginning in the 2025-26 school year, are currently outside the scope of this Plan.)

Using Student Assessment and Intervention Data to Evaluate Early Literacy Instruction in the District

Administrative Responsibility for Data Management and Reporting

- The curriculum director or a licensed district reading specialist approved by the district administrator shall have primary administrative responsibility for establishing and monitoring data-tracking procedures related to this *Early Literacy Remediation Plan*.
- The district administrator or designee shall have primary administrative responsibility for ensuring that the District annually reports assessment and intervention data to the Department of Public Instruction, as required by section [118.016\(7\)](#).

Uses of the Data Directed Primarily by the Administrative Leadership Team and School Board

Under the direction of the curriculum director, the District Administrator, and the School Board, assessment and intervention data related to this Plan will be used to help evaluate:

1. The District’s **program of reading goals**, including to help determine the progress that the District is making for existing goals and to inform possible revisions to the District’s reading goals. See § [118.015\(4\)\(a\)](#).
2. The District’s adopted **academic standards** in reading, writing, and English language arts. See §§ [118.30\(1g\)\(a\)1](#) and [120.12\(13\)](#).
3. The District’s **budgetary needs** related to reading instruction, such as staffing, resources for professional development, and purchases of curricula, classroom instructional materials, and library materials. See § [118.015\(4\)\(b\)](#).

Use in the Annual Curriculum Review Process

Under the direction of the curriculum director and the District Administrator, the licensed reading specialist(s) charged with conducting an annual evaluation of the District’s reading curriculum under section [118.015\(3\)\(d\)](#) shall consider assessment and intervention data related to this Plan as part of that evaluation process for at least kindergarten through third grade.

Other Uses of the Data that will be Coordinated Primarily at an Administrative Level

Under the direction of the curriculum director, the elementary principal, and the District Administrator, and with the involvement of the District’s licensed reading specialist(s) where appropriate, the District will use assessment and intervention data related to this Plan for the following:

1. As a component of the District’s periodic review of its curriculum plan for reading and language arts, including evaluating the relevant instructional materials.
2. To help evaluate and improve the District’s core set of instructional methods for teaching reading and early literacy skills.
3. To evaluate the structure, quality, and implementation of the District’s early literacy intervention systems and procedures, including any optional programs that can serve a remedial function, such as certain summer school offerings.
4. To identify reading achievement gaps that may be affecting specific student subgroups, and to assist in identifying recommendations or action steps that may assist in addressing those achievement gaps.
5. To inform recommendations and planning for educator training and professional development.
6. To inform the future review and evaluation of this *Early Literacy Remediation Plan*.



*Supporting, Promoting and
Advancing Public Education*

Open Meetings Law

A Summary for Wisconsin School Boards

The open meetings law is found in sections 19.81 to 19.98 of the Wisconsin Statutes. There are other statutory requirements for calling, noticing and conducting regular and special school board meetings that are not discussed in this summary (see ss. 120.11 and 120.43, for example). Also, for the open meetings requirements related to collective bargaining, read ss. 19.82(1), 19.85(3), 19.86 and 111.70(4)(cm)2.

Coverage

The open meetings law covers "meetings" of "governmental bodies." A school board is a "governmental body" covered by the open meetings law. The law also is applicable to formally constituted subunits of the board, such as board-created committees. However, any board or committee formed for or meeting for the purpose of collective bargaining is not a "governmental body" covered by the open meetings law. *Section 19.82(1).*

"Meeting" means the convening of members of a governmental body for the purpose of exercising the responsibilities, authority, power and duties delegated to or vested in the body. Whenever the members of a governmental body meet to engage in governmental business, be it discussion, decision or information gathering, the open meetings law applies if the number of members present is sufficient to determine the body's course of action regarding a proposal discussed at the meeting. If one-half or more of the members of a governmental body are present, the law "rebuttably presumes" that it is a "meeting" covered by the open meetings law. The term "meeting" does not include any social or chance gathering or conference which is not intended to avoid the law. *Section 19.82(2).*

Convening in Open Session

Every meeting of a governmental body, including contemplated closed sessions, must be preceded by public notice and initially convened in open session. All discussion and action, formal or informal, must be initiated, deliberated and acted upon in open session, except where the meeting has been properly closed for a purpose permitted by s. 19.85. During a period of public comment, a governmental body may discuss any matter raised by the public. *Section 19.83.*

"Open session" means a meeting which is held in a place reasonably accessible to members of the public and open to all citizens at all times.

