



Colorado Association of School Boards
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March 20, 2018

Ms. Erin Kane, Interim Superintendent
Mr. David Ray, Board President
Board of Education
Douglas County School District RE-1
620 Wilcox Street
Castle Rock, CO 80104
via email: dray@dcsdk12.org; ejkane@dcsdk12.org

Dear Superintendent Kane, Mr. Ray and Board Members:

We are pleased that the district has chosen to take advantage of CASB's Policy Manual Audit Service. This service is provided as a benefit of the district's membership with CASB. Please find the results of the audit outlined below.

CASB performed an audit of the district's administrative policy manual. Where necessary to inform the audit, we also cross-checked the Board's policies and other district resources available on the district's website.

Purpose:

The audit consists of a spot check for policies required by law, a general look at the contents of the policy manual and feedback on the manual's format. This is not a comprehensive or legal review, but it does give the district an indication as to whether its administrative policy manual is as effective as it should be.

Policies required by law:

When comparing the district's administrative policies to CASB's list of legally required policies, we found 33 legally required policies that are either missing from the manual or are not easily located. These documents are identified on the enclosed list (by an X) for the district's immediate attention.

Comments on content and manual format:

The following suggestions are intended to assist the district with a review of its policies, increasing policy effectiveness and making policies more user friendly, as well as ensuring compliance with current requirements and consistency with desired practices or goals.

- A. ***Content:*** The district should update out-of-date policies and eliminate unnecessary documents as suggested below.

1. *Outdated policies:*

- a. Many of the legally required policies appear to need updating based on a comparison of revision dates to those on the CASB Core sample policies. These policies are identified (by a circle) on the enclosed list of legally required policies, with the revision date of the district's policy also indicated.
- b. We located additional policies that appear to no longer reflect requirements and/or practice. Some examples include:
 - Policy H, Negotiations, indicates that the district has negotiated agreements with three employee groups (the DCFT, the ATU and the DCFCE). However, the district's website identifies only one negotiated agreement with the ATU.
 - Policy HB, Relationship with Labor Unions, addresses relationships with labor unions that have contracts in effect for the 2012-2013 school year, which may no longer be valid.
 - DFA, Cash Management and Investment Policy (as well as other policies in Section D, Fiscal Management), may no longer reflect the district's financial management and investment practices as reflected in the chart of accounts applicable to Workday or Oracle Transactions, as indicated on the district's website.
 - EFF, Food Services for the Elderly, is quite dated and may no longer reflect practice.

2. *Duplication:* Policies that duplicate one another should be repealed to eliminate redundancy and clear up inconsistencies that may be a result. For example:

- a. CASB incorporated its nondiscrimination protections into a comprehensive, revised sample policy, AC, Nondiscrimination/Equal Opportunity, and set forth one complaint and compliance process in a revised sample regulation, AC-R, to ensure consistency in the treatment of unlawful discrimination and harassment claims (see the March 30, 2012 issue of *Policy Parameters*, available on the CASB website, for an explanation of these modifications). The district could update its own policy AC and develop a similar regulation AC-R accordingly and repeal policies and regulations JBA, Nondiscrimination/Non-Harassment of Students; JBB, Nondiscrimination on the Basis of Disability, and JBB-R, Nondiscrimination on the Basis of Disability (Regulation).
- b. Policies whose subjects are likely addressed by the district's safety plan are no longer necessary (i.e., EBB/EBBB, Accident Prevention and Procedures/First Aid/Accident Reports; EBCA, Disaster Plans; EBCB, Fire Drills; EBCB-R, Fire Drills (Regulation), etc.).
- c. JICB, Smoking and Other Uses of Tobacco by Students, is duplicative of ADC, Tobacco-Free Schools.

- d. GBI, Electronic Mail, is duplicative of EGAEA, Electronic Communication, and GBEE*, Staff Use of the Internet and Electronic Communications.
- e. IKAB, Student Progress Reports to Parents/Guardians and Students, is duplicative of IKA, District Assessment Policy.

