

Celebrating 100 Years of Leadership in Public School Governance 122 West Washington Avenue, Suite 400 Madison, WI 53703 Phone: 608-257-2622 · Fax: 608-257-8386 John H. Ashley, Executive Director

April 26, 2021

River Valley School District 660 W. Daley Street Spring Green, WI 53588

## **RE:** Policy Services Quick Check

Ms. Glasbrenner:

As requested by the District, I have completed the "Quick Check" of the district's policy manual to identify any WASB Policy Manual Checklist policies (suggested policy topics, including those mandated by law) that seem to be missing and to identify local policies with a last revision date indicating that they may need review and updating due to recent law changes affecting the topic. Please remember that the "Quick Check" is based on a general inspection of the district's policy manual. It does not include substantive review and analysis of policy content. Its purpose is to help organize and prioritize a school district's local policy work.

The district's policy manual currently contains many of the policy topics included on the WASB Policy Manual Checklist and other policy topics generally recommended by WASB policy consultants. There are, however, several policy topics that are either missing from the policy manual or may be in need of review and updating.

- Refer to Table 1 in this report for WASB Policy Manual Checklist and other recommended policy topics that are not currently addressed in the district's policy manual. Table 1 identifies whether the policy topic is mandated by law or recommended for some other reason.
- Refer to Table 2 in this report for WASB Policy Manual Checklist and other recommended policy topics contained in the district's policy manual that have been identified as needing review based on the date of last policy revision. The policy topics identified on Table 2 were primarily triggered by dates of significant law changes affecting the topics. Table 2 provides only general guidance on what might need to be reviewed in the particular policies based on those law changes.
- Refer to Table 3 in this report for WASB Policy Manual Checklist and other recommended policy topics contained in the district's policy manual that have been identified as needing review based on an issue that was noticed and flagged incidental to the "Quick Check". Keep in mind that just because an issue was flagged related to a particular policy doesn't mean that the policy was thoroughly reviewed and that it is the only issue(s) that may be of concern for policy review and

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updating purposes. Also keep in mind that just because no issue was flagged related to a particular policy doesn't mean that the policy may not be in need of review.

As part of the District's efforts to maintain the most up-to-date and legally compliant policy manual, it is recommended that the District consider subscribing to the *WASB Policy Resource Guide (PRG)*. The Policy Resource Guide is a Web-based policy tool designed to assist Wisconsin school boards and administrators in policy development and implementation. It contains information on a wide variety of topics, including policies required by law and "hot policy" topics. It also includes sample policies that you can use in reviewing and revising the policies flagged in this "Quick Check."

I hope this "Quick Check" report and related information is helpful to your district. If you have any questions, or would like any further policy assistance, please feel free to contact me (direct phone number 608-512-1707 or via email at bforbes@wasb.org) or contact any other WASB Legal Counsel or Policy Services staff member.

Sincerely,

Scott R. Mikesh WASB STAFF ATTORNEY

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## Table 1

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Mandatory policy for school districts, but current policy not found or lacking key component required by statute or administrative rule						
PRG Suggested Policy #	Policy Name	Reason Why Current RVSD Policy Book was Flagged				
346	Testing of English Language Learner (ELL) Students	PI 13 uses updated language of Limited English Proficiency pupil (LEP), and no longer uses ELL - Update Rule to address changes in language District has Rule regarding LEP students, but no reference to LEP policy Each school board whose student population includes one or more English Learner (EL) students is required by PI 13 of the state administrative code to adopt a policy regarding the following: (1) the identification, language assessment, classification and reclassification of EL students; (2) the design of the educational program and support for EL students; (3) support services; and (4) academic achievement and assessment of EL students, including parental notification of testing. Title III of the Elementary and Secondary Education Act (ESEA) also requires a similar policy. In addition, DPI guidance information requires districts to address exiting EL students from EL programs/services.				
361.2	Library Materials Selection	School boards are required by PI 9.03(1)(e) of the state administrative code to address nondiscrimination in library material selection policies. The board's library media materials selection policy must be consistent with section 121.02(1)(h) of the state statutes and its implementing rule PI 8.01(2)(h) of the state administrative code. Both of these are included as legal references, without touching upon the requirements within the statute or rule. Collections must be current and balanced and depict in an accurate and unbiased way the cultural diversity and pluralistic nature of American society. Consider policy update to add content of statute and rule				
363.3	Assistive Technology (Technology for Students with Special Needs)	Reference made in 342.1 to Special Education Handbook, which shall meet state/federal law requirements and be adopted by Board - Confirm that Assistive Tech is covered in SPED Handbook - School districts are required to adopt a policy addressing technology for students with special needs as part of three-year information and technology plan, which is required to be in place in order for a district to obtain a subgrant from the DPI under the federal Enhancing Education Through Technology Act of 2001. The local technology plan must be consistent with the objectives of the Wisconsin Educational Information & Technology Plan and include other information as required by DPI, such as this particular policy requirement. Districts are required to provide assistive technology for students with special needs in accordance with state and federal special education laws and the Elementary and Secondary Education Act (ESEA).				
411.3	Foster Care Children	Did not see that foster care children were specifically addressed during review of policies. See Title I, Part A of the Elementary and Secondary Education Act 20 U.S.C. §6311(g)(1)E and §6312(c)(5)] concerning requirements related to foster care children to provide equal access and to remove barriers; also requirement to adopt policy/procedures for transportation of foster care children				