Public Notice

Content

Public notice must set forth the time, date, place and subject matter of the meeting, including that intended for any contemplated closed session, in such form as is reasonably likely to apprise members of the public and news media thereof. Notice of a contemplated closed session should refer to the specific statutory exemption. The public notice may provide for a period of public comment. *Section 19.84(2).*

Timing

Public notice of every meeting must be given at least 24 hours prior to the meeting's commencement. If for good cause this is impossible or impractical, shorter notice may be given, but never less than two hours in advance. *Section 19.84(3).*

Separate notice must be given for each meeting, at a time and date reasonably close to the time and date of the meeting. *Section 19.84(4).*

Intent to reconvene in open session within 12 hours after a closed session must be noticed at the same time and in the same manner as notice of the meeting convened prior to closed session. *Section 19.85(2).*

Whom to Notify

In addition to any notice required by other statutes, notice of meetings must be given (1) to the public, (2) to news media who have filed written requests, and (3) to the official newspaper, or if none, to a news medium likely to give notice in the area. *Section 19.84(1).*

When giving notice of a meeting "to the public," the chief presiding officer of the governmental body, or such person's designee, must use one of the following methods: (1) posting a notice in at least 3 public places likely to give notice to persons affected, (2) posting a notice in at least one public place likely to give notice to persons affected and placing a notice electronically on the governmental body's Internet site, or (3) by paid publication in a news medium likely to give notice to persons affected. *Section 19.84(1)(b).*

Subunit Exception

Formal subunits of school boards may meet without public notice during or immediately after a lawful meeting of the school board to discuss or act on a matter which was the subject of the board meeting. The presiding officer of the board meeting must publicly announce the time, place and subject matter of the meeting of the subunit in advance at the board's meeting. *Section 19.84(6).*

Closed Sessions

A meeting may be convened in closed session under one or more of the exemptions provided in s. 19.85(1), including the following exemptions that have been used by school boards:

(a) Deliberating concerning a case which was the subject of any judicial or quasi-judicial trial or hearing before that governmental body.

(b) Considering dismissal, demotion, licensing or discipline of any public employee or person licensed by a board or commission or the investigation of charges against such person, and taking of formal action on any such matter; provided that the public employee or person licensed is given actual notice of any evidentiary hearing which may be held prior to final action being taken and of any meeting at which final action may be taken. The notice shall contain a statement that the person has the right to demand that the evidentiary hearing or meeting be held in open session. This paragraph and par. (f) do not apply to any such evidentiary hearing or meeting where the employee or person licensed requests that an open session be held.

(c) Considering employment, promotion, compensation or performance evaluation data of any public employee over which the governmental body has jurisdiction or exercises responsibility.

(d) Considering strategy for crime detection or prevention.

(e) Deliberating or negotiating the purchasing of public properties, the investing of public funds, or conducting other specified public business, whenever competitive or bargaining reasons require a closed session.

(f) Considering financial, medical, social or personal histories or disciplinary data of specific persons, preliminary consideration of specific personnel problems or the investigation of charges against specific persons except where par. (b) applies which, if discussed in public, would be likely to have a substantial adverse effect upon the reputation of any person referred to in such histories or data, or involved in such problems or investigations.

(g) Conferring with legal counsel for the governmental body who is rendering oral or written advice concerning strategy to be adopted by the body with respect to litigation in which it is or is likely to become involved.

(h) Consideration of requests for confidential written advice from the elections commission under s. 5.05(6a) or the ethics commission under s. 19.46(2), or from any county or municipal ethics board under s. 19.59(5).

Convening in Closed Session

A meeting of a governmental body may be convened in closed session only when the governmental body is first properly convened in open session, and only to consider matters under one or more of the exemptions in s. 19.85(1). A motion to close shall be carried by majority vote. The vote of each member on the motion must be recorded in the minutes.

Before the motion is adopted, the presiding officer must announce the nature of the business to be considered in closed session and the specific statutory exemption or exemptions by which the closed session is claimed to be authorized. The announcement shall become part of the record of the meeting.