B. Format: To enhance the overall usability of the manual, we suggest a focus on the areas listed below.

1. **Policy codes:** Many of the district's policies do not contain the same codes CASB uses to organize policies of the same subject matter. This makes the policies extremely difficult to locate and undoubtedly causes confusion when trying to revise policies based on CASB policy updates. Some examples include:
 - a. IMBB and IMBB-R, Exemptions from Required Instruction, should be coded IHAM and IHAM-R, Health and Family Life/Sex Education and Health and Family Life/Sex Education (Exemption Procedure).
 - b. JFAB, Admission of Non-Resident and Homeless Students, should be coded JFABD, Homeless Students.
 - c. JECBA, Admission of Foreign Students, should be coded JFABB, Admission of Non-Immigrant Foreign Exchange Students.
 - d. JICB, Prevention of Bullying, should be coded JICDE*, Bullying Prevention and Education.
 - e. JICJ, Student Use of District Information Technology, should be coded JS*, Student Use of the Internet and Electronic Communication.
 - f. KFAA, Public Conduct on School Property, should be coded KFA, Public Conduct on District Property.
2. **Use of the Policy Governance® Model:** The Board has defined its specific role in Board policy and has delegated administrative policy decisions to the superintendent. Board and administrative policies are located in separate manuals for additional clarity of responsibilities. We did, however, identify areas where unnecessary duplication appears to exist. For example, BC, Board Member Conduct and Ethics, appears to be duplicative of Board policy GP 1.8, Board Member's Code of Conduct.
3. **Organization:** As indicated on the enclosed list of policies required by law, we were unable to locate many policies whose subjects may be addressed elsewhere. It is CASB's view that not having a central location for these policies, such as the administrative policy manual, can result in confusion and may unintentionally compromise the district's commitment to transparency. For example:
 - a. Missing Section D, Fiscal Management policies may be part of the Workday or Oracle Transactions, available online.

- b. Missing policies on evaluation of licensed staff are likely addressed on Google Sites and the online "Staff Process" link.
- c. Administrative policy GBGF, Leaves of Absence, does not address legal leave or bereavement leave. The Employee Guide covers these subjects, but the Employee Guide does not reflect current requirements.

CASB recommendations and final remarks:

This audit shows that the district's administrative policies and the Board's policies would benefit from a review and several updates are required. We recommend attention be given to the areas mentioned in the audit immediately to better protect the district from potential liability.

It is important for the Board to establish and monitor its policy goals and for district staff to review administrative policies regularly to ensure alignment with Board policy, goals and current district practices. These processes are key to effective governance. As you review the recommendations contained herein and make necessary revisions to the manuals, please keep in mind that CASB policy staff is here to assist the district with policy resources and customized services. In particular, the district may wish to consider CASB's Policy Manual Overhaul Project to review and update its administrative policy manual.

A Policy Manual Overhaul Project is a customized service whereby CASB manages the policy revision process from beginning to end, working with the staff (and the Board, as necessary), to update out-of-date policies, identify areas where policy is lacking, ensure policies reflect current practices and requirements, and recode policies as necessary. A full description of CASB's policy services is enclosed for the district's review.

As previously noted, this audit represents merely a spot check of the policy manual and does not identify every problem or attribute of the manual. Further, the audit is not a legal review. Please consult with the district's legal counsel on all legal matters, including policy adoption and revision.

Thank you for the opportunity to review the district's administrative policy manual. Please feel free to contact me or Jeri Hodgson Fleuter, CASB's deputy executive director, if you have questions or would like to discuss CASB's policy services in further detail.

Sincerely,

Lynne B. Hunt

Lynne B. Hunt
Policy Specialist

Enclosures: List of Policies Required by Law or Highly Recommended by CASB
Description of CASB's Policy Services

33 Missing; 6 Exhibits

POLICIES REQUIRED BY LAW or HIGHLY RECOMMENDED¹
(for use with Policy Governance® Boards)²

Policies required by law

Douglas County

- √ State or federal law requires the district to have a policy on this subject and the law may direct some or all of the policy's content, as noted below
- Companion to legally required policy or regulation
- * These policies comprise the legally required code of conduct and discipline for students
- ▼ Policies legally required to be adopted by the Board
- Policies not legally required to be adopted by the Board, but appears prudent and/or appropriate for the Board to do so

2016

■√ AC 2008

Nondiscrimination/Equal Opportunity
20 U.S.C. §1681, 29 U.S.C. §621 *et seq.*, 29 U.S.C. §701 *et seq.*, 42 U.S.C. §12101 *et seq.*, 42 U.S.C. §2000d, 42 U.S.C. §2000e, 42 U.S.C. §2000ff *et seq.*, 34 C.F.R. §106, C.R.S. §22-32-109(1)(II), C.R.S. §24-34-301-308, C.R.S. §24-34-402, C.R.S. §24-34-402.3(3)(a) (must adopt policy that commits to nondiscrimination and directs annual written notice)

2015

√ AC-R X
(formerly GBAA-R and JBB-R)

Nondiscrimination/Equal Opportunity (Complaint and Compliance Process) – Regulation
42 U.S.C. §2000e *et seq.*, 34 C.F.R. 104.7 (grievance procedure is required)

2016
2014

- AC-E-1 X
▼√ AD X

Nondiscrimination/Equal Opportunity (Sample notice) – Exhibit
School District Mission
C.R.S. §22-32-109.1 (1.5) (mission must reflect safety for students and staff as a priority)

2017

▼√ ADC 2013

Tobacco-Free Schools

¹ This list references sample policies developed by the Colorado Association of School Boards. Policies developed by specific school boards may contain content/language different from the CASB sample policies noted. It is important to understand the policy content requirements and not assume that a locally developed policy with a particular policy code or title meets the requirements of law. In the alternative, a local school board may have met the need for a legally required policy using a policy title and code that is different than the CASB sample policies.