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523.11	Employee Alcohol and Drug Testing (including school bus driver alcohol and drug testing)	School districts that own or lease school buses or assign employees to operate motor vehicles in a manner that requires a commercial driver's license must adopt an alcohol and drug testing policy and procedures to correspond with the Omnibus Transportation Employee Testing Act (OTETA) and its implementing regulations. See 49 C.F.R. Part 40 - Federal procedures for transportation workplace drug and alcohol testing programs. See 49 C.F.R. Part 382 - Federal regs governing controlled substances and alcohol use by drivers and related testing.
526.1	Employment References and Verification (Aiding and Abetting Sexual Abuse)	Districts receiving federal funds under the Elementary and Secondary Education Act (ESEA, as amended) are required by 20 U.S.C. 7926 to adopt a policy prohibiting school employees, contractors or agents from assisting another school employee, contractor or agent in obtaining a new job if they have knowledge of, or probable cause to believe that, the other employee, contractor or agent engaged in sexual misconduct regarding a minor or student in violation of the law. This policy prohibition could be in a separate policy or included in a related district policy.
527	Staff Complaints and Grievances	Section 66.0509(1m) of the state statutes requires local governments, including school districts, to create a locally- defined employee grievance procedure. At a minimum, the grievance procedure must be available for employee grievances related to employee discipline, termination and workplace safety Although this may be addressed in Board Policy, this may also be contained within the Employee Handbook and would not need to also be addressed in policy
Critical polic	cy for school districts, but	t current policy not found or lacking key component required by statute or administrative rule
PRG Suggested Policy #	Policy Name	Reason Why Current RVSD Policy Book was Flagged
342.8	Section 504 Plans and Services	Districts are encouraged to adopt a policy addressing Section 504 identification, eligibility, and services (as distinct from IDEA policies/procedures). A 504 coordinator should be identified by the district. To the extent that the district has a 504 manual/handbook, the need for this recommended policy becomes less important.
Recommend	ded policy for school dist	ricts, but current policy not found or lacking key component required by statute or administrative rule
PRG Suggested Policy #	Policy Name	Reason Why Current RVSD Policy Book was Flagged
671.5	Employee Compensation Paid from Federal Grants During Extraordinary Circumstances	This policy has been recommended for adoption by the DPI, based on guidance provided by the U.S. Dept. of Education (https://www2.ed.gov/documents/coronavirus/factsheet-fiscal-questions.pdf). A draft of DPI policy language:
751.5	Use of Private Vehicles to Transport Students (alternative transportation)	This policy is recommended because there are many requirements pertaining to drivers, vehicles and insurance when alternative transportation is used. If this applies to your district you should develop a policy and procedures that correspond with current requirements outlined in section 121.555 of the state statutes.