No business may be taken up at any closed session except that which relates to matters contained in the presiding officer's announcement of the closed session. *Section 19.85(1).*

Ballots, Voting and Records

Except for the election of officers of the governmental body, no secret ballot may be used to determine any election or decision. Any member of the governmental body may require that a vote be taken at any meeting in such a manner that each member's vote is ascertained and recorded, except for the election of board officers. *Section 19.88(1) and (2).*

The motions and roll call votes of each meeting of a governmental body shall be recorded, preserved and open to public inspection to the extent prescribed in the public records law. *Section 19.88(3).*

Exclusion of Members

No duly elected or appointed member of a governmental body may be excluded from any meeting of such body. Unless the rules of the governmental body provide to the contrary, no member of the body may be excluded from any meeting of a subunit of that governmental body. If the member is not a member of the subunit, attendance at the subunit's meeting may trigger additional notice requirements. *Section 19.89.*

Recording, Filming and Photographing

Whenever a governmental body holds a meeting in open session, the governmental body must make a reasonable effort to accommodate any person desiring to record, film or photograph the meeting. However, this does not permit recording, filming or photographing a meeting in a manner that interferes with the conduct of the meeting or the rights of the participants. *Section 19.90.*

Penalty and Enforcement

A member of a governmental body may be subject to a forfeiture for violation of the open meetings law. No member of a governmental body is liable under the open meetings law on account of his or her attendance at a meeting held in violation of the open meetings law if he or she makes or votes in favor of a motion to prevent the violation from occurring, or if, before the violation occurs, his or her votes on all relevant motions were inconsistent with all those circumstances which cause the violation. *Section 19.96.*

Any action taken at a meeting of a governmental body held in violation of the open meetings law is voidable by a court. *Section 19.97(3).*

Attorney General's Interpretation

Any person may request advice from the Attorney General as to the applicability of the open meetings law under any circumstances. The Wisconsin Department of Justice publishes the "Wisconsin Open Meetings Law Compliance Guide," available at doj.state.wi.us.

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REVISED JULY 2021

Social Media, Online Communications and Email Use: The Implications for Board members
WASB/WSAA

Core Concepts to Consider before the Communication Occurs

- As to any form of electronic communication that pertains to her/his office or to District business, a Board member should ask herself/himself the following questions:
 - Should I be using this method of electronic communication at all? (e.g., Will the content of my communication remain under my control or under the control of an appropriate custodian of records; and is the communication being retained in a manner, and for a duration of time, such that it can be retrieved and produced if needed?); and
 - Should I be using this specific method of communication for this specific subject matter?
- Electronic communications are generally an effective and efficient medium for activities such as:
 - addressing scheduling/availability for meetings,
 - bringing potential agenda items to the attention of the District Administrator and Board President, and
 - the one-way distribution of information (e.g., from the District Administrator to all Board members).
- Many boards strongly discourage (and, in some circumstances, applicable laws will directly prohibit) individual board members from using email, social media or other forms of electronic communication for any of the following:
 - Open Meeting Law, Closed Session and Discretion: Interactive discussion of substantive Board business among multiple Board members, due to Open Meetings Law concerns (e.g., potential walking quorums or illegal meetings) and due to the potential appearance of impropriety surrounding communications that are perceived to be inappropriately “secretive” even if not unlawful;
 - FERPA and Wisconsin Pupil Records Law (Sec. 118.125): Communications regarding matters that involve individually identifiable students, due to potential violation of the laws surrounding student privacy and the confidentiality of student record information; or
 - Public Records: Communications regarding District matters that are considered confidential or highly sensitive (e.g., closed session content, personnel matters, etc.), due to issue

First Amendment to the U.S. Constitution

- Board Member Role:
 - First Amendment to the U.S. Constitution: Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.
 - Board members do not lose their First Amendment rights by being a board member.
 - Board members may speak for or against an issue with certain caveats.
 - Board members may participate on outside committees or groups that advocate a particular viewpoint.
 - Board members must still be aware of open meeting law implications if they participate in an advocacy group with other board members.
 - Board members may also have campaign finance and electioneering issues that come into play as well.