² In order to ensure compliance with the statutory requirement that the Board adopt a policy on a specific subject, the Board may wish to adopt the corresponding regulation as well as the policy. See e.g. regulations in section J.

³ Code not found in the NEPN/NSBA policy classification system; code created by CASB to meet a Colorado-specific policy need.

C.R.S. §22-32-109(1)(bb) (must adopt a policy that prohibits use of tobacco products), C.R.S. 22-32-109.1(2)(a)(I)(H) (policy required as part of safe schools plan), C.R.S. §25-14-103.5 (must adopt policy that prohibits tobacco use)

2017 **ADD** 2009

Safe Schools
C.R.S. §22-32-109.1 (must adopt a safe schools plan that includes specific components)

2017 **ADF** 2010

School Wellness
Section 204 of P.L. 111-296 (must adopt school wellness policy if the district receives federal funding for child nutrition programs)

2015 **AED*** X

Accreditation
C.R.S. §22-11-307(1) (must adopt policies for accreditation of district schools)
C.R.S. §22-32-109(1)(mm) (board duty to adopt and implement policies for accreditation of district schools)

2017 **BCB** 2002

School Board Member Conflict of Interest
2 C.F.R. 200.318(c) (must have written standards of conduct covering conflicts of interest concerning the selection, award and administration of contracts funded by federal funds)
C.R.S. §22-32-109(1)(y) (must adopt bylaws on conflict of interest)

2015 **BE** OK

School Board Meetings *BE/DEA/BEB*
C.R.S. §22-32-108(5)(b) (policy must require recordings of regular and special board meetings to be retained for at least 90 days)

2013 **BEAA*** X

Electronic Participation in School Board Meetings
C.R.S. §22-32-108(7)(a) (must adopt policy allowing board members to attend and participate electronically in regular or special board meetings, if the board wishes to allow this practice)

2017 **DAC*** X

Federal Fiscal Compliance
2 C.F.R. Part 200 (must adopt policy to comply with federal Uniform Grant Guidance)

2016 **DIA*** X

Online Schools and Online Programs (Permissible Documentation)
1 CCR §301-71, Rules 3.02.9 and 8.0 (must adopt policy tracking student enrollment, attendance and participation, if the district authorizes an online program or online school)

2017 **DJB*** X
2017 **DJB*-R** X

Federal Procurement
Federal Procurement – Regulation
2 C.F.R. 200.318 to 200.326 (must adopt procurement procedures that reflect requirements of the Uniform Grant Guidance, for purchases made (in whole or in part) with federal funds)

2017 **DJE** 2009

Bidding Procedures
C.R.S. §22-32-109(1)(b) (must adopt competitive bidding procedures for purchase of goods and services, except professional services)

Are these available in Work Day Chart of Accounts?

- 2017 DKC ²⁰¹⁶ Expense Authorization/Reimbursement (Mileage and Travel)
2 C.F.R. 200.474 (must adopt travel reimbursement policy to comply with federal Uniform Grant Guidance)
- 2017 ECA/ECAB ²⁰⁰³ Security/Access to Buildings
C.R.S. §22-32-109.1(5) (policy must require annual inspections to address hazards, vandalism and other barriers to safety and supervision)
- 2017 EEAEAA* ²⁰⁰³ Drug and Alcohol Testing for Bus Drivers
2018 EEAEAA*-R ²⁰⁰³ Drug and Alcohol Testing for Bus Drivers – Regulation
49 C.F.R. § 382.601 (must have policies and procedures that comply with federal law)
- 2010 EEAFB* ²⁰⁰³ Use of School Vehicles by Community Groups
C.R.S. §22-32-128 (must adopt policy on reasonable use of school vehicles by persons over age 65)
- 2017 EF-E-1 ~~X~~ School Meal Payments – Exhibit
USDA Guidance SP 46-2016 (there is no legal requirement that this exhibit be adopted by the Board nor be included in a Board’s policy manual; however, districts that participate in the National School Lunch and/or School Breakfast Program(s) are required by federal guidance to have a written policy regarding unpaid school meal charges)
- 2017 EF-E-2 ~~X~~ Civil Rights Complaint Procedure for School Nutrition Program – Exhibit
USDA Food and Nutrition Service (FNS) Instruction 113-1 (there is no legal requirement that this exhibit be adopted by the Board nor be included in a Board’s policy manual; however, districts receiving federal funds for child nutrition programs are required by the USDA to have a written civil rights complaint procedure)
- 2017 EFEA* ~~X~~ Nutritious Food Choices
C.R.S. §22-32-134.5 (must adopt policy to restrict the sale of beverages to students to those that meet the state’s minimum nutritional standards)
- 2008 EGAEA ~~X~~ Electronic Communication
C.R.S. §24-72-203(1)(b)(l) (must adopt policy on retention, archiving and destruction of public electronic records)
C.R.S. §24-72-204.5 (must adopt policy on monitoring e-mail)
- 2016 GBA ~~X~~ Open Hiring/Equal Employment Opportunity ^{Have GBA-R 2016}
29 U.S.C. §201 et seq., 29 U.S.C. §621 et seq., 29 U.S.C. §701 et seq., 42 U.S.C. §12101 et seq., 42 U.S.C. §2000d, 42 U.S.C. §2000e, C.R.S. §22-32-109(1)(ll), C.R.S. §22-32-110 (1)(k), C.R.S. §22-61-101, C.R.S. §24-34-301-308, C.R.S. §24-34-402, C.R.S. §24-34-402.3(3)(a) (must adopt policy that commits to nondiscrimination and directs annual written notice)
- 2012 GBAA ~~X~~ Sexual Harassment
42 U.S.C. §2000e et seq. (must adopt policy that commits to nondiscrimination and directs annual written notice)