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## Table 2

	Current policies and may need to be updated following recent changes in the law						
PRG Suggested	Policy Name	Local Policy	Date of Last	Reason Why Current RVSD Policy Book was Flagged			
Policy #		Number	Update				
537	Professional Staff Development Opportunities	535	11/12/15	DATE FLAG: PI34 was repealed and a new chapter PI34 created; Changes to state's licensing framework & to the related mentoring requirements specified in DPI's licensing regs.).			
652	Revenues from Investments	652	2/11/16	2017 Act 78 allows local governments to invest funds in time deposits having any length of maturity. Under prior law, any such investment in a time deposit was required to mature in not more than 3 years, which is the language contained within current policy. Consider updating if longer maturity lengths are desired by the Board			
447.1	Corporal Punishment/Use of Physical Force by Staff (Seclusion and Restraint)	443-Rule 2	3/16/15	Changes in the law pursuant to 2019 WI Act 118 See October 2020 WASB Focus Article https://wasb.org/wp-content/uploads/2020/10/F202010.pdf			
453.4	Administering Medications to Students	452.4	8/11/16	See also district 352 policy and exhibits 1 and 2. (2017) 118.29 change allows auth personnel to administer opioid antidote and protects against liability - Consider policy update			
370	Extracurricular Activities and Programs	370	10/8/15	Update under Wis. Stat. Sec. 118.133 allows home school students to participate in extracurricular activities and interscholastic athletics However, policy states that programs shall be offered to students who are in the "schools in the district," which would not include home school students			
347	Student Records	347	9/14/17	Statutes relating to the speed at which student records must be transferred to another school district were updated in 2018; Policy does not indicate how quickly records must be transferred, so this new requirement could be added			
723.2	Threats of School Violence	722.2	10/13/16	Policy titled: Bomb Threats 175.32 mandatory reporting threats of school violence; See safety program, which may address reporting			
723.1	Emergency Drills	722.1	10/13/16	Wis. Stat. Sec. 118.07(2)(a)1. sets forth requirements for several different types of school safety drills, including fire and other drills. The statutes allow for districts to substitute safety drills as needed. Consider updating policy per 118.07			
933.1	Performance and Payment Bonds	667	2/26/98	Dollar amounts in Wis. Stat. Sec. 779.14 appear to have been modified Update policy to account for new monetary limitations in statute			
853	Raffles	655	3/31/97	Wis. Stat. Sec. 563.91 has increased the maximum number of raffles allowed			

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543	Support Staff Recruiting/Hiring	543	11/11/99	Policy does not reference the need for the District to conduct background checks or TB screening questionnaires - Consider adding to policy to confirm that the District is taking these steps with support staff employees
537.1	Teacher Mentoring (PI-34)	535.1	10/10/13	PI34 was repealed and a new chapter PI34 created; Changes to state's licensing framework & to the related mentoring requirements specified in DPI's licensing regs.)
171.1	Public Notification of Board Meetings	171.1	6/12/14	2019 Act 140 amends WI Open Meetings Law - specifying allowable methods for issuing notice to the public of a meeting of a governmental body Current policy indicates that notice will be provided to "public" without further clarification in that is 3 postings in community or one posting and website. Language could be updated to clarify posting process
411	Student411-RuleNondiscrimination411-RuleComplaintProceduresProcedure for Filing411.1-Harassment/Sexual411.1-			Review in light of nondiscrimination changes and Title IX Policies and exhibits concerning harassment and sexual harassment and Title IX should be reviewed and coordinated if there is any conflict between policies, rules, and exhibits
411.1	Procedure for Filing Harassment/Sexual Harassment Complaint			Review in light of nondiscrimination changes and Title IX Policies and exhibits concerning harassment and sexual harassment and Title IX should be reviewed and coordinated if there is any conflict between policies, rules, and exhibits
411.1	Exhibits: Bullying/Harassment Report (411.1- Ex.1/411.2-Ex.1); Bullying/Harassment Report (411.1-Ex. 2/411.2 Ex. 2); Student Bullying Report Form (411.1 Ex. 3/ 411.2 Ex 3); Elementary Bullying/Harassment Report Notes (411.1 Ex. 4/ 411.2 Ex. 4)	411.1 Exhibit 1/411.2 Exhibit 1		Review in light of nondiscrimination changes and Title IX Policies and exhibits concerning harassment and sexual harassment and Title IX should be reviewed and coordinated if there is any conflict between policies, rules, and exhibits