Individual Board Member Powers

- Board members have very few statutory powers to exercise as individuals.
- Some of the legal duties that individual board members have are duties to refrain from certain conduct.
- Local policy can grant power to and place boundaries on the authority of individual board members.
- The board's officers have statutory powers and duties specific to their individual office.

Board ≠ Individual Board Member:

- Distinguishing between the role of the board member as an individual not representing the board and the board as a whole.
- Unless the Board member is performing a legally designated duty or responsibility, or unless he/she has been expressly authorized by the Board, an individual board member should not, in his/her electronic or other communications, either
 - purport to speak on behalf of the entire Board or for the District, or
 - speak in a manner that purports to obligate the Board or District to a particular course of action.
- Social Media, Electioneering, Letters to the Editor, Yard Signs, etc.:
 - It is strongly encouraged that board members preface any advocacy remarks with the statement that the board member is acting in her/his individual capacity rather than in his/her capacity as a board member.
 - For written remarks, such a disclaimer statement should be included in the message, preferably in its opening sentence and in its conclusion.

Public education is the cornerstone of our economy, our democracy, and our society. A strong public education system is vital to ensuring that every child has access to the knowledge and skills they need to succeed in the ever-changing world. Public education exists to promote the public good and school board members guide the direction and promote our district to ensure we continue to succeed.

Qualities of a School Board Member

There are many qualifications and qualities that experienced school board members have indicated are important to school board membership. These include:

- A commitment to the belief that all children of the school district are entitled to have available to them a beneficial educational program.
- An open mind and readiness to learn.
- A willingness to attend seminars and workshops which can help them make intelligent decisions in school affairs.
- A vision and an ability to understand changes in our society.
- The ability to act with other school board members to advance the best interests of the school district.
- The capability to articulate the philosophy and goals of the school and to listen carefully to the criticisms offered by people with differing views.
- A willingness to invest the hours that will be necessary to faithfully discharge their duties.
- Freedom from conflict with any other interest.

What Does the School Board Do?

The school board leads and governs the schools and educational programs of the school district. That leadership role is performed as part of a team that includes the superintendent. The leadership team, in turn, operates within a unique framework of authority, duties, and powers that is established by a variety of state and federal laws and that is supplemented by local policy decisions with student learning and student achievement as the centerpiece of the Board's mission.

The legal qualifications for being a school board member include:

- A citizen of the United States; and
- 18 years of age or older; and
- A resident of the school district for at least 28 consecutive days at the time of application.

What is expected of a School Board Member?

As a board member, you are expected to make decisions on major issues that affect the students and citizens of your community. Some of the activities you will be expected to do include attend board meetings, attend school functions, keep yourself informed about issues, participate in professional development opportunities for yourself and the school board, and interact with your fellow board members and the superintendent. These activities require a time commitment, but it is time extremely well spent when you consider that you are helping to shape the future of the children in your community. Your fellow board members, the superintendent, and administrative team will help guide and help as you learn the roles of the board.

How much time can I expect to spend on school board responsibilities?

The time required to complete your school board responsibilities will most likely vary by time of the year. It will depend on how many meetings are scheduled. Our district has 2 scheduled meetings a month. The committee meeting is on the 1st Monday of the month and our regular meeting is held on the 3rd Wednesday of the month, both at 6:00 pm. Additional meetings may be scheduled for specific topics such as the annual meeting and board retreats.

What if I have other questions?

The board president and/or superintendent usually can answer your questions on protocol or procedure as well as issues facing the board. Other board members, both current and past, may also be good resources. You can contact the district office at 608-687-7771 to speak to the superintendent who is willing to meet with anyone regarding being a part of the C-FC school board.

School Board Appointment Process

- The district office will post the vacancy on August 22nd which is the day the vacancy occurs.
 - There will be a 14-day deadline for applications (August 22 – Sept 10).
- A qualified elector
 - A citizen of the United States; and
 - 18 years of age or older; and
 - A resident of the C-FC school district for at least 28 consecutive days at the time of the application.
- Any eligible person who desires to be considered for appointment to this public office must file the following materials at the Office of the Superintendent, which is located at S2770 State Road 35, Fountain City, WI 54629.
 1. A letter of interest or a completed School Board Vacancy form (see attached), which identifies the potential appointee's name, residential address, and telephone number, and that also addresses the individual's qualifications and the reasons they are interested in serving on the Board of Education.
 2. A sworn Declaration of Eligibility to Hold Office (see attached). The Declaration must be sworn to before a notary or another official who is authorized to administer oaths.