Put all by VFP addresses subject

- 2017 ²⁰⁰⁵ ■√ GBEA Staff Ethics/Conflict of Interest
2 C.F.R. 200.318(c) (must have written standards of conduct covering conflicts of interest concerning the selection, award and administration of contracts funded by federal funds)
- 2017 ²⁰¹⁰ √ GBEB Staff Conduct (And Responsibilities)
C.R.S. §22-32-109(1)(ee) (must adopt policy prohibiting personnel from recommending certain drugs for students or ordering behavior tests without parent permission)
- 2000 ▼√ GBEBA ^{OK} Staff Dress Code
C.R.S. §22-32-109(1)(cc) (must have dress code policy)
- 2013 ²⁰⁰³ ▼√ GBEC Alcohol and Drug-Free Workplace
41 U.S.C. §701 and 702 (must publish and distribute statement prohibiting controlled substances if the district receives federal funds)
C.R.S. §25-14-103.5 (must adopt policies prohibiting use of retail marijuana on school property)
- 2015 ²⁰⁰⁶ √ GBEE* Staff Use of the Internet and Electronic Communications
47 U.S.C. 254(h), C.R.S. 22-87-104(1) (must adopt policy that includes blocking and filtering technology for all Internet computers)
- 2015 ²⁰⁰¹ ▼√ GBGB Staff Personal Security and Safety
C.R.S. §22-32-109.1(3) (must adopt policy repeating wording in law regarding assault, conduct towards and false accusations of abuse directed at employees)
- 2018 ▼√ GCE/GCF ^X Professional Staff Recruiting/Hiring
C.R.S. §22-32-109.1(8) (must adopt policy that requires screening of new and current employees for criminal activity – these CASB policies address these provisions)
- 2012 ▼√ GCKAA ^X Teacher Displacement
C.R.S. §22-63-202 (2)(c.5)(II)(B) (requirement to develop policies for board adoption addressing displacement and mutual consent provisions)
- 2015 ■√ GCO ^X Evaluation of Licensed Personnel ^{Plans available online;}
C.R.S. §22-9-106(1), C.R.S. §22-9-103 (must adopt written system for evaluation of all licensed staff) ^{Google Sites}
- 2011 ▼√ GCQA ^X Instructional Staff Reduction in Force
C.R.S. §22-63-202(3) (must include in board policy, or a contract between the board and employees, the manner in which employment contracts will be cancelled when there is a justifiable decrease in the number of teaching positions)

Also have " Staff Process online "