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## Table 3

	Policies in need of review as a result of issue discovered during quick check						
Policy Name	Policy Title	Local Policy Number	Reason Why Current RVSD Policy Book was Flagged				
151.2	Administration in Policy Absence	151.3	Policy applies when "emergency action must be taken" Consider softening this language to allow for administrative action in those situations where administration needs to act, but the situation might not be an "emergency"				
171.2	Agenda Preparation and Dissemination	171.2	Policy is not completely clear whether board member requests to place an item on the agenda may be denied by Board President or District Administrator Same question for the public - If they submit materials, are they guaranteed that their issue will receive a place on the agenda for discussion?				
173	Closed Sessions	173	Policy appears to be reciting much of the language contained within 19.85 concerning closed sessions; however, some of the language does not align with the statute				
183	Board Member Attendance and Voting Method	183	Given recent experiences with virtual meetings and remote participation at school board meetings, consider revising policy or making the temporary policy from August 13, 2020 a permanent policy that allows for some level of remote participation from individual board members. Note that the Temporary Policy specifically references the "Emergency Order" and this language should be changed if the intent is to allow virtual participation in the absence of an emergency order				
183	Temporary Policy for Board Member Attendance and Voting Method During the Emergency Order	183.1	Given recent experiences with virtual meetings and remote participation at school board meetings, consider revising policy or making the temporary policy from August 13, 2020 a permanent policy that allows for some level of remote participation from individual board members. Note that the Temporary Policy specifically references the "Emergency Order" and this language should be changed if the intent is to allow virtual participation in the absence of an emergency order				
187	Public Participation at Board Meetings	187	Reference in the policy that the Board will not hear complaints concerning personnel or comments that infringe on privacy rights of students or staff. Were the Board to allow individuals to make positive statements regarding personnel or students, while refusing to hear complaints, this could raise claims of First Amendment viewpoint discrimination.				
190	Recognitions for Accomplishment	190	See prior comment concerning Policy 187 - If Board welcomes positive speech regarding students/staff, this may create a public forum issue that limits the District's ability to refuse to publicly hear negative commentary regarding students or staff				
221	Recruitment and Employment of District Administrator	221	Reference to candidates needing to meet state and "local" requirements in order to be considered. However, the Policy does not clarify what "local requirements" means? Consider clarifying what is meant by "local" requirements.				
225	Administrator Evaluation	223.1	Policy indicates that Board may annually evaluate the performance of all administrators. Generally, the Board evaluates the District Administrator. Note that some administrators in the District will need to be evaluated by individuals who have proper training and credentials				

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225	District Administrator Evaluation	225	Policy indicates that Board may annually evaluate the performance of all administrators; Generally, the Board only evaluates the District Administrator as other Admins may need to be evaluated by individuals who have proper training and credentials
333 341.1	Parent Rights in Relation to District Programs/Activities and Student Privacy Reading Instruction	332 341.1	School districts that receive federal funds for any program administered by the U.S. Department of Education are required by the Protection of Pupil Rights Amendment (PPRA) of the General Education Provisions Act to adopt written policies addressing parent access to instructional materials and student privacy, including the following: (1) right of a parent to inspect, upon request, any instructional material used as part of a student's educational curriculum; (2) protection of student privacy when the district administers or distributes a student survey that would reveal specific types of personal information; (3) right of a parent to inspect, upon request, a survey created by a third party before it is administered or distributed to a student; (4) collection, disclosure or use of personal information collected from students for the purpose of marketing or selling that information; (5) right of a parent to inspect, upon request, any instrument used in the collection of student physical examinations or screenings by the schools or district, exclusive of any student evaluation administered in accordance with IDEA. Policy does not reference 118.016, concerning reading readiness assessment law changes for 2016-2017
			Consider updating to include reading readiness or, consider adding a legal reference to 118.016 to signal that the district is aware of the requirements of the statute and is in compliance
342.4	Programs for Children-at-Risk	342.3	At Risk Plan is cross-referenced Consider expanding policy to reference some of the required components of PI-25 Otherwise, if those components are included in the cross-referenced At Risk Plan, may not need to modify policy
343.7	Lesson Plans	343.1	Cross reference to RVEA contract may be outdated - Likely language on lesson plans in old CBA, but anything current would likely be in employee handbook and not in a teacher contract
345.1	Grading Systems	345.1	HEAB requires districts to have grading policies that define the grading system used in each of the district's high schools, including whether it is weighted or unweighted, which subjects are included in the GPA on the official high school transcript, how pass-fail grades are incorporated into the GPA, how grades from study abroad or from alternative or home schools are incorporated into the GPA, and how to incorporate grades earned in another country by students with permanent resident status.
345.4	Promotion and Retention (including kindergarten promotion)	345.3	Policy mentions promotion in the title, but seems focused more so on the issue of retention Promotion language required in 118.30 that should be added concerning 4th and 8th grade promotion? Add legal citation to Wis. Stat. Sec. 118.30
345.6	High School Graduation Requirements	345.5	Youth Options language is outdated and should be modified Reference available for some students to substitute physical education credit, up to .5
351	Summer School	351	Legal Reference to Wis. Stat. Sec. 66.30 is no longer valid and may be deleted
362.1	Interlibrary Loan	362.1	Consider adding legal reference to Wis. Stat. Sec. 43.72 - Library Exchanges
364	Guidance and Counseling Programs	363	Requirements in PI 26 concerning "education for employment" and "academic and career planning." See also, Wis. Stat. Sec. 118.28(59) regarding district requirements concerning ACP program
443.1	Student Dress	443.1	Consider cross reference to youth gangs policy as that discusses restrictions on student dress that may be gang related