To ensure consideration, the letter of interest or completed School Board Vacancy form must be received in the Office of the Superintendent prior to **4 p.m. on Thursday, September 10, 2024**, and the sworn Declaration of Eligibility must be completed and filed in the office on or before the date of the Board of Education meeting at which the Board of Education considers the potential appointees. The application and sworn Declaration may be hand delivered to the district office or sent by U.S. Mail. It is the sole responsibility of the individual who is submitting the materials to verify that the District has received the materials on a timely basis.

Inquiries regarding this Notice may be directed to the office of the Superintendent by telephone at (608) 687-7771 or by email at twhite@cfc.k12.wi.us.

- We will post to consider potential applicants at the September 18th board meeting.
 - Applicants will need to submit a "Sworn Declaration of eligibility" that will be provided when the letter of interest is provided to the superintendent.
 - All identified potential candidates will be considered and be given an opportunity to make a statement at the September 18th board meeting.



Cochrane-Fountain City School District

52770 State Highway 35 Fountain City, Wisconsin 54629

Mr. Troy White
Superintendent
twhite@cfc.k12.wi.us
608-687-7771 x313

Mr. Steve Stoppelmoor
JH/HS Principal
sstoppelmoor@cfc.k12.wi.us
608-687-4391 x102

Ms. Amy Schaefer
Elementary Principal
aschaefer@cfc.k12.wi.us
608-687-4391 x106

Darrin Dillinger, President
Larry Cyrus, Vice President
Niki Secrist, Clerk
Lynn Doelle, Treasurer
Michael Ayala, Director
Amanda Lacey, Director
Lisa Wolfe, Director

COCHRANE – FOUNTAIN CITY BOARD VACANCY FORM TO FILL A VACANCY

To the Cochrane – Fountain City School Board:

I, _____, a qualified elector of Cochrane-Fountain City School District, wish to be considered for appointment to fill the vacant position on the Cochrane-Fountain City School Board, which will begin upon appointment and end with the spring election in April 2023.

(Applicant's Signature)

Dated this ____ day of _____, _____

(District use only)

Received by Troy White, Cochrane-Fountain City Superintendent

this ____ day of _____, _____

APPLICATION INFORMATION

Name: _____ Phone No. _____

Address: _____ City: _____

Email Address: _____

What are your reasons for seeking appointment to the Cochrane-Fountain City School District?

What contributions do you feel you can make to the Cochrane-Fountain City School District?

Any other information which you feel may assist the School Board in its evaluation of your candidacy:



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COCHRANE-FOUNTAIN CITY SCHOOL DISTRICT DECLARATION OF ELIGIBILITY TO HOLD OFFICE AS AN APPOINTEE TO THE SCHOOL BOARD

This document shall be sworn before a notary or other person who is authorized to administer oaths.

I, _____, being duly sworn, state that
(Print the name of the person wishing to be considered for appointment)

I am willing to be considered for selection to the office of school board member, as an appointee to fill a vacancy and that I meet the applicable age, citizenship, residency, and voting qualification requirements prescribed by the constitutions and laws of the United States and the State of Wisconsin, and that I will otherwise qualify for the office if I am selected to fill a vacancy on the School Board of the Cochrane-Fountain City School District.

I further state that I have not been convicted of a felony in any court within the United States for which I have not been pardoned and that I know of no reason that would otherwise make me ineligible to hold the above-identified office.

My present address, including my municipality of residence for voting purposes is:

Town of _____ OR Village of _____ OR City of _____

(House or Fire No./Street Name Mailing Municipality and State Zip code)

(Signature of the person, named above, wishing to be considered for appointment)

STATE OF WISCONSIN

County of _____ ss.
(County where sworn)

Subscribed and sworn to before me this _____ day of _____, 20_____.

(Signature of person authorized to administer oaths)

(Printed name)

____ Notary Public or _____
(Official title, if not a notary)

For a Notary: My commission expires _____ or _____ is permanent

NOTARY SEAL NOT REQUIRED