- 2018 ▼√ GDE/GDF ²⁰¹⁶ X Support Staff Recruiting/Hiring
 C.R.S. §22-32-109.1(8) (must adopt policy that requires screening of new and current employees for criminal activity – these CASB policies address these provisions)
- 2014 √ IHAM-R (circled) Health and Family Life/Sex Education (Exemption Procedure) – Regulation
 C.R.S. §22-25-106(4)(b), C.R.S. 22-25-110(2)(b) (if the district has comprehensive health program, program must include notice and exemption procedure) *wrong code* *IMBB-R*
- 2014 ▼√ IHBK* (formerly IHA) X Preparation for Postsecondary and Workforce Success
 C.R.S. §22-32-109(1)(ff) (must adopt policy to notify parents of courses that satisfy higher education admission guidelines)
 C.R.S. §22-32-109(1)(oo)(l) (board duty to adopt policy requiring individual career and academic planning for students beginning in no later than ninth grade)
- 2014 √ IHBK*-R (formerly IHA-R) X Preparation for Postsecondary and Workforce Success (Implementation Plan for Student Individual Career and Academic Plans) – Regulation
 1 CCR 301-81 (ICAP implementation plan must include policies and procedures)
- 2015 ▼√ IKA ^{OK} Grading/Assessment Systems
 C.R.S. §22-11-504(3), C.R.S. §22-7-1006.3(8)(a) (must adopt policy to ensure appropriate school personnel explain a student's state assessment results and growth information to each student's parent/guardian)
 C.R.S. §22-7-1013(6) (must adopt policy regarding the use of pencil and paper on state assessments)
 C.R.S. §22-7-1013(8) (must adopt policy to allow parents to excuse their children from participation in state assessments)
- 2015 ▼√ IKA-R ^{OK} X Grading/Assessment Systems (Exemption Procedure and Information to Parents/Guardians)
 C.R.S. §22-7-1013(7) (must adopt procedure concerning distribution of assessment calendar to parents/guardians)
 C.R.S. §22-7-1013(8) (must adopt procedure to allow parents to excuse their children from participation in state assessments)
- 2017 ▼√ IKF ^{OK} Graduation Requirements
 C.R.S. §22-32-109(1)(kk) (board must adopt graduation requirements that meet or exceed state graduation guidelines)
- 2017 ▼√ IKF-2 ^{OK} Graduation Requirements (Beginning with the Class of 2021) *Coded IKF-R-3*
 C.R.S. §22-32-109(1)(kk)(ll) (board must adopt graduation requirements that demonstrate English and Math readiness in accordance with the state graduation guidelines)
- 2015 √ ILBC X Early Literacy and Reading Comprehension (Colorado READ Act)
 C.R.S. §22-7-1202(2) (must adopt policy regarding the decision to retain a student based upon the student's significant reading deficiency)
- 2014 √ ILBC-R X Early Literacy and Reading Comprehension (Procedures to Implement the Colorado READ Act) – Regulation

2009		C.R.S. §22-7-1208(1) (must adopt procedures to implement the Colorado READ Act)
2019	▼√ IMDB	Flag Displays C.R.S. §22-32-109(1)(ii) (must adopt policy regarding the right of students and district employees to reasonably display the flag of the United States)
2016	■√ JB X	Equal Educational Opportunities 20 U.S.C. §1701-1758, 20 U.S.C. §1681, 29 U.S.C. §701 <i>et seq.</i> , 42 U.S.C. §2000d, C.R.S. §22-32-109(1)(ll) (must adopt policy that commits to nondiscrimination and directs annual written notice)
2012	■√ JBB OK?	Sexual Harassment <i>Coded JBA</i> 20 U.S.C. §1681 <i>et seq.</i> (must adopt policy that commits to nondiscrimination and directs annual written notice)
2018	▼√ JF 2008	Admission and Denial of Admission C.R.S. §22-32-109(1)(ll) (must adopt policy stating that enrollment is open to children who reside in the state and enrollment decisions shall be made in a nondiscriminatory manner)
2018	■√ JFABD 2013	Homeless Students <i>wrong code - JFAB</i> 42 U.S.C. §11432(g)(1)(J)(iv) (must adopt policies to ensure participation of homeless student liaison in professional development and other technical assistance activities) C.R.S. §22-32-109(1)(dd) (must adopt and revise policies to remove barriers for homeless children)
2018	- JFABE* X	Students in Foster Care
2018	√ JFABE*-R X	Students in Foster Care – Regulation 20 U.S.C. 6312(c)(5)(B) (must adopt procedures governing the transportation of students in foster care)
2018	■√ JFBA 2017	Intra-District Choice/Open Enrollment <i>wrong code JCA/JFB</i>
2018	√ JFBA-R	Intra-District Choice/Open Enrollment – Regulation C.R.S. §22-32-109(1)(ll), C.R.S. §22-36-101(2)(a) (if the district has more than one building at any grade level must adopt policies and procedures to implement choice provisions)
2018	■√ JFBB 2017	Inter-District Choice/Open Enrollment
2018	√ JFBB-R	Inter-District Choice/Open Enrollment – Regulation C.R.S. §22-32-109(1)(ll), C.R.S. §22-36-101(2)(a) (must adopt policies and procedures to implement choice provisions)
2013	√ JFC 2005	Student Withdrawal from School/Dropouts <i>wrong code JHA</i>
2009	√ JFC-R X	Student Withdrawal from School/Dropouts – Regulation C.R.S. §22-14-108 (must adopt policies and procedures requiring written notice to parents/guardians of student's dropout status)
2014	▼√ JH 2011	Student Absences and Excuses
2013	▼√ JHB 2011	Truancy <i>Part of JH</i>