чрти 20, 832		1121	How does this policy relate to policy 8272
832	Weapons on School Premises	443.4	How does this policy relate to policy 837? Policy begins with prohibition on any individual having a weapon and ends with focus on students. Would it be better to
			combine policies and only have one policy that covers community, students, and staff?
443.8	Gang-Related Behavior	443.7	Consider cross reference to student dress code as both policies cover student dress related issues
492	Videotaping and/or Photographing and/or Digital Media Recording of Students	443.8	Policy refers to Exceptional Educational Needs (EEN) students. Language should be updated to Students with Disabilities
656	Student Fees	451	Policy titled: Student Aid Programs Cross reference or combine with Student Fee policy
460	Student Scholarships and Awards	460	Technical and Academic Excellence policies are dealt with separately in earlier policies "General" discrimination language that states "any basis prohibited by law" - Replace with complete nondiscrimination statement language
656	Student Fees	470	See also 362.2 library fines Consider Cross Reference to 451 - Student Aid (or merging of two policies) as both policies cover topic of full or partial deferment of fees if student has financial need
453.3	Communicable Diseases	523	Covers students and staff; however, policy is located in Personnel chapter. Consider splitting to have separate policies in the 400 and 500 chapters that deal with students and staff separately
523.31	Employee Treatment for Chemical Dependency or Mental Illness	523.2	Reference to RVEA contract is likely outdated Could cross reference to employee handbook instead if that issue is dealt with in the Handbook
523.3	Employee Assistance Program	523.21	Reference to RVEA contract is likely outdated Could cross reference to employee handbook instead? Is EAP program described in 1995 same as current program or does policy need to be updated to describe current EAP plan?
528	Staff-Student Relations	524.4	\$25 annual gift limit for gifts to staff from students or gifts to students from staff?
536.1	Resignation of Professional Staff	534	Notation that Liquidated Damages "may" be assessed based on District Administrator's recommendation. Are liquidated damages specified in the employee contract? Reasons for waiving damages should be in handbook so decisions are consistent and it eliminates possibility that decisions to waive are being made inappropriately for some people and not for others
538	Professional Staff Evaluation	536	Policy only states that evals for professional staff will be handled in accordance with employee handbook. Consider having the evaluation process and its requirements set forth in board policy instead with the employee handbook citing to the board policy
548	Support Staff Evaluation	544	Reference in board policy to RVEST contract; however, this is likely outdated language Consider changing RVEST language to Employee Handbook
457	Sudden Death or Suicide (Prevention and Response)	722.5	Wis. Stat. Sec. 115.365(3) includes a requirement to provide some suicide-related professional development and information to staff Wis. Stat. Sec. 118.295 liability exception for suicide intervention efforts

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			Wis. Stat. Sec. 118.01(2)(d)7 references a student suicide awareness curriculum requirement
			Consider updating policy per new statutes
453.11	Automated External	722.67	"Use of the AED" - 1.b. "If a victim is unresponsive, call "9-1-1" and get AED." This instruction is confusing in that it seems to
	Defibrillators		indicate that the individual (if alone) is being instructed to leave the victim to call 911 and get the AED. May be appropriate
			to differentiate what happens if person at the scene is alone with the victim or when there are others available who can be
			instructed to call 911 and go to get the AED
453.12	Concussion	727	2014 head injury/concussion legislation 118.293 - Requirement that concussion information sheet is distributed and signed
	Management		for each season; Not referenced in policy and may want to add
821.4	Web Page	744	Consider language in policy concerning the District's obligation to provide a webpage and accompanying information that is
	Management		fully accessible to individuals to varying types of disabilities
	(Creating and		
	Placing Web Pages)		
760	Food Services	760	New 2015 USDA nondiscrimination statement required to be included on all materials/documents related to federal-
	Management		funded school meal programs, which includes related board policies
761	Free and Reduced	761	New 2015 USDA nondiscrimination statement required to be included on all materials/documents related to federal-funded
	Price Meals		school meal programs, which includes related board policies
763	Management of	762	New 2015 USDA nondiscrimination statement required to be included on all materials/documents related to federal-funded
	Student School Meal		school meal programs, which includes related board policies
	Accounts (including		
	collection of lunch		
	fees)		
763	Food Service	762.1	New 2015 USDA nondiscrimination statement required to be included on all materials/documents related to federal-funded
	Collection and Non-		school meal programs, which includes related board policies
	Payment		
833.1	Use of Recreational	833	This policy is restrictive against snowmobiles in certain respects. Consider cross reference to policy that allows students to
	Vehicles on School		drive snowmobiles to school to ensure that there is no conflict between the two policies
	Property		
347	Exhibits: Release	347-	Exhibit 2 includes an October 1 cutoff for parent to make directory data decision. If parent misses deadline but later informs
	Form for Student	Exhibits	the District that records may not be released, the District would not be able to deny request. May consider language
	Records Not		indicating requests after October 1 will take effect on the day they are received?
	Considered to be		
	"Student Directory		
	Data" (Ex. 1);		
	Request for Non-		
	Disclosure of		
	"Student Directory		
	Data" (Ex. 2)		