- 2013 ²⁰⁰² ▼▼ JIC
 * Student Conduct
 C.R.S. §22-32-109.1(2)(a) (must adopt written conduct and discipline code that contains specific components)
- 2013 ²⁰⁰² ▼▼ JICA
 * Student Dress Code
 C.R.S. §22-32-109.1(2)(a)(I)(J) (must adopt dress code policy that prohibits disruptive clothing)
- 2013 ²⁰⁰² ▼▼ JICDA *JIC/JICDA is code*
 * Code of Conduct
 C.R.S. §22-32-109.1(2)(a)(I)(A) (must adopt policies on student conduct)
- 2016 ▼▼ JICDE* *wrong code JICB*
 * Bullying Prevention and Education
 C.R.S. §22-32-109.1(2)(a)(I)(K) (must adopt specific policy on bullying prevention and education)
- 2015 ²⁰⁰⁹ ▼ - JICEA
 2015 ²⁰⁰⁹ ▼▼ JICEA-R *part of policy*
 School-Related Student Publications
 School-Related Student Publications (School Publications Code) – Regulation
 C.R.S. §22-1-120(4) (must adopt written publications code consistent with state law)
- 2017 ²⁰⁰⁹ ▼▼ JICF
 * Secret Societies/Gang Activity
 C.R.S. §22-32-109.1(2)(a)(I)(F) (must adopt specific policy on gang activity)
- 2016 ²⁰¹⁰ ▼▼ JICH
 * Drug and Alcohol Involvement by Students
 C.R.S. §22-32-109.1(2)(a)(I)(G) (must include written prohibition in conduct code regarding drug and alcohol use)
 C.R.S. §25-14-103.5 (must adopt policies prohibiting use of retail marijuana on school property)
- 2013 ²⁰¹⁰ ▼▼ JICI
 * Weapons in School
 20 U.S.C. §7151 (in order to receive federal funds, must have policy that requires expulsion for certain weapons violations and requires referral to law enforcement)
 C.R.S. §22-32-109.1(2)(a)(I)(G) (must include written prohibition in conduct code regarding weapons)
 C.R.S. §22-33-106(1)(f) (must adopt policy regarding firearm facsimiles)
- 2015 ²⁰⁰² ▼▼ JIH
 * Student Interviews, Interrogations, Searches and Arrests
 C.R.S. §22-32-109.1(2)(a)(I)(I) (must adopt policy on searches, including locker searches)
- 2017 ²⁰⁰⁵ ▼▼ JK
 2017 ▼▼ JK-R
 * Student Discipline
 * Student Discipline – Regulation
 C.R.S. §22-32-109.1(2)(a) (must adopt written conduct and discipline code that contains specific components)
- 2008 ▼▼ JK*-2
 * Discipline of Students with Disabilities

C.R.S. §22-32-109.1(2)(a) (must adopt written conduct and discipline code that contains specific components, but discipline of special education students can be part of a more general student discipline policy)

2017
2017

2010
▼√ JKA
▼√ JKA-R
2010

* Use of Physical Intervention and Restraint
* Use of Physical Intervention and Restraint – Regulation
C.R.S. §22-32-109.1(2)(a)(l)(D) (must adopt policy and procedures for the use of reasonable and appropriate physical intervention)

2013

▼√ JKBA* X

* Disciplinary Removal from Classroom
C.R.S. §22-32-109.1(2)(a)(l)(B) (must adopt specific policy allowing removal from class consistent with state law)

2013
2013

2012
▼√ JKD/JKE
▼√ JKD/JKE-R
2012

* Suspension/Expulsion of Students (and Other Disciplinary Interventions)
* Suspension/Expulsion of Students (Hearing Procedures) – Regulation
C.R.S. §22-32-109.1(2)(a)(l)(E) (must adopt general policies and procedures regarding disciplinary actions)

2013

▼√ JKG* X

Expulsion Prevention
C.R.S. §22-33-202 (must adopt policy to identify at-risk students)

2014

▼√ JLCDA* OK

Students with Food Allergies
C.R.S. §22-32-139 (must adopt policy for the management of food allergies and anaphylaxis among students)

2014

2003
▼√ JLDAC

Screening/Testing of Students (And Treatment of Mental Disorders)
20 U.S.C. §1232h (must adopt policy that addresses specific areas outlined in statute, including student privacy, parental access to information and administration of physical exams)
C.R.S. §22-32-109(1)(ee) (must adopt policy prohibiting personnel from recommending certain drugs for students or ordering behavior tests without parent permission)
C.R.S. §22-32-109.2 (must adopt policy concerning the screening and treatment of emotional/mental disorders or disabilities)

2014

- JLDAC-E X

Notification of Rights Under the Protection of Pupil Rights Amendment (PPRA) – Exhibit (there is no specific legal requirement that this exhibit be included in a Board's policy manual; however, districts are required by law to provide notification on this subject and this exhibit reflects the specific legal requirements)

2014

▼√ JLJ* X

Physical Activity
C.R.S. §22-32-136.5(3)(a) (must adopt physical activity policy – law requires elementary students be given opportunity to engage in specified amounts of physical activity)

2018

2014
▼√ JRA/JRC

Student Records/Release of Information on Students
20 U.S.C. §1232g(a)(1)(A) (may not have policy that denies parents certain rights regarding student records)
C.R.S. §22-32-109(1)(ff) (must adopt policy to disclose eighth grade students' names and mailing addresses to the Colorado Commission on Higher Education)

2009

2010

√ JRA/JRC-R

Student Records/Release of Information on Students (Review, Amendment and Hearing Procedures) – Regulation
20 U.S.C §1232g(a)(1)(A) (must have procedure that allows parents to inspect and review student records)

2009

2010

- JRA/JRC-E-1

C.R.S. §22-32-126(5)(b) (must adopt procedures regarding disclosure of student discipline information)
Student Records/Release of Information on Students (Notification to Parents and Students of Rights Concerning Student Education Records) – Exhibit (there is no specific legal requirement that this exhibit be included in a Board's policy manual; however, districts are required by law to provide notification on this subject and this exhibit accompanied by sample policy JRA/JRC and regulation JRA/JRC-R meet the notification requirement)

2013

■√ JRCA* X

Sharing of Student Records/Information between School District and State Agencies
C.R.S. §22-32-109.1(6) (must adopt policies consistent with state and federal law related to sharing student information for safety purposes)

2017
2017

▼√ JRCB* OK
▼√ JRCB*-R OK

Privacy and Protection of Confidential Student Information
Privacy and Protection of Confidential Student Information (Hearing and Complaint Procedures) – Regulation
C.R.S. 22-16-107 (2)(a) (must adopt policy regarding material breach of contract hearings involving a school service contract provider's misuse or unauthorized release of student personally identifiable information)
C.R.S. 22-16-107 (4)(a) (must adopt a "student information privacy and protection policy" that addresses the "issues specified in C.R.S. 22-16-106 (1)")
C.R.S. 22-16-112 (2)(a) (must adopt policy for hearing parent complaints regarding the district's compliance with the Student Data Transparency and Security Act, C.R.S. 22-16-101 et seq.)

2014

2010

▼√ JS*

Student Use of the Internet and Electronic Communications
47 U.S.C. §254(h), (must adopt policy that includes blocking and filtering technology for each district-provided technology device that allows for Internet access by a minor; policy must also include student education about appropriate online behavior)
C.R.S. §22-87-104(1) (must adopt policy of Internet safety for minors)

JICU wrong code

2015

▼√ KB X

Parent Engagement in Education
C.R.S. §22-32-142(1)(a), (c) (must adopt parent engagement policy and identify a district employee to act as point of contact for parent engagement training and resources)

2005

2018

√ KBA

C.R.S. §22-32-142 (1)(d) (exempts small rural school districts that enroll less than 1,000 students from requirements of (1)(a) & (c))
District Title I Parent Involvement
20 U.S.C. §6301 et seq., Title I, Part A, Section 1118 (if the district receives any Title I funding the district policy must address the specifics contained in KBA)

2018

- KBA-E X

School-Level Title I Parent Involvement – Exhibit

20 U.S.C. §6301 *et seq.*, Title I, Part A, Section 1118 (there is no specific legal requirement that this exhibit be included in a Board's policy manual; however, it serves as a reminder that every Title I school is required by law to develop a school-level parent involvement policy as described in this exhibit)

- 2014 ✓ KDB X
Public's Right to Know/Freedom of Information
C.R.S. §24-72-205(6)(a) (must adopt policy regarding the fee for research and retrieval of public records, if the district imposes such a fee)
- 2015 ✓ KDE 2009
Crisis Management (Safety, Readiness and Incident Management Planning)
C.R.S. §22-32-109.1(4) (must establish school response framework that meets requirements of sub-paragraphs (4)(a-o))
C.R.S. §22-1-125(5) (requirements for automated external defibrillators must be referenced in safety, readiness and incident management plan)
- 2016 ✓ KFA 2014
Public Conduct on District Property *wrong code KF AA*
C.R.S. §25-14-103.5 (must adopt policies prohibiting tobacco and retail marijuana use on school property)
- 2010 ✓ KI 2009
Visitors to Schools
C.R.S. §22-32-109.1(7) (must adopt policy that allows access to observe classes, activities and functions)
- 2012
2014 - LBD* OK
✓ LBD*-R OK
Relations with District Charter Schools
Relations with District Charter Schools (Procedures for Establishment, Review, Renewal, Revocation and Closure) – Regulation
C.R.S. §22-30.5-110 (1.3) (must adopt procedures and timelines for the charter renewal process)
C.R.S. §22-30.5-110 (6) (must adopt procedures for closing a charter)

Highly recommended policies

The following policies (and any accompanying regulations) are highly recommended and should be adopted by the Board because they comprise the Board's bylaws:

- 2000 BBBA PG Board Member Qualifications *GP'S 1.0, 1.2 OK*
- 2017 BCB 2007 School Board Member Conflict of Interest (also on the legally required list)
- 2013 BDAX Board Organizational Meeting
- 2016 BDB OK School Board Officers *GP 1.3, 1.4*
- 2013 BDF OK Advisory Committees *GP 1.6*
- 2015 BE OK School Board Meetings (also on legally required list)
- 2013 BEAA* X Electronic Participation in School Board Meetings (also on the legally required list)
- 2014 BEC OK Executive Sessions *BE/BEA/BEB*
- 2013 BEDA OK Notification of School Board Meetings *BE/BEA/BEB*
- 2016 BEDB GP 1.5 Agenda *PG Policy OK*