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411	Student Harassment/Sexual Harassment	411.2	Review policies, rules, and/or exhibits relating to student or staff sexual harassment situations to ensure that each of the policies, rules, and exhibits coordinates with one another and with recent Title IX Sexual Harassment policy adoption
411.1	Exhibits: Bullying/Harassment Report (411.1- Ex.1/411.2-Ex.1); Bullying/Harassment Report (411.1-Ex. 2/411.2 Ex. 2); Student Bullying Report Form (411.1 Ex. 3/ 411.2 Ex 3); Elementary Bullying/Harassment Report Notes (411.1 Ex. 4/ 411.2 Ex. 4)	411.1 Exhibit 1/411.2 Exhibit 1	Review policies, rules, and/or exhibits relating to student or staff sexual harassment situations to ensure that each of the policies, rules, and exhibits coordinates with one another and with recent Title IX Sexual Harassment policy adoption
411.1	Procedure for Filing Harassment/Sexual Harassment Complaint	411.1- Rule/411.2- Rule	Review policies, rules, and/or exhibits relating to student or staff sexual harassment situations to ensure that each of the policies, rules, and exhibits coordinates with one another and with recent Title IX Sexual Harassment policy adoption
453.4	Administering Medication Procedure	452.4-Rule 1	(2017) 118.29 change allows auth personnel to administer opioid antidote and protects against liability - Consider update to Rule
453.3	Periods of Exclusion from School with Infectious Conditions	523-Exhibit	Covers students and staff; however, policy is located in Personnel chapter. District could consider splitting contents of policy to have separate policies in the 400 and 500 chapters that deal with students and staff separately
453.3	Guidelines and Procedures Regarding	523-Rule	Covers students and staff; however, policy is located in Personnel chapter. District could consider splitting contents of policy to have separate policies in the 400 and 500 chapters that deal with students and staff separately

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	Communicable Disease		
512	Procedure for Handling Harassment/Sexual Harassment Complaints	524.3-Rule	Review policies, rules, and/or exhibits relating to student or staff sexual harassment situations to ensure that each of the policies, rules, and exhibits coordinates with one another and with recent Title IX Sexual Harassment policy adoption
533	Fair Credit Reporting Act Disclosure Statement	533-Exhibit	Not certain that it is necessary to include copy of FCRA disclosure statement in Board Policy as an exhibit. Would require monitoring and BOE approval if language in FCRA changes and background check vendor wants to utilize updated language
821.4	Consent Form - Web/RVTV Permission to Display Classroom/Academic Activities	744-Exhibit	May be conflicting information between Rule 443.8 and Exhibit? Rule states that parent permission is not required when student has voluntarily chosen to participate in class or school project or event. However, the exhibit indicates that if the parent does not grant permission for classroom activities with photos, videos, etc., the student may be required to participate in an alternate activity
763	Food Service Collection and Non- Payment	762.1-Rule	New 2015 USDA nondiscrimination statement required to be included on all materials/documents related to federal-funded school meal programs, which includes related board policies
823	Access to Public Records	822-Rule	Indication that the per side cost of copying is \$0.25 per side - This may be excessive given the most recent Attorney General guidance concerning appropriate copying costs under public records law
353.1	Fair Credit Reporting Act Disclosure - Volunteers	861-Exhibit 2	If this FCRA disclosure form appears to be identical to the form earlier in 533. If so, could just cross reference the two exhibits and delete one from the policy book