PG policies updated 2017

2005
2007
2014
2003
2014

BEDD
BEDF
BEDG
BEDH
BG 2002

Rules of Order OK BE/BEA/BEIS
Voting Method OK " " "
Minutes OK " " "
Public Participation at School Board Meetings OK
School Board Policy Process

The following policies (and any accompanying regulations) may be highly recommended, based on the district's circumstances, to protect the district from legal liability, give adequate notice of rights and responsibilities to employees and students and/or provide certain assurances to the Colorado Department of Education or other regulatory agencies. The Board should consult with its own attorney to make this determination.

2014
2015

■ ADE X
AEA X

Innovation in Education
Standards Based Education

EL 1.9 - but not enough

2015

■ CBI OK-PG

Evaluation of Superintendent

BSL 1.4

2014
2010

■ DAB* X
■ DBO X

Financial Administration
Annual Budget

2014

■ DBD X

Determination of Budget Priorities

2003

■ DI X

Fiscal Accounting

2005

■ DIE 2002

Annual Audit

2017

■ DJ/DJA 2014

Purchasing/Purchasing Authority

2015

EBAB 2003

Hazardous Materials

2016

EBBA 2003

Prevention of Disease/Infection Transmission

2017

EBBB 2003

Accident Reports

2017

ECAF X

Use of Video and Audio Monitoring

2017

EEAEF* X

Video Cameras on Transportation Vehicles

2010

EEAG 2003

Student Transportation in Private Vehicles

2010

EEBA X

School Transportation Vehicles (Use of Safety Belts)

1999

EGAD OK

Copyright Compliance

2017

GBEB-R X

Staff Conduct (And Responsibilities) – Regulation

2015

GBGAB* X

First Aid Training

2014

GBGF 2016

Federally-Mandated Family and Medical Leave

2013

GBGI OK

Staff Military Leave

2007

GBGK X

Staff Legal Leave

2013

■ GCQF X

Discipline, Suspension and Dismissal of Professional Staff

all under GBGF

not part of GBGF, but in Employee Guide

[NOTE: Care should be taken to ensure that any policies in the GD section preserve the at-will status of classified employees.]

2018

GDA X

Support Staff Positions

2006

GDBC X

Support Staff Supplementary Pay/Overtime

2010

GDG X

Part-Time and Substitute Support Staff Employment

2008

GDQB X

Resignation of Support Staff

2013

GDQD X

Discipline, Suspension and Dismissal of Support Staff

2013

IMB X

Teaching about Controversial Issues and Use of Controversial Materials

2013	▼ JICC	Student Conduct in School Vehicles
2015	■ JICEC*	Student Distribution of Noncurricular Materials
2012	▼ JIHB	Parking Lot Searches (<i>if students park at school</i>)
2003	■ JJA-1 or JJA-2	Student Organizations (Limited Forum <i>or</i> Open Forum)
2017	○ JLCB	Immunization of Students <i>DLCC is code</i>
2016	JLCD	Administering Medications to Students
2017	■ JQ	Students Fees, Fines and Charges
2014	▼ JS*	Student Use of the Internet and Electronic Communications (<i>also on the legally required list</i>)
<hr/>		
2009	KBBA	Custodial and Noncustodial Parent Rights and Responsibilities
2015	■ KE	Public Concerns and Complaints
2014	■ KEC	Public Concerns/Complaints about Instructional Resources
2015	■ KF	Community Use of School Facilities
2015	■ KHC	Distribution/Posting of Noncurricular Materials
2003	KLMA	Relations with Military Recruiters, Postsecondary Institutions and Prospective Employers

Examples of other policies that the Board may wish to adopt if applicable to the district's needs and circumstances (although not legally required to do so):

2016	○ DFA/DFAA	Revenues from Investments/Use of Surplus Funds
2007	○ DK	Payment Procedures
2007	○ DKA	Payroll Procedures
2007	DN	School Properties Disposal
2000	FEH	Supervision of Construction
2000	FF	Naming New Facilities
2015	○ IG	Curriculum Development
2015	○ JC	School Attendance Areas
2013	○ JEB	Entrance Age Requirements
2015	○ JFABB	Admission of Non-Immigrant Foreign Exchange Students
2016	○ JFF	Student Activities Funds
2015	○ KHB	Advertising in the School District/Revenue Enhancement
2008	LBDB*-1	Relations with Institute Charter Schools (School Boards with Exclusive Chartering Authority)
2008	LBDB*-2	Relations with Institute Charter Schools (School Boards without Exclusive Chartering Authority)

code is ECBA

COLORADO ASSOCIATION OF SCHOOL BOARDS